

SANDAG Fiscal Year Ending 2023 – Five Prior Year Audit Recommendations and Corrective Action Plans - External/Internal Reports

Report Issue Date	Completed	Audit Report Title/Issue/Recommendation	Count & Priority	No. of Times Recommended	Status	Corrective Action	Date of Implementation	Planned Implementation Date	Revised Implementation Date	Date to AC	OIPA Tested	Recommendation Owner	Recommendation Dept.
1		Legend:											
2		Yellow Circle				Recommendations In Progress for this audit/issue							
3		Green Circle				Recommendations Implemented or No Recommendations given for this audit/issue							
4		Blue Circle				Recommendations Not Implemented or No Action Proposed for this audit/issue							
5		Red Circle				Passed Planned Implementation Date							
6		No Circle				Information Not Available/unkown							
7													
8		1				First time a recommendation has been given							
9		2				Recommendation has been repeated once							
10		3				Recommendation has been repeated twice							
11		4				Recommendation has been repeated three times							
12													
13		ALL YEARS				TOTAL COUNT OF OUTSTANDING AUDIT RECOMMENDATIONS	201						
14		EXTERNAL AUDITS				SUBTOTAL COUNT OF RECOMMENDATIONS	63						
15		July 2022	Yes			90% Design Audit for Eastbrook to Shell Double Track Project	3						
16		Observation 1				OBS-016-01: Policy Statement Update Required							
17		Observation 2				OBS-016-02: Interdisciplinary Check (QP-08)							
18		Observation 3				OBS-016-03: HNTB Design Audit							
19		June 2022	Yes			ITOC Transnet Extension Activities Report	7						
20		Finding 1				City of Coronado - Need to Improve Project Timesheet Tracking Procedure	1						
21						We recommend that the City improve their timekeeping procedures in an effort to adequately support staff time incurred for projects included within the RTIP. Specifically, we recommend the City implement TransNet project codes within their time entry system so that work completed for TransNet projects may be easily identifiable and available for review.							
22		Finding 2				City of El Cajon - Need to Use Approved Exaction Fee	1						
23						Recommend that the City recover the under-collection of exaction fees in the amount of \$101.36. Additionally, the City update and collect the proper exaction on a yearly basis to be in compliance with the RTCIP fees.							
24		Finding 3				City of Escondido - Need to Use Approved Exaction Fee	1						
25						Recommend that the City recover the under-collection of exaction fees in the amount of \$13,227.13. Additionally, the City update and collect the proper exaction on a yearly basis to be in compliance with the RTCIP fees.							
26		Finding 4				City of Lemon Grove - Need to Use Approved Exaction Fee	1						
27						Recommend that the City recover the under-collection of exaction fees in the amount of \$129.15. Additionally, the City update and collect the proper exaction on a yearly basis to be in compliance with the RTCIP fees.							
28		Finding 5				City of Oceanside - Need to Use Approved Exaction Fee	1						

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29		Recommend that the City recover the under-collection of exaction fees in the amount of \$7,499 for FY21. Additionally, the City update and collect the proper exaction on a yearly basis to be in compliance with the RTCIP fees.			●	As part of the checks and balances, DSD Engineering and Admin Staff will work together to ensure the updated fees are received from SANDAG and included in the July 1st fee updates on the City's website as well as tracking and invoicing software.							
30	Finding 6	City of Del Mar - Need to Meet Maintenance of Effort (MOE) Requirement	1		●								
31		We recommend that the City budget and incur adequate discretionary expenditures in order to meet its MOE requirement.			●	Due to the Fiscal Year 2020-21 projected revenue loss of \$3.1 million caused by the Coronavirus pandemic, in June 2020, the City Council had to approve extreme cuts in order to offset the anticipated revenue loss. Among other expenditure cuts, Capital Projects, including street related projects had to be deferred and only essential projects that were legally required and/or critical to public health and safety were included in the updated Fiscal Year 2020-21 budget. Unfortunately, these required cuts led to the City not meeting the MOE requirement for Fiscal Year 2020-21. Although revenues are gradually recovering to pre-pandemic levels, the City will never recover the revenue that was lost since March 2020. In accordance with Section 8 of the TransNet Extension Ordinance, the City of Del Mar has requested that the commission review and approve a request to allow the City to make up the shortfall by June 30, 2024.		June 30, 2024					
32	Finding 7	City of San Marcos - Need to Meet Maintenance of Effort (MOE) Requirement	1		●								
33		We recommend the City Budget and incur adequate discretionary expenditures in order to meet its MOE requirement.			●	The City had unanticipated project delays and interruptions due to COVID-19, resulting in a shortfall of budgeted discretionary funds sufficient to meet the MOE requirement. However, the City stated that there had been a recent pickup in construction and the appropriation of additional discretionary funds in FY22 to allow the City to meet its MOE requirements. In accordance with Section 8 of the TransNet Extension Ordinance, the City of San Marcos has requested that the commission review and approve a request to allow the City to make up the shortfall by June 30, 2024. This request was approved		June 30, 2024					
34	November 2021	EPU Construction Review Report and Checklists; El Portal Undercrossing Project; Contract No. S647183	6		●								
35	Observation 1	OBS-014-01: The Contractor's Quality Control Manager (CQCM) is not serving specified roles	1		●	None provided to the OIPA at this time							
36	Observation 2	OBS-014-02: Organization Chart in the CQCP is obsolete	1		●	None provided to the OIPA at this time							
37	Observation 3	OBS-014-03: Contractor's QC is not familiar with Three-Phase QC System	1		●	None provided to the OIPA at this time							
38	Observation 4	OBS-014-04: Contractor Auditing: The reviewer found no record that the Contractor conducted audits or assessments of the QCP program.	1		●	None provided to the OIPA at this time							
39	Observation 5	OBS-015-01: Testing and Inspection Matrix/Schedule: The reviewer found no testing log in e-Builder that would demonstrate sampling methodology was adhered to.	1		●	None provided to the OIPA at this time							
40	Observation 6	OBS-015-02: Testing and Inspection Matrix/Schedule: The reviewer observes that no audits/surveillance of the Contractor by the CMC were filed in e-Builder.	1		●	None provided to the OIPA at this time							
41	March 2021	TransNet Triennial Performance Audit - 2021	26		●								
42	Finding 1	Many TransNet Extension Ordinance Major Corridor Projects were Implemented or In-Progress as Intended, Although Delivery of Remaining Portfolio is Uncertain	2		●								
43	1	Clearly identify whether the remaining TransNet Extension Ordinance projects will be part of the 2021 Regional Transportation Plan, before the SANDAG Board approves the 2021 plan, and provide a similar identification for any key changes in future Regional Transportation Plans.	Critical	1	●	SANDAG intends to comply with this recommendation.						Phil Trom	
44	2	Develop regular crosswalks to summarize and compare planned major corridor projects outlined in the TransNet Extension Ordinance with current improvement implementation status by identifying project progress in terms of "complete", "in-progress", "cancelled", or "moved beyond 2026 and outside the TransNet Extension Ordinance period". SANDAG should complete this reconciliation annually, at the minimum when it revises its Capital Improvement Program Budget, or when SANDAG makes a major update to the Regional Transportation Plan and explain deviations from the TransNet Extension Ordinance including scope expansions, reductions, or mergers with other project segments through a log that captures all explanations. When performing this reconciliation, SANDAG should utilize a consistent numbering format or key identifier for each project to facilitate the tracking of changes over time.	High	1	●	Staff has already developed a crosswalk to all TransNet funded projects and this list will be available through the recent updates to the TransNet Dashboard. Staff will also continue to review all CIPs during the annual budget process to identify those projects that are complete, in progress or cancelled.						Michelle Smith	
45	Finding 2	Improved Financial Models and Controls were in Place, but Plans are Needed to Address Insufficient Funds for Remaining Major Corridor Projects	5		●								
46	1	Develop and adopt a formal process to address issues identified during annual Plan of Finance updates that discusses short-term and long-term funding scenarios and how options specifically impact the scope and schedule of remaining TransNet Extension Ordinance projects. The plan should include clear methodology, criteria, and triggers for making decisions on TransNet Extension Ordinance projects if funding does not materialize as expected and how to make choices to reduce scope, delay, or eliminate projects from the TransNet Extension Ordinance portfolio.	Critical	1	●	Staff looks to the approved Regional Plan for project prioritization, scope, and phasing and will document current processes and procedures to inform decisionmakers of potential risks to project delivery discovered through the annual Plan of Finance exercise.						Susan Huntington and Dawn Vettese	
47	2	Develop a risk-based approach for Quality Assurance/Quality Control testing and indication of review to strengthen documentation of Quality Assurance/Quality Control activities employed and results to better demonstrate data verifications.	Medium	1	●	Staff will develop a risk-based approach for review of QA/QC candidates, and complete documentation changes currently underway to better demonstrate data verifications						Cindy Burke	
48	3	Enhance organization of Peer Review Process supporting documents by providing a corresponding table to capture topics discussed, reference items to checklists, and close out memos to better link what was planned, what was done, and how issues were addressed.	Medium	1	●	Staff will implement this recommendation to improve Peer Review Process documentation.						Cindy Burke	
49	4	Clearly describe to the Board the Quality Assurance/Quality Control sampling methodology employed, any limitations of the data, and associated cost-benefits or risks of the approach.	Low	1	●	Staff will implement this recommendation on Board communication of QA/QC results and methods.						Cindy Burke	
50	5	Continue valuable efforts to formalize and pursue a mature system of Quality Assurance/Quality Control policies and procedures as well as consistent implementation of the policies and procedures.	Low	1	●	Staff will continue development and implementation of QA/QC policies and procedures						Cindy Burke	
51	Finding 3	SANDAG Focused on TransNet Extension Ordinance Compliance and Transparency, but it could Better Demonstrate Accountability	4		●								
52	1	Clearly and comprehensively report on actual progress and accomplishments (or lack thereof) against the TransNet Extension Ordinance on a regular, periodic basis—such as quarterly or annually—for project scope, costs, schedule, accomplishments, and outcomes against promises.	Critical	1	●	Staff already provides this information via TransNet Report Cards and the ITOC Annual report. Going forward, staff will review projects and compare against TransNet Ordinance to provide a comparison against the original list of projects and costs.						Michelle Smith	
53	2	Demonstrate compliance with the TransNet Extension Ordinance by identifying, tracking, and reporting on various requirements and provisions to the Board and ITOC on a regular, periodic basis—such as quarterly or annually.	High	1	●	Staff will continue working with ITOC members to provide regular reporting on compliance with the Ordinance.						Ariana zur Nieden	
54	3	Implement shorter-term steps to report on performance, while waiting on the longer-term Transportation Performance Management Framework, including continued development of SANDAG's proposed "Goals and Provisions" document to distribute to the Board and ITOC.	High	1	●	Staff has already started with this process and will continue to improve on reporting performance on a regular basis						Grace Mino	
55	4	Create summarized graphics to quickly indicate TransNet Extension Ordinance status based on data in the revised quarterly reports for reporting to the Board and ITOC.	Medium	1	●	Staff has already started with process and will continue to improve on data presentation.						Michelle Smith	
56	Finding 4	AB 805 Weighted Voting Did not Significantly Change Delivery of TransNet Extension Ordinance Programs and Projects – No recommendations in this Chapter.	0		●								
57	Finding 5	Enhancements could be made to SANDAG's Regional Safety Planning Efforts, although Bicycle & Pedestrian Safety Improved	3		●								
58	1	Consider the benefits of identifying a regional safety planning coordinator to synchronize safety efforts of the region and regularly communicate progress on safety goals to the Board and ITOC.	Medium	1	●	Staff will consult with peer agencies to learn about best practices in the establishment of a safety coordinator position to understand the benefits to the San Diego Region.						Phil Trom	
59	2	Consider and prepare a regional safety plan that complements Caltrans' Statewide Plan and details SANDAG's vision, goals, objectives, and strategies to address regional trends, road conditions, and driving behaviors.	Medium	1	●	Pending adoption of the 2021 Regional Plan, staff will implement strategy to develop Regional Vision Zero Plan/Regional Safety Plan.						Phil Trom	

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60		3	Medium	1	●	Staff will consult with peer agencies to learn about best practices to engage with relevant agencies on emergency and resilience issues beyond current practices.						Phil Trom	
61		Finding 6		8	●								
62		1	Critical	1	●	SANDAG staff will develop a rough order of magnitude estimate of these impacts within available staffing resources.						Linda Culp	
63		2	Critical	1	●	Recently, the City of San Diego has proposed a more streamlined review process and SANDAG staff will continue working on these details with city staff. SANDAG staff will also work with Board leadership on these issues.						Linda Culp	
64		3	Critical	1	●	SANDAG staff will revise the existing quarterly status reports as recommended.						Linda Culp	
65		4	High	1	●	SANDAG has developed an initial crosswalk as part of this audit process and will continue to make updates annually.						Linda Culp	
66		5	Medium	1	●	SANDAG staff will consider adding this additional detail to Board reports in addition to the modifications already being made through Recommendation Nos. 17 and 18.						Linda Culp	
67		6	Medium	1	●	SANDAG tracks internal milestones such as permitting schedules and can consider adding other internal milestone to this tracking.						Linda Culp	
68		7	Medium	1	●	Finance staff will continue working closely with Regional Bikeway Program staff, within available staffing resources, to identify potential capacity and revenue constraint and opportunities to evaluate/modify bikeway program projects and funding as needed.						Dawn Vettese	
69		8	Low	1	●	The Dashboard will be updated to include explanatory notes for missing data that is not applicable to certain projects. Staff will consider options to more clearly display project status information for projects delivered in multiple phases.						Chelsea Gonzales	
70		Finding 7		4	●								
71		1	High	1	●	Recruitment materials will be updated to incorporate conflict of interest provisions						Ariana zur Nieden	
72		2	Medium	1	●	Staff will propose an amendment to the Ordinance to modify service limit language.						Ariana zur Nieden	
73		3	Low	1	●	Staff will work with ITOC and Board members to consider expansion of ITOC qualifications.						Ariana zur Nieden	
74		4	Low	1	●	Staff will work with ITOC and Board members to consider moving selection process for members outside of the Board.						Ariana zur Nieden	
75		July 2020	Yes	Poinsettia Station Improvements (PSI) Quality Assurance Review	3	●							
76		Observation 1		1	●								
77		1		1	●	None provided to the OIPA at this time							
78		Observation 2		1	●								
79		1		1	●	None provided to the OIPA at this time							
80		Observation 3		1	●								
81		1		1	●	None provided to the OIPA at this time							
82		Observation 4		0	●								
83		February 2020	Yes	Mid-Coast Corridor Transit Project Safety Program System Audit (CM Team Safety Review)	2	●							
84		1		1	●	None provided to the OIPA at this time							
85		2		1	●	None provided to the OIPA at this time							
86		June 2018	Yes	TransNet Triennial Performance Audit - 2018	40	●							
87		Finding 1		9	●								
88		1	Key	1	●	This process will be more formally incorporated as part of the TransNet Major Corridors Plan of Finance annual updates		Ongoing				Dawn Vettese and Ariana zur Nieden	TransNet
89		2	Key	1	●	SANDAG staff and economic consultants are working to create sales tax forecasts that incorporate ranges and scenarios and will present this work to ITOC for input.						Jim Miller	Technical Services
90		3	Key	1	●	Staff will present information on cost estimating practices and methods used to communicate cost changes to the ITOC, Transportation Committee and Board in April/May 2018 for input.	Presented to Transportation Committee April 20, 2018	April/May 2018				Jim Linthicum	MMPI

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91	4	ITOC should direct SANDAG to ensure the "Plan of Excellence" and its 7-point Data Accuracy and Modeling Work Plan are implemented.	Key	1		Significant progress has been made on the 7-Point Data Accuracy and Modeling Work Plan and ongoing efforts have been incorporated into the agency's Plan of Excellence with progress tracked there. As part of the 7-Point Plan, staff determined that errors were limited to income variables (Point 1), have conducted a dependency analysis to determine where the income variables were used and correct as needed (Point 2), developed a comprehensive flow diagram showing interactions between data and modeling components (Point 3), surveyed agency staff to understand and document how data are disseminated and used (Point 4), convened a nationwide expert panel for recommendations for regional forecasting (Point 5), developed processes and standards to communicate data, methods, and analysis in a clear and transparent manner (Point 6), and (Point 7) realigned people, processes, and technology to support adequate staffing and expertise.						Ray Major	Technical Services
92	5	ITOC should direct SANDAG to establish a formal structured protocol to review funding sources.	Key	1		This process will be more formally incorporated as part of the TransNet Major Corridors Plan of Finance, in coordination with the adopted Regional Plan.		Ongoing				Susan Huntington	TransNet
93	6	ITOC should direct SANDAG to monitor TransNet revenues and debt service obligations against needed growth projections.	Key	1		SANDAG Finance and TransNet staff will continue to communicate information on a regular basis, including cash flow needs, changes to project timing, and sales tax projections; meet and discuss with the SANDAG financial advisor any potential changes to needs; meet with investment bankers to understand instruments currently on the market that could fit SANDAG needs; and include all relevant information at regular intervals or on an as needed basis at ITOC meetings						Ariana zur Nieden	Finance
94	7	ITOC should direct SANDAG to identify methods to assess options, if needed, to delay, eliminate, or reduce scope of projects.	Key	1		As part of the 2019 Regional Plan update all projects, including TransNet projects, will be evaluated.						Phil Trom	Planning
95	8	ITOC should direct SANDAG to monitor and report on the impacts of changing transportation technologies on the transportation network and future TransNet projects.	Normal	1		SANDAG will include technology assumptions in the development of revenue constrained transportation scenarios for the 2019 Regional Plan.						Phil Trom	Planning
96	9	ITOC should direct SANDAG to continue to work closely with the Metropolitan Transportation System (MTS) and North County Transit District (NCTD) to monitor the TransNet Transit Operations Plan.	Key	1		SANDAG will work with MTS and NCTD to develop a new methodology to proactively monitor TransNet Transit Operations funding, focusing on existing data for costs and revenues and recognizing the limitations of estimating costs and revenues over such a long term. Once a new methodology has been established, staff will report annually to ITOC and Transportation Committee.	Presented to the Board of Directors on July 13, 2018					Brian Lane	Planning
97	Finding 2	To better measure how transportation improvements meet TransNet Program goals and what has been accomplished with the taxpayer's investment.	7										
98	1	ITOC should request SANDAG to set targets to measure TransNet performance against the TransNet Extension Ordinance goals.	Key	1		SANDAG will be setting performance management goals related to the MAP-21/FAST Act timelines and requirements. Staff will evaluate federal performance management goals in order to align with TransNet funded projects.	PM1 Safety targets: 2018 safety targets were established on January 26, 2018; 2019 targets were established on January 25, 2019; 2020 targets were established on January 24, 2020 PM2 Pavement and Bridge Condition: Targets established on October 5, 2018 PM3 Transportation and System Performance: Targets established October 5, 2018					Rachel Kennedy	Planning
99	2	ITOC should request SANDAG to capture performance outcome data related to safety metrics, pavement condition, and bridge condition.	Key	1		SANDAG staff is collaborating with Caltrans, will work with CTAC, and will examine other sources.	In December 2020, SANDAG staff presented to the TRANSNET on the development of 2021 safety targets, mid-performance period review of infrastructure condition performance following FHWA's National Highway System (NHS) pavement and bridge assets, mid-performance period review of system performance, freight, and Congestion Mitigation and Air Quality (CMAQ). Tracking and reporting on local agency pavement condition will continue to be analyzed	Late 2020				Sam Sanford	Planning
100	3	ITOC should request SANDAG to conduct a more robust analysis of cause and effect for all performance metrics.	Key	1		The recommended analysis likely will require the use of modeling/other analytical tools and additional resources. SANDAG staff will propose an approach to implement this recommendation based on the outcome of Recommendation 5 of finding 2. Update: The safety dashboard is expected to launch publicly this summer with interactive visualizations and downloadable data. The safety dashboard will be the primary data source for the forthcoming Regional Vision Zero Action Plan that will provide data driven safety analysis, crash trends, and countermeasure prioritization for the region. Updates to the safety dashboard are expected during the Action Plan development process lasting through the summer of 2024. The assets conditions dashboard, currently under development, is focused on bridges and pavements. Asset conditions data have been loaded into SANDAG databases. The initial version expected in summer 2023 will include a subset of the regional transportation network and include current conditions, trends, planned and programmed projects, and other data as available.	Late 2020/2021	Summer 2024				Samuel Sanford	Planning
101	4	ITOC should request SANDAG to provide regular performance monitoring reports that consider past performance in relation to TransNet goals.	Key	1		More regular reporting is feasible for highway system performance, as more robust data is available via Caltrans PeMS. Local street and road performance (in terms of average speed and travel time) is now available via a third-party vendor (INRIX). Transit data reporting (in terms of passengers per revenue hour, passengers per revenue mile, operating cost per passenger, operating cost per revenue hour, revenue hours per employee, and farebox recovery ratios) also is feasible and can be made available via reporting currently conducted under Transportation Development Act monitoring.						Ellison Alegre	Operations
102	5	ITOC should request SANDAG to consider allocating funding for additional performance monitoring activities.	Key	1		SANDAG staff will develop options to implement this recommendation, including any potential budget impacts, and bring to the Transportation Committee and Board for review and direction.		TBD				José Nuncio Ray Traynor	TransNet Operations
103	6	ITOC should request SANDAG to explore and study public-private partnerships.	Normal	1		SANDAG staff in the Operations Department have been working on partnerships with transportation information providers such as Google and Waze. Our current 511 system uses Google traffic and transit data as well as utilizes the Google map. Future plans have us extending the regional Data Hub into a Transportation Mobility Cloud with the intent of utilizing third-party data as well as sharing public data with the private sector		Subject to completion of Framework Findings and ITOC and Board action				Alex Estrella	Operations

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104	7	ITOC should request SANDAG to enhance the Story Map tool, TransNet project status listing, or develop a different tool to capture project output details and track TransNet accomplishments over time.	Key	1		The implementation of this recommendation will require changes to existing tools and processes. SANDAG staff will propose an approach to implement this recommendation based on the outcome of Recommendation 5 of finding 2						Michelle Smith	TransNet
105	Finding 3	To enhance delivery of the major corridor capital construction program and track highway performance.	3										
106	1	ITOC should request SANDAG to update and refine the project listing started in the 10-Year Look-Back Review.	Normal	1		Project Office staff will utilize the project list crosswalk created with the 10-Year Look-Back Review and incorporate the data field into the dashboard webform as part of the 2019 upgrade. Update: According to the recommendation owner Susan Huntington, SANDAG has incorporated changes to its internal TransNet Dashboard to crosswalk projects to TransNet Extension Ordinance numbers. Once the internal database is complete, SANDAG stated it will revise the public-facing Dashboard to show status by Ordinance #. There have been delays to the schedule for updating the public-facing dashboard but the change has been implemented in the database. According to the Manager of Software Development Solutions The public facing dashboard re-development effort has begun and they are targeting August as the go live date.	February 2023	Summer 2019	08/01/21			Susan Huntington	TransNet
107	2	ITOC should request SANDAG to begin gathering data on whether the Construction Manager/General Contractor (CMGC) method used on the Mid-Coast Corridor Transit project is delivering on expectations.	Normal	1		Mid-Coast has procedures and tools in place to capture CM/GC savings and efficiencies including comment and review logs, risk matrix and RFI response process. To address the recommendation, an innovations log or other method of formally tracking will be developed. SANDAG will research industry standards for comparing construction contracting methods for application to CM/GC to Low Bid. Mid-Coast will be compared to Mission Valley East Light Rail Transit Extension as the closest side-by-side comparative example. Project, Construction, and CM/GC managers will continue to meet regularly to review change orders and schedule impacts identified in the survey.						John Haggerty Allan Kosup	MMPI Caltrans
108	3	ITOC should request SANDAG to gather and store documents to support "benefit" statistics tracked for the North Coast Corridor and the Mid-Coast Corridor.	Normal	1		Mid-Coast data are maintained on a project file sharing site and project record documents including logs and cost data will be permanently stored in a SANDAG SharePoint location.						John Haggerty Allan Kosup	MMPI Caltrans
109	Finding 4	To better understand whether Local Street and Road Program spending is delivering projects that result in the best performance outcomes and value for taxpayer investment.	3										
110	1	ITOC should request SANDAG to revisit the TransNet Extension Ordinance congestion relief and maintenance split.	Normal	1		SANDAG staff is moving forward with addressing this and other performance and reporting related activities included in the FY 2018 TransNet Triennial Performance Audit Report. Corrective action included moving forward with the development a Regional Transportation Performance Framework based on input and feedback from ITOC gathered during the May 2018 ITOC meeting. The Framework will help address this and other Chapter 2 and Chapter 4 performance and reporting related recommendations. The Framework is expected to be completed in early 2021. Update: According to Alex Estrella, this effort has now been folded into the agency wide effort for examining possible amendments to the TransNet ordinance which are still under consideration/ongoing staff discussions		Ongoing				Alex Estrella	Operations
111	2	ITOC should request SANDAG to continue to monitor compliance with SANDAG Board Policy No. 031, Rule 21.	Key	1		Board Policy No. 031 Rule No. 21 addresses accommodation of bicyclists and pedestrians. SANDAG will conduct a compliance review using the existing processes of the Policy. Results will be reported to CTAC for discussion and determination of need to modify compliance guidelines and processes. SANDAG will amend applicable Board Policy to track development of bicycle and pedestrian projects built using TransNet funds. Update: Management has determined that based on a consideration of the costs and benefits that the cost outweighs the benefit and therefore the listed corrective action will not be taken but that they have identified an improved process and will move forward with implementing that to improve compliance		Fall 2020				Chris Kluth	Planning
112	3	ITOC should request SANDAG to conduct another review of local projects.	Key	1		SANDAG will conduct a compliance review using the existing processes of the Policy to determine if modifications are necessary to be more consistent with the SANDAG Complete Streets Policy. Update: Management has determined that based on a consideration of the costs and benefits that the cost outweighs the benefit and therefore the listed corrective action will not be taken but that they have identified an improved process and will move forward with implementing that to improve compliance		Fall 2020				Chris Kluth	Planning
113	Finding 5	To further enhance transit operations and improve effectiveness of transit service.	7										
114	1	ITOC should request the SANDAG Board to direct SANDAG to continue to analyze major transit commute routes and services.	Normal	1		SANDAG staff will continue to report on this area via the annual State of the Commute Report.	Presented to the Board of Directors on July 13, 2018					Brian Lane	Planning
115	2	ITOC should request the SANDAG Board to direct SANDAG to regularly track and report on TransNet goals to increase services to seniors and persons with disabilities.	Key	1		SANDAG staff will look at ways to report on this area via the annual State of the Commute Report beginning FY 2018.	Presented to the Board of Directors on July 13, 2018					Brian Lane	Planning
116	3	ITOC should request the SANDAG Board to direct SANDAG to work together with the region's transit operators to analyze options offsetting the impact subsidy disparities have on available funds.	Normal	1		SANDAG staff is currently working with the transit operators on a Regional Fare Study that may help offset the revenue impacts of the discount subsidies. Additionally, SANDAG staff will work with both transit operators' staff to study other options to increase ridership and revenues.	Presented to the Board of Directors on July 13, 2018					Brian Lane	Planning
117	4	ITOC should request the SANDAG Board to direct SANDAG to collaborate with the operators to revisit the operating cost ceiling tied to changes in the Consumer Price Index.	Normal	1		SANDAG Planning and Finance staff will meet with the operators to collaborate on possible solutions to address this recommendation. It is expected that these solutions could be included in a future amendment to the Ordinance.	Presented to the Board of Directors on July 13, 2018					Brian Lane	Planning
118	5	ITOC should request the SANDAG Board to direct SANDAG to continue efforts to establish baseline data for bike and pedestrian volume.	Normal	1		SANDAG will continue to capture and maintain baseline data to identify trends and establish targets.	Ongoing					Linda Culp	Planning
119	6	ITOC should request the SANDAG Board to direct SANDAG to finalize and implement the in-progress Regional Bikeway Program Management Plan.	Normal	1		Upon completion of Program Management Plan SANDAG Active Transportation Team will have trainings with project managers to implement PMP practices.	Plan published in July 2018					Linda Culp	Planning
120	7	ITOC should request the SANDAG Board to direct SANDAG to use dashboard data that currently tracks frequent causes of delays during the design and environmental phases of bike projects.	Key	1		Guidance on documenting lessons learned will be included in the Program Management Plan SANDAG will work to develop procedures and tools to maintain lessons learned, identify and mitigate project risks, and improve schedule delivery	Ongoing					Linda Culp	Planning
121	Finding 6	To enhance the Environmental Mitigation Program and better measure performance.	6										
122	1	ITOC should request the SANDAG Board to direct SANDAG to continue efforts to establish a new Memorandum of Agreement with Caltrans, California Department of Fish and Game, and the U.S. Fish and Wildlife Service.	Key	1		The MOA has expired, but funding under the SANDAG CIP budget will be available for FY 2019. SANDAG will be using the results of the Ten-Year Review Look-Back and FY 2018 TransNet Triennial Performance Audit as the basis for a new MOA starting in May 2018.	The Board of Directors approved a new MOA on February 22, 2019					Kim Smith	Planning

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123	2	ITOC should request the SANDAG Board to direct SANDAG to review and update EMP cost estimates in light of higher costs than anticipated.	Key	1		SANDAG is tracking the change in cost for the lagoon restoration efforts and comparing it to the cost savings associated with lower than estimated land acquisition costs.						Kim Smith	Planning
124	3	ITOC should request the SANDAG Board to direct SANDAG to consider the most efficient use of available funding and possible adjustments.	Key	1		SANDAG will start to discuss ways to address this issue in spring 2018 and it will become part of the revised MOA identified in Recommendation of this finding above.		May 2019-June 2029				Kim Smith	Planning
125	4	ITOC should request the SANDAG Board to direct SANDAG to revisit the established economic benefit methodology.	Key	1		The economic benefit methodology is addressed as part of the new MOA approved by the SANDAG Board on February 22, 2019. Additional funding for economic benefit would be considered only after debt service for borrowing for the first ten years of the EMP has been completed (2029) and then as part of the Plan of Finance approval by the SANDAG Board. This will provide 20 years of data to determine what if any economic benefit has occurred and how much if any economic benefit could be provided.	The Board of Directors approved a new MOA on February 22, 2019; this will be an ongoing corrective action					Kim Smith	Planning
126	5	ITOC should request the SANDAG Board to direct SANDAG to make changes, as appropriate, to marketing efforts for the local streets and road mitigation bank funding.	Key	1		SANDAG has made several attempts to promote the availability of these credits. SANDAG will work with Communications staff to establish a systematic approach. Communications has met with the Planning EMP staff and has calendared upcoming milestones in order to plan public information releases on all communication platforms.		Through life of Transnet Ordinance				Kim Smith	Planning
127	6	ITOC should request the SANDAG Board to direct SANDAG to measure progress in meeting specific and detailed EMP goals, objectives, and action items for regional monitoring and management.	Normal	1		SANDAG has already identified several similar efforts from around the country. SANDAG will develop a proposed approach to these complex ideas to the public and report as a report card or similar evaluation system. Work will start in summer 2018 to develop a detailed work plan. Communications is involved in the planning effort and will effectively work with the department to produce informative pieces for distribution on multiple communication platforms		Draft May 2021, Final June 2021				Kim Smith	Planning
128	Finding 7	To better summarize information for decision makers and inform the public on TransNet.	5										
129	1	ITOC should request the SANDAG Board to direct SANDAG to regularly report on implementation of TransNet Extension Ordinance goals.	Key	1		Communications is working on and will complete a proactive annual plan for publishing progress that will entail multiple forms of communication pieces on a variety of communication platforms.	Implementation shown in FY 2018 ITOC report					Joy DeKorte	Communications
130	2	ITOC should request the SANDAG Board to direct SANDAG to modify staff reports for SANDAG Board and other oversight committees.	Key	1		A comprehensive review of the agenda production process, including report preparation, is being conducted based on the Board's Plan of Excellence to ensure transparency and clear, concise, and easily understandable information in reports and presentations	Presented to the ITOC on April 15th 2020					Victoria Stackwick	Government Relations
131	3	ITOC should request the SANDAG Board to direct SANDAG to more prominently featuring the TransNet logo on SANDAG and TransNet partner websites.	Normal	1		SANDAG staff will review existing websites and make recommendations for additional TransNet logo and language placement to create stronger recognition of the TransNet Program. Staff also will begin review of partner agency websites to see where SANDAG and TransNet logos and corresponding language can be added/enhanced. SANDAG social media posts will reference the use of TransNet funding where appropriate, and #TransNetSD will continue to be used as a way of threading all TransNet-funded program and project posts together. Social media campaigns specific to TransNet-funded efforts and accomplishments will be more regularly pursued. Update: As of July 8th, according to Joy Dekorte "I don't consider it completed just yet, although we have made steps to get there. We made changes to the current site in March 2019 to better feature TransNet at www.sandag.org/transnet , and the new website will also feature it more prominently". She also is expecting it to be completed in full by Fall of 2021	Early 2023	February/March 2021	Fall 2021			Joy DeKorte	Communications
132	4	ITOC should request the SANDAG Board to direct SANDAG to revamp SANDAG website to capture documents pertinent to TransNet in a centralized area.	Normal	1		The sandag.org/TransNet web page will be reviewed and recommendations made will include each TransNet component, including the Dashboard. Staff has been pursuing a complete redesign of sandag.org, expected to begin in FY 2019, which is planned to include higher visibility of each TransNet component, including the Dashboard. Additionally, staff will begin a coordinated review of the Dashboard to determine the most effective way to link projects back to the Ordinance.						Joy DeKorte	Communications
133	5	ITOC should request the SANDAG Board to direct SANDAG to ensure data on completed projects is maintained in the Dashboard.	Normal	1		SANDAG will ensure all completed projects are maintained in the Dashboard, and that all expenditures have been associated with the appropriate funding source.						Lamont Dowell	TransNet
134	September 2016	Yes	SANDAG Federal Certification Review	5									
135	Finding 1	Transition to satisfy FAST Act and performance measures were determined to meet requirements.	1										
136	1	SANDAG Board will designate existing board members of the Metropolitan Transit System and North County Transit District as transit representatives on the SANDAG Executive Board.	Normal	1		N/A	Done on an ongoing annual basis starting February 24, 2017					Elisa Arias/ Robyn Wapner	Planning and Innovation/ Government Relations
137	Finding 2	Congestion Management Process (CMP) framework developed in accordance with the 8-step approach.	1										
138	1	SANDAG should ensure that all CMP activities are sufficiently organized within the agency to eliminate fragmentation.	Normal	1		N/A	Implementation was presented to FHWA at the certification review in May of 2020					Samual Sanford	Planning and Innovation
139	Finding 3	The activity-based model (ABM) transition is complete and it integrates transportation and land-use.	1										
140	1	SANDAG should explore strategies that may scale back certain model components for evaluating smaller projects to improve model run times.	Normal	1		Evaluation of smaller projects is critical to SANDAG's mission for supporting the region's ability to evaluate planned development for potential impacts to communities in addition to the evaluation of infrastructure projects proposed by SANDAG and its member jurisdictions. The recommendation from the federal government failed to consider potential local impacts from changing the SANDAG model functionality. The recommendation, however, is focused on an end goal of improving model run times. For that goal SANDAG Data and Modeling staff implemented a three phase strategy of improvements. The three phases involve short term procedural changes, mid-term methodological changes, and long-term programmatic changes to the SANDAG travel demand model code.		Phase 1 is completed; Phase 2 July 2020; Phase 3 January 2024				Wu Sun	Planning and Innovation
141	Finding 4	SANDAG's Regional ITS Architecture maintenance and usage is unclear.	1										

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142	1	SANDAG should consider updating the ITS Strategic Plan.	Normal	1	●	SANDAG staff is addressing this recommendation and corrective action includes updating the Regional ITS Architecture. This document is under development and will be complete in December 2020. The ITS Architecture serves as the basis for the ITS Strategic Plan which will be completed in spring of 2021. Both the update of the ITS Architecture and ITS Strategic Plan are being developed as part of the 2021 Regional Plan. Update: According to Alex Estrella, the work is being completed in conjunction with the ITS Architecture Update which is in DRAFT form and is included as part of the DRAFT 2021 Regional Plan, Appendix DD. The final plan will be completed and in alignment with the Final 2021 Regional Plan. Update: According to Alex Estrella, this item has been implemented		Spring 2021				Alex Estrella	Planning and Innovation
143	Finding 5	Involvement with Highway Safety Improvement Program (HSIP) and Strategic Highway Safety Plan (SHSP) observed.	1		●								
144	1	SANDAG should continue Steering Committee and Challenge Area team meeting participation and is encouraged to look at the new SHSP homepage.	Normal	1	●	N/A	Ongoing, SANDAG has been participating since at least April 23, 2019					Samual Sanford	Planning and Innovation
145	INTERNAL AUDITS	SUBTOTAL COUNT OF RECOMMENDATIONS	109										
146	May 2023	Yes	Contracts and Procurement Operational and System Control Audit Report (Part I)	58	●								
147	Finding I	Noncompliance with Procurement Laws, Rules, Regulations, and Internal Policies and Processes	23		●								
148	1	Create a Standard Operating Procedure (SOP) and update procurement solicitation forms for Evaluation Panel participants to follow that explains their responsibility to complete score sheets and to provide notes that justify their scores.			●	Management shall create procedures and guidelines, and update forms used by Evaluation Panel members. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
149	2	Management shall review and update the procedure guides and training provided to Contracts Analysts related to facilitating the solicitation process. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.			●	Management shall review and update the procedure guides and training provided to Contracts Analysts related to facilitating the solicitation process. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
150	3	Update the procurement board policies to clearly explain competition requirements for contracts and task orders. The policies should also clearly explain the options for not competing and the procedures and approvals that should be followed in those instances.			●	Pending Direction by the Board. Management will present any requested modifications to Board Policies for the Board's consideration.	TBD						CEO
151	4	Ensure that SOPs around procurements clearly explain the need and requirements for competition as well as the allowed exceptions and requirements for them.			●	Management will review and update procedure guides and resources pertaining to competing contracts and task orders. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
152	5	Update the procurement board policies to clearly limit the amendment amount(s) allowed without both the Executive Director's signature and to specify when Board approval is required to approve amendments.			●	Pending Direction by the Board. Management will present any requested modifications to Board Policies for the Board's consideration.	TBD						CEO
153	6	Update the procurement board policies to clearly state that the amendment amount requiring board approval is cumulative of all amendments. This should also consider all other work on the same project issued under previous task orders or contracts, unless a new full and open competition has occurred for the services. This should clearly explain that exceptions to this must be analyzed by the Contracts department to ensure bid splitting is not occurring and that sufficient competition has occurred for the amounts awarded thus far.			●	Pending Direction by the Board. Management will present any requested modifications to Board Policies for the Board's consideration.	TBD						CEO
154	7	Update the Procurement Manual to reflect the changes in Recommendations 1 and 2			●	Management updates the Procurement Manual on a regular basis and shall review/add language pertaining to contract amendments and bid splitting as part of upcoming revisions. The Procurement Manual will also be revised as part of the Procurement Program Optimization Initiative. Timing for completion of this work is currently unknown.	TBD						Director of Contracts and Procurement Services
155	8	Create an SOP for contracts staff that clearly explains their role in reviewing amendments and procurement history to ensure bid splitting and avoidance of competition is not repeatedly occurring.			●	Management shall develop procedures, guidelines, and related resources to assist with the review of contract amendments and procurement history. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
156	9	Update the procurement board policies to address retroactive procurement transactions and to restrict/limit them. If allowing them, clearly limit the allowed circumstances to emergencies. The restrictions should define and specify that "poor planning" is not allowed and include examples such as departments being unaware of expiring contracts/task orders and being unaware of procurement processing timelines and requirements			●	Pending Direction by the Board. Management will present any requested modifications to Board Policies for the Board's consideration.	TBD						CEO
157	10	Create a tracking system/method for expiring contracts/task orders to ensure customer department awareness of planning needs for current and future procurements.			●	Already Implemented. This functionality has been established and is currently in use. Management anticipates enhancement with implementation of the new ERP	N/A						
158	11	Update the Procurement Manual to follow the recommendations in Recommendation 1, as well as to limit or restrict the approval of retroactive requests if negligence occurred on the department's behalf due to not tracking their expiring contracts and/or task orders			●	Management updates the Procurement Manual on a regular basis and shall review/add language pertaining to retroactive requests. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
159	12	Create a SOP for both departments and contracts staff to explain the roles, responsibilities, requirements, forms, approvals needed, and processing retroactive procurement requests			●	Management shall develop procedure guides for Contracts Analyst and project managers related to retroactive transactions. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
160	13	Contracts department to provide training on appropriate planning efforts and expectations for project managers and customer departments. This should include tracking of contracts, monitoring of expiration dates and procurement timelines for any next steps or changes to projects.			●	Management shall develop training for project managers related to procurement planning and contract administration responsibilities. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
161	14	Update the Procurement Manual to clearly explain the required forms for procurement transactions. This should include the options and how to submit their requests with the information and forms needed.			●	Management updates the Procurement Manual on a regular basis and shall review/add language pertaining to required forms. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
162	15	Create SOPs for staff on requiring forms from departments or project managers and how to review them for completeness and compliance. Procedures should include examples of properly completed forms/requests as well as improper ones.			●	Management shall develop procedures, guidelines, and related resources to assist with the review of forms from project managers. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
163	16	Update the Board Policy No. 017, the Employee Handbook and Procurement Manual to create more internal controls around approval and signature of procurement transactions by including the OGC in all transactions to ensure risks are mitigated.			●	Pending Direction by the Board. Management will present any requested modifications to Board Policies for the Board's consideration. Management makes regular updates to the Employee Handbook and Procurement Manual, and will consider the need for internal controls as well as the relative risks of each individual transaction, the experience level of the designated staff member, and the needs of the agency regarding the volume of transactions that occur on a daily basis.	TBD						Chief Executive Officer, and Senior Director of Organization Effectiveness
164	17	Require staff to provide detailed reasons/justifications for amendment requests.			●	Management shall implement procedures and expectations for ensuring amendment requests are justified and substantiated. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services

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165	18	Create SOPs and provide training to project managers and contract analysts to ensure amendments are reduced in frequency by ensuring that sufficient planning is being done and review of amendment requests are analyzed by contracts staff			●	Management shall develop procedures guides and provide training to support the objective of reducing the number of amendments. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown	TBD						Director of Contracts and Procurement Services
166	19	Create SOPs and provide training for contracts staff to address proper document storing and recording procurement transactions			●	Management shall develop procedures and guidelines, and provide training to Contracts Analysts, to address storage of documentation. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown. Management also notes the ERP will include document tracking and storage capabilities.	TBD						Director of Contracts and Procurement Services
167	20	Create SOPs for QA/QC efforts to ensure document storing and procurement transactions are properly recorded			●	Management shall develop and implement procedures for conducting QA/QC efforts pertaining to procurement records. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
168	21	Update contract templates to define the various dates specified in the contract (effective date, period of performance, and ordering period).			●	Already implemented	N/A						
169	22	Update contract templates to ensure consistency when referring to dates and clarify when each date applies			●	Already implemented	N/A						
170	23	Update contract templates to ensure they explicitly define if task order terms are allowed to exceed the contract expiration date.			●	Already implemented	N/A						
171	Finding II	High Awards and Increases due to Non-Competed Procurements and Excessive Amendments	3		●								
172	1	Create clear policies and Standard Operating Procedures (SOP) to ensure competition is open and full as frequently as required by applicable laws, rules and regulations			●	Please see response to Recommendation VII.7 from the Action Plan responsive to Part I of the Contracts audit							
173	2	Create clear policies and SOPs to ensure sole sources are limited and are thoroughly being reviewed and analyzed to ensure potential risks are mitigated			●	Please see response to Recommendation VII.4 from the Action Plan responsive to Part I of the Contracts audit							
174	3	Create clear policies, SOPs, and provide training for project managers and contract analysts to ensure amendments are reduced in frequency. These should ensure that sufficient planning is being done and reviews of amendment requests are analyzed thoroughly			●	Please see response to Recommendation I.18 from the Action Plan responsive to Part II of the Contracts audit	TBD						Director of Contracts and Procurement Services
175	Finding III	Invoices are Missing, Lacking Supporting Documentations, or Not Consistent with the Corresponding Fee Schedule	7		●								
176	1	Require detailed/itemized invoices and progress reports or a detailed summary of work performed for a payment to be processed			●	Please see response to Recommendation III.1 from the Action Plan responsive to Part I of the Contracts audit							
177	2	Update Request for Payment Form to explicitly require invoices to be attached			●	Please see response to Recommendation III.2 from the Action Plan responsive to Part I of the Contracts audit							
178	3	Create formal procedure and training for invoice payment to include instructions/methods for verifying invoiced work is included in the contract/task order			●	Please see response to Recommendation III.3 from the Action Plan responsive to Part I of the Contracts audit							
179	4	Update contract templates to require detailed/itemized invoices as well as progress reports or detailed summaries of work performed to be included with invoice			●	Please see response to Recommendation III.4 from the Action Plan responsive to Part I of the Contracts audit							
180	5	Create a tracking and filing system to ensure that all received and paid invoices are recorded and filed properly			●	Implementation in Progress. The new ERP system will include functionality that will automatically track and file all invoices and supporting documentation that is submitted for payment. This functionality is expected to be included in Phase 1 of the ERP implementation, due for completion in Summer 2023	Summer 2023						Director of Accounting and Finance
181	6	Create a SOP that provides instructions on entering and processing invoices to ensure all information is entered correctly into OneSolution and/or any future financial payment system			●	As part of the ERP project, Management shall ensure appropriate procedure guides and resources pertaining to entering and processing invoices are prepared and available for staff	Summer 2024						Director of Accounting and Finance
182	7	Investigate how many invoices were not captured by OneSolution and determine if financial reports were inaccurate because of any uncaptured invoices			●	Already Completed	Upon Request						Director of Accounting and Finance
183	Finding IV	Encumbrances are Not Recorded upon Award/Execution of a Procurement	4		●								
184	1	Create SOPs that clearly identify both the Contracts department's and Finance department's role and responsibilities for encumbering, as well as step by step instructions for each department. These should include of timelines of when steps should occur			●	Implementation in Progress. The new ERP system will include functionality that automatically encumbers funding for projects; the system will also be capable of supporting encumbrance tracking processes. This functionality is expected to be included in Phase 1 of the ERP implementation, due for completion in Summer 2023	TBD						Senior Director of Organization Effectiveness and Director of Accounting and Finance
185	2	Provide regular training to each department on their assigned roles, responsibilities, and procedures			●	As part of Action IV.1 outlined above, Management shall provide training to improve awareness and understanding of the roles and responsibilities of Finance and Contracts and Procurement Services team members with respect to encumbrances	TBD						Senior Director of Organization Effectiveness and Director of Accounting and Finance
186	3	Create a streamlined process where both departments are communicating regularly on updates or changes to the encumbrance process and ensuring that their procedures align			●	Implementation in Progress. The new ERP system will include functionality that automatically encumbers funding for projects, thereby eliminating the need to coordination between Finance and Contracts and Procurement Services team members regarding encumbrances. This functionality is expected to be included in Phase 1 of the ERP implementation, due for completion in Summer 2023	Summer 2023						Director of Accounting and Finance
187	4	Create a process and tracking system/method, inclusive of both the Contracts and Finance departments, for internal controls to ensure all encumbrances are processed upon execution of a contract, task order or amendment			●	Implementation in Progress. The new ERP system will include functionality that automatically encumbers funding for projects; the system will also be capable of supporting encumbrance tracking processes. This functionality is expected to be included in Phase 1 of the ERP implementation, due for completion in Summer 2023	Summer 2023						Director of Accounting and Finance
188	Finding V	Weakened Internal Controls due to Excessive Delegation of Authority Granted by Board of Directors (BOD) to Staff to Govern Agency Oversight	4		●								
189	1	Update Board Policy No. 017 to clearly restrict bid splitting			●	Pending Direction by the Board. Management will present any requested modifications to Board Policies for the Board's consideration	TBD						CEO
190	2	Update Board Policy No. 017 to limit the Executive Director's authority on approving agreements to only allow emergencies and/or urgent need procurements. Both "emergencies" and "urgent need" should be clearly defined and in accordance with applicable laws			●	Pending Direction by the Board. Management will present any requested modifications to Board Policies for the Board's consideration	TBD						CEO
191	3	Update the Delegation of Authority by Executive Director Policy to align with the recommended changes to Board Policy No. 017 and current Board Policy No. 041 by creating more internal controls to include clearly limited parameters around contract amendments and task orders by including the OGC and/or Finance department(s) in all transactions to ensure risks are mitigated			●	Management shall ensure the Delegation of Authority by Executive Director policy is consistent with any modifications to Board Policies adopted by the Board	TBD						Senior Director of Organization Effectiveness and Director of Contracts and Procurement Services
192	4	Update the Procurement Manual to restrict and/or clearly limit procurement transactions and actions that conflict with proper internal controls, to include the examples referenced as observations in this finding			●	Management shall continue to review and update the Procurement Manual on a regular basis to ensure consistency with relevant laws and regulations, as well as Board policies. The Procurement Manual will also be revised as part of the Procurement Program Optimization Initiative. Timing for completion of this work is currently unknown	TBD						Senior Director of Organization Effectiveness and Director of Contracts and Procurement Services

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193		Retrospective Procurements by Executive Leadership to Rectify and Pay for Unauthorized Work	6		●								
194	1	Update the procurement board policies to address retroactive procurement transactions and to restrict/limit them. If allowing them, clearly limit the allowed circumstances to emergencies. The restrictions should clearly define "poor planning", specify that it is not allowed, and should include examples such as departments being unaware of expiring contracts/task orders, departments being unaware of procurement processing timelines and requirements and department lack of succession planning when loss of staff occurs.			●	Pending Direction by the Board. Management will present any requested modifications to Board Policies for the Board's consideration	TBD						CEO
195	2	Create a tracking system/method for expiring contracts/task orders to ensure awareness of planning needs for current and future procurements			●	Implementation in Progress. The existing Contracts Management System (CMS) supports this function. Similar functionality will be incorporated into the design of the Contracts and Procurement Services module within the new Enterprise Resource Planning (ERP) platform, with Phase 1 due to go live in Summer 2023	Summer 2023						Senior Director of Organization Effectiveness
196	3	Update the Procurement Manual to follow Recommendation 1 of this finding.			●	Management shall continue to review and update the Procurement Manual on a regular basis to ensure consistency with relevant laws and regulations. The Procurement Manual will also be reviewed and updated as part of the Procurement Program Optimization Initiative. Timing for completion of this item is currently unknown	TBD						Senior Director of Organization Effectiveness and Director of Contracts and Procurement Services
197	4	Create a SOP for staff to explain the roles, responsibilities, requirements, forms, and approvals needed for all procurement transactions including retroactive procurement requests.			●	Management shall create procedures and guidelines for project managers to support their responsibility for ensuring consultants/contractors fulfill their obligations under an awarded contract. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
198	5	Provide training on procurement planning to include appropriate efforts and expectations for project managers to include tracking of contracts, monitoring of expiration dates, and procurement timelines to follow for any next steps or changes to projects			●	Management shall provide training and develop resources to support project managers with procurement planning and contract administration functions. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
199	6	Provide training to departments and project managers to ensure understanding of on-call contracts and processes to award task orders			●	Management shall provide training and developing resources to improve awareness among project managers regarding administration of on-call contracts. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services
200		Inefficient Monetary Amendments of Contracts for Non-Performance	5		●								
201	1	Require performance evaluations of consultants upon completion or termination of a contract and/or task order.			●	Ongoing Activity. SANDAG's procurement and contract administration practices require project managers to complete an evaluation of consultants upon completion of a project. Improvements to existing practices will be considered as part of the Procurement Program Optimization Initiative.	Ongoing						Director of Contracts and Procurement Services
202	2	Create SOPs for project management roles that clearly explain responsibilities to ensure projects are being completed on time and in an efficient manner. This should include assessing and documenting the consultant's completion of deliverables, milestones, and whether they meet the contract requirements and agency needs or not			●	Management shall create guidelines and procedures for project managers to support their responsibility for ensuring consultants/contractors fulfill their obligations under an awarded contract. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown	TBD						Director of Contracts and Procurement Services
203	3	Create policies and SOPs that clearly explain allowed justification for amendments. These procedures should include examples of both allowable and non-allowable justifications			●	Management shall create policies and procedures designed to improve contract and task order amendments, including allowable justifications. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown	TBD						Director of Contracts and Procurement Services
204	4	Require that amendment requests include thorough justification details. Also require that contract analysts ensure they are reviewing and analyzing whether justifications are allowable			●	Management shall create policies and procedures designed to improve contract and task order amendments, including the requirement for thorough justifications. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown	TBD						Director of Contracts and Procurement Services
205	5	Create a SOP for contract analysts that clearly explains how to review amendment requests and procurement history to ensure amendments are justified, to identify excessive amendments, to identify potential bid splitting, avoidance of competition, non-performing consultants, and conflicts of interest.			●	Management shall create procedures and guidelines for use by Contracts Analysts when facilitating requests for contract and task order amendments. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown	TBD						Director of Contracts and Procurement Services
206		Contracts Awarded for Services that In-House Staff should be Qualified to Perform	6		●								
207	1	Conduct an analysis to determine if additional staff is needed to perform common legal and/or HR services, which could ensure a cost saving to the agency.			●	Ongoing Activity. Management already undertakes this activity on a regular basis during development of the annual Program Budget and at other times during the year when considering the cost effectiveness of adding a staff resource vs. obtaining consultant resources							Deputy CEOs
208	2	Provide training to ensure OGC staff is qualified to meet SANDAG's needs and the requirements of their classification specification. Training should include environmental, construction, employment, public finance, contracts, intergovernmental, binational relations, and toll operations			●	Ongoing Activity. The OGC team members, like all SANDAG staff, regularly participate in professional training and development activities to expand and grow their capabilities.							General Counsel
209	3	Consider reducing in-house legal staff down to one or two attorney's and move to outsourcing only. This would further support independence, from a legal perspective, around the Board, Management and OIPA matters.			●	Ongoing Activity. Management considers the staffing resources needed for each department during development of the annual Program Budget and will continue to consider the number of team members and skills and experience needed for OGC.							Deputy CEOs and General Counsel
210	4	Provide training to ensure HR staff is qualified to meet SANDAG's needs and the requirements of their classification specification. Training should include staff recruitment, strategic planning and organizational assessment, classification and compensation, and employee training.			●	Ongoing Activity. Human Resources team members, like all SANDAG staff, regularly participate in professional training and development activities to expand and grow their capabilities.							Senior Director of Organization Effectiveness
211	5	Recruit and hire staff that is qualified based on the applicable classification specification and is able to meet the needs of SANDAG.			●	Ongoing Activity. SANDAG's recruitment program and practices have been developed with the goal of hiring individuals who have the knowledge, skills, and abilities necessary for successful job performance.							Senior Director of Organization Effectiveness
212	6	Provide leadership training to address analyzing internal capacity/experience versus external expertise to mitigate overspending on consultants, identifying training needs for staff based on continuous agency needs, and improving efficiency around project performance and avoiding potential delays.			●	Ongoing Activity. These recommendations for training align to various ongoing leadership, program and project management development initiatives that are underway and/or planned for implementation.							Senior Director of Organization Effectiveness
213	October 2021	Yes	Contracts and Procurement Operational and System Control Audit Report (Part I)	40	●								
214		INADEQUATE ADMINISTRATIVE STANDARD OPERATING PROCEDURES (SOPs) FOR CONTRACT ANALYSTS AND PROJECT MANAGERS	3		●								
215	1	Creating formalized SOPs with step-by-step instructions for tasks for both contract analysts and project managers (e.g., desk procedures).			●	Management shall create procedures and guidelines for Contracts Analysts and project managers to support their responsibilities regarding procurement and contract administration functions. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD						Director of Contracts and Procurement Services

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216	2	Providing formal and regular training to contract analysts and project managers on their assigned roles, responsibilities, and procedures			●	Management shall provide training and develop resources to support Contracts Analysts and project managers in fully understanding their roles and responsibilities with respect to procurement and contract administration functions. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
217	3	Updating the Procurement Manual to clearly identify and segregate roles and responsibilities for contract analysts and project managers.			●	Management shall review and update the Procurement Manual to define roles and responsibilities for Contracts Analyst, project managers, and Executives. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Senior Director of Organization Effectiveness and Director of Contracts and Procurement Services	
218	Finding 2	INSUFFICIENT TRAINING OF CONTRACT ANALYSTS AND PROJECT MANAGERS AND INSUFFICIENT REQUIREMENTS TO QUALIFY AS A PROJECT MANAGER	6		●								
219	1	Creating SOPs for contract analyst and project manager specific tasks.			●	Management shall create procedures and guidelines for specific tasks performed by Contracts Analysts and project analysts. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
220	2	More clearly segregating the duties of contract analysts and project managers			●	Management shall review and update the Procurement Manual to define clear roles and responsibilities for Contracts Analyst, project managers, and Executives. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
221	3	Providing consistent training for contract analysts provided by contracts subject matter experts and/or management			●	Management shall offer training and professional development opportunities for Contracts and Procurement Analysts. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
222	4	Providing annual and/or continuous training on the Procurement Manual and SOPs for both contract analysts and project managers.			●	Management shall provide regular training and develop resources to support Contracts Analysts and project managers in fully understanding their roles and responsibilities with respect to procurement and contract administration functions. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
223	5	Identifying and requiring that employees meet specific qualifications and have attended external formal project manager specific training prior to being assigned to a project manager role; for employees assigned as project managers over higher risk and dollar projects, formal certified project manager training should be required.			●	Management shall establish qualifications and require completion of regular training for all employees with contract management responsibilities. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
224	6	Encouraging external training provided by professional associations specific to contracts (such as CAPPO and NIGP) and project management			●	As part of Action Item II.3, Management shall provide training services from professional associations and industry experts related to contracts and procurement as well as project management	TBD						
225	Finding 3	ITEMIZED BREAKDOWN OF WORK PERFORMED NOT REQUIRED FOR INVOICE PAYMENT	4		●								
226	1	Requiring detailed/itemized invoices and progress reports or detailed summary of work performed for a payment to be processed e.g., source documents such as detailed timesheets or task specific assignment sheets that supports labor or work product results, goods and/or receiving receipts from third parties, etc.			●	Management shall review and update existing policies and establish guidelines and procedures that require submittal of sufficient supporting documentation for the payment of goods or services.	Summer 2023 and beyond					Director of Accounting and Finance	
227	2	Updating Request for Payment Form to explicitly require itemized invoices to be attached.			●	The new ERP system will include functionality for electronically submitting requests for payment of invoices. Procedures will be established within the system that require supporting documentation. This functionality is expected to be included in Phase 1 of the ERP implementation, due for completion in Summer 2023	TBD					CFO and Director of Accounting and Finance	
228	3	Creating formal SOPs and training for invoice payment to include instructions/methods for verifying invoiced work is included in the contract/task order.			●	As a follow-on to Action Item III.1, Management shall establish and conduct training for project managers regarding verification of goods provided and/or work performed relative to contract/task order specifications	Summer 2023 and beyond					Director of Accounting and Finance	
229	4	Updating contract templates to require detailed/itemized invoices as well as progress reports or detailed summaries of work performed to be included with invoices.			●	Management shall review and update standard agreement templates to establish and clarify expectations regarding the quality and substance of invoices submitted by consultants and vendors, including adequate supporting documentation. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown	TBD					Director of Contracts and Procurement Services	
230	Finding 4	INADEQUATE CONTRACT MANAGEMENT SYSTEM (CMS) WITH LIMITED CAPABILITIES AND USAGE AND INACCURATE AND MISSING INFORMATION	11		●								
231	1	Replacing the CMS with a system that properly interfaces with the agency's enterprise resource planning system (ERP) or is a system within the agency's ERP, with the ability to communicate/integrate with finance encumbrance, invoice, and payment records to include tracking, searching, and recording invoice payments against contracts, task orders, etc. The replacement ERP and the data stored within should also be user-friendly, easily accessible, and easily reportable.			●	Implementation in Progress. Management initiated activity to transition procurement and contract administration functionality, including all related data and records, from the current CMS to the new ERP system in Spring 2022. The project will be completed in multiple phases; Phase 1 includes the budget, finance, and procurement modules, and is expected to go-live in Summer 2023, with further refinements and functionality to be added through the end of 2024	Summer 2023 and beyond					Senior Director of Organization Effectiveness and Director of Business Information and Technology Services	
232	2	Providing staff training and step-by-step SOPs on using the replacement CMS and submitting all types of procurement requests			●	As part of the ERP project, Management shall ensure appropriate procedure guides and resources pertaining to submitting procurement requests are prepared and available for staff. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown	Summer 2023 and beyond					Senior Director of Organization Effectiveness	
233	3	Ensuring staff can query to identify the contractor and subcontractor efficiently and easily within the replacement CMS without going to various other platforms or documents			●	Management shall ensure appropriate procedure guides and resources pertaining to querying contract records are prepared and available for staff. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown	Summer 2023					Senior Director of Organization Effectiveness	

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234	4	Ensuring that all contracts and contract-related records and documents are stored in 1 easily accessible location, preferably within the replacement CMS			●	Implementation in Progress. All records currently contained within the CMS will be transitioned and stored within the new ERP. The data transfer process is part of Phase 1 of the project, due for completion in Summer 2023.	Summer 2023					Senior Director of Organization Effectiveness	
235	5	Ensuring the replacement CMS is updated with correct and complete information and data to correct the inaccuracies and blanks from the current CMS records			●	Implementation in Progress. As part of transitioning records from the CMS to the ERP, Management shall identify and update missing or incorrect information.	Summer 2023					Senior Director of Organization Effectiveness	
236	6	Requiring that the listed project manager for a contract is the actual project manager in the replacement CMS			●	Management shall implement additional measures to improve the accuracy of the project manager associated with all procurements and awarded contracts within the ERP. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
237	7	Specify required fields in the replacement CMS and require all mandatory fields to be completed			●	Implementation in Progress. The Contracts and Procurement module within the new ERP will include functionality that requires submittal of minimum mandatory information for each type of procurement or contract-related transaction. This functionality is expected to be included in Phase 1 of the ERP implementation, due for completion in Summer 2023	Summer 2023					Senior Director of Organization Effectiveness	
238	8	Providing staff certain access to the replacement CMS, based on their job duties			●	Implementation in Progress. Management shall review and update system access policies as part of transitioning from the CMS to the Contracts and Procurement module within the new ERP. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	Summer 2023 and beyond					Senior Director of Organization Effectiveness	
239	9	Ensuring that the replacement CMS can provide an audit trail for review			●	Implementation in Progress. Management shall implement all reasonable and available measures within the new ERP to provide an audit trail	TBD					Senior Director of Organization Effectiveness and Director of Business Info. and Technology Services	
240	10	For continuity and efficiency, at least more than 1 employee but preferably more than 3 should have an in-depth knowledge, training, and skill in the replacement CMS and should be able to provide reports to auditors and/or other authorized recipients			●	Management shall establish procedure guides and related resources, and train Contracts Analysts, to effectively prepare data sets, reports, etc. in the new ERP. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
241	11	If recommendation one is chosen not to be accepted and SANDAG continues to use the current CMS, auditors recommend applying recommendations 2-10 to the current CMS			●	N/A as recommendation 4.1 was accepted							
242	Finding V	MODIFICATIONS OF DETAILS IN RECORDS OF NEGOTIATION (RON)	2		●								
243	1	Creating a formal SOP and provide training on completing a RON to both project managers and contract analysts.			●	Management shall create procedures and provide training for Contracts Analysts and project managers regarding the preparation of Records of Negotiation. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
244	2	Providing negotiation training and/or guidelines to project managers and contract analysts to include reasons/intent of negotiations, best practices, and risks of not negotiating and/or not following best practices			●	Management shall create procedures and guidelines, and provide training, for Contracts Analysts and project managers regarding negotiation practices. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
245	Finding VI	INADEQUATE DOCUMENTATION FOR SOLE SOURCE TRANSACTIONS	6		●								
246	1	Providing training to staff on sole source laws, rules, regulations, and processes			●	Management shall provide training for Contracts Analysts and project managers regarding sole source transactions. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
247	2	Creating formal administrative procedures on sole source processes			●	Management shall create administrative procedures and guidelines regarding sole source transactions. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
248	3	Updating the current sole source justification template to include procurement request details such as contract/task order/amendment number, project manager name, vendor name, etc			●	Management shall revise the Sole Source Justification form to include pertinent procurement details, including contract/task order/ amendment number, project manager name, vendor name, etc. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
249	4	Reorganizing contract and sole source records in one centralized location			●	Under Consideration. As noted in response to Recommendation IV.4, Management considered migrating almost 20 years of contracts and procurement records into the CMS when the system was implemented in 2018/2019. Due to prohibitive costs and resource requirements relative to the benefits expected to be derived, Management decided not to proceed with this action. Management will revisit this decision as part of establishing a new records management system within the ERP.	TBD					Senior Director of Organization Effectiveness	
250	5	Updating CMS to have accurate information.			●	Implementation in Progress. As part of transitioning records from the CMS to the ERP, Management shall identify and update missing or incorrect information.	Summer 2023					Senior Director of Organization Effectiveness	
251	6	Ensuring required documents are saved as separate files and labeled accordingly, such as saving a sole source justification form as such			●	Already Implemented. Practices consistent with this recommendation have been established for Contracts and Procurement Analysts when naming and saving documents to the CMS and are currently in use. Similar practices will be implemented for record-saving within the ERP.							
252	Finding VII	MATERIAL WEAKNESSES WITH THE IDENTIFICATION OF ON-CALL AND SOLE SOURCE CONTRACTS AND AMENDMENTS	8		●								
253	1	Revising the on-call process to ensure fairness and equity throughout the entire process			●	Management shall review and evaluate existing processes used by SANDAG for the procurement of on-call services relative to best practices recommended by federal and state funding agencies, industry experts, and other public agencies with contracts and procurement programs that are similar in nature to SANDAG's program. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Senior Director of Organization Effectiveness and Director of Contracts and Procurement Services	
254	2	Providing training on procurement planning to include the steps and timeline needed to prepare for various sized and timed projects to contract analysts, project managers and any approving staff			●	Management shall provide training for Contracts Analysts, project managers, and Executives regarding procurement planning. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
255	3	Ensuring sufficient procurement planning efforts are being made to avoid sole sources and amendments			●	Management shall establish new processes that regularly engage Directors and department managers in the identification and prioritization of upcoming contract needs to support comprehensive and effective procurement planning activities. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	

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256	4	Reviewing the sole source policies, processes, and procedures to ensure a clear understanding of allowed sole sources, limitations around sole sources, and the review and approval requirements of sole sources			●	Management shall review policies and procedures to ensure there is clarity and understanding regarding sole source transactions. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
257	5	Creating sole source SOPs for all levels of the approval process.			●	Management shall develop procedures and guidelines to support approval of sole source transactions. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
258	6	Creating and providing training related to sole sources to include examples of allowable/approvable situations when a sole source is or can be justified and an explanation and examples of when poor planning does not suffice in requesting a sole source procurement			●	Management shall provide training for Contracts Analysts and project managers regarding sole source transactions to include the noted content. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
259	7	Ensuring that on-call procurements are being appropriately advertised to reach sufficient, qualified and a variety of contractors and subcontractors, including outreach efforts using public platforms and attendance of outreach events to attract new and disadvantaged contractors and subcontractors			●	Management shall review and evaluate current outreach and advertising efforts pertaining to contracting opportunities and identify areas for improvement. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Director of Contracts and Procurement Services	
260	8	Revising the Procurement Manual to avoid conflicting language, particularly with the contract management of A&E contracts and allowance of sole sources.			●	Management shall review and revise the SANDAG Procurement Manual to eliminate any conflicting language pertaining to administration of A&E contracts. This recommendation shall be completed in conjunction with Action Item I.3. This effort will fall under the Procurement Program Optimization Initiative. Timing for completion is currently unknown.	TBD					Senior Director of Organization Effectiveness and Director of Contracts and Procurement Services	
261	October 2021	Yes	Operational – Process and System Control Review of Vendors	11	●								
262	Finding 1		SANDAG's Segregation of Duties Matrix is Outdated and Ineffective	2	●								
263	1	SANDAG should review and update its segregation of duties matrix so it adheres to SANDAG Board Policy 41, the State Controller's Office's Internal Control Guidelines, and other best practices. The OIPA encourages that SANDAG seek guidance from the OIPA when designing the new segregation of duties matrix to ensure compliance with SANDAG Board Policy 41.		1	●	Management has been performing annual review of internal control measures as part of the financial audit requirement. However, due to staffing constraints, perfect segregation of duties in certain areas could not be obtained. Management has established segregation controls as the resources permit, as well as put in place mitigating controls to minimize any potential risks. Management will seek guidance from OIPA to further improve on internal controls update: An Accountant I was hired in October 2021 to perform new vendor setups as part of her job duties. In an effort to separate and segregate operational duties within the Accounting Department, an Associate Accountant was designated to verify and validate vendor information entered by Accountant I.	October 2021	End of November 2021				Leeanne Wallace	Finance
264	2	SANDAG should implement controls to ensure that staff adhere to the updated segregation of duties matrix.		1	●	The department has been understaffed in some critical functions for a long time. Some staff members have been performing multiple functions and responsibilities and overworked. With the constraint in obtaining additional resources, in the past, segregation of duties was sometimes compromised to meet operational and business needs. Management was aware of the issue and obtained approval to add a new position to support the vendor set up process. The position was filled recently, and the person will be starting in midOctober 2021. This person will be trained on Vendor Set up process and will perform the vendor setup duties. Another designated staff will be verifying, and validating vendor information entered in the system to ensure accuracy and approving it for use. Management will perform periodic reviews of internal control measures including segregation duty matrix. Management is in the process of evaluating current department structure to ensure it properly supports internal controls and operation efficiency. update: An Accountant I was hired in October 2021 to perform new vendor setups as part of her job duties. In an effort to separate and segregate operational duties within the Accounting Department, an Associate Accountant was designated to verify and validate vendor information entered by Accountant I.	October 2021	End of November 2021				Leeanne Wallace	Finance
265	Finding 2		The Vendor Database Is Incomplete, Inaccurate and Lacks Quality Controls	8	●								
266	1	1. Review all vendors and classify them as active or inactive, and label them as such.		1	●	1. A thorough review and update if needed of the vendor database including active and inactive status, any missing or duplicate information will be conducted when the newly designated staff is on board. Update: To be completed when ERP is live		End of December 2021	When ERP goes Live			Leeanne Wallace	Finance
267	2	2. Replace or update the current vendor management software to prevent creating duplicate vendors.		1	●	2. Vendor management software is a module of the current accounting system which will be replaced when SANDAG starts the new ERP system implementation anticipated by the beginning of the calendar year 2022. Finance will work with system implementation team to make sure accurate vendor data is installed into the new system. Update: To be completed when ERP is live		End of December 2021	When ERP goes Live			Leeanne Wallace	Finance
268	3	3. Standardize naming conventions to avoid near duplicate vendors, such as "U S Postal Service" and "United States Postal Service".		1	●	3. The vendor naming conventions will be further reviewed in the new ERP system implementation process to prevent potential duplications. Update: To be completed when ERP is live		End of December 2021	When ERP goes Live			Leeanne Wallace	Finance
269	4	4. Add the missing information such as the Taxpayer Identification Numbers and addresses for existing and active vendors.		1	●	4. See list # 1 Update: To be completed when ERP is live		End of December 2021	When ERP goes Live			Leeanne Wallace	Finance
270	5	5. Reconcile the vendor list to ensure that incomplete, inaccurate, or duplicated vendors are removed from the vendor list.		1	●	5. See list # 1 Update: To be completed when ERP is live		End of December 2021	When ERP goes Live			Leeanne Wallace	Finance
271	6	6. Consider hiring additional staff to ensure ease of staff multiple job duties.		1	●	6. Management is evaluating staffing structure for internal control support and will seek additional resources as needed. Update: To be completed when ERP is live		End of December 2021	When ERP goes Live			Leeanne Wallace	Finance
272	7	7. Ensure that only entities conforming to SANDAG's definition of a vendor are included in the vendor list.		1	●	7. See list # 1 Update: To be completed when ERP is live		End of December 2021	When ERP goes Live			Leeanne Wallace	Finance
273	8	8. Provide training to staff for managing the database to ensure consistency in entering vendor information.		1	●	8. Vendor process and data management training will be provided to staff. Update: To be completed when ERP is live		End of December 2021	When ERP goes Live			Leeanne Wallace	Finance
274	Finding 3		Accounts Payable Summations Do Not Have Enough Room To Fully Display Totals Of \$1 Billion Or More	1	●								

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275	1	The OIPA recommends SANDAG either update or replace the current accounting software so that the totals can be fully displayed in the vendors AP ledger.		1		Current system report has limitations embedded in displaying the summations of \$1 billion or more in PDF file format. Please note the data source stored in the financial system is reliable and when the data was converted into an excel file format, the summations are displayed correctly. Our current software in version 16.2 has been outdated, and the software provider ended their technical enhancement support on March 31, 2021, and no longer provides fixes after the date passed. We can still receive the functional support from the same provider through March 31, 2023, with access to the support desk and self-service portal. There was a business decision made not to proceed with the current software upgrade to 19.2 and will remain on 16.2. Therefore, the reporting deficiency cannot be resolved with the current software. Management is focusing on replacing the current accounting software with a new ERP solution. The ERP project implementation is managed by our IT Department.		By new ERP system implementation completion date (Financial/Budget)				Leeanna Wallace	Finance
276		Progress Report of Outstanding Recommendations											
277		Total Recommendations	201										
278		Passed Planned Implementation Date	1										
279		Recommendations In Progress for this audit/issue	152										
280		Recommendations Implemented or No Recommendations given for this audit/issue	34										
281		Recommendations Not Implemented or No Action Proposed for this audit/issue	14										
282													
283													
284	+	FULLY IMPLEMENTED REPORTS	COUNT OF RECOMMENDATIONS	118									
513													
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