



**Orange County Sheriff Department
Contract Compliance Review and Strategic Procurement Assessment**

FINAL REPORT

November 4, 2022

Brian Smith, Consultant, NIGP-CPP, CPPO

**Marcheta E. Gillespie, FNIGP, CPPO, NIGP-CPP, CPM, CPPB, C.P.M.
Senior Consultant**

TABLE OF CONTENTS

I.	EXECUTIVE SUMMARY	3
II.	INTRODUCTION.....	6
III.	METHODOLOGY AND APPROACH	8
IV.	ENTITY OVERVIEW	9
V.	PROJECT SCOPE OF WORK AREAS	10
	A. PROCUREMENT POLICY AND PROCESS ASSESSMENT.....	10
	B. ORGANIZATIONAL AND STAFFING ASSESSMENT.....	17
	C. CUSTOMER SERVICES ASSESSMENT	25
	D. CONTRACT FILE REVIEW	26
VI.	CONCLUSION	33
VII.	APPENDICES	
	Appendix A: Summary of Recommendations	35
	Appendix B: On-Site Stakeholder Interviewees	42
	Appendix C: Contract File Review.....	43
	Appendix D: Summary of Retroactive Contracts.....	44

I. EXECUTIVE SUMMARY

The County of Orange (“County”) contracted with NIGP Consulting to perform a contract compliance review and strategic procurement assessment (“Assessment”) of Orange County Sheriff’s Department (OCSD). The results of the Assessment are presented in this final report (“Report”). NIGP Consulting has previously conducted a similar Assessment for Orange County’s Central Procurement Office (“CPO”), Public Works (“OCPW”) and Community Resources (“OCCR”). Given the CPO’s responsibility for the Contract Policy Manual (“CPM”) and broad oversight over the procurement function at County, there are several recommendations in this OCSD Report that are also found in the CPO Report, as well as a number of consistent recommendations in the previous OCPW and OCCR reports.

The purpose of the Assessment was to conduct a high-level assessment of the current state of the OCSD procurement function, led by the OCSD Purchasing Manager and team of Deputy Purchasing Agents (“DPA”). The OCSD Purchasing Team serves as the decentralized procurement support function in OCSD with direct report to the Director of Financial and Administration Services (“Director”) and under the command of the Executive Director of Administrative Services (“Executive Director”) and ultimately the OC Sheriff. The Assessment further considers how effectively and efficiently OCSD collaborates with other OCSD functions, to include sworn staff. The Assessment considers the procurement practices of the decentralized department, particularly in relation to consistent adherence to the County Procurement Manual (“CPM”) and the 2021 Procurement Procedures Manual (“PPM”). The Assessment focuses on identifying any disruptions to critical County operations, work arounds, and areas of potential risk for County.

The Assessment addresses the effectiveness of the OCSD procurement function as it relates to compliance with procurement policies and procedures. The Assessment identifies impediments in the procurement function and provides recommendations for increased efficiency, as well as alignment with industry best practices. The Report addresses the key components of the Assessment, which includes:

- Procurement Policy and Process
- Organization and Staffing
- Customer Service Level
- Procurement Contract File Review

The Assessment was conducted by two NIGP consultants (“Review Team”). The Review Team consisted of Senior Consultant Marcheta Gillespie, FNIGP, NIGP-CPP, CPPO, CPPB, C.P.M, CPM and Consultant Brian Smith, NIGP-CPP, CPPO. The Review Team represents over 65 years of collective public procurement expertise from highly engaged thought leaders in the profession.

The Review Team conducted the Assessment using NIGP’s four phase methodology:

- 1) Preparation: County and CPO written policies, procedures and underlying procurement regulations are reviewed, in addition to State of California regulations applicable to CA counties.
- 2) On-site Data Collection and File Review: On-site file reviews are conducted, as well as virtual interviews of OCSD DPAs and OCSD staff (“customers”) involved in the procurement function.
- 3) Analysis: Information provided by CPO and OCSD staff, gathered thru staff interviews, and available thru industry information are analyzed to identify opportunities for improvement, to align with industry best practices.
- 4) Report Generation: A draft report is developed for review and input by OCSD, CEO and CPO staff, resulting in the provision of the final Report.

In addition to providing a summary of the analysis for each Assessment category, the Report also includes supporting details reflected as appendices. The following appendices are included with this Report:

- Appendix A: Summary of Recommendations
- Appendix B: On-Site Stakeholder Interviewees
- Appendix C: Individual Contract File Reviews
- Appendix D: Summary of Retroactive Contracts

OCSD staff were supportive during the review and open to discussing challenges and opportunities for improvement. The Purchasing Manager and Assistant Purchasing Manager were particularly valuable to the Review Team throughout this Assessment. The OCSD Purchasing Team assisted in collecting information, providing names and contact information for virtual interviews, providing access and clarification on contract files, and providing general support to the Review Team.

In general, the OCSD Purchasing Team operates in a supportive environment. The Team is striving to meet the needs of their customers; however, they are challenged by continuous vacancies, continued impacts of COVID 19, a lack of expertise due to large numbers of newer staff and various inefficiencies which present disruptions to OC operations, and increase risk to the entity. These present opportunities for OCSD, CPO and OC to improve procurement operations.

There are several themes observed at OCSD, which have been consistent with themes recognized in previous Assessments of other departments. Those include:

- Customers view DPAs as a valuable resource and depend upon them to interpret the CPM and provide guidance on sourcing needs.
- DPAs are struggling to meet customer needs due to vacancies and high turnover in positions.
- DPAs have good support from CPO leadership, who provide oversight, support in resolving larger procurement issues, guidance on policy and procedures, and who provide extensive training.
- Opportunities exist throughout the procurement function to increase accountability, efficiency, competition, service, value and transparency.
- Improvements are needed in communication.
- A procurement transformation initiative would create tremendous value for OCSD, its staff, and the sustainability of its business operations.

In addition to the above, some of the more unique themes observed at OCSD include:

- OCSD Purchasing has had longstanding challenges with staffing levels, and by extension, sufficient experienced and knowledgeable staff due to constant staff turnover.
- DPAs and customers need increased training to better understand the purpose of their role, to clarify roles and responsibilities, to reduce errors, to decrease retroactive purchases and to increase efficiencies and value of service delivery.
- Inconsistencies in staff actions and decisions lead to errors, increased risk, increased processing times and staff frustration/confusion.
- OCSD has numerous challenges related to supplier engagement, leading to lengthy contracting timelines, repeat solicitations, lack of/absence of supplier responses to solicitations and challenges meeting customer needs.
- Significant issues in the staff and organizational structure of DPA positions create challenges with recruiting, onboarding, developing and retaining professional staff, including perpetuating high turnover rates in the procurement function.

Conclusion

Purchasing staff at OCSD have expressed appreciation for their procurement leadership and enjoy a positive work environment. However, they struggle with the lack of resources to effectively and consistently perform their duties at a level required for the department. Staff must be equipped for the type of change advocated for in this Report, in order for the change to be effective and longstanding. For front-line managers to be most effective in driving change, they must know that they are empowered and supported by CPO and County leadership. This will drive positive results thru greater consistency, improved levels of service, increased effectiveness, and a higher degree of staff professionalism.

OCSD Purchasing is supported by their leadership, and by the Executive Director and Financial Services Director. Further, the CPO is actively pursuing transformation of procurement across the entity. The Review Team believes this support, coupled with the procurement transformation initiative, is critical to the success of OCSD and the entity overall. The goal of this Assessment is to support OCSD and OC to standardize procurement, reduce risk, increase efficiency and elevate the level of service to customers throughout the entity. However, to be most effective, these changes require strong centralized leadership not only from the CPO, but a strong partnership with all department leaders.

The Review Team has offered recommendations that it believes are reasonable and achievable. Recommendations target opportunities to increase competition, efficiency, staff development, and the level of service to the customers of OCSD procurement. Further, the recommendations bring OCSD into alignment with the practices and expectations of the CPO, creating a level of standardization and compliance.

As has been noted in previous project assessments, the implementation of recommendations will have different owners, perhaps multiple owners. Dependent upon the approach deemed most appropriate and effective by the OC, some recommendations may be more appropriately delegated to the CPO for implementation. Given the CPO's central oversight role for procurement at OC, it would be reasonable for them to take ownership of recommendations that have broader implications, as well as benefits, for other departments in the OC. While recommendations were provided based upon observation of the OCSD (based upon this specific engagement), the Review Team supports a strategic approach of allocating ownership wherever within the OC each recommendation's implementation will bring greatest value, consistency and oversight. It is further recognized that, since the start of this project engagement, some actions within OC may have impact on recommendations in this Report, potentially negating further action on a given recommendation. Where possible, the Review Team has noted actions already taken by the CPO or OCSD.

The OCSD team view their work environment as positive, in spite of being challenged by a number of vacancies. They view their leadership as trustworthy, supportive and having genuine care for the teams' well-being. The Review Team's interactions with the staff, the leadership and the customers were positive, and the Review Team found all staff to be committed to providing value for the entity and the community. The Review Team is confident that the team at OCSD is fully capable of analyzing the recommendations in the Report and implementing those changes best suited for the department and the entity. How effective OCSD is in the pursuit of procurement transformation will depend greatly upon strong leadership, collaboration, and a clearly defined vision.

II. INTRODUCTION

The Review Team brings a breadth and depth of procurement expertise necessary to execute scope of the Assessment. Mr. Brian R. Smith, NIGP-CPP, CPPO, PMP, has more than 35 years of Public Procurement experience, and has served as Multnomah County, Oregon's Purchasing Manager for the past 15 years. At Multnomah County, he built and fosters a nationally recognized procurement organization that supports \$1.2B in annual spend. He received the NIGP Distinguished Service Award in 2022 and was NIGP's 2013 Professional Manager of the Year. He also served seven years as an NIGP Chapter Ambassador, supporting the establishment of the Ambassador Program as Chair during its initial two years. Mr. Smith is active as a trainer and consultant and leads several public procurement legislative reform initiatives.

Marcheta Gillespie, FNIGP, CPPO, NIGP-CPP, C.P.M., CPPB, CPM, has over 30 years of experience in public sector procurement and executive leadership. She retired as the City of Tucson's Chief Procurement Officer, having led a nationally recognized strategic procurement operation with over 50 professional staff, multiple program areas and an annual procurement spend of over \$400M. Marcheta is an industry consultant, instructor, and leader in the public procurement community. Marcheta assisted in the development of the Principles and Practices of Public Procurement. She has served extensively in leadership positions in the industry, including as President and 10-year board member for NIGP - The Institute for Governmental Procurement, as well as Chair of the Universal Public Procurement Certification Council. Ms. Gillespie has completed consulting engagements for cities, counties, universities, airports, special districts and state agencies throughout the United States. Marcheta has been inducted as a Fellow of the Institute by NIGP (the Institute's highest honor), receiving the 2019 Albert H Hall Award, as well as receiving the NIGP Distinguished Service Award.

Utilizing their extensive public procurement experience and overall professional knowledge, the Review Team directed the strategies and approach of this Assessment. The Review Team conducted virtual interviews of a cross-section of OCSD staff, analyzed provided documentation and researched applicable procurement policy and procedure. An on-site review was conducted for the contract audit.

Components of the Assessment included:

- Review of applicable state and local ordinances, statutes, legislation, policies, and administrative manuals
- Review of current procurement processes, procedures and cycle times for: a) Identification of needs for goods and services; b) Specifications of identified needs for goods and services to be procured; c) Requisitions for purchases; d) Solicitations (sourcing methods); e) Evaluation of solicitations; f) Award of solicitations; g) Contract administration; and h) Record keeping
- Identify potential process efficiency opportunities and deviations from procurement best practices
- High level assessment of Procurement Staff Authority
- High level assessment of DPA understanding of and accountability to policy
- Review of 20 contracts, including small dollar purchases and formal procurements.

Under the previous Assessment of the CPO, the Review Team conducted a detailed review of the CPM and various applicable state and local regulations. The foundation of those reviews informs various recommendations and observations under this Assessment. Further, proposed changes in this Assessment are in alignment with the same public procurement industry standards which guided the CPO Assessment and OCCR Assessment. A summary of all recommendations for OCSD opportunities in the various scope areas is provided as Appendix A. The list of OCSD staff members interviewed is provided as Appendix B.

Appendix C is the detailed reviews of the twenty (20) randomly selected contract files for goods and services in all OCSD divisions. Appendix D provides details of the Retroactive purchases analysis.

III. METHODOLOGY AND APPROACH

NIGP Consulting has a proven methodology used to conduct procurement consulting engagements. The methodology, in use since 1995, provides consistency and thoroughness for each unique project. Each of the four project phases are critical to fully assessing the entity and preparing a final report with appropriate recommendations specific to that entity.

A. Preparation

As part of the preparation phase of the engagement, the Review Team requested OCSD provide information in each of the designated areas of the scope. The Review Team was previously informed through the CPO project as to State of California codes, statutes, and regulations. The Review Team worked closely with OCSD staff to compile the stakeholder list for the DPA and end user interviews and to review the interview questions in advance. Supplemental to documentation previously acquired through the CPO, OCSD provided additional information specific to the OCSD operation. These documents included department org charts, job descriptions, reports and related data.

B. On-site and Off-site Data Collection

The on-site contract audit was conducted April 18-25, 2022. Virtual staff and end user interviews were conducted over several weeks to accommodate schedules and conflicts. Interviews were held with 30 DPAs and customers responsible for their own contracting in the various OCSD divisions. Interviews provided an opportunity to learn about stakeholders' needs, what they felt was working well and where they experienced challenges or had concerns with the procurement function.

The Review Team requested a report of all procurements conducted by OCSD to randomly select 20 contracts in goods and services. Numerous discussions were held to ensure the Review Team had a clear understanding of the documents being reviewed, the applicable policies and the practices employed throughout the sourcing process.

C. Analysis

The Review Team analyzed all collected information including the 2017, 2018, 2019 and 2021 CPMs applicable to the specific contract files being audited. The 2021 CPM formed the basis for the assessment of current state processes and practices. The Report provides recommendations reflective of best practices in the public procurement industry. These recommendations support strategic objectives for managing an effective procurement operation, focused on simplifying and streamlining processes and increasing the levels of open competition and transparency.

D. Report Generation

The Report provides the results of the Assessment and provides findings and subsequent recommendations, offered as opportunities for enhancing procurement. A draft report was reviewed by OCSD prior to issuance of the final report. The review of the draft report provided OCSD an opportunity to identify any errors, offer clarifications and ensure the Report incorporated all areas of expectation based upon the contractual agreement. All input from OCSD on the draft report was considered by the Review Team prior to issuing this Report.

IV. ENTITY OVERVIEW

OC has a decentralized procurement structure, with DPA positions allocated throughout the entity, reporting to directors of the applicable departments. DPAs are responsible for providing procurement services to their respective customer departments, in compliance with the policies and under the oversight of the CPO. In OCSD, the procurement function reports to the Director of the Financial Services Division, under the command of both the Executive Director of Financial Services and ultimately the OC Sheriff.

The OCSD Strategic Plan of 2021/2022 ([OCSD%20Strategic%20Plan%202021-2022%20&%20Mission%20Statement](#)) contains four Pillars of Focus, three of which create connectivity for the procurement function: Service & Innovation, Accountability and Efficiency, Workforce Development. While the OCSD Purchasing Team supports the entire department across all program areas, these focus points create opportunities for ongoing improvement and increased service to the department. Further, the Core Values of OCSD create further connectivity to three of the six core values of public procurement: Integrity (Ethics), Service and Professionalism. In combination with Accountability, Impartiality and Transparency, these values drive the overall and day to day function of procurement within the public sector.

OCSD Purchasing facilitates and manages approximately \$139M in procurement spend annually for the department. These acquisitions include a broad variety of goods and services, such as food services for the Jail, boats for Harbor Patrol, vet services for Patrol, helicopters for Air Support, and X ray equipment for the Coroner. To effectively support this broad range of needs, OCSD Purchasing works closely with customers in all areas of the department.

It's important for a procurement staff to understand how they fit within the entity structure, in regard to both relationships with the various stakeholders, but also in terms of how the function supports the broader mission of the entity. As a decentralized procurement function, OCSD Purchasing must appreciate their role in the context of both OCSD but also in relation to their accountability to the CPO. There must also be clarity in their understanding of leadership's expectations as well as a sense of the level of support provided by those upline in the organizational structure.

The Executive Director views procurement as critical service providers to OCSD, who must be focused on meeting internal client needs, while keeping clients informed and focusing on creating efficiencies. While the Executive Director feels procurement services are doing well overall, there is a recognition that numerous challenges are creating obstacles to optimum performance. These include staffing challenges, supply chain disruptions, operational inefficiencies and a lack of clarity in procurements role throughout the entity. The Executive Director is committed to supporting the procurement function, filling staff vacancies and advancing appropriate recommendations from the Assessment.

Equally, the Director and Deputy Director of Financial Services are advocates for the procurement function and the value it provides to OCSD. Both feel the overall feedback from peers is that Purchasing has improved from previous years. Similar to the expectations of the Executive Director, the Directors are committed to excellent customer service and increasing effective operations.

Finally, it is recognized that the nature of a public safety department is dealing with the public safety, health and welfare, thus their needs are often sensitive and urgent. It is not unusual in a public safety structure to see frequent rotating and transitioning of leadership. This presents challenges of loss of experience in each area of business, often having an impact on the procurement function. These conditions can lead to increased exceptions and impacts to the procurement process.

V. PROJECT SCOPE OF WORK AREAS

The scope of the Assessment covers four key areas of procurement:

- Procurement Policy and Process
- Organization and Staff
- Customer Service Level
- Procurement Contract File Review

Each area is described in its current state, followed by an overview of industry global best practices (where applicable), and a listing of recommendations for increased alignment to those global best practices. Recommendations are intended to address the challenges that exist in the current state, striving to advance the entity toward an improved future state. Recommendations are presented in consideration of what is reasonable and in the best interest of OCSD and OC.

A. PROCUREMENT POLICY AND PROCESS REVIEW

Through documentation reviews, policy research, organizational overview and interviews of stakeholders, the Review Team was able to analyze the overall procurement strategy and practices at OCSD. As a public safety function, the high profile, sensitive and often urgent needs of OCSD present heightened challenges for the procurement function. OCSD also possess a very diverse range of goods and service's needs. The department has a centralized procurement function, with all DPAs reporting to the Purchasing Manager (Admin Manager II). While the CPO is responsible for procurement oversight throughout OC, OCSD is accountable for authorizing designated staff for specific responsibilities within the procurement function. DPAs and designated customers are responsible for executing the purchasing and contracting responsibilities for OCSD. This includes compliance with the CPM, ensuring sufficient resourcing for the function, and delineation of the roles and responsibilities of staff.

Through the previous CPO Assessment, a thorough analysis of policies was conducted in comparison to the ABA Model Procurement Code and various applicable state regulations. For the OCSD Assessment, the Review Team focused on the current state of the department's ability to comply with applicable policies and to manage the various processes necessary to execute their responsibilities. The Assessment considered the following:

- Review of applicable state and local ordinances, statutes, legislation, policies, and administrative manuals.
- Review of current procurement processes, procedures and cycle times
- Identification of potential process efficiency opportunities and deviations from procurement best practices.
- High level assessment of Procurement Staff Authority.
- High level assessment of DPA understanding of and accountability to policy.

1. Current State

Procurement responsibility is primarily centralized to the OCSD Purchasing Team, led by the Purchasing Manager. Customers in OCSD have a fairly broad range of procurement-related responsibilities, from directly managing sourcing activities to providing specifications to the OCSD Purchasing Team. OCSD is required to comply with both the CPM and the DCPM for their purchase needs in goods, services, design and construction.

Through the interviews, documentation analysis and contract file audits, OCSD was found

generally compliant with the CPM, however, various inconsistencies and challenges were observed (as noted throughout the Report). OCSD offers staff training on the CPM and procurement policy through CPO-provided training. Some training is also provided by OCSD Purchasing management, although the approach is inconsistent and not all staff are equitably trained. This introduces variations in how procurements are managed as well as a lack of understanding by staff on the purpose of various procurement practices.

In 2021, the CPO published and distributed a Procurement Procedures Manual (“PPM”) to the entire DPA community through their monthly meetings and announcements. Additionally, in support of CPO, the OCSD Procurement Manager addressed the release of the PPM in his OCSD Purchasing All-Staff meeting. A PPM draft was provided to staff in May for input and feedback.

While OCSD Procurement management was familiar with the PPM and took steps to provide opportunity to staff to provide input in the draft and also addressed the PPM in a staff meeting, during the interviews none of the staff expressed familiarity or knowledge of the PPM. Further, when interviewing OCSD customers, they were also not aware of the PPM.

While OCSD management shared that staff was informed of the PPM, the actions taken do not seem to have resonated with the staff, and no clear actions were evident with the customers. This suggests a level of disconnect between the various stakeholder groups: OCSD Purchasing Team, OCSD procurement management, OCSD customers and the CPO. It is possible that, while information was shared, the recipients did not connect the purpose and value of the PPM, nor how it should be leveraged on a regular basis in their roles and responsibilities. After hearing a number of the concerns of customers and the Purchasing Team, the implication of this disconnect is seen as fairly significant to the issues presented in this Report.

The Assessment identified impediments and inefficiencies in several key areas of procurement practices at OCSD:

- Strategy and Planning
- Procedures
- Communications
- Time Management
- Sourcing
- Standardization
- Relationship Management

The following observations were noted in each of these key areas:

Strategy and Planning

- Limited procurement sourcing strategy which leads to difficulties in effectively planning for resources
- Lack of category management strategy, whereby staff are aligned with specific spend categories, and lack of category spend analysis for better sourcing decisions
- Lack of consistency in DPA and customer roles and responsibilities throughout OCSD

Procedures

- Customers feel lack of opportunity to provide input into procurement policies and procedures
- County Council (“CoCo”) interpretations of CPM and DCPM vary across the entity
- Customers feel contract renewals are time consuming and take a lot of staff resources

Communication

- Customers feel pressured to accept “low bid” and that DPAs are not consistently providing guidance on concerns customers have over quality and service
- DPAs have limited interaction with customers to discuss upcoming needs
- Lack of communication to customer when there are lengthy delays in processing requisitions or purchase orders
- OCE not updated on a consistent and regular basis to share information with customers on delays or issues

Time Management

- Lack of entity processing standards for sourcing processes leading to inconsistent expectations of customers and inconsistent guidance from DPAs
- Poor time management by customers causing pressures on DPAs to “scramble”, particularly given the sensitive nature of many OCSD purchases
- Purchasing Team issuance of Contract Renewal Forms intended to address time management, however, does not allow for sufficient experience with contractor in first 3 months of contract service
- Delays in assigning requisitions to staff once received in Purchasing (customer frustration and impact to service needs of customers)
- Delays in paying contractors impacting supplier community willingness to engage in sourcing opportunities (occasions where contractors not paid for months after invoice submission); contractors “giving up” on doing business with County.
- Lengthy processing times for purchases, both formal and informal

Sourcing

- Lack of scope of work/specification development templates and standards, customers struggle to create SOW/specs leading to reuse and reliance on old and outdated bids/rfps
- Lack of guidance and reasonable solutions for addressing urgent (but not emergency) purchases (customers then leveraging Retroactive process as urgent becomes an emergency due to sourcing process timelines)
- Lack of dialogue between Purchasing and customers on development of scopes/specifications for clarity, additional information, removal of competitive barriers, understanding of how to address quality concerns
- Limitations of CalCard use creating burdens on customers for unique purchase needs (“opportunity buy” of food items for Jail) that may not be conducive to traditional sourcing processes and hinder opportunities for more immediate payment to suppliers (potentially encouraging greater engagement by small/DEI businesses)
- CalCard processes are manual and labor intensive
- Purchasing not always open to engaging CoCo for contract dispute discussions
- For purchases requiring two quotes whereby a second source is not available and whereby a supplier chooses not to submit, Purchasing not providing alternative solutions beyond requiring a formal solicitation process (customers’ needs may be very unique, specialized or constrained in the supply chain, so there may be only one provider).
- There is a perception by numerous customers that Purchasing leadership are not always supportive of cooperative contracts, and do not consistently provide clarification as to the reason a cooperative option is not desirable.
- Customers and DPAs continue to struggle with significant supply chain issues including limited responses (challenges of a single response to a solicitation from a lesser quality supplier or product) or challenges locating back up suppliers when others can’t perform or deliver
- Suppliers not committing to prices for terms requested by OCSD, resulting in limited

competition (ex: used to have 8 suppliers competing on a product, now only receiving one response) and potential rebid requirement by DPAs

Standardization

- Lack of standardized roles and responsibilities for DPAs and customers leading to inconsistencies, errors, confusion and delays
- Lack of detailed procurement procedures leading to increased risk of compromising the integrity of the procurement process, inconsistencies, waste and uninformed decision making.
- Customers duplicating efforts to track data through creation of individual division spreadsheets leading to duplication of effort, increased risk of errors and impact to staff resources
- Lack of entity-wide standard contracts across all departments, each department appears to create their own
- Lack of clarity in CPM on Price Increase Form (form doesn't match policy) creating confusion for customers

Relationship Management (Internal and External Customers)

- Customers experience inconsistency in how/if DPAs handle low ratings on Vendor Performance Evaluations (“VPE”) (customers expressed frustration in having to deal with poor quality providers who were previously given low rating)
- Customers not recognizing value from completing VPEs only 3 months into contract performance
- Customers don't experience timely action from some DPAs when addressing issues identified in VPE
- Ineffective supplier relationship management creating barriers to open competition, such as inflexibilities in adjusting sourcing requirements, extensive negotiations for lower risk purchases, lack of alignment between insurance requirements and level of risk for a specific purchase, lack of incentives to engage by DEI businesses, absence of identifying new ways of doing business in a limited supply market
- DPAs provide information from CPM and process requirements, but customers do not view them as guiding and advising them on how to meet the customers' needs; customers often don't experience Purchasing trying to understand their needs/issues, but rather just giving them steps to follow or forms to complete
- Customers struggling with supplier management and contract administration issues; do not see Purchasing as providing them support in this area

2. Best Practices

Absent a specific policy or procedure that is required of the County due to the use of state or federal-funding source regulations, procurement practices should be guided by the Public Procurement Values and Guiding Principles¹ and Global Best Practices². These industry standards establish that procurement should have a strategic approach to how it will meet the needs of the entity it serves. Rather than reactively addressing needs, a strategic procurement function aligns with the goals and objectives of the entity in each of the defined areas. As opposed to a tactically driven procurement function (one that reacts to activity in the environment), a strategic procurement function focuses on the correlation between procurement services and the clients served. Through proper alignment, the entity can better set expectations, ensure needs are properly met, and align resources toward a common vision.

¹ Values and Guiding Principles of Public Procurement, NIGP, <https://www.nigp.org/our-profession/values-and-guiding-principles-of-public-procurement>

² Global Best Practices, NIGP, <https://www.nigp.org/our-profession/global-best-practices#strategy>

There are numerous Global Best Practices available that serve as standards for procurement professionals throughout the sourcing and contract administration process. These include practices such as:

- Strategic Procurement Planning
- Invitation for Bids
- Request for Proposals
- Distinguishing Between Scope of Work and Statement of Work
- Contract Administration
- Supplier Relationship Management

3. Recommendations:

OCSD Purchasing is encouraged to develop a Strategic Procurement Plan, specific not only to the overall procurement function, but which also speaks to meeting the planned procurement needs of the department on an annual basis. This is particularly important for the significant workload on a reduced Purchasing Team. This plan should incorporate the specific annual goals of the CPO, goals specific to OCSD, objectives related to specific OCSD projects, as well as the planned approach to all sourcing needs of the department.

In consideration of the input from OCSD Purchasing and customers interviews, as well as the Review Team observations, the following recommendations are offered for the key areas of procurement practices.

Strategy and Planning

- Create a Procurement Sourcing Plan annually for customer needs (recommend connecting to Budget process), including discussions with customers and Purchasing Team. Meet regularly with OCSD leadership to discuss plan updates and share information with Purchasing Team.
- Encourage Purchasing Team to meet in advance with customers about upcoming needs prior to requisition process, to identify ways that Purchasing can add value (discussing solutions, options, efficiencies and to educate Purchasing on customer need)
- Implement a spend and category management program. This involves analyzing categories of spend and analysis of how current workload is assigned. This should be further vetted throughout the department, such that staff are not limited to assignment of a given division, but rather are assigned based upon categories of similar spend in goods and services to the extent that is reasonable. Category managers should be trained in strategic spend analysis to assist in identifying opportunities to leverage new contract opportunities, as well as analyzing past spending practices for modification to drive savings and efficiencies.
- Educate Purchasing Team on spend management, identify data desired from spend analytics and strategize on decision making process for leveraging spend data for improved sourcing decisions (including identifying new contracts needed for OCSD customers, opportunities to merge contracts, opportunities to leverage cooperative opportunities)

Procedures

- Map current-state OCSD sourcing processes (for internal and external facing processes) to identify non-value-added steps, inefficiencies, decision points, data input/output, documents, approvals and pain points. Use current-state maps to identify future-state OCSD opportunities and implement new OCSD processes. Engage customers and suppliers in process mapping.
- Establish strategy, templates and standard approach for price negotiations; provide training to Purchasing Team and customers
- Coordinate with CPO to identify specific areas where OCSD is challenged with County Council (“CoCo”) interpreting CPM and DCPM differently within OCSD as well as across other departments

- Coordinate a discussion with key customers to discuss the Contract Renewal process to identify opportunities for adjustment that will enable standards and expectations for how responses will be managed, as well as identify opportunities for efficiencies
 - Modify policy on retroactives to allow for increased authority by DPA Managers as well as increased delegated authority for DPAs and Directors (Note: *Recommendation of Purchasing Manager to address issues with Sheriff/Directors having to deal with \$500 purchases*)
 - CalCard: Conduct meetings with OCSD stakeholders, Finance and CPO to discuss opportunities for improved CalCard use. Possible topics to include (based upon customer and DPA feedback):
 - Increased use of CalCard for key purchase opportunities (such as spot buys/opportunity buys)
 - Increased efficiencies by mapping processes for Card use for non-value-added steps and opportunities to streamline
 - Increased CalCard thresholds for small purchase needs
 - Increased CalCard use for payments to offset burdens of lengthy payment timelines for suppliers, particularly DEI suppliers
 - Run report of CalCard spend to analyze spend for opportunities of increased leverage (such as targeting top areas of spend and opportunities to increase administrative revenue)
 - Consider opportunities to create DPAs in areas outside of OCSD Purchasing for ability to use CalCard
- Note: Purchasing Manager supports expanding CalCard opportunities.*

Communications

- Create Procurement Liaisons across all Commands and/or Divisions in OCSD, whereby the role serves as a central liaison with OCSD Purchasing. This role may then have central responsibility for dissemination of information, coordination and follow up on status updates, vetting of questions and tracking of procurement actions for their respective Command/Division.
- Provide training/refresher training for Purchasing Team on CPM requirements for various sourcing process, and discuss ways in which team should be guiding and advising customers on various sourcing options and tools to address customer concerns regarding lower quality goods or services; incorporate information into customer training as well
- Establish expectations for DPAs to meet on a regular basis with customers to discuss upcoming needs, issues, questions and to increase Purchasing Team knowledge of OCSD needs
- Establish expectation for staff and ensure accountability for communication to customer when there are lengthy delays in processing contracts or purchase orders
- Monitor compliance for management expectation of OCE weekly updates for Purchasing Team updates on status

Time Management

- Establish OCSD standards (or estimates) for turnaround times on various processes, documents, service responses. Collaborate with CPO on entity-wide standards that may exist, or which could exist for such timelines. Run processing times reports to analyze deviations from standards/estimates for needed action or adjustments to process.
 - Consider benchmarking for industry timeline “trends” (also leverage information from proposed process mapping to identify steps to eliminate as non-value add, lower risk, etc)
 - Discuss standards and expectations for Purchasing Team and customer roles and responsibilities with a stakeholder team; document expectations/standards and train Purchasing Team and customers (possible actions include requisition assignment, updates in OCE, processing quotes, issuance of PO’s, email/phone call response

times, contract amendments, formal solicitations, invoicing and payment processing for suppliers)

- Create a discussion with Finance and customers to discuss challenges experienced in the supplier payment processes for potential efficiencies
- Contract Renewal Report: Recognizing the value of being proactive with the customer outreach on supplier performance feedback for potential contract renewal, discuss with customers ways in which to improve upon existing process, and expectations for potential renewal terms.

Sourcing

- Conduct training on the 2021 PPM with Purchasing Team and customers
- Evaluate policy and process for informal quoting processes to determine degree of flexibility for Purchasing Team to make decisions on alternatives (allowance for a “no response” to be considered a response for not requiring a formal process); train staff on expectations for providing guidance to customers in this area
- Scope of Work/Specification Development: Establish standard templates with consideration of the following:
 - Train Purchasing Team and customers on use of new templates
 - Collaborate with stakeholder team in creation of templates to discuss needs and expectations
- Discuss update opportunities for DCPM; discuss concerns and challenges with customers and schedule discussion with OCPW
- Cooperatives:
 - Increase flow of information to customers regarding available cooperatives and RCAs available; increase knowledge of DPAs on same
 - While there may be a valid reason for not using a given cooperative contract, ensure DPAs have an understanding of why and consistently provide explanation to customer(s)

Note: During the completion of this Assessment, it is noted that CPO has established a partnership with CoProcure, to increase awareness of available cooperative contracts available in the market
- Discuss approach (either based upon PPM or based upon Purchasing leadership expectations) for managing urgent, but not emergency needs for customers. Discuss with CPO for any entity-wide standards.
- Host a roundtable with key stakeholders (Purchasing Team, customers, suppliers) on:
 - Barriers to the competitive process for suppliers; review the “We No Bid” NIGP Business Council white paper³ (original published in 2013, with refresh being published Oct 2022)
 - Ways to leverage information in the market/from suppliers to help educate OCSD on other ways to address the continued constrained supply chain
 - Pursue training opportunities; identify outside sources (such as NIGP webinars and list serve discussions) for additional ideas on how peer entities are managing these issues.

Standardization

- Create standard roles and responsibilities document for DPAs and customers
- As part of training Purchasing Team and customers on PPM, use PPM to assess all internal processes (considering recommendation for process mapping) to determine changes and establishment of expectations for standards connecting to PPM procedures
- Discuss with customers any duplicative efforts for tracking procurement records
- Discuss with CPO establishing standard template for contracts and solicitations
- Discuss with CPO the CPM and the Price Increase Form to address any inconsistencies and/or opportunities for customer training; include customers in discussion

³ “We No Bid” NIGP Business Council White Paper, 2013

Relationship Management

- Establish DPA backups to follow up on workloads in extended absences and provide customers continued support
- Establish a plan for increased supplier engagement and reduction of barriers to competition
- Establish formal procedures for how Purchasing Team will manage and follow up with customers on negative feedback received on VPE or Contract Renewal forms, including specific discussions with suppliers/contractors on feedback
- Establish formal training and supplier outreach for the supplier community; discussions should include “how to” do business with the County, opportunities for improvement in processes and requirements that prevent engagement by the supplier community and to discuss upcoming opportunities
- Create more intentional opportunities for Purchasing Team to learn from customers; the nature of goods and services acquired by OCSD requires a more in-depth level of awareness and understanding in order to work with customers on finding solutions for their needs.

In addition to the recommendations above, the following recommendations from previous Reports are also deemed relevant to some observed practices at OCSD. These should be discussed with the CPO as they have broader implications across the entity:

- Establish a standard price and cost analysis model for various structures (unit price, market basket, % of list price, etc) as well as a model for price point allocation.
- Establish a standard scoring approach for RFPs to the greatest extent possible for consistency in committee performance and consistency in treatment of the supplier community. Presently there are 3 approaches to scoring (including consensus, total points, and average). The scoring of a proposal could be affected dependent upon which scoring method was selected.
- Work with CPO and County Counsel to identify and eliminate discrepancies between CPM language and solicitation (IFB, RFP) terms and conditions.
- Establish policy, procedure, and training for supplier evaluation, including determinations of responsibility, responsiveness, and assessment against evaluation criteria.
- Require written evidence of all quotes, eliminate verbal quote practice.
- Work with the CPO to leverage the County’s Supplier Outreach Program to build a strategy to expand and diversity supplier base and increase competition at OCSD.
- Increase staff accountability to record data accurately and thoroughly in the appropriate system to capture information available for reporting on procurement spend and various contracting metrics.
- Establish a recommendation for award template for IFBs, where customer/end user can capture for the official record, their evaluation and recommendation for award.
- Collaborate with CPO to develop a formal Contract Administration program for OCSD, to include defined roles and responsibilities, policies, templates, and training.

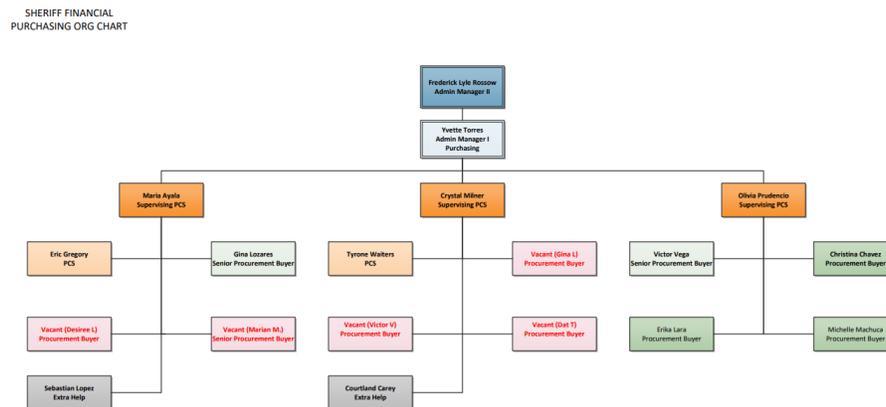
B. ORGANIZATION AND STAFFING ASSESSMENT

The Review Team conducted a high-level review and analysis of the current organizational structure of OCSD Purchasing, as well as staff qualifications, capabilities to interpret policy and develop solutions and overall performance. The Assessment also included observations of OCSD’s Purchasing leadership effect on the procurement function, the impact of the existing procurement authority in the department, as well as the overall impact on the procurement function.

1. Organizational Structure Current State

The County has a decentralized procurement structure, with both a centralized staff (CPO) and 270 Deputy Purchasing Agents (DPA's) in 22 departments in the County. The responsibility for procurement authority resides with those individuals designated as DPAs by the respective department heads. In the case of OCSD, the Sheriff has designed a team of 17 DPAs to be primarily responsible for procurement at OCSD. These individuals provide direct procurement services to the 5 OCSD Commands: Custody Operations, Patrol Operations, Investigations & Special Operations, Professional Services and Administrative Services. Within the 5 Commands are several Divisions, including Jails, Harbor Patrol, Crime Lab, Coroner, Training, IT and a wide variety of others.

Each of the OCSD Commands and Divisions have individuals who are responsible for working with Purchasing Team as the subject matter experts and customers for the various department needs. Their responsibilities include requesting goods and services, drafting scopes of work/specifications, evaluating proposals, and contract administration. On average, the OCSD Purchasing Team is responsible for annual expenditures of \$139M/yr. Below is the current organizational chart for OCSD Purchasing:



Following are the positions included in OCSD Purchasing:

- 1 Purchasing Manager (Admin Manager II)
- 1 Assistant Purchasing Manager (Admin Manager I)
- 3 Supervising Purchasing Contract Specialist (1 new hire)
- 2 Purchasing Contract Specialist
- 3 Senior Procurement Buyers (1 vacancy)
- 7 Procurement Buyers (1 new hire, 4 vacancies)

The above reflects the current status of the OCSD staff, which includes 17 budgeted positions, for which there are 5 vacancies. This represents a 30% vacancy. At the start of the Assessment (April 2022), there were 6 vacancies in OCSD Purchasing. During the Assessment, OCSD was able to fill 2 positions, however, another position was lost due to another promotional opportunity within the entity.

One of the greatest challenges for OCSD Purchasing is the continuous challenges of resourcing the division. Inherent in the current allocation of positions in this area is the limitations for advancement. This limitation is compounded by the number of lower-level positions which force staff to leave the division for other opportunities within the organization. This has created a revolving door at OCSD, which was even witnessed during this Assessment (another team member left for a position elsewhere in the entity). The lack of progression within various

Purchasing positions is an entity wide issue (and has been noted in other NIGP Consulting Reports), however, it is particularly challenging in OCSD.

While a good leader is supportive of employees pursuing other advancement opportunities, there comes a point where the value gained from what the employee contributes to the position is overshadowed by the cost of onboarding and developing the new employees. When this happens with numerous positions, over extended periods of time, it renders the team and the division incapable of recovering in a reasonable time and operating at the level needed to serve the customers. OCSD Purchasing is struggling to perform in their role for their customers based in large part on being continuously under-staffed and in a mode of onboarding and training.

This is constant evolution of change in personnel is not limited to OCSD Purchasing. The very nature of public safety, in many entities, is a continuous rotation of personnel (civilian and commissioned) across different areas of the department. While there are very legitimate reasons for this approach, it does create a similar dynamic to the loss of Purchasing staff to other departments: loss of knowledge, loss of experience, loss of developed competencies; loss of ability to manage higher degrees of complex assignments. So, Purchasing not only has to manage the constant “restart” of recruiting for positions and training new procurement professionals, it has to also manage the cycle of new subject-matter experts in roles throughout the entity. This affects everything from knowledge of scopes of work and specifications, to understanding of policies and procedures to ability to communicate information effectively throughout their Command or Division.

Best Practice:

The placement and structure of the procurement function in an organization is instrumental to establishing the level of service, control, and protection for the organization operation. The Public Procurement Best Practice, “The Place of Procurement” advocates for the position of Procurement within the entity to optimize the influence and impact Procurement has on its internal and external stakeholders. This best practice builds a case for the strategic placement of the Procurement function, further supported by the ABA Model Procurement Code. Both advocate for Procurement’s role in the “C Suite” of an organization. This placement maximizes the effectiveness of Procurement within the entity and is critical for the entity to fully benefit from Procurement operations.

Recommendations:

The Review Team has previously recommended, through each of the previous Reports for OC, that a centralized-hybrid procurement function led by a Chief Procurement Officer is the optimal procurement organizational structure for public sector procurement. This organizational structure would vest full procurement authority with the CPO reporting directly to the County Executive. The authority of the CPO would include full authority over all identified procurement staff (DPAs at the County). With a centralized-hybrid structure, many of the DPAs would continue to be co-located with the departments they support. The purpose of the centralized-hybrid structure is to protect the organization from the inherent risks in spending over \$500M/annually of the public’s funds. Further, this centralized control and authority increases the overall effectiveness of the procurement function, introduces standardization across the overall DPAs and increases the quality of service supporting the internal and external stakeholders.

As has been cited in previous Reports, in order to transform the procurement function at OC into

⁴ Global Best Practices, NIGP, <https://www.nigp.org/resource/global-best-practices/THE PLACE OF PUBLIC PROCUREMENT WITHIN THE ENTITY Best Practice.pdf>

a high-performing, value-added service provider for the entity, OC leadership must ensure the function is properly and consistently resourced, development and supported to perform in a strategic manner rather than a tactical manner.

At the OCSD level, given the current structure (decentralized), the Review Team offers the following recommendations:

- Create a classification structure whereby DPA positions across the entity have consistent and equitable position standards, qualifications, responsibilities, opportunities for advancement and pay
- Conduct an analysis with HR to standardize the manner in which the DPA roles are budget and allocated across departments throughout the entity
- Collaborating with HR and budget, identify ways to address the compression issues related to the DPA roles in OCSD Purchasing, to establish greater consistency in DPA roles and responsibilities, to increase opportunities for advancement in DPA roles within the same department (for increased retention opportunities) and to address the imbalance in DPA role/purchasing-based position allocation across all departments
- Consider a staffing structure that allows for a single individual to progress through a series of procurement positions based upon achievement of clearly defined qualifications within the same position control number. This approach would allow someone to hire in at an entry level, but then promote based upon achievement of clearly defined requirements (i.e. – years of experience, achievement of professional certification).

2. Staff Analysis Current State

During the Purchasing Team interviews, as well as the customer interviews, the Review Team was struck by the number of individuals who were new to the entity or to their role. Many of the staff interviewed had 1-5 years of experience in Purchasing, many of them brand new to the profession. Similarly, many of the customers interviewed were brand new to their own positions. In combination with the number of vacancies in the Division, Purchasing leadership is in a constant state of reallocating workloads across remaining team members, training new staff and striving to continue providing the same level of service to OCSD customers.

OCSD Purchasing Leadership

Offsetting the challenges of new and inexperienced Purchasing staff is the seasoned leadership in OCSD. The Purchasing Manager brings many years of procurement experience to the position, including specific experience in the CPO. It was noted by OCSD executive leadership, Purchasing staff and customers alike that the Purchasing manager is professional, cares about his team, works to establish trust with the Purchasing Team and has made numerous improvements to the division. The Purchasing Manager is professional, strives to create a positive environment for the team and extends appreciation to staff for their work. He is viewed as trustworthy and ethical by his team, leadership and customers. The Purchasing Manager's goals for the Purchasing Team include:

- Maintain open communication
- Maintain a support work environment
- Create consistency, structure, standardization
- Continue to provide training for staff and customers

The Assistant Purchasing Manager and Supervising PCS staff also strive to create a supportive environment, focus on training staff and doing their best to manage the challenges of staffing and resource constraints. These individuals also bring a fair amount of experience to their positions and appear to be respected and appreciated by leadership, staff and customers. Managers have hosted several team building activities for the division, try to have meetings to keep staff informed and seem to genuinely care about their staff. They appear to enjoy their work and to be committed

to doing their best to serve the department and contribute to its overall success.

Following is feedback from the customer and Purchasing staff interviews regarding OCSD Purchasing leadership:

- The Purchasing Manager is a very good manager and shows appreciation to the staff
- The Purchasing environment is positive and supportive
- There is comfort in openly asking questions
- Information is shared among the team and managers
- Staff enjoy working on the team, staff and managers all get along well
- Purchasing Manager and Assistant Manager set expectations for staff and make positive changes for improvements

Given the relationship between department DPAs and the CPO, the following feedback is provided from the interviews regarding the CPO:

- The CPO provides a lot of support, and it is appreciated
- Training provided by CPO is relevant, succinct, and of high quality
- Suggestion that CPO do some type of “Did you know?” type campaign for all end users to help educate end users on procurement
- CPO is receptive to DPA ideas for new training topics
- CPO did a good job with the last CPM update, raising threshold to \$200K for BOS approval helped a lot; did a good job of reaching out to DPAs for input

During interviews with the various managers, the Review Team found them to be supportive of industry best practices, to have a strong desire to meet customer and team needs and have a solid grounding in public procurement core competencies. Managers have developed checklists of functions and processes where they track new staffs’ experiences and training to monitor their development. There does seem to be a disconnect between what is desired and supported by the management team and what is being conveyed and what is resonating with the staff, particularly newer staff.

OCSD Purchasing Team

During customer interviews, many shared their appreciation for OCSD Purchasing staff, particularly in light of Purchasing being down so many staff positions on a regular basis. While many recognized the staffing challenges, customers still expressed frustration in a number of areas in Purchasing’s support. The Review Team’s findings in this Report demonstrate the impact of failing to have a sufficiently staffed, trained, and resourced professional procurement function delivering support to internal customers.

Following are comments and general statements from customer interviews regarding Purchasing leadership and the Purchasing Team:

- The Purchasing Team is “awesome, but they are always short staffed”
- Purchasing managers are understanding as they help their staff work through their busy workload
- Purchasing is responsive and receptive to inquiries
- The Purchasing team communicates very well
- Communications have improved from the past
- Purchasing team members are responsive, patient, answers questions effectively
- Part of the value of having DPAs in the customer department is that it allows for dedicated and knowledgeable support in the procurement role,

- Procurement is an important role and has a significant impact on how well customers can do their job
- “There are some staff who are amazing!”
- “Staff does an excellent job”
- The Purchasing Manager and his team are “passionate about policy”, they are very knowledgeable in it
- Would like to see Purchasing be more flexible for the environment they are in and in situations such as urgent situations
- Procurement tracking the customers contracts is a “huge benefit”
- “Procurement is under-appreciated; buyers are very responsive; frustration comes largely from the lack of resources”

It is also important to note the challenges customers offered during interviews when interacting with Purchasing leadership and team members:

- With constant turnover of staff, OCSD regularly loses knowledge and experience of Purchasing staff and customers, which has an impact on operations
- There are morale problems for some due to the disparity between the various DPA positions throughout the entity, including the differing position titles, pay, promotional opportunity and responsibility.
- Facilities manages their own design and construction projects (as opposed to using OC Public Works) however, these positions are not classified as DPAs and the individuals performing in these roles have not had any procurement training. As such, they are not held accountable to the same standards as DPAs throughout the entity (certified by the CPO, mandatory training, compliance with standards, recipients of regular communications) They do follow DCPM as well as the CPM. They also have Project Managers who are also doing their own design-bid-build projects, including signing contracts. This is an area of risk and inconsistency with how procurements are handled throughout the entity under the CPM. (up to 5 PMs serve in this role)
- Knowledge varies tremendously from one Purchasing staff member to another, as does the level of service they provide
- Would like to see Purchasing take more responsibility and accountability for providing guidance and advice
- Purchasing managers need to better prioritize the work for their team
- Purchasing needs to remember customers don’t always speak their language, so they need to communicate better
- Purchasing doesn’t always communicate or strive to understand the environment that [public safety] is operating within (safety issues for officers, the community, jail, coroner)

Finally, below are some of the challenges noted by Purchasing staff:

- High turnover of procurement team has a significant impact on Purchasing’s work and ability to keep up with customer demand
- Because of high turnover, customers get frustrated particularly w/new trainees
- New staff do not feel they are getting enough formal training and that training varies significantly from staff to staff
- Staff feel overwhelmed
- While staff are trained on procurement basics, they feel they have to figure out much of the details on their own
- Staff do not feel information is shared in a cohesive manner
- Newer staff are unclear on their role and do not understand the planned approach for training
- Purchasing recently moved to electronic bids, but didn’t receive training

- Most staff commented on feeling frustrated with approaches to training and new procedures and tools
- Newer staff expressed the need for more time with supervisors
- Customers need more training
- Purchasing staff need backups
- Concerns regarding impacts to OCSD in light of the combination of many new Purchasing staff and many new staff in customer roles leads to the loss of a lot of knowledge and experience, varying stages of training and a lot of high profile/pressing purchases.

Recommendations:

The following recommendations are offered regarding the leadership and staff analysis of OCSD Purchasing:

- Realignment of workload of Purchasing Manager and Supervising PCS positions; Purchasing Manager needs to increase amount of time dedicated to strategy and leadership; adjust workload balance of the working supervisors toward increased time supervising and supporting staff (particularly newer staff) and less time working on sourcing (present balance is approximately 80% working on procurements; 20% supervising – recommend a 60% supervising/40% supporting procurement work at minimum)
- Conduct an in-depth workload analysis for opportunities to improve how work is assigned among the existing staff
- Conduct a staffing assessment to determine training needs for each staff member, as well as needed core competency development
- Purchasing leadership should meet with staff, particularly newer staff, to discuss procurement’s role in OCSD, the value of procurement service to the entity, the overall strategy of Purchasing’s approach to developing staff and the “why” of procurement service. This approach is intended to provide a holistic approach to onboarding new staff and instill in staff the perspective of “why” they are doing the work they were hired to do.
- Establish a formal training and professional certification plan for the entire team
- OCSD staff managing sourcing for design and construction services need to be DPAs, including going through all steps to achieve this status OR an appropriate number of DPAs need to be assigned to these areas OR this work needs to be considered for reallocation to OCPW. Moreover, analysis needs to be done as to why non-DPAs are signing contracts
- Need to establish training and guidelines for staff to properly advise customers on the best use of available sourcing tools based upon the needs and concerns of the customer (qualifications versus price, supplier evaluation, criteria for solicitation)
- Consider mentorship opportunities for newer staff (*Note: The Review Team is aware that there is some mentoring provided in OCSD Purchasing, however, none of the newer staff mentioned anything about assigned mentors. It is worth noting that the CPO is looking into a formal mentoring program for Purchasing staff at OC*)
- DPAs need to serve as advisors to customers; expectations and guidance on this advisory role needs to be provided, including training for DPAs on how to serve in this role, to increase the value of the procurement function across OC
- A cadence of meetings should be developed for the entity: Purchasing leadership meeting with staff regularly, DPAs meeting with customers regularly, Purchasing management should be meeting with new staff regularly (one on one or small groups). Meetings should include training, opportunities for brainstorming ideas, asking questions, discussing improvements in operations.
- Need clear roles & responsibilities documents for Purchasing staff and for customers, to include expectations
- Assign backups for when staff are out, communicate that to customers so they have someone

else available for assistance

3. Training

Current State

The Review Team heard repeatedly from Purchasing Team and customers that more training is needed throughout OCSD. Many offered their appreciation for the training offered by the CPO, but indicated a lot more training is needed, particularly training that is unique to OCSD. Customers have received limited procurement training, and particularly given the degree of changes in staff throughout OCSD, customers need assistance in gaining procurement knowledge, awareness and consistency in application.

Most customers do not regularly use or refer to the CPM, but rather look to OCSD Purchasing for guidance and clarification on procurement policy. In July of 2021, another update to the CPM was issued, alongside the issuance of the "PPM". While it has been a year since the PPM was made available, all customers and Purchasing staff (with the exception of Purchasing leadership) were unaware of its existence, did not receive training and have not leveraged this extremely valuable resource.

Customers expressed interest in a generalized Procurement 101 training, as well as specific training on topics such as scope of work/specification development, supplier management, negotiations, system specific training (such as OC Expediter) and other related topics.

Finally, there is a lack of training on contractor performance oversight, resulting in different groups managing performance inconsistently. Contractor performance falls on customers on a daily basis, however, they do leverage OCSD Purchasing when issues arise for guidance. It is noted that contract administration introduces the greatest areas of risk to the entity, much more so than the sourcing process. As such, there should be a significant investment in contract administration structure, policy, process, training and oversight.

Recommendations:

Training is critical to the success of any staff and operational transformation. It is part of what sustains the most vital resource of any government entity, the human resource. OCSD procurement staff will need to develop and/or expand their procurement expertise to move the entity toward industry best practices and elevate the level of service for their internal and external stakeholders. Training associated with personal growth and development will better equip staff to adapt and embrace the changes needed for transformation. A holistic approach to training will elevate the technical and soft skills for staff engaged in the procurement function. Further, staff should focus on, and management should advocate for, training that will assist procurement staff to become professionally certified. Professional credentials increase the credibility of the procurement team, helping them to become recognized as the entity's resident experts in procurement.

The following recommendations are offered in consideration of the interviews conducted and observations of the Review Team in the area of training:

- Perform cross-training of the OCSD Purchasing team, enabling all staff to have expertise in the various good and service areas to ensure a consistent level of service and succession planning.
- As discovered during the CPO review, the CPO conducts regularly scheduled meetings with department DPAs, sharing updates on procurement policy and procedures. To

ensure dissemination of these updates, schedule subsequent meetings with the OCSD staff performing procurement-related activities to share the updates/training.

- Create a training program and plan for customers throughout OCSD, engaging the Purchasing Team to be part of developing, delivering and engaging with the training with customers to increase opportunities for relationship building, collaboration and knowledge sharing.
 - *Note: During discussions with Purchasing Manager, he recommended quarterly training session to increase knowledge and communications among his team and customers.*
- Survey customers and Purchasing Team for topics needed for inclusion in the training program; coordinate with CPO to ensure training is supplemental to training provided by the CPO and not duplicative; discuss with CPO whether training opportunities are open to non-DPA staff (information on this being available to non-DPAs has not been consistent).
- Establish guidelines for Contract Administration, provide training, standard tools and standard procedures
- Create a document with standard procurement terms and acronyms used in OCSD to provide to customers as part of training material
- Leverage Job Aides (currently available at CPO website) for “How To” sessions with Purchasing staff and customers
- Based upon the size of OC, the number of DPAs performing procurement-related functions and the clearly and regularly communicated needs of the customers and DPA staff, OC should consider expanding the role and size of the CPO training function. It is noted that the CPO has expanded training opportunities for DPAs over the past few years. A continued expansion of this role would have a significant impact on the department operations
- Create a list (with stakeholder input) of requested training topics for end user training: Intro to procurement training, OCE training, PPM procedures, procurement planning/prep, scope/spec development, insurance/risk assessment, supplier performance evaluation, spend management

C. CUSTOMER SERVICE ASSESSMENT

As part of the Assessment, it is critical to gain an understanding of stakeholder perception of the procurement process, their understanding of their role in the process, and their level of customer service satisfaction. This is achieved through interviews of key stakeholders to determine current needs, current levels of support, level of satisfaction with support, key challenges and identification of opportunities for improvement to enhance customer service as well as to propose customer satisfaction measures

Current State

- Impact of pandemic and changes to the workforce structure continue to impact the level of customer service
- Lack of clarity for Purchasing staff on purpose and value of procurement work for the entity
- Lack of clearly defined customer service guidelines leading to inconsistent service levels
- Absence of clearly defined roles & responsibilities contribute to the frustration and confusion when it seems staff aren’t being responsive
- Purchasing does not have other staff checking on workload during extended absences
- “Purchasing at the County doesn’t seem to have progressed with the times. We spend a lot of time on the little things and that makes the big things harder to address”.
- Customers frustrated with lack of Purchasing management and staff responsiveness to calls and emails (noting sometimes there is simply “no response”, in addition to very lengthy timeframes for a response)
- Many customers desire an increased level and depth of support from Purchasing, including services such as analysis of price increases, support in addressing poor quality supplier service, guidance on process and sourcing options, clarity on how to handle contract administration issues, risk analysis

Recommendations

- Establish DPA backups for all Purchasing Team members
- Schedule advance planning discussions with customers
- Train Purchasing staff on purpose and value of procurement work for the entity
- Establish customer service guidelines, including response times for various activities
- Establish clearly defined roles & responsibilities
- Create staff backups
- Conduct open forums between staff and customers on various procurement-related topics to discuss establishing standards, tools, sharing information and receiving customer feedback
- Conduct regular customer surveys

D. FILE COMPLIANCE REVIEW

For purposes of this file review, contract files were selected from a report of 200 Master Agreements provided by OCSD (a subset of the 650 active Master Agreements) and approximately 260 PO/CT records. Twenty (20) contract files, approximately 4% of the contracts on the report provided, were audited. Of the 20 records, the majority had some degree of error or oversight in compliance with policy, procedure, or exception lacking evidence in the file. Many files required clarification of what transpired and several deviated from industry standards in procurement. While it is noted that several of the contracts were awarded under previous year CPM policies, extending this rate of error across all active OCSD contracts suggests the need to provide increased controls, training on procurement file management, clarification and standardization of procedure, revision to CPM policy (noted in previous CPO Report), introduction of additional tools for procurement oversight, and more formalized contract compliance by OCSD and CPO staff. The training should include division supervisors and managers who oversee staff working within the procurement function.

The compliance reviews include reviews of applicable State of California statutes and applicable local regulations as represented in the CPM. (Note: Contract files are reviewed under the CPM effective at the time of the contract award and administration. As such, the 2017, 2018, 2019 and 2021 CPMs were utilized for the contract file reviews) The contract files were also reviewed in consideration of public procurement best practices and the ABA Model Procurement Code. The Review Team also looked at how compliance to these various requirements were implemented into practice. A summary of the file reviews is contained in Table 1.0 below, and details of each contract file review is located in Appendix C.

Current State

There were several notable best practices identified during the contract file review. These have been noted in previous Reports but are worth mentioning here. They include:

- Risk Assessment/Insurance Modification approval form to make changes to standard requirements
- Contract Increase Request Form to make changes beyond the level of authority of the DPA
- Contract Compliance Checklist
- Well organized files
- Evidence of communications between DPA and customers, demonstrating sound procurement practices including discussions regarding projected timelines and actions and properly advised client about sourcing options

Below are the Review Team’s noted observations of from the Contract File Review:

- Overall, there is a lot of inconsistency across the various actions evidenced in the files evaluated. While some files demonstrate appropriate actions by Purchasing staff and

customers, others present concerns about actions.

- Files would benefit from executive summaries with centralized key data. Executive summaries “tell the story” of what transpired in a procurement, providing key data, milestones, and justification for actions. Many of the files audited lacked information that established the basis of actions, thereby affecting transparency and accountability. While the outside of the folder does contain some data, it is often not complete.
- Several files have extensive delays without any notation of what caused delays.
- File lacks evidence to support basis for method used, as well as inconsistencies in noted sourcing method, and situations where sourcing method changed over time without explanation as to what transpired
- Documented pricing/costs noted in file exceed permissible threshold for sourcing method used
- Occasions of extensive/long term use of suppliers without proper justification or competitive sourcing
- Numerous files with activity (stated or presumed) that raise concerns about actions during competitive bid process
- Numerous occasions where response from supplier community extremely limited, if non-existent; other occasions where changes are made after award which could have affected who may have been interested in competing
- Use of cost-plus-percentage-of-cost pricing basis, which is contrary to industry best practices and the ABA Model Procurement Code
- Numerous occasions where solicitations are cancelled and resolicited, potentially indicating barriers may exist within the solicitation which are precluding the supplier community from competing
- Numerous files missing insurance
- Occasions where sole source approach lacked support in file
- Modifications made to records after the fact without explanation
- Evaluation records not matching
- Incomplete documentation required for RFP process not in file
- Multiple files are maintained for a single procurement, separating contracts from the information that forms the basis of the decisions related to the contract (evaluation information). This makes auditing the contract more challenging and creates a barrier to accessing the information. Information pertaining to a sourcing process is considered public record and should be readily available to the public for inspection at the appropriate time. It is unclear on why a separate file needs to be maintained as no known state law establishes that evaluation information is confidential and can be withheld from the public or made difficult to access.
- Multiple awards from a single solicitation lack any numeric correlation in the filing system, creating similar challenges as outlined above.
- Need to establish a single, complete file whether fully electronic (and therefore load all records into the electronic format) or a complete physical file. Current practice of partial electronic and partial physical is challenging.
- Many of the contract files have limited competition, restrictive specifications, insufficient supplier outreach or demonstrated research as to why suppliers chose not to engage.
- Lack of evaluation scorecard, standard template, or formula for the departments to utilize. Files are lacking in any type of evaluation information to support committee scoring beyond the score itself.

The majority of the files reviewed contained some type of error, required clarification on actions taken, or contained contradictory information. Many of the files demonstrated challenges with supplier engagement, with limited competition or repeated issuance due to no supplier response. This highlights the overall challenge of not generating sufficient competition.

During the OCSD contract compliance review, as was the case with previous compliance reviews of the CPO and OCPW, the Review Team did not have access to electronic systems used for procurement, including OC Expeditor, CAPS, Bid Sync, CAMS, or the G drive. The limitation of third-party access to County systems is understandable, however, it does create certain challenges. The Review Team had to work with OCSD to secure information not contained in the contract file. OCSD maintains both a physical file and multiple electronic records (in multiple systems) of each contract, with the physical file provided as the official public record subject to public records requests. Given documentation is maintained in multiple systems, it was difficult to locate all the required data and various evidence required to complete the contract audit.

The official contract record (which is provided to the public, auditors, reporters) should be complete, orderly and include only the documentation appropriate for the public record. It should “tell the story”, standing on its own merits, without need for extensive assembly of information from other sources. During the contract audit, there was a draft review process which afforded OCSD staff an opportunity to address contract record omissions from the physical contract file as well as to update the file to reflect accurate and complete information.

Some preliminary findings were removed from the final contract audit record once OCSD staff were able to provide the required evidence. Given the physical contract file is viewed as the official contract record, it should contain complete information or, at a minimum, notation that the information is contained in other specific locations. Throughout the contract file review, notes have been made and provided as recommendations for improvement, recommendations to avoid future findings or recommendations for consideration of standardization across the organization.

Table 1.0 – Summary of Contract File Review

Record#	Owner	Observation	Specific Finding
C003270r Bookmark to Appendix C	Jails	Missing process documentation	<ul style="list-style-type: none"> • No originating requisition found in file • Budget approval only on extension request • No evidence of CPO approval • No Child Support Enforcement Certification found in file • No insurance found for current term • While CPE form was not required under 2017 CPM, documented evidence of performance not found in file
C019890r	Investigations	Multiple rebids without adequate process documentation	<ul style="list-style-type: none"> • Req shows commodity but per CPM definition this might be more appropriately classified as a Capital Asset • No evidence of bid evaluation and recommendation • No evidence of customer’s award recommendation • Bid language for exceptions after award leading to disqualification not followed • Gap of 9 months between bid issuance and cancellation with no explanation of what transpired

C021338r	Coroner/Investigations	None	<ul style="list-style-type: none"> Only language in agreement was about Federal grants
C021399r	OCSD	Missing documentation and justification for why the contract price was more than double bid award. Evaluation documentation process inadequate	<ul style="list-style-type: none"> No documentation of County Attorney review No documentation of public opening or number of responses received at bid opening. No evidence of DPA/CPO concurrence with committee recommendation No order documents Many unsigned/undated evaluation notes Contract price was more than double bid award price with no explanation
C021440r	North Patrol	Missing evaluation documentation	<ul style="list-style-type: none"> No COI statement from two of three evaluation committee members Summary evaluation altered manually and does not match individual evaluation score sheets. No information provided on why pricing point allocations were modified. No Sexual Misconduct insurance No ordering document
C028543r	Training	Sourcing process not clear	<ul style="list-style-type: none"> Generally difficult to determine what transpired in file Contracting for 3 years with supplier and no competition Lacks sole source justification
C028616r	OCSD/Fac Ops/Harbor	Use of Cost-plus pricing not recommended per ABA Model Code. Concern misstated amount available may have impacted competition	<ul style="list-style-type: none"> No documentation of bid analysis or record of award recommendation basis No insurance
C028696r	Crime Lab	Summary document would provide clarity as to what transpired	<ul style="list-style-type: none"> No record of public bid opening or who submitted at the opening No ordering documents Confusion in file on actions without explanation Concerns regarding actions during competitive bid process without explanation on record

C030000r	Administrati on	None	<ul style="list-style-type: none"> • No insurance • Federal lobbying certificate included, but no reference to Federal funding anywhere else in file
C030393	Info Services	File is unclear and lacks supporting documentation for method use	<ul style="list-style-type: none"> • Unclear on sourcing method used • Inconsistent information in file • Costs in file exceed allowable competitive threshold
C030016r	Financial/Ad ministration	Missing clear explanation of why procurement type changed and reasons for multiple changes to contract term	<ul style="list-style-type: none"> • No quote from supplier • No reference to Federal funds, but Federal language in contract • No ordering documents • Multiple modifications to term and change in procurement type without explanation
C030039r	Employee Services	Possible CalCard use in future for this type of purchase	<ul style="list-style-type: none"> • None
C030052r	Coroner	Missing documentation	<ul style="list-style-type: none"> • RCA supplier missing quote • No copy of RCA • No insurance • No required Federal language included • No signed Federal certifications
C030075 (C028596 cancelled?)	North Patrol	Cost of processing for a micro purchase	<ul style="list-style-type: none"> • Unclear on whether Coop or RCA
C030100r	Hazardous Device Squad	Possible CalCard use in future for this type of purchase	<ul style="list-style-type: none"> • no req until 3 months after first service • PO not issued until 2 months after req
C030140r	Various	Missing documentation	<ul style="list-style-type: none"> • No PO/CTs • No CPE form
C030145r	OCSD/Jail	Lack of price increase analysis/ verification and documentation missing	<ul style="list-style-type: none"> • No documentation of public opening • No documentation if Local Small Business Preference was checked or not applicable • Notice to several suppliers missing • No current insurance • No justification analysis for price increase

C030179r	Quartermaster	Summary document would help determine what transpired	<ul style="list-style-type: none"> • No quote for \$75K limit • No CPO approval for NASPO contract • No current insurance • No evidence of individual purchases
--------------------------	---------------	---	---

In addition to the randomly selected files for the Procurement file Review, the Review Team evaluated files processed as “retroactives” under the CPM. The files were reviewed to identify appropriateness of the retroactive process in compliance with the CPM, but also to identify potential improvements within OCSD to potentially reduce the number of retroactives. It was anticipated that the causes of the retroactives could point to challenges that need to be addressed within the OCSD operation. Attachment D contains a summary of the observations from each file review.

As a group, the retroactive contracts fell into several areas that suggest policy improvement directions. The first three areas: Late Grant/regulatory notification, Extended negotiations, and other delays do not necessarily suggest any particular errors led to the contracts being processed as retroactive. Rather, these seem like appropriate uses of the process that has been set up to seek Board approval when there are exemptions to the traditional sourcing process.

The next area: Spend tracking/Review approval process, suggest that the systems used to track both when contracts are expiring, and the value spent under those contracts, may have some weaknesses. Additionally, the review and approval process for bringing items to the Board did not catch errors which caused contracts to be retroactive.

A quarter of the retroactives are directly attributable to a process or training deficiency. This includes ensuring the correct contract is used and that items purchased are included on the contract. Two other retros are worth exploring as they may suggest process improvements in the signature process. There is also the reality of valid reasons for leveraging a retroactive, including new staff (of which there are many in OCSD) *learning* and making honest mistakes, or not being able to get the supplier community to respond to a solicitation, at which time a rebid is required but the current term contract expires.

One excellent practice that stood out was laying out the contract history as in A19-001284 versus putting it in text like A20-001193 and A20-001238. This greatly increases both readability and transparency. Additionally, there are many annual contract amendments. Without sacrificing Board Approval steps, moving to multi-year contracting could reduce some of the transactional work. This likely involves larger rule changes but could significantly reduce workload without impacting appropriate oversight.

Recommendations

Based upon the above Contract File Review and the review of identified Retroactive records, the following recommendations are offered:

- Reassess policy on Retroactives and consider use of CalCard for certain purchases versus issuing after-the-fact purchase orders (potential to still track and report on Retroactives thru CalCard reporting)
- Micro-purchases need to be reassessed for value in the type of process followed (ex: contract file for \$400 purchase via Master Agreement versus processing with CalCard); the invested internal costs to manage this type of purchase far exceed the cost and risk associated with it
- Contracts do not include documentation that “tell the story” of what transpired. Contract records must stand on their own merit and should not require explanation from an individual. Implement practice of providing written justification in the file for activities that are not clearly evident on the face of the file, whether that justification is part of an electronic record or a stand-alone executive summary of some type.

- Mandate use of a Contract Summary Page for all contract files. Contract tracking sheets provide organization and valuable, easy-to-access data on the outside of the contract file. Establish a standardized management review process for completed staff work and contract file reviews. Create a Contract File Checklist for management to use during staff work review.
- Provide increased staff training for consistency, understanding and increased compliance for Purchasing Team's use of the CPO's Electronic Procurement File Folder (EPFF) and adherence to the CPO file management policy. Discuss with staff what documentation should and should not be in the official contract record. The CPO standard should be followed such that appropriate contract data is captured and recorded, and all electronic records not contained in the central file (whether physical or electronic) are identified with their specific location.
- Provide staff training (or refresher training) on how to appropriately assemble, and maintain, the official contract record. This should include identifying who is specifically accountable for updating and maintaining the official contract record, including additional data and documents that need to be added to the file after contract award (e.g. – updated insurance certificates, amendments, purchase orders).
- Create a specific file management policy, including streamlining how files are stored throughout the organization.

These recommendations are focused on creating greater clarity of expectations, streamlining processes, and aligning procurement actions with industry best practices. The contract file is the official record of an entity's procurement action, the basis of that action and the supporting documentation demonstrating compliance. Proper management of contract files leads to reduced risk to the agency, confidence in the due process for parties competing in the sourcing process and increased transparency of the agency.

For additional guidance on industry standards for compliance auditing, review the Global Best Practice entitled "Audits"⁵.

⁵ Global Best Practices, NIGP, <https://www.nigp.org/our-profession/global-best-practices#strategy>

VI. CONCLUSION

The Assessment of OCSD demonstrated a fundamental compliance to state regulations, as well as general compliance to CPO policies for OC. The Purchasing Team, as well as the Purchasing Manager, demonstrated a desire to support the needs of their internal customers while collaborating with the CPO. The recommendations in this Report reflect the goals of increased efficiency and effectiveness of procurement practices, improved communications, increased development of the Purchasing staff, improved customer service and more compliant files.

The Assessment analyzed 13 core areas of the procurement function at OCSD. The Review Team identified 80 recommendations for improvements across all 13 areas. These recommendations include short-, medium- and long-term opportunities for OCSD's increased alignment with CPO expectations as well as alignment with public procurement industry best practices. The Review Team recommends a phased approach to incorporating changes in a manner that will be value-added without being overly burdensome.

Establishing a strategy to implement these recommendations is essential to developing an implementation plan that is reasonable, measured and proactive. These recommendations are an investment in OC's most valuable resource, the staff. In partnership with the CPO, OCSD has already demonstrated improvements over the past year and has clearly articulated their support of CPO's oversight role of procurement across the OC.

It will be essential for OC, CPO and OCSD to support OCSD Purchasing Team to move forward with the recommendations. While the Review Team has confidence that the Purchasing Manager and his team have the capacity, desire and commitment to continue to improve, substantive change requires a strong commitment from the executive level and strong leadership for the Purchasing Team in order for change to be sustained.

Vital to this effort is ensuring that OCSD Purchasing has the resources to pursue change, but also to be sufficiently resourced to provide the appropriate level of support to OCSD. There has been a clear impact over the past few years to OCSD Purchasing's ability to meet their responsibilities and fulfill their roles due to significant and on-going resource challenges.

As a public safety function in the community, the effective and efficient operation of OCSD is particular critical to the community. OCSD Purchasing is a vital and integral part of the support within the department that enables front line service providers to meet their responsibilities to the community it serves.

The Review Team appreciates the opportunity under this engagement to share industry best practices and professional recommendations for OCSD's consideration. More importantly, it was a pleasure to work with the team at OCSD. NIGP and the Review Team are available for clarification or further services should OCSD deem that necessary.

VII. APPENDICES

Appendix A:	Summary of Recommendations
Appendix B:	On-Site Stakeholder Interviewees
Appendix C:	File Compliance Reviews
Appendix D:	Summary of Retroactive Contracts

Appendix A: Summary Of Recommendations

Item	Recommendations
Strategy and Planning	
SP-1	Create a Procurement Sourcing Plan annually for customer needs (recommend connecting to Budget process), including discussions with customers and Purchasing Team. Meet regularly with OCSD leadership to discuss plan updates and share information with Purchasing Team.
SP-2	Encourage Purchasing Team to modify the approach to meetings with customers in advance of procurements. While Purchasing management has shared there are meetings with Purchasing, Budget and customer units, based upon the interviews, a more intentional dialogue about value and options is encouraged in these meetings. Meetings should be focused on strategy, including possible solutions, options and efficiencies, as well as to educate Purchasing on the customer need.
SP-3	Implement a spend and category management program. This involves analyzing categories of spend and analysis of how current workload is assigned. This should be further vetted throughout the department, such that staff are not limited to assignment of a given division, but rather are assigned based upon categories of similar spend in goods and services to the extent that is reasonable. Category managers should be trained in strategic spend analysis to assist in identifying opportunities to leverage new contract opportunities, as well as analyzing past spending practices for modification to drive savings and efficiencies.
SP-4	Educate Purchasing Team on spend management, identify data desired from spend analytics and strategize on decision making process for leveraging spend data for improved sourcing decisions (including identifying new contracts needed for OCSD customers, opportunities to merge contracts, opportunities to leverage cooperative opportunities)
Procedures	
P-1	Map current-state OCSD sourcing processes (for internal and external facing processes) to identify non-value-added steps, inefficiencies, decision points, data input/output, documents, approvals and pain points. Use current-state maps to identify future-state OCSD opportunities and implement new OCSD processes. Engage customers and suppliers in process mapping.
P-2	Establish strategy, templates and standard approach for price negotiations; provide training to Purchasing Team and customers
P-3	Coordinate with CPO to identify specific areas where OCSD is challenged with County Council (“CoCo”) interpreting CPM and DCPM differently within OCSD as well as across other departments
P-4	Coordinate a discussion with key customers to discuss the Contract Renewal process to identify opportunities for adjustment that will enable standards and expectations for how responses will be managed, as well as identify opportunities for efficiencies
P-5	Modify policy on retroactives to allow for increased authority by DPA Managers as well as increased delegated authority for DPAs and Directors (Note: <i>Recommendation of Purchasing Manager to address issues with Sheriff/Directors having to deal with \$500 purchases</i>)

P-6	<p>CalCard: Conduct meetings with OCSD stakeholders, Finance and CPO to discuss opportunities for improved CalCard use. Possible topics to include (based upon customer and DPA feedback):</p> <ul style="list-style-type: none"> ○ Increased use of CalCard for key purchase opportunities (such as spot buys/opportunity buys) ○ Increased efficiencies by mapping processes for Card use for non-value-added steps and opportunities to streamline ○ Increased CalCard thresholds for small purchase needs ○ Increased CalCard use for payments to offset burdens of lengthy payment timelines for suppliers, particularly DEI suppliers ○ Run report of CalCard spend to analyze spend for opportunities of increased leverage (such as targeting top areas of spend and opportunities to increase administrative revenue) ○ Consider opportunities to create DPAs in areas outside of OCSD Purchasing for ability to use CalCard
Communications	
C-1	<p>Create Procurement Liaisons across all Commands and/or Divisions in OCSD, whereby the role serves as a central liaison with OCSD Purchasing. This role may then have central responsibility for dissemination of information, coordination and follow up on status updates, vetting of questions and tracking of procurement actions for their respective Command/Division.</p>
C-2	<p>Provide training/refresher training for Purchasing Team on CPM requirements for various sourcing process, and discuss ways in which team should be guiding and advising customers on various sourcing options and tools to address customer concerns regarding lower quality goods or services; incorporate information into customer training as well</p>
C-3	<p>Establish expectations for DPAs to meet on a regular basis with customers to discuss upcoming needs, issues, questions and to increase Purchasing Team knowledge of OCSD needs</p>
C-4	<p>Establish expectation for staff and ensure accountability for communication to customer when there are lengthy delays in processing contracts or purchase orders</p>
C-5	<p>Monitor compliance for management expectation of OCE weekly updates for Purchasing Team updates on status</p>
Time Management	
TM-1	<p>Establish OCSD standards (or estimates) for turnaround times on various processes, documents, service responses. Collaborate with CPO on entity-wide standards that may exist, or which could exist for such timelines. Run processing times reports to analyze deviations from standards/estimates for needed action or adjustments to process.</p> <ul style="list-style-type: none"> ○ Consider benchmarking for industry timeline “trends” (also leverage information from proposed process mapping to identify steps to eliminate as non-value add, lower risk, etc) ○ Discuss standards and expectations for Purchasing Team and customer roles and responsibilities with a stakeholder team; document expectations/standards and train Purchasing Team and customers (possible actions include requisition assignment, updates in OCE, processing quotes, issuance of PO’s, email/phone call response times, contract amendments, formal solicitations, invoicing and payment processing for suppliers)
TM-2	<p>Create a discussion with Finance and customers to discuss challenges experienced in the supplier payment processes for potential efficiencies</p>

TM-3	Contract Renewal Report: Recognizing the value of being proactive with the customer outreach on supplier performance feedback for potential contract renewal, discuss with customers ways in which to improve upon existing process, and expectations for potential renewal terms.
	Sourcing
S-1	Conduct training on the 2021 PPM with Purchasing Team and customers
S-2	Evaluate policy and process for informal quoting processes to determine degree of flexibility for Purchasing Team to make decisions on alternatives (allowance for a “no response” to be considered a response for not requiring a formal process); train staff on expectations for providing guidance to customers in this area
S-3	Scope of Work/Specification Development: Establish standard templates with consideration of the following: <ul style="list-style-type: none"> ○ Train Purchasing Team and customers on use of new templates ○ Collaborate with stakeholder team in creation of templates to discuss needs and expectations
S-4	Discuss update opportunities for DCPM; discuss concerns and challenges with customers and schedule discussion with OCPW
S-5	Cooperatives: <ul style="list-style-type: none"> ○ Increase flow of information to customers regarding available cooperatives and RCAs available; increase knowledge of DPAs on same ○ While there may be a valid reason for not using a given cooperative contract, ensure DPAs have an understanding of why and consistently provide explanation to customer(s)
S-6	Discuss approach (either based upon PPM or based upon Purchasing leadership expectations) for managing urgent, but not emergency needs for customers. Discuss with CPO for any entity-wide standards.
S-7	Host a roundtable with key stakeholders (Purchasing Team, customers, suppliers) on: <ul style="list-style-type: none"> ○ Barriers to the competitive process for suppliers; review the “We No Bid” NIGP Business Council white paper (original published in 2013, with refresh being published Aug/Sept 2022) ○ Ways to leverage information in the market/from suppliers to help educate OCSD on other ways to address the continued constrained supply chain ○ Pursue training opportunities; identify outside sources (such as NIGP webinars and list serve discussions) for additional ideas on how peer entities are managing these issues.
	Standardization
ST-1	Create standard roles and responsibilities document for DPAs and customers
ST-2	As part of training Purchasing Team and customers on PPM, use PPM to assess all internal processes (considering recommendation for process mapping) to determine changes and establishment of expectations for standards connecting to PPM procedures
ST-3	Discuss with customers any duplicative efforts for tracking procurement records
ST-4	Discuss with CPO establishing standard template for contracts and solicitations
ST-5	Discuss with CPO the CPM and the Price Increase Form to address any inconsistencies and/or opportunities for customer training; include customers in discussion

	Relationship Management
RM-1	Establish DPA backups to follow up on workloads in extended absences and provide customers continued support
RM-2	Establish a plan for increased supplier engagement and reduction of barriers to competition
RM-3	Establish formal procedures for how Purchasing Team will manage and follow up with customers on negative feedback received on VPE or Contract Renewal forms, including specific discussions with suppliers/contractors on feedback
RM-4	Establish formal training and supplier outreach for the supplier community; discussions should include “how to” do business with the County, opportunities for improvement in processes and requirements that prevent engagement by the supplier community and to discuss upcoming opportunities
RM-5	Create more intentional opportunities for Purchasing Team to learn from customers; the nature of goods and services acquired by OCSD requires a more in-depth level of awareness and understanding in order to work with customers on finding solutions for their needs.
	General Procurement Practice
G-1	Establish a standard price and cost analysis model for various structures (unit price, market basket, % of list price, etc) as well as a model for price point allocation.
G-2	Establish a standard scoring approach for RFPs to the greatest extent possible for consistency in committee performance and consistency in treatment of the supplier community. Presently there are 3 approaches to scoring (including consensus, total points, and average). The scoring of a proposal could be affected dependent upon which scoring method was selected.
G-3	Work with CPO and County Counsel to identify and eliminate discrepancies between CPM language and solicitation (IFB, RFP) terms and conditions.
G-4	Establish policy, procedure, and training for supplier evaluation, including determinations of responsibility, responsiveness, and assessment against evaluation criteria.
G-5	Require written evidence of all quotes, eliminate verbal quote practice.
G-6	Work with the CPO to leverage the County’s Supplier Outreach Program to build a strategy to expand and diversity supplier base and increase competition at OCSD.
G-7	Increase staff accountability to record data accurately and thoroughly in the appropriate system to capture information available for reporting on procurement spend and various contracting metrics.
G-8	Establish a recommendation for award template for IFBs, where customer/end user can capture for the official record, their evaluation and recommendation for award.
G-9	Collaborate with CPO to develop a formal Contract Administration program for OCSD, to include defined roles and responsibilities, policies, templates, and training.
	Organizational Structure
OS-1	Create a classification structure whereby DPA positions across the entity have consistent and equitable position standards, qualifications, responsibilities, opportunities for advancement and pay

OS-2	Conduct an analysis with HR to standardize the manner in which the DPA roles are budget and allocated across departments throughout the entity
OS-3	Collaborating with HR and budget, identify ways to address the compression issues related to the DPA roles in OCSD Purchasing, to establish greater consistency in DPA roles and responsibilities, to increase opportunities for advancement in DPA roles within the same department (for increased retention opportunities) and to address the imbalance in DPA role/purchasing-based position allocation across all departments
OS-4	Consider a staffing structure that allows for a single individual to progress through a series of procurement positions based upon achievement of clearly defined qualifications within the same position control number. This approach would allow someone to hire in at an entry level, but then promote based upon achievement of clearly defined requirements (i.e. – years of experience, achievement of professional certification).
OS-5	Create a classification structure whereby DPA positions across the entity have consistent and equitable position standards, qualifications, responsibilities, opportunities for advancement and pay
OS-6	Conduct an analysis with HR to standardize the manner in which the DPA roles are budget and allocated across departments throughout the entity
OS-7	Collaborating with HR and budget, identify ways to address the compression issues related to the DPA roles in OCSD Purchasing, to establish greater consistency in DPA roles and responsibilities, to increase opportunities for advancement in DPA roles within the same department (for increased retention opportunities) and to address the imbalance in DPA role/purchasing-based position allocation across all departments
	Staffing
SF-1	Realignment of workload of Purchasing Manager and Supervising PCS positions; Purchasing Manager needs to increase amount of time dedicated to strategy and leadership; adjust workload balance of the working supervisors toward increased time supervising and supporting staff (particularly newer staff) and less time working on sourcing (present balance is approximately 80% working on procurements; 20% supervising – recommend a 60% supervising/40% supporting procurement work at minimum)
SF-2	Conduct an in-depth workload analysis for opportunities to improve how work is assigned among the existing staff
SF-3	Conduct a staffing assessment to determine training needs for each staff member, as well as needed core competency development
SF-4	Purchasing leadership should meet with staff, particularly newer staff, to discuss procurement’s role in OCSD, the value of procurement service to the entity, the overall strategy of Purchasing’s approach to developing staff and the “why” of procurement service. This approach is intended to provide a holistic approach to onboarding new staff and instill in staff the perspective of “why” they are doing the work they were hired to do.
SF-5	Establish a formal training and professional certification plan for the entire team
SF-6	OCSD staff managing sourcing for design and construction services need to be DPAs, including going through all steps to achieve this status OR an appropriate number of DPAs need to be assigned to these areas OR this work needs to be considered for reallocation to OCPW. Moreover, analysis needs to be done as to why non-DPAs are signing contracts

SF-7	Need to establish training and guidelines for staff to properly advise customers on the best use of available sourcing tools based upon the needs and concerns of the customer (qualifications versus price, supplier evaluation, criteria for solicitation)
SF-8	Formalize the mentoring approach for newer Purchasing staff, to include establishing mentorship standards and training for mentors.
SF-9	DPAs need to serve as advisors to customers; expectations and guidance on this advisory role needs to be provided, including training for DPAs on how to serve in this role, to increase the value of the procurement function across OC
SF-10	A cadence of meetings should be developed for the entity: Purchasing leadership meeting with staff regularly, DPAs meeting with customers regularly, Purchasing management should be meeting with new staff regularly (one on one or small groups). Meetings should include training, opportunities for brainstorming ideas, asking questions, discussing improvements in operations.
SF-11	Need clear roles & responsibilities documents for Purchasing staff and for customers, to include expectations
SF-12	Assign backups for when staff are out, communicate that to customers so they have someone else available for assistance
	Training
T-1	Perform cross-training of the OCSD Purchasing team, enabling all staff to have expertise in the various good and service areas to ensure a consistent level of service and succession planning.
T-2	As discovered during the CPO review, the CPO conducts regularly scheduled meetings with department DPAs, sharing updates on procurement policy and procedures. To ensure dissemination of these updates, schedule subsequent meetings with the OCSD staff performing procurement-related activities to share the updates/training.
T-3	Create a training program and plan for customers throughout OCSD, engaging the Purchasing Team to be part of developing, delivering and engaging with the training with customers to increase opportunities for relationship building, collaboration and knowledge sharing.
T-4	Survey customers and Purchasing Team for topics needed for inclusion in the training program; coordinate with CPO to ensure training is supplemental to training provided by the CPO and not duplicative; discuss with CPO whether training opportunities are open to non-DPA staff (information on this being available to non-DPAs has not been consistent);
T-5	Establish guidelines for Contract Administration, provide training, standard tools and standard procedures
T-6	Create a document with standard procurement terms and acronyms used in OCSD to provide to customers as part of training material
T-7	Leverage Job Aides (currently available at CPO website) for “How To” sessions with Purchasing staff and customers
T-8	Based upon the size of OC, the number of DPAs performing procurement-related functions and the clearly and regularly communicated needs of the customers and DPA staff, OC should consider expanding the role and size of the CPO training function. It is noted that the CPO has expanded training opportunities for DPAs over the past few years. A continued expansion of this role would have a significant impact on the department operations
	Customer Service

CS-1	Establish DPA backups for all Purchasing Team members
CS-2	Schedule advance planning discussions with customers
CS-3	Train Purchasing staff on purpose and value of procurement work for the entity
CS-4	Establish customer service guidelines, including response times for various activities
CS-5	Establish clearly defined roles & responsibilities
CS-6	Create staff backups
CS-7	Conduct open forums between staff and customers on various procurement-related topics to discuss establishing standards, tools, sharing information and receiving customer feedback
CS-8	Conduct regular customer surveys
	File/Record Management
FM-1	Reassess policy on Retroactives and consider use of CalCard for certain purchases versus issuing after-the-fact purchase orders (potential to still track and report on Retroactives thru CalCard reporting)
FM-2	Micro-purchases need to be reassessed for value in the type of process followed (ex: contract file for \$400 purchase via Master Agreement versus processing with CalCard); the invested internal costs to manage this type of purchase far exceed the cost and risk associated with it
FM-3	Contracts do not include documentation that “tell the story” of what transpired. Contract records must stand on their own merit and should not require explanation from an individual. Implement practice of providing written justification in the file for activities that are not clearly evident on the face of the file, whether that justification is part of an electronic record or a stand-alone executive summary of some type.
FM-4	Mandate use of a Contract Summary Page for all contract files. Contract tracking sheets provide organization and valuable, easy-to-access data on the outside of the contract file. Establish a standardized management review process for completed staff work and contract file reviews. Create a Contract File Checklist for management to use during staff work review.
FM-5	Provide increased training for consistency, understanding and increased compliance for Purchasing Team’s use of the CPO’s Electronic Procurement File Folder (EPFF) and adherence to the CPO file management policy. Discuss with staff what documentation should and should not be in the official contract record. The CPO standard should be followed such that appropriate contract data is captured and recorded, and all electronic records not contained in the central file (whether physical or electronic) are identified with their specific location.
FM-6	Provide staff training (or refresher training) on how to appropriately assemble, and maintain, the official contract record. This should include identifying who is specifically accountable for updating and maintaining the official contract record, including additional data and documents that need to be added to the file after contract award (e.g. – updated insurance certificates, amendments, purchase orders).
FM-7	Create a specific file management policy, including streamlining how files are stored throughout the organization.

Appendix B: On-Site Interview Attendees

Name	Department/Office
Maria Ayala	DPA – Supervising PCS
Christina Chavez	Inmate Services
Jannett Chavez & Elizabeth Ochoa	Facilities Planning/Maintenance Services
Norma Crook & Lynn Wilkerson	Director/Assistant Director
Jasmine Espinoza	Harbor Patrol
Deena Fulghum & Luana Weinkauf	Technology
Tracy Harvell	Investigations
Ronald Heim	Quartermaster
Elyce Heppner	Training
Erika Lara	DPA – Procurement Buyer
Gina Lozares	DPA – Sr Procurement Buyer
Bridgette Ludwig	North Operations Patrol
Michelle Machuca	DPA – Procurement Buyer
Edward Manhart	Air Support
Marian Marcos	DPA – Sr Procurement Buyer
Jeffrey McMillan	Media Analysis Bureau
Olivia Prudencio	DPA – Supervising PCS
Julio Robles & Francisco Martinez	Jail
Lyle Rossow	DPA – Purchasing Manager
Ana Sanabria	Crime Lab
Robin Scruggs	Southwest Operations
Yvette Torres	DPA – Assistant Purchasing Manager
Leslie Trejo	Coroner
Victor Vega	DPA – Sr Procurement Buyer
Tyrone Waiters	DPA – Procurement Contract Specialist
Brian Wayt	Executive Director – Admin Support

Appendix C: Contract File Review

(Individual files provided separately)

Attachment D: Summary of Retroactive Contracts

Record Number	Observation	Specific Finding
18-001068	Cause was outside agency control.	Retroactive due to receiving late notification from the grantor, County of San Diego.
18-001267	This suggests more guidance may be needed as to when amendments should be brought to the Board of Supervisors	It is unclear why OCSD waited more than 18 months to bring the amendment for approval given the first amendment was entered into 2/16/18 when the option to extend was exercised and changes to the facility, rent, term, and insurance were being negotiated.
19-000511	Suggests when rules change a brief analysis might be done to determine how those changes impact projects in process.	Confusion over which version of A&E rules were effective.
19-000792	Suggests a review of systems used to track contract expirations in time to take action, or potentially individual training issues.	Retroactive due to an administrative oversight.
19-001093		7 month delay due to extended negotiations with the new property owner at the end of the old lease.
19-001284	Could additional negotiation time be expected for this contract when it has to be renegotiated in 5 years?	Retroactive 3 months due to extended negotiations on a sole source elevator maintenance contract.
19-001398	Cause was outside agency control.	Retroactive due to receiving late notification from the grantor,
20-000011	This estimation error suggests issues in training as well as revision to the review/approval process may be warranted.	Retroactive (only 2 weeks) due to other party extending the time of the existing 5 year agreement.
20-000424	Is there a need for greater accountability for individual staff when these unauthorized purchases are made?	Staff ordered equipment not on contract.
20-000472	Reaching back four years and crossing over previous amendments raises concerns about how this contract was managed. "Unanticipated maintenance costs" reaching back across multiple fiscal years is a red flag.	Retroactive due to appropriate but overlooked invoices.
20-000577	This suggests training in the appropriate process may be needed.	Original Administrative approval should have been Board approved.
20-000903	Cause was outside agency control.	Retroactive due to receiving late notification from the grantor, County of San Diego.
20-001045	This estimation error suggests issues in training as well as revision to the review/approval process may be warranted.	Retroactive as the Initial approval was 38% of the actual 3 year need.
20-001127	Seems timely and a straightforward contractor name change request.	Name change notice happened since the previous amendment.
20-001193	Does this bring up a potential issue of why the vendor is approving first v. Board Approval first?	Vendor not returning the signed contract led to this being retroactive.

20-001238	I would question the reasoning here of this being a difference between the suppliers service v. goods terms, given that they have had a contract successfully with this supplier- with multiple amendments 7/14/15-6/13/20.	OCSD took an additional six months to negotiate leading to the need for a retroactive request.
21-000192	Suggests a need for training on ordering processes.	Staff used the incorrect contract for ordering.
21-000263	Suggests the review and approval processes need to be revisited to catch errors like this.	This redoes A20-1238 from two months previous. Turns out the figures included in that were understated by \$2,559.
21-000535	Improved customer education could help avoid situations like this moving forward.	Non-compliant purchase authorization has since been addressed by a process change.
21-000689	Completely reasonable given the complexity.	Extended negotiations on a sole source contract.
21-000890	Cause was outside agency control.	Retroactive due to receiving late notification from the grantor, County of San Diego.
21-000934	Could the cost increases have been foreseen?	Based on the dates and dollars, this implies that the contract is retro due to the cost increases of California minimum wage.
S22G	Timely action taken and cause was outside agency control.	Retroactive due to actions taken by California Public Utilities Commission and FCC.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 1501151 / 060 14011774	Document Reviewer:	MG
Alternative Reference Numbers:	060 C003270-LQ (BidSync SS #)	Contract Folder #	C003270
Contractor:	Partners for a Safer America	Customer Department:	Jails
Title:	Bail Bond & Defence Attorney Advertising	Proc Staff/DPA:	L Quirarte / M Morcos
Review Under CPM Policy Version:	2017 CPM	Funding Source:	Revenue contract
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	See notes below
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	See notes below
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	N	No originating requisition found in file, memo dated 10/15/14 requesting revenue generating sole source; Req 1399885 dated 2/12/20 for yr extension (ref to while RFP is being processed)
Budget & Dept Approval of Req	Evidence of approvals; dates	N	Budget approval on extension req 1399885 only
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	Y	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	Partial	BOS approval secured for SS; DPA & Dept Head approved, no budget approval (assume due to revenue contract); no evidence of CPO approval (reference to BidSync approval?); Item pulled from BOS agenda during COVID Emergency authority to CPO
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Partial	7/1/15 - 6/30/20; extended one year due to new RFP process - see notes below
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)		N/A	
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	

Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	
Public Bid Opening		N/A	
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:		N/A	
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N	No CSE form found in file
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	Y	ASR 15-000391 (5/19/15) - 1 yr contract with 4 add'l one year periods expiring 6/29/20
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	Partial	No child support enforcement cert found in file; contract signatures and pricing present
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N	Current term no ins found on record
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	No PO/Revenue Contract	\$134k/yr estimated in revenue share; later years reference \$300K+/yr revenue
Contract Amendments (CA)/Mods to PO	Copy of contract in file; Issue date		
CA/COR Customer Approval	List all by number and date reference	N/A	
		N/A	

Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS K's = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	*New: Renewals and extensions only for Comms over \$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed CPE	N	While CPE form was not req'd under 2017 CPM, documented evidence of performance was not found in file
Contract Renewals/Extensions			
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	Y	Amend #1 extended one year, new exp is 6/29/21 (no renewal options in Sole Source request and contract); ref to BOS Reso 3/26/20 (ref to CPM Exempt 2-11)
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

Note in file that RFP was issued and rec'd no responses, so processed as a SS approved by BOS in 2010 w/non-profit Safer America for a period of 5 years total. This is a new SS for the next 5 years(2015-2020). Agreement and SS request approved for 5 years w/o additional terms; then issued request to extend an add'l year thru amend #1. Req for 1 yr ext references needing time (by DPA) to process new RFP and avoid lapse in coverage, however, no further notes found in file after 6/4/20. Reference in file to BOS delegating authority to CPO for emergency handling of requests during COVID. Reference in file from OCSD staff that the CPO would be approving and item being pulled from BOS agenda, however, file does not reflect any actual approval from CPO for the additional year.

OCSD Response: During the Pandemic, CPO took a resolution to the Board of Supervisors granting authority to approve contracts. This specific file/contract was one of those contracts that was approved per the Board resolution authority. CPO maintains a list of the approved contracts approved under the resolution and this contract is on that list.

Staff response above is noted and in line with the general observation and assumption from the file review. However, the findings remain unchanged as those findings are separate from the noted BOS authority granted to CPO to approve contracts.

OCSD CONTRACT FILE AUDIT			
Document Reviewed (MA, CT, PO):	PO 060 18012095/PO 060 18011890	Document Reviewer:	MG
Alternative Reference Numbers:		Contract Folder #	C019890
Contractor:	Air Power / Omaha	Customer Department:	Investigations
Title:	Engine Replacement Cessna 182	Proc Staff/DPA:	Yvette?
Review Under CPM Policy Version:	2017 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	Req shows commodity but per CPM definition this might be more appropriately classified as a Capital Asset; this did not affect the action taken to bid
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1241933, 9/12/17; \$51K; after the initial review of scope/budget approval to get to point of bid issuance (Jan 2018) there was a 9 month gap with no information in the routing notes, until 9/18 with note saying bid was being cancelled and awarded to another contractor on another contract
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	Y	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	Y	bid out 4 times before responses rec'd
Criteria for Award	Included in solicitation; min req's met if RFA	Y	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	N/A	one time purchase
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			

Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	?	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	?	treated as a commodity, but should potentially have been Capital Asset?
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	Y	
Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	Y	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N	Do not see evidence of bid evaluation and recommendation
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A in 2017 CPM	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	Y	Cause of 2nd low bidder being eliminated
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N	No evidence of recommendation from customer
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	Y	Contract signed 5/11/18 to Omaha
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K; Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS; Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	Y	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N/A	Never received from awarded contractor; it appears the contract/PO was awarded/signed and issued to Omaha. On 5/29/18, a cancellation letter was sent to Omaha.
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	N/A	Never finalized as contractor failed to provide insurance and 2nd low bidder would not meet a contract requirement for Child Support Enforcement record

Contract issued to contractor	Copy of contract in file; Issue date	N/A	
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Apprval		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$\$t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

It took 1 year from poit of req submission (9/17) to the bid being cancelled (9/18); there is a gap of 9 months in the req notes/routing between bid issuance and cancellation decision w/no explanation of what transpired, it must be pieced together from various emails in the file; Appears this was rebid multiple times w/o responses, until the rebid when Omaha and Air Power bid in May 2018; Bid language indicated "exceptions" taken after award would lead to disqualification - it appears both bidders ended up taking exceptions to conditions (insurance and child support) after notice of award, thus both were rejected and the solicitation cancelled; would highly recommend an executive summary for contracts, as it was very difficult and time consuming to piece together the information in this file

Staff Response: This purchase file folder is from 2018 and the solicitation was cancelled. I accepted the OCSD Purchasing manager in 2020 but concur with the notes above.

Staff response is duly noted.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	PO 060 21010904	Document Reviewer:	MG
Alternative Reference Numbers:		Contract Folder #	C021338
Contractor:	Sandoval Custom Creations	Customer Department:	Coroner /Investigations
Title:	LED Covert Street Light Surveil Cameras	Proc Staff/DPA:	M Ayala
Review Under CPM Policy Version:	2019 CPM	Funding Source:	Federal
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS , Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity /Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1437228
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	Y	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	Y	quote from Sandoval Custom; S/S form
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	N/A	
If Federal, field flagged in OCE	"alt funding"	Y	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N	only language in agreement was about Federal grants
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)		N/A	
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	
Public Bid Opening			

Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	N/A	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N/A	Delivery by 3rd party
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	PO	50,746
Contract issued to contractor	Copy of contract in file; Issue date	N/A	
Contract Amendments (CA)/Mods to PO	List all by number and date reference		
CA/COR Customer Approval		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	

RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

Staff have clarified that the purchase was funded with a Federal Grant (High Intensity Drug Trafficking Areas Program), which would be subject to the FAR. Did not see specific language in the sourcing document/contract that reflected the citation or specific language from the FAR that would be applicable to the purchase and therefore, a requirement of the contractor for compliance.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 20011103	Document Reviewer:	MG
Alternative Reference Numbers:		Contract Folder #	C021399
Contractor:	Incadence Strategic Solutions	Customer Department:	OCSD
Title:	Mobile Fingerprint ID	Proc Staff/DPA:	L Quirarte
Review Under CPM Policy Version:	2018 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1323257, \$3M est, 12/4/18
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	Y	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	Y	System notification to bidders list effective 8/7/19 (approx 55 suppliers on list)
Criteria for Award	Included in solicitation; min req's met if RFA	Y	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	8/25/20 - 8/24/23 (3 yr terms, renewable for 7 add'l 1-yr terms)
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		Y	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	?	Note to file suggests CoCo review, but nothing in file to record CoCo approval
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	Y	RFP 060-C021399 issued 9/18/19
Bidders List	Demonstrates sufficient notification of opportunity	Y	System notification to bidders list effective 8/7/19 (approx 55 suppliers on list)

Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	Y	10/7/2019
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	Partial	BidSync print out (dated 6/24/20 - 9 months after bid opening) shows due date, but nothing demonstrating public opening data shared nor the number of responses received at bid opening
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N	no record of opening activity outside of document referenced above
Evaluation Process:		Y	memo notes suggest 5 proposals received for RFP
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	Y	5 committee members, evidence of recommendation, file contains quals and COI docs for each member
RFP - Proposer Interviews	req'd over \$1M;	Y	Oral presentations - 5 parties notified
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	Y	BAFO requested of all 5 parties; 11/15/19; Recommendation 1/9/20; Score sheets in file
RFP - Cost Analysis	Record in file if cost part of eval criteria	Y	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	Y	multiple references secured
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	Y	Signature in offer for cert.
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	Y	CoCo included in negotiations and final review
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	Y	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	Y	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K; Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS; Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	Y	Approved under ASR # 20-000149 on 8/25/20
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	Y	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	Y	Contract signed, inclusive of certs req'd, pricing
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	Y	
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	Partial	MA in file, however, no other order docs?
Contract issued to contractor	Copy of contract in file; Issue date	Y	
Contract Amendments (CA)/Mods to PO	List all by number and date reference		
CA/COR Customer Approval		N/A	

Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$\$t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

OCSD purchasing staff appropriately advised client that an RFP would be a more inclusive process, versus the initially requested 2 step bidding process that may have been ineffective in the past (pass/fail criteria eliminated potentially otherwise competitive offers) - best practice role for procurement; original offer from InCadence at \$1,042,352.49. Contract award pricing at \$2,552,244.11. Why did the price double? There are positive/negative indicator packets (evaluation documents) for 4 of the respondents in the file, but not on the successful contractor; 6 month gap between BAFO dated 11/15/19 and CoCo review 5/21/20 (nothing in file to record what transpired; if for negotiations, would be good to mention somewhere in the file)

Observations of "box" with confidential info: Lots of handwritten notes kept, unclear as to purpose; consider keeping only the formal evaluation docs, not individual committee member notes and/or staff notes; nothing on evaluator score sheets is signed or dated by the evaluator; no way to tell who completed this document.

Staff response: The difference of the Original offer pricing of \$1,042,352.49 and the Contract award pricing of \$2,552,244.11 is the result of Annual Maintenance costs (after warranty expiration) and an increase number of devices/equipment.

Staff response is duly noted, however, raises questions as to why annual maintenance and additional equipment was not part of original solicitation and evaluation. Doubling costs suggest substantial increase in scope and original competitive analysis. Additional noted concerns remain.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 20011931	Document Reviewer:	MG
Alternative Reference Numbers:	RFP 060 C021440-MT	Contract Folder #	C021440
Contractor:	Trauma Intervention Programs	Customer Department:	North Patrol
Title:	Comprehensive Crisis Intervention Svcs	Proc Staff/DPA:	V Touch
Review Under CPM Policy Version:	2018 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/a	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1324352; \$250K for 5 yr term, 12/10/18
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	Y	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	Y	published 2/19/20
Criteria for Award	Included in solicitation; min req's met if RFA	Y	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	RFP intended 5 yr term (7/7/20 - 7/6/25)
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		Y	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	Y	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	Y	

Bidders List	Demonstrates sufficient notification of opportunity	Y	Published in system; 69 viewed, cannot see how selection of supplier categories is accomplished in system, cannot see how many downloaded (print out from system is very minimal info)
Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	Y	4/3/2020
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	?	Unclear on how bidders access bid opening info in system? Otherwise is it "N" due to COVID?
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N	System generated, but no way to tell "who" responded from printed BidSync doc
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	Partial	COI stmt signed by one committee member but no record of other two; Eval Comm Qual Form completed by 1, but no record of other 2
RFP - Proposer Interviews	req'd over \$1M;	N/A	while not required, for this service, would recommend (however, was incumbent provider)
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	Partial	all scoresheets present; however, scores do not match summary doc; summary score sheet has a handwritten modification w/o any indication as to reason or signed for record
RFP - Cost Analysis	Record in file if cost part of eval criteria	N	No information in file on how points allocated on pricing points (modification to summary eval scoresheet)
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation		
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	Y	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	Y	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K; Services = over \$100K/yr to a single contractor, multi-yr over \$500K = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	Y	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	Y	All certs signed, contract signed, pricing included

Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	Partial	current coverage in file ("professional liability" listed twice on cert, but no specific reference to the Sexual Misconduct insurance req'mnt in RFP/Contract?)
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	N	MA issued for \$165K/5 yrs but no ordering doc
Contract issued to contractor	Copy of contract in file; Issue date	Y	
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Approval		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS K's = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	*New: Renewals and extensions only for Comms over \$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed CPE	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

Risk Assessment & Mod of Ins Terms form - best practice; file reflects communications w/DPA that support good procurement practices Including disc about projected timelines and actions; properly advised client about issuing an RFP for a 5 year term versus renewing an informal for another year; timeline observation: req submitted 12/10/18, discussion about doing RFP for over a year, RFP published 2/19/20 (14 months later) possibly due to COVID priorities; (Staff Response: Concur w/auditors comments and delays due to COVID priorities.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	CT 060 20011032	Document Reviewer:	MG
Alternative Reference Numbers:	CT 060 21010571, CT 060 22010403	Contract Folder #	C028543
Contractor:	Evans Gun World	Customer Department:	Training - Katella
Title:	Use of Shooting Range Facility	Proc Staff/DPA:	D Thai
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	N	Sourcing method is not clear; Initial req came in under \$50K, no evidence of quote. Next req for addtl \$17K (purchase now exceeds \$50K threshold) requiring formal source in the future, with potential emergency or sole source as interim); unclear on why went to Board, since SS wasn't argued until another year term discussed.
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Partial	See notes below
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y?	1394682; 1/14/20; \$45K; 1468072; \$17,400 4/6/21; don't see req for the \$135K
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	N/A	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	Partial	Unclear on why purchase was not handled as informal originally? File lacks clarity as to why not handled as formal when additional time and funds were needed; requirements do not suggest support of sole source
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	Partial	This is the 2nd contract with the same supplier; dependent upon \$\$ on the 1st CT w/supplier as well as the firing range renovation and COVID, this may have been more appropriately handled as a formal or an emergency. Justification lacking as sole source. Sole source not done until well into the 2nd (actually 3rd) term with the same supplier. See note below.

RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	10/1/20 - 9/31/21
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	
Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	Y	CoCo recommended doing this as a separate contract, but unclear on why this went to the Board?
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K; Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS; Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	Y	Reference to ASR 20 000-474 for approval of this purchase. Why did this require Board approval?
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	

Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	N/A	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N/A	Waiver of ins provided via signed Risk Assessment form
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	Partial	See notes below
Contract issued to contractor	Copy of contract in file; Issue date	Y	
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Approval		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	Y	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N	See notes below
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes.

Difficult to determine all that transpired in this file; lacking explanation of the various actions that occurred; record suggests that the supplier was engaged prior to this contract under CT 060 ????? for \$45K for 10/1/19 - 9/30/20 (asking to pull this file); Req 1394682 requests a "quote", but no quote in file? Resulting CT 060 20011032 appears to connect to CT 060 21010571 (system issue), then another req submitted to add funds of \$17.5K. Finally a SS request for another year and another \$135K. Given this now reflects 3 years with the same provider and no competition, should have competed.

Sole Source request issued 8/4/21, approved 8/10/21 to CT060 20011032 to increase by \$17,400 and to add another term 10/1/21 - 9/30/22 for \$135K; Justification for sole source lacking: While range was only supplier who met the needs, they are not the only supplier available as evidenced in response to Question #4 (suggests

CT 060 20010369	10/1/19 - 9/30/20		
CT 060 20011032	10/1/20 - 9/30/21	\$45K	quote (new contract but with same provider)
CT 060 21010571	10/1/20 - 9/30/21	see above	System error, connected to CT 060 20011032
CT 060 21010571	10/1/20/ - 9/30/21		\$17,500 increase for more services before expiration
CT 060 22010016	10/1/21 - 9/30/22	\$135K	
CT 060 22010403	10/1/21 - 9/30/22	see above	Connected to CT 060 21010571

Staff response: The OCSD Gun Range Facility has undergone massive construction that has involved multiple delays in completion. This necessitates the use of Evans Gun World range to facilitate the necessary "qualification" required by policy. Each of the CT documents were for a specific period of time and dollar amounts. Board of Supervisors (BOS) approval was obtained for the issuance/amendments as required per policy. The Sole Source forms was part of the package of forms sent to the BOS.

Staff response is duly noted. Response does not fully address all issues identified; file continues to lack clarity and sufficient support for actions taken; actions do not

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 21011023	Document Reviewer:	MG
Alternative Reference Numbers:	Bid #060 C028616	Contract Folder #	C028616
Contractor:	Apple Specialties	Customer Department:	OCSD/Fac Ops/Harbor - E Ochoa
Title:	Plumbing Supplies	Proc Staff/DPA:	V Vega
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	original 1408896 1/13/21; revised 1410095 & 146128 to address misstated \$\$ on original req (reqs coded as "service" rather than "commodity")
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	Y	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	Y	posted in system 10/16/20
Criteria for Award	Included in solicitation; min req's met if RFA	Y	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	2/1/21 - 1/31/23 (3 yr contract)
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		Y	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	Y	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	

Bidders List	Demonstrates sufficient notification of opportunity	Y	50 on list "viewed", 8 downloaded
Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	Y	bid issued, extended and re-bid several times; last re-bid closing of 12/18/20; numerous typos on dates in req discussion
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	?	Unclear on how bidders accessed bid information? On-line?
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	Y	bid tabulation in file
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	Y/partial	only evidence of dept review and approval is in req approval path comments; no record of basis of award recommendation, no documentation of analysis
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	Y	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	Y	two evaluators provided review docs; 11/29/20
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	Y	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	only two bidders, two contracts awarded by position
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	Y	All applicable docs present and signed
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	Y/Partial	missing auto, W/C, EL; no current ins in file
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	No PO/MA only	
Contract Issued to Contractor	Copy of contract in file; Issue date	Y	1/29/2021
Contract Amendments (CA)/Mods to PO	List all by number and date reference	Y	Amend 1, 2
CA/COR Customer Apprval		Y	

Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	Y	Amend 2 increased \$ of contract due to mistated dollars required for both contracts; approved by CPO
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		Y	
CA/COR Signed by Contractor		Y	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	Y	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

Favorable observations: DPA Compliance Review Check Sheet, printed tabs and folder organization = best practice alignment

Concerns/Issues: Use of cost-plus-percentage-cost pricing basis - not specifically called out in CPM, however, not recommended for public procurement per ABA Model Procurement Code; pending what was included in bid, record reflects a misstated \$\$ amount for the 2 awards, which was subsequently amended in the contract (did this have any affect on the bid process and intent? Would others have competed if they knew dollars available were significantly higher?), limited competition (approx 45 viewed, 8 downloaded, but only 2 responded and 1 was very minimal response - also this was the 3rd time this had been competed w/previous efforts lacking responses); no record of OCSD reaching out to those who didn't submit to inquire as to why they were competing, particularly given the type of commodity; if COVID was an impact on ability for suppliers to compete, the record should reflect this feedback; req submitted on 4/3/20 - award finalized 3/29/21 (one year for plumbing bid suggests concerns in the market given plumbing supplies would seem widely available in a large community like OC); CPM requires a record of basis for cancelling and rebidding, which is not readily identified in the file; DPA Compliance Review Check List states "required number of solicitations" in file (unclear on what this means) and that insurance was present (which it does not all appear to be present)

Staff Response: there has been a countywide issue with getting robust responses to our bid solicitation on bidsync. CPO is currently looking into other options. Moving forward, we will avoid the "cost plus %" methodology to align with ABA Model Procurement Code. Between the time to do multiple rebids and the pandemic (Covid), this commodities contract was delayed.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 21010713	Document Reviewer:	MG
Alternative Reference Numbers:		Contract Folder #	C028696
Contractor:	Tecan US Inc.	Customer Department:	Crime Lab
Title:	Consumables for EVO Instrument (Lab Equip Supplies)	Proc Staff/DPA:	G Lozares
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1400435; 2/18/20 \$178,500yr/\$535,500 total
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	Y	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	Y	Published 8/27/20
Criteria for Award	Included in solicitation; min req's met if RFA	Y	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	12/17/20 - 12/16/23 (3 yr term)
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		Y	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	Y	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	Y	approx 15 viewed, 4 downloaded
Public Bid Opening			

Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	Y	Original due date 8/7/20; extended 9/14/2020 and 9/21/20
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	?	COVID restriction; online access to info?
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N	Nothing in the file shows who submitted upon the final opening; bid tabulation in file prepared by DPA
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	Y	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	Y	Memo from customer since only 1 bid received; nothing on recommendation indicates the pricing is acceptable, beyond "apparent lowest bidder"
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	Y	DPA approved
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	Y	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	Y	
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	?	MA issued \$535K - no ordering docs
Contract issued to contractor	Copy of contract in file; Issue date	Y	
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Apprvl		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	

Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$\$t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

This solicitation appears to have been extended or reissued under the same number. Correspondence suggests the successful bidder was contacted after no responses were received to the bid, they then agreed to submit (were unaware of the bid initially) and did so under a reissued or extended opening. This needs to be clarified. A summary document would "tell the story" of what transpired, otherwise challenging to determine what transpired.

Staff response: Purchasing Manager concurs with Audit comments. This was bid out two times and only one response received to the 2nd bid. The resultant contract and pricing was negotiated with the sole responsive bidder.

Staff response is duly noted. Staff handling of solicitation was not in alignment with industry standards.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	PO 060 21010638	Document Reviewer:	MG
Alternative Reference Numbers:		Contract Folder #	C030000
Contractor:	Omni Enterprises	Customer Department:	Admin J Leauasoga
Title:	Cleaning & Disinfecting Services	Proc Staff/DPA:	D Thai
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1426660; 9/19/20; \$3500
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	N/A	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	Y	Quote from Omni in file (one time cleaning)
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	C/CA = Max 5 years (exc RCAs); Less than 5 years - ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	

Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	N/A	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	Y	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N	No insurance in file
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	Y	
	Copy of contract in file; Issue date		
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Approval		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	

CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

Another file example where Federal lobbying certificate was secured, but no reference to Federal funding on req or anywhere else in file. *(Purchasing Response - This was a one-time Covid related cleaning with special budget (Covid related) job # EOC10220 which was used during the pandemic to identify purchases that may qualify for regular FEMA (or CARES Act) reimbursement. The Federal T&C and certification was included to comply with FAR and qualify for FEMA reimbursement.)*

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 21010565	Document Reviewer:	MG
Alternative Reference Numbers:		Contract Folder #	C030016
Contractor:	Omni Enterprise Inc	Customer Department:	Financial/Admin
Title:	Janitorial Cleaning Supplies	Proc Staff/DPA:	G Lozares
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Partial	Doc coding changed over time, from quote, to bid, to emergency - unclear as to what transpired with this file; Staff response: \$50k is single quote level for Services (1 quote) - this response does not clarify why the coding changed in the file
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1428819 9/16/20 \$50K
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	Y	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N	No quote from provider in file
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Partial	9/24/20 - 9/23/21, extended to 2/23 amend #1; term reduced back to 11/17/20 Amend #2
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)		N/A	
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	

Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	
Public Bid Opening		N/A	
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:		N/A	
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K; Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	Partial	signed contract, Federal language in contract presumably to enable COVID funding recovery; unclear as to whether all required federal certs were requested, only cert in file is Anti-Lobbying; others may not be required, dependent upon source of Federal funds/recovery requirements
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	Y	Noted Risk Mngr waived part of insurance for type of service
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	N	No ordering documents in file
Contract issued to Contractor	Copy of contract in file; Issue date	Y	
Contract Amendments (CA)/Mods to PO	List all by number and date reference		

CA/COR Customer Approval		Y	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	Y	two amendments issued, as well as 8 modifications
CA/COR Review/Approval Proc or DPA		Y	
CA/COR Signed by Contractor		Y	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$\$t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

No quote on file from supplier, no reference to Federal funds, but Fed language in contract; awarded MA on 9/23/20 (term intended 9/24/20 - 2/23/21); issue amend #1, signed 11/19/20 to correct term in contract - typo; then issue 6 more modifications (dated 1/12/21 - after the identified cancellation date - thru 3/11/21), then another modification #8 to cancel the contract effective 11/17/20, which predates the signing of the 2nd contract amendment? Amendment #2 isn't signed by supplier until 5/7/21? File lacks clear explanation of what transpired with the changing in Procurement Type and the reason for multiple changes to term.

Staff response: Originally intended to be an IFB but due to Covid we went with a \$50k service contract (single quote level) due to the immediate need due to the pandemic. Amendment #1 was to correct the end date of the original CT document. Amendment #2 was to terminate the contract since we had a long term contract solution.

Staff response duly noted. File should contain justification for actions taken by staff and should provide documentation and information for file to stand on its own merits without necessity of staff explanation.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	PO 060 21010643	Document Reviewer:	MG
Alternative Reference Numbers:		Contract Folder #	C030039
Contractor:	Truth Be Told Polygraph	Customer Department:	Employee Services
Title:	Polygraph Services	Proc Staff/DPA:	O Prudencio
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	Retroactive
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	Approved by CPO and CFO via request form
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1435380, \$5,800 (two past invoices payment)
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	N/A	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	N/A	
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	
Public Bid Opening			

Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	N/A	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	N/A	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N/A	
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	Y	
	Copy of contract in file; Issue date	N/A	
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Apprval		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	

CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

before old contract expires; these purchases took place during a lapse in between the two contracts; small purchase amount only requires one quote anyway, so either way the purchase is compliant; possible pCard use in the future for this type of situation. (Purchasing Response: Response: The PCard cannot be used to pay for retroactive purchases, per PCard policy (CPO tracks and runs reports of retroactive purchases countywide via CAPS+) Final auditor response: Reassess policy on retroactives.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	PO 060 21010579	Document Reviewer:	MG
Alternative Reference Numbers:	RCA 017 18010014	Contract Folder #	C030052
Contractor:	Interior Office Solutions	Customer Department:	Coroner
Title:	Office Furniture	Proc Staff/DPA:	M Machuca
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity /Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1436806; 10/6/20; Cares Act reimbursement, \$29K
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	When reimbursed by or used with Cares Act funds, are instructions to still select "none" for Alternate Funding?
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	N/A	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N	Quote from RCA supplier referenced on req, didn't see copy in file
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	Y	RCA 017 18010014
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	N/A	
If Federal, field flagged in OCE	"alt funding"	N	Should "Federal" be selected for Cares Act purchases?
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N	Even when not flagged as "Federal", the Federal language and certs are added into some of the purchases where Cares Act funds would be used/reimbursed afterwards. Where and how are staff instructed as to what language to include in these purchases?
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	

Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	
Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75k or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	N/A	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	N/A	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N/A	

PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	Y	PO 060 21010579 is coded as "One Quote"; should be coded as RCA if that Code is available; how is spend under an RCA captured if individual orders from customers are not connected to the RCA document number?
	Copy of contract in file; Issue date	N	agreements requires Fed certs, no signed certs in file
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Approval		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

No quote in the file, no signed Fed certs

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 21010784	Document Reviewer:	MG
Alternative Reference Numbers:	MA 042 20011817	Contract Folder #	C030075
Contractor:	Mediowaste Disposal LLC	Customer Department:	North Patrol
Title:	Med Pharm Waste Pick Up & Disposal	Proc Staff/DPA:	G Lozares
Review Under CPM Policy Version:	2021 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	?	whichever this is classified as, where is the evidence from CPO that this is an authorized coop/RCA use? Which seems trivial for \$400; copy of MA Coop/RCA in the file with pricing info
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	?	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1394330; \$400.00; 1/13/20
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	Y	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	9/1/20 - 8/31/23 (renewable for 2 addtl yrs)
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	

Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	N/A	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	N/A	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	Y	
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	Y	Subordinate MA for \$400
	Copy of contract in file; Issue date		
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Approval		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	

CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/a	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

documentation for a \$400 purchase. (Response - RCA classification is used for RCA contracts issued by CPO vs COOP which is classified as piggybacking off of another non-RCA County contract or Cooperative program agreement. While Pcard may have been more efficient for payment, the services being rendered was for Hazardous Waste Disposal so the issuance of a \$400 subordinate contract was most likely to secure the T&Cs/protection provided by the HCA contract) Auditor response: Purchasing response did not confirm that purchase was from a Coop or an RCA. Reference to T&Cs/protection of HCA contract - did not see any contract in the file?

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	PO 060 21010993	Document Reviewer:	MG
Alternative Reference Numbers:		Contract Folder #	C030100
Contractor:	AVSG After Hours	Customer Department:	Haz Device Squad
Title:	Specialized Vet Services for K-9 Paco	Proc Staff/DPA:	V Vega
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	Recorded as "Retroactive" in file, however, req inappropriately coded as "Retroactive Contract - Less than \$500" for each req
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	Two reqs for emergency services for vet care of canine; Retro approval request form processed
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1439429. 1441000
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	N/A	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K - appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	Services delivered in June-Aug, partially paid by Cpt (reimbursed) on emergency basis; unclear why
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	

Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	
Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K; Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	N/A	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	N/A	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N/A	
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	Y	\$3,884.26
	Copy of contract in file; Issue date		
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Apprval		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	

Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS K's = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

options with pCard payment or expedited processing for retroactive purchases; unclear on why this took 5 months to process by client and DPA. (*Purchasing response: PCard cannot be used for retroactive purchases per PCard policy - CPO tracks and runs reports on retroactive purchases*) Auditor response: No response provided to reason for extensive processing delay. Recommend reassessing PCard policy on payment for these micro-purchases. Consider other alternatives for data tracking. Excessive internal processing cost for extremely small purchases.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 21010890	Document Reviewer:	MG
Alternative Reference Numbers:	Against RCA 017-20010020	Contract Folder #	C030140
Contractor:	T Mobile (prev Sprint Solutions)	Customer Department:	Various
Title:	Wireless Data and Voice Equipment	Proc Staff/DPA:	D Lopez
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/ Service /HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	Y	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1403197, 1447637, 1457133
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	N/A	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	Y	1 quote req'd per \$ amt, RCA and Participating Addendum from NASPO contract in file
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	1/1/21-8/11/24
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	
Public Bid Opening			

Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	N/A	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	N/A	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N/A	
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	N/A	See note below
	Copy of contract in file; Issue date		
Contract Amendments (CA)/Mods to PO	List all by number and date reference		
CA/COR Customer Approval		Y	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	Y	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	

RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N	If renewal, should include CPE?
Contract Renewals/Extensions			
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

Note from Purchasing: MA Document (CAPS+) issued for this 3-year contract and a copy is in the file folder. A CT/PO document was not issued because PO documents are usually issued for a single purchase/invoice and CT documents can be issued for purchases where there will be multiple invoices but the contract duration is typically 1-year or less.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 21011227	Document Reviewer:	MG
Alternative Reference Numbers:	Bid #060 C030145 DT	Contract Folder #	C030145
Contractor:	Keefe Group	Customer Department:	OCSD/Jail - C Chavez
Title:	Various Snack, Food, Beverage for Resale	Proc Staff/DPA:	D Thai
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	141744, 6/4/20, \$3.24M for 3 yr term
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document		
Informal Procurements:		N/A	
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	Y	
Criteria for Award	Included in solicitation; min req's met if RFA	Y	No copy of the solicitation/IFB in the file, but located copy in another of the awarded contracts (multi-award)
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	3/4/21 - 3/3/24 (3 yr initial term)
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		Y	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	Y	multi-award (4) w/primary & secondary
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	

Bidders List	Demonstrates sufficient notification of opportunity	Y	approx 50 suppliers viewed, 14 downloaded; 5 responses
Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	Y	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	Y	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	Y	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	Y	evaluation by D Thai w/recommendation for multiple award to 4 of 5 bidders - C Chavez
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation		
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	Y	2/11/2021
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	Y	Y Torres 3/16/21
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N	File 1 of 4 (confirmed other awarded suppliers in other files); This file only includes this supplier (however, also included the sole unsuccessful bidder in this folder?)
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	Y	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	Partial	older certs in file from previous contracts, and cert for current term, however, no ins cert covering from point of award (3/4/21 - 12/4/21) in file
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	Y	\$3.24M for MA 3 yr term; 2 yr renewal opt; no ordering doc
Contract Issued to Contractor	Copy of contract in file; Issue date	Y	
Contract Amendments (CA)/Mods to PO	List all by number and date reference	Y 1/21/22	Req 1517812 to allow price increases w/o need for addtl \$ allocation

CA/COR Customer Approval		Y	Letter justifying price increase submitted by contractor; no info in file about customer analysis of pricing increase to determine if appropriate and necessary
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	Y	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		Y	
CA/COR Signed by Contractor		Y	Amendment #1 signed by contractor on 1/12/22-price increase for multiple items under contract
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$\$t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

Confusion on why records reflect that the amendment was executed and docs recorded in system as complete, but Amendment #1 was not signed by anyone until 4/13/22, when signed by L Rossow? Hw did customer/DPA determine that pricing increase was justified based upon contractor letter? Didn't locate CPE form; reference checks via system data submitted? File 1 of 4

Staff response: During the pandemic and supply chain disruptions, there were price increase requests that were received from various contractors. Price increases are scrutinized against price indexes (CPI, etc.).

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 21011077	Document Reviewer:	MG
Alternative Reference Numbers:	NASPO ValuePoint #164719	Contract Folder #	C030179
Contractor:	Galls LLC	Customer Department:	Quartermaster - R Helm
Title:	Ballistic Vest	Proc Staff/DPA:	Waiters, T
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop , RCA	Y	
Proper Sourcing Method for Contract Type	Commodity /Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	Partial	NASPO Coop - participating addendum for Point Blank Enterprises and distributor Galls, LLC in file; no quotes in file for \$75K limit
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1451015 1/5/21 - request for contract renewal, \$750K
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	N/A	
Informal Procurements:		N/A	
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N/A	
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO ; MA created if RCA; approved by BOS	Y	NASPO Cooperatives are on the CPO "Approved" list of Coops that can be used by County departments - access list to confirm
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K - appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	3/15/21 - 11/10/22, less than a full year to align with current NASPO contract term
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)		N/A	
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	

Bidders List	Demonstrates sufficient notification of opportunity	N/A	
Public Bid Opening		N/A	
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:		N/A	
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	via executed subordinate agreement and participating addendum
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc	Y	approval letter from CA DGS authorization to use NASPO contract; subordinate contract of OC, Master Agreement NASPO/Point Blank, Distributor Form Galls LLC, Participating Addendum, Price List
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N	No current insurance cert, but certs from previous years under other agreements
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	N	No PO/CT in file; where is evidence of individual purchases under the MA?
Contract Issued to Contractor	Copy of contract in file; Issue date	Y	
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Apprval		N/A	

Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS K's = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

DPA checklist indicates both "new contract" and "vendor renewal notice"? It is unclear as to whether this is a request to "renew" use of the NASPO agreement or if they are trying to use the NASPO agreement to continue use of Galls specifically and found them under this coop. Evidence in file of long term use of Galls (numerous years of ins certs in file). If this was actually a "renewal", where is the evidence of the previously authorized use of this NASPO contract previous to the term referenced in the contract file? Was there a previous contract and what happened to that contract? Method of "solicitation" on req shows "Coop - Subordinate - 2 quotes written" but there is no evidence in file of any quotes from any other sources. Note: This file is an example of how challenging it is for a third party to piece together the story of what transpired without any type of summary of what transpired.

Staff response: OCSD utilized the NASPO Cooperative contract (on approved CPO list of Coops) to obtain these commodities. Purchasing manager concurs that better file documentation was needed for this file.

Staff response duly noted.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 21011245	Document Reviewer:	MG
Alternative Reference Numbers:		Contract Folder #	C030236
Contractor:	Ruben Escobar	Customer Department:	Coroner
Title:	Post Mandated Death Invest. Courses	Proc Staff/DPA:	V Vega
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Y	
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1456466 - \$7500 for original term; 1492380 - increase by \$30K
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	Y	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	N	No evidence of quote received from supplier
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	
Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	C/CA = Max 5 years (exc RCAs); Less than 5 years - ext up to 1 year w/o BOS approval; Board awarded Services contracts = not over 3 rs w/o BOS approval	Y	Term = 3/4/21 - 3/3/26
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	

Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	
Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	Y	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	Partial	MA signed, included pricing and scope; but as noted, no original quote received from supplier
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	Y	Risk Mngr provided partial ins waiver; evidence of auto insurance in file but exp 3/1/21
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	N	MA = NTE \$7500, no orders in file
Contract Amendments (CA)/Mods to PO	Copy of contract in file; Issue date		
CA/COR Customer Approval	List all by number and date reference	Y	Mod #1 - increase MA by \$25K
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	Y	CPO approval received for increase beyond 10% of original contract amount
CA/COR Review/Approval Proc or DPA		Y	

CA/COR Signed by Contractor		Y	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions			
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

Training (POST). Copy of agreement provided. Auditors note: The agreement provided raises additional concerns regarding the manner in which this contract appears to have been handled. Original request was for \$7500; modifications increased by another \$30K. No quote submitted by contractor (understood that final contract includes pricing, however, nothing was originally submitted by the contractor to show evidence of their pricing). Contract attachment shows costs well beyond \$7K and \$30K (contract includes pricing beyond \$170K). File provides no explanation for what transpired on this contract.

OCSD CONTRACT FILE AUDIT

Document Reviewed (MA, CT, PO):	MA 060 21011842	Document Reviewer:	MG
Alternative Reference Numbers:		Contract Folder #	C030393
Contractor:	LexisNexis	Customer Department:	Info Services - Blackburn
Title:	LexisNexis Desk Officer Reporting System	Proc Staff/DPA:	G Lozares
Review Under CPM Policy Version:	2019 CPM	Funding Source:	General
Evidenced in Contract File:	Represented By/Inclusive Of	Present in File	Comments
Type of Sourcing Method	Quote, IFB, RFP, RFA, SS, Emer, Coop, RCA	Partial	File lacks clarity on sourcing method; req coded as "standing contract", a reference that is not found in the CPM; communications in file say it's being handled as a sole source; procurement type on MA says 1 quote . Staff response: single quote level Service (less than \$50k). While staff response is accepted for clarity, it is still noted that the file lacked sufficient information to properly record the decisions made by staff.
Proper Sourcing Method for Contract Type	Commodity/Capital Asset/Service/HS	Y	Req coded as "commodity", appears to be a services and handled as service. Staff response: end user selects req type which can't be changed after req is created. Staff decision to handle as service vs commodity is duly noted for this record.
Coop Purchase: Indiv/Specific or term contract; national-based	under \$75K over life = 1Q; min 2 quotes req'd if exceeds \$75K, Quote Recap doc (if multi-quotes), Copy of contract, CPO written approval to use contract, BOS approval if over threshold (MA + DO; PO or CT)	N/A	
Regional Cooperative Agreements (RCA)	BOS approval req'd on MA if over formal threshold limits of source method; file contains basis of use (MA; CT or PO)	N/A	
Req in OC Expediter:	Justification included; date & #; person creating req not person approving	Y	1467431; 5/5/21; \$43K
Budget & Dept Approval of Req	Evidence of approvals; dates	Y	
Spec/Scope/Terms & Conditions	Evidence of requirements in sourcing document	N/A	
Informal Procurements:			
- Commodities	Under \$10K over contract life (1Q), \$10K-\$25K (2Q); no consecutive purchase to same vendor	N/A	
- Capital Assets	\$5K - \$25K over contract life (2Q), no consecutive PO to same vendor	N/A	
- Services/Human Services	Under \$50K over life of K (1Q) no consecutive PO to same vendor (HS unless funding source rule differs)	Partial	While handled originally as an informal, the costs for the "life" of this purchase exceed thresholds
Advertised/Public Notice (C/CA/S/HS)	IFB/RFP/RFA - "adequate public notice"; posted in online notification system; evidence of quotes submitted for informals	N/A	
Criteria for Award	Included in solicitation; min req's met if RFA	N/A	
RCA/Coop	Justification for non-RCA use; verified Coop approved by CPO; MA created if RCA; approved by BOS	N/A	
Emergency	C/CA/S/HS (under \$1K - pcard/petty cash) C/CA/S/HS over \$1K - CPO/DPA approval, req/PO w/in 10 days); Cap Assets (over \$75K appr'd req from CEO to CPO/DPA w/memo to file; unbudgeted over \$25K = BOS); Over \$200K = ASR	N/A	

Sole Source	DPA approval; Commodity (over \$250k/yr = CoCo & BOS); Capital Asset (over \$75K = CoCo & BOS); Services/Human Services (over \$75K/yr or 2yr+ any \$\$ = CoCo & BOS); exemption = CPO	N/A	Communications say this is sole source, no evidence of sole source request or approval in file. Staff response: Sole source was discussed but not required per the dollar amount/duration of the resultant contract. Staff response is duly noted, but file lacks clarity.
RFA (Request for Application)	administrative review conducted; late application submittals w/in 24 hrs; BOS awards to applicants meeting min requirements; MA goes to BOS	N/A	
Validate Contract Term	ext up to 1 year w/o BOS approval; Services = not over 3 rs w/o BOS approval	Y	6/10/21 - 12/31/23 (2yr agr)
If Federal, field flagged in OCE	"alt funding"	N/A	
If Federal, terms & conditions included	reflects most restrictive req's between Feds & CPM	N/A	
Solicitation Review/Approval to publish		N/A	
Solicitation Attorney Review/Approval	Only \$100K & over (services)	N/A	
Formal Solicitation (inc dates)			
Commodities	Competed over \$25K over contract life; award to lowest responsive/responsible; inc T&Cs (non approp, cancel, term for c/c)	N/A	
Capital Assets	Competed over \$25K over contract life; award to lowest responsive/responsible bidder	N/A	
Services/Human Services	Competed over \$50K over life of contract; IFB lowest r/r; RFP most r/r	N/A	
Bidders List	Demonstrates sufficient notification of opportunity	N/A	
Public Bid Opening			
Solicitation Due Date	Evidence of hard close; no late for IFB unless single w/in 24 hrs; RFP permits late w/in 24 hrs	N/A	
Public Bid Opening Held	Commodities & Capital Assets over \$100K/yr; Services/Human Services over \$200K/yr;	N/A	
Record of Bid Opening	All Commodities/Capital Assets & Services over \$200k/yr (\$, name)	N/A	
Evaluation Process:			
IFBs	IFB - no committee; no specified process; evidence of recommendation or evaluation	N/A	
RFPs Eval Committee Established	Committee established; odd number, min 3; completed COIs	N/A	
RFP - Proposer Interviews	req'd over \$1M;	N/A	
Evaluation Score Sheets	; MOR w/ranking, signed by committee; consolidated score sheet; indiv score sheets w/ASR to BOS	N/A	
RFP - Cost Analysis	Record in file if cost part of eval criteria	N/A	
References	Req'd prior to award for IFBs/RFPs, if not done during evaluation	N/A	
Two-Step/Pre-Qual	Evidence supporting pre-qual process	N/A	
If Federal funding	Compliant w/Thresholds, types; Cost/Price analysis	N/A	
Child Support Enforcement Form	All contracts up to 10/1/19, except Coops, Informals and Non-Profits	N/A	
Local Small Business Preference	IFB - LSB opportunity to price match when w/in 5% of ALB or LSB pref waiver requested and approved by CPO/CFO (waiver request in file); RFP - 5% added to score for LSB unless dept waiver request approved by CPO/CFO; certified as SB by CDGS	N/A	
Recommendation for award	IFB/RFP/2 Step; attachments and approvals included; approve by CoCo prior	N/A	
Award Approval	Evidence of award in BidSync (4/25/18 memo); reference check conducted (IFB) before award; RFP requires CPO/DPA concurrence w/committee recommendation prior to BOS/award	N/A	
Attorney Award Approval	contract signed by atty; HS contracts going to BOS	N/A	

Board Award Approval	Commodities = no BOS; Capital Asset = unbudgeted C.A. over \$50K or over budget for "budgeted" by 10% or \$100K); Services = over \$200K/yr to a single contractor, multi-yr over \$1M = BOS); Human Services = Over \$200K, multi-yr over \$500K for all yrs; SS over \$75K or 2yrs	N/A	
Award Notice to Supplier/NOIA	Evidence of notice to successful supplier	N/A	
Notice to Unsuccessfuls	Evidence of notice to participating suppliers	N/A	
Contract packet complete	Inclusive of signed contract O&A page, pricing, all applicable certifications, OCLSB verified, etc)	N/A	
Insurance (COI) Received & Compliant	Commodities/Services required over \$5K except emergency, OTS software, 3rd party carrier; not under \$5K unless maintenance/trades, human services, prof services, leases & software	N/A	
PO/CT issued in CAPS	Copy or evidence in file; approved by DPA; value & date	Partial	Agreement references \$60K+ of costs for agreement, but MA issued for \$34K, req created for \$43K? No ordering doc in file
Contract issued to contractor	Copy of contract in file; Issue date	Y	See notes below.
Contract Amendments (CA)/Mods to PO	List all by number and date reference	N/A	
CA/COR Customer Approval		N/A	
Approval for Commodity CA/COR	Over \$10K = BOS, Under \$10K = CPO&CFO; under \$500 = none; if change exceed 30% original K amount = CPO approval; exceptions PW/HS/other	N/A	
Approval for Services/HServices CA/COR	decreases & under 10%/\$20K for non-BOS Ks' = dept; for non-BOS K's w/ increases over 10% original /\$20K = CPO; for BOS K's = BOS for any \$ over contingency	N/A	
CA/COR Review/Approval Proc or DPA		N/A	
CA/COR Signed by Contractor		N/A	
RetroacCA/changes	BOS ratified; OR under \$500, under \$10K = CPO & CFO approved; over \$10K = BOS; HS contracts/Emergencies/Phone-tech licenses = no BOS	N/A	
Contractor Performance Eval (CPE) Form	\$25K, Services/HS over \$50K, All BOS contracts; Conflict of Interest form in file for person completed	N/A	
Contract Renewals/Extensions		N/A	
Commodities:	1 yr extension permitted if under 5yrs; DPA w/o BOS if no increase beyond average \$/yr; documented contractor perf (CPE); SS = new request form to justify each yr	N/A	
Contractor Performance	Documented satisfactory performance before renewal or extension?	N/A	
Services: Over \$200K/yr	BOS approval req'd unless Yrs 2&3 w/no changes to scope/\$\$/t&c; ASR req'd if all contract yrs = over \$750K; Extensions w/increases + total value under \$200K/yr = DPA	N/A	
Human Services: Over \$200/yr	BOS approval; if under 5 years = HS approval ok	N/A	

Notes:

File lacked clarity; contained information alluding to sole source, handling as commodity and service. DPA Compliance Review Check List records this as a "Commodity over \$25K" and "new contract".

Staff response: Services contract less than \$50k (single quote level). It was issued as a MA (master agreement) for a 2-year period. The MA (CAPS+ pages) and contract T&Cs are in the file folder. County Counsel was involved in order to review the vendor's T&Cs that are in the contract.

Staff response is duly noted. File lacked proper clarity to determine the staff actions taken. MA was not seen in the file during review.