



April 2026

DeKalb County Government
Department of Purchasing & Contracting

AUDIT OF LOW BID PROCUREMENT PROCESS

FINAL REPORT



Lavois Campbell, CIA, CISA, CFE, CGA-CPA
Chief Audit Executive
Office of Independent Internal Audit, DeKalb County, GA

Audit Report No. IA-2024-0237-PC

This page was intentionally left blank.



Lavois Campbell
Chief Audit Executive

FINANCE DEPARTMENT
AUDIT OF LOW BID PROCUREMENT
REPORT NO. 2024-0237-PC

FINAL

HIGHLIGHT SUMMARY

Why We Performed the Audit

In accordance with the Office of Independent Internal Audit (OIIA) Annual Audit Plan, we conducted a performance audit of DeKalb County's Low Bid Procurement process, with a focus on the control activities. The objective of this audit was to determine whether the internal controls over this process are adequately designed and operating as intended.

How We Performed the Audit

Our methodology included, but was not limited to, the following:

- Assessed the alignment of policies and procedures with actual and best practices.
- Tested a sample of requests for compliance with policies.
- Surveyed select user departments for feedback related to the efficiency of the process.

Background

The County's Purchasing Policy requires a competitive sealed bidding process (ITB/Low Bid) for goods and services exceeding \$50,000, ensuring vendors compete solely on price in a fair and transparent marketplace.

The ITB process is governed by the County's 2014 Purchasing Policy and 2017 P&C Procedure Manual, which outline approved procurement methods and delegate to the Director of Purchasing and Contracting the authority to implement and update operational procedures.

The policy's purpose is to promote best value, broad competition, and safeguards that ensure integrity, equity, and accountability in public purchasing. Purchasing and Contracting (P&C) oversees compliance with these policies, guiding user departments through key ITB steps, including solicitation development, advertisement, bid opening, evaluation, and award approval. In recent years, P&C has modernized procurement operations through digital platforms such as OpenGov, PRSS, and CV360, enhancing transparency, efficiency, and documentation throughout the ITB lifecycle.

What We Found

Our audit found that the County does have policies and procedures in place for managing the Low Bid Procurement process. However, we also identified opportunities for improvement that, if implemented, could further mitigate the risk of financial loss and reputational damage to the County.

Audit Findings
1. Outdated and Incomplete Purchasing Policy and Procedures Manual (Repeat Finding)
2. Ineffective System Controls Prevent Reliable Tracking and Reporting (Repeat Finding)
3. Systematic Failures in Procurement File Integrity and Retention
4. Undefined Requirements for ITB Solicitation Approval
5. Lack of Adequately Defined Timelines, Tracking, and Oversight of ITB Procurement Process
6. User Department Perspectives on Procurement Delays: Communication Gaps and Post-Approval Bottlenecks

We recommend that Management do the following to address the report findings:

- Update the County's Purchasing policy and P&C's procedure manual
- Implement Standardized Documentation and Approval Controls
- Define Start/End Points and Step-Level Timelines
- Enhance Data Integrity and System Tracking
- Strengthen Oversight and Quality Assurance
- Clarify Approval Methods and Accountability
- Address Staffing and Training Needs
- Develop a mechanism for UDs to communicate concerns

MANAGEMENT RESPONSE:

Management agreed with all six findings but did not agree with certain recommendations as written. Management indicated that it will evaluate alternative approaches to address the underlying risks and conditions identified, with corrective action plans to be informed by the current Institute for Public Procurement (NIGP) review. Management stated that corrective actions will be implemented within twelve (12) months after acceptance of NIGP's final recommendations. OIIA will periodically follow up during this period to assess whether management's planned and implemented actions adequately address the findings and related risks.



TABLE OF CONTENTS

HIGHLIGHT SUMMARY	2
BACKGROUND AND INTRODUCTION	4
AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY	6
AUDIT RESULTS	7
FINDING 1: OUTDATED AND INCOMPLETE PURCHASING POLICY AND PROCEDURES MANUAL (REPEAT FINDING)	7
FINDING 2: INEFFECTIVE SYSTEM CONTROLS PREVENT RELIABLE TRACKING AND REPORTING (REPEAT FINDING)	13
FINDING 3: SYSTEMATIC FAILURES IN PROCUREMENT FILE INTEGRITY AND RETENTION	16
FINDING 4: UNDEFINED REQUIREMENTS FOR ITB SOLICITATION APPROVAL	23
FINDING 5: LACK OF ADEQUATELY DEFINED TIMELINES, TRACKING, AND OVERSIGHT OF ITB PROCUREMENT PROCESS	26
FINDING 6: USER DEPARTMENT PERSPECTIVES ON PROCUREMENT DELAYS: COMMUNICATION GAPS AND POST-APPROVAL BOTTLENECKS	32
APPENDICES	40
Appendix I – Objective, Scope, and Methodology	40
Appendix II – Key Definitions and Abbreviations	41
Appendix III – Management Response Memo	42
DISTRIBUTION	45
PROJECT TEAM	46
STATEMENT OF ACCORDANCE	47



BACKGROUND AND INTRODUCTION

In accordance with the Office of Independent Internal Audit (OIIA) Annual Audit Plan, we conducted a performance audit of DeKalb County's Low Bid Procurement process, with a focus on the control activities.

The County Purchasing Policy requires a competitive sealed bidding process for the purchase of goods and services with an estimated cost of more than \$50,000, and/or revenue of more than \$100,000. Through this Invitation to Bid (ITB) process, qualified and responsive vendors compete based on price only.

This process, commonly referred to as Low Bid Procurement, is governed by the County's Purchasing Policy dated August 6, 2014, and the Purchasing and Contracting Procedure Manual, which was last revised in March 2017.

The County's Purchasing policy prescribes the acceptable methods for the acquisition of commodities, equipment, and services County wide, except as excluded.

Section 18 of the County Ordinance states, "The Chief Executive, subject to the approval of the Commission, shall establish rules to regulate purchasing for all county departments, offices, and agencies of the county government, with the exception of the tax commissioner, clerk of the superior court, district attorney, and sheriff".

The purpose of the policy is to promote a system that achieves the following:

- obtain the best value in terms of quality, service, and price when expending public funds.
- foster effective, fair, and broad-based competition for public procurement within the free enterprise system.
- provide safeguards for the maintenance of quality, integrity, and equity in the purchase of County property.

The County's current Policy, Part 2, Section II states: "The Director is authorized to establish, implement, and enforce written operational procedures relating to acquisitions and dispositions subject to this Policy. Such procedures shall, to the extent consistent with applicable law and this Policy, be based upon generally accepted public purchasing principles and practices and shall become effective upon approval by the Chief Executive Officer. Additionally, these procedures may be revised, as necessary, through the same process used for their initial approval."

Part 2, Section IV requires a Purchasing Advisory Committee comprised of members from user departments (selected by the County's Chief Executive Officer, Executive Assistant/Chief Operating Officer, Director of Finance, and the Director) to review



purchasing procedures and make recommendations for changes; resolve problems regarding the purchasing process.

The Purchasing and Contracting Department (**P&C**) of DeKalb County government is **responsible for ensuring compliance with Purchasing Policy** and internal procedures. P&C facilitates the user department’s (UD) procurement of goods and services while ensuring a fair, transparent, and competitive process that results in the very best value. This includes reviewing the information submitted by the UD and evaluating the appropriateness of the method of procurement selected based on the circumstances.

Standard ITB/Low Bid Procurement Lifecycle

The process flows from initial User Department request through solicitation, evaluation, and approval, concluding with the Notice to Proceed.



LEGEND: ○ Standard Step ● Process Decision ● Approval Threshold

Source: P&C’s Purchasing and Contracting Procedure Manual, last revised in March 2017

P&C has attempted to streamline and enhance its procurement operations through digital platforms, including the OpenGov system for publishing solicitations and receiving vendor responses, the Procurement Request Submittal System (PRSS) for submission and tracking of procurement requests, and CV360, which is the County’s newly implemented financial system, for purchase orders and contracts.

Prior Audit Findings

The OIIA conducted an audit of the low bid procurement process, Audit of Low Bid Procurement - Process Audit Report No. 2017-004-PC, published in May 2018. A follow-up was conducted in September 2021 to determine the status of management’s implementation of proposed action plans.



The following chart summarizes the status of the previous findings and their relationship to the current findings as applicable.

Summary of Prior Related Findings

Finding No.	Description	Sept 2021 Status	Current Related Finding(s)
1	Insufficient Documentation to Verify Performance of Key ITB Activities/Compliance with Policies and Procedures	Partially Complete	Findings 3,4, & 5
2	The User Department Role and Responsibilities in the Bid Evaluation Process Need to be Clarified	Partially Complete	Finding 1

Source: August 2024 Follow-up Audit Report and July 2025 Audit Report.

In addition to the OIIA audit of the Low Bid Procurement process in 2018, the Hartman Firm, LLC was engaged to work with the OIIA and the DeKalb Board of Ethics Office to independently assess the County’s procurement program, investigate various allegations which had been brought to OIIA’s attention, and assess the County’s susceptibility to waste, fraud, corruption, and abuse in its procurement program.

The report dated January 31, 2019, identified similar issues related to the Low Bid Procurement process as follows:

- 1) Outdated policies and procedures
- 2) P&C does not properly maintain documentation in its files

The issues identified in this assessment related to the Low Bid Procurement process are in line with the previous audit findings and mirror the current audit findings.

AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

The objective of this audit was to assess whether internal controls over DeKalb County’s Low Bid Procurement process are designed and operating effectively to ensure compliance with County policy. Additionally, we sought to evaluate whether the current framework supports transparency and fair competition through well-documented transactions and a process free of unnecessary bottlenecks.

The audit consisted of an analysis of relevant policies and procedures, interviews with Purchasing & Contracting (P&C) staff, and a review of supporting documentation for selected Invitation to Bid (ITB) contracts where the procurement process began between January 1, 2023, and December 31, 2024.

Sampling Limitation: The items selected for testing were chosen using judgmental sampling criteria based on specific risk factors (e.g., project age, high dollar value) rather than statistical sampling methods. Consequently, the results of our testing apply only to the



specific items reviewed and cannot be projected to the entire population of ITB procurements.

In addition, we gathered feedback by surveying UDs who had ITBs during the period. Details of our audit objectives, scope, and methodology are provided in **Appendix 1** of this report.

AUDIT RESULTS

Our audit identified opportunities to strengthen internal controls and governance, specifically regarding recurring challenges noted in prior reviews. While the County’s procurement framework provides a functional foundation for conducting Low Bid Procurements, we identified specific operational gaps—summarized below—that limit efficiency and accountability:

- **The need to update the County purchasing policies and P&C procedures,**
- **Inconsistencies in documentation retention,**
- **Gaps in evidence regarding critical steps and approvals, and**
- **A lack of defined timelines and monitoring controls.**

Strengthening these areas will improve data integrity and procedural clarity. By addressing these issues through updated policies, procedures, and effective monitoring, P&C can enhance operational efficiency, ensure compliance, and reinforce public confidence in the competitive procurement process.

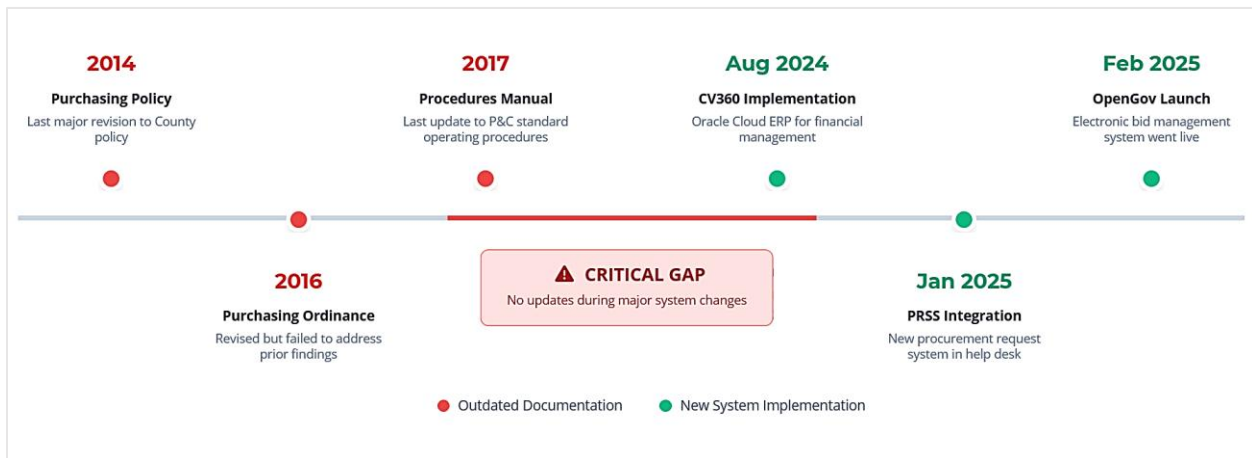
The following findings and recommendations are designed to mitigate risk and improve the overall effectiveness of the County’s ITB procurement function.

FINDING 1: OUTDATED AND INCOMPLETE PURCHASING POLICY AND PROCEDURES MANUAL **(REPEAT FINDING)**

We assessed the County’s purchasing policies and Purchasing & Contracting (P&C) procedures for Low Bid Procurements to determine if they were adequate and aligned with daily operations. Through staff interviews and a comparative analysis of written guidelines versus actual workflows, we identified a significant misalignment: current policies and procedures are outdated and do not reflect the County’s present operations and technology.



The diagram below illustrates the 7+ year gap between established documentation and current technology.



Source: P&C Management

This represents a **repeat finding**, originally reported in the OIIA 2018 Audit of Low Bid Procurements (Audit Report No. 2017-004-PC, Finding 1). Management's corrective action in response to the prior audit finding was, "P&C is in the process of addressing inconsistencies between the policy and procedures manual through the development of a purchasing ordinance." The purchasing ordinance has not been revised since 2016; therefore, it does not address the audit findings.

As a result, the County's purchasing policy (last revised in 2014) and procedures manual (last updated in 2017) remain outdated. They do not reflect current operations, new technology like the Procurement Request Submittal System (PRSS), or address numerous control gaps.

The DeKalb County **Purchasing Policy (last updated in 2014)** and **P&C Procedure Manual (last updated in 2017)** do not reflect current practices, newly implemented systems, or defined staff responsibilities. This has led to inconsistent application of procedures and a lack of evidence of required steps and approvals.

The following systems have been implemented since the last update and are therefore not addressed in the procedures manual:

- PRSS - The current requirement is for UDs to submit all procurement requests through the PRSS (Procurement Request Submittal System), which was integrated into the County's CV360 IT help desk application in January of 2025.
- OpenGov - OpenGov (electronic bid management) was implemented in February 2025. The policies and procedures have not been updated with the requirements and procedures for the use of this new application.
- CV360 (the County's Oracle cloud-based system) was implemented in August 2024. It includes the procurement and financial management systems.



The following processes were not documented in the procedures:

- Procurement requests through PRSS

There are no documented control procedures in place to detect and escalate unassigned procurement requests, which could potentially avoid unnecessary delays.

- Virtual meetings

The P&C Procedure Manual only speaks to in-person meetings; procedures for virtual meetings are not addressed. The procedures for virtual ITB meetings should include, but not be limited to, defining when they are permitted, recording requirements, storage/sharing, retention, and access.

- Bid Storage

The procedure manual does not define protocols for handling and securing bids. Bid handling protocol should address storage location, chain of custody, and mailing procedures/timeline for late-bid notices.

- Non-responsive/non-responsible letters

The procedure manual covers drafting of non-responsive/non-responsible letters, but the mailing procedure and timelines following CPO approval are not addressed.

We also found that the procedures manual does not:

- Define employee roles and responsibilities.
- Specify minimal employee training requirements.
- Prescribe timelines for completion of critical steps.

The root cause of this issue is P&C's lack of a formal policy governance and change management process to ensure timely updates of procurement procedures when new systems are implemented, or operational changes occur.

The **Government Accountability Office (GAO) Green Book** states that an effective control environment requires management to document and periodically update policies and procedures to reflect current operations, risks, and technology.

The **Government Finance Officers Association (GFOA) Best Practices in Procurement** recommends government procurement policies clearly define roles and approval authorities, incorporate system-based monitoring, and provide training.

The National Institute of Governmental Purchasing (NIGP) prescribes best practices in Invitation for Bids as follows:

- Current and complete policies, procedures, and records are required for transparency.



- A policy manual should clearly define authority and responsibility and provide guidelines.
- Changes in organizational structure or process should trigger self-assessments and updating of documentation.

In addition, NIGP's Principle of Professionalism emphasizes continual development, training, and maintenance of standards.

Outdated policies and procedures increase the risk of inconsistent procurement practices, unclear accountability, and process inefficiencies. The absence of updated guidance for newly implemented systems (PRSS, OpenGov, and CV360) may lead to delays in processing procurement requests, incomplete documentation, and inadequate control over bid custody, virtual meeting management, and vendor communication. These gaps reduce operational transparency, hinder compliance with procurement standards, and weaken the County's ability to ensure fair, timely, and auditable contracting activities.

The County ordinance gives the CEO authority over the policy; however, the P&C Director, who is the process owner, is not assigned the responsibility to identify and propose changes as deemed necessary and has no authority over the policy. The policy gives the P&C Director authority to establish, implement, and enforce operational procedures, but again does not assign the responsibility for ensuring the procedures are updated in a timely manner.

In addition, the policy requires a Purchasing Advisory Committee (PAC) to review purchasing procedures and make recommendations for changes. We received no evidence that this committee has had any meetings prior to the completion of this audit. This committee, which is to include representation from UDs, could be beneficial in ensuring that revisions are practical and actionable. However, if the P&C director is not deemed responsible for ensuring the procedures are updated accordingly and in a timely manner, the committee, even if active, may not be effective.

As a result of these deficiencies in the ordinance and policy, no protocol exists to ensure that policies and procedures are reviewed and updated in a timely manner. Outdated policies and procedures result in a **misalignment of executive leadership expectations and actual practice**, as well as unclear accountability, responsibilities, and authority.

Without timely updates, the County cannot ensure the necessary controls are in place to address risks from changes in technology, operations, and staffing. This could impair the ability to respond effectively to urgent needs while still ensuring that the process is not used to circumvent the normal competitive procurement processes.

P&C has hired an Institute for Public Procurement (NIGP) consultant to review its policies to identify deficiencies; this review has not been completed at the time of the audit.



RECOMMENDATIONS:

To correct this long-standing deficiency and ensure policies and procedures are effective and sustainable, we recommend:

1.1 Develop a New Purchasing Framework

The **P&C Director**, under the oversight of the **Chief Operating Officer**, must complete the development of the new purchasing framework. This framework must **incorporate guidance from the ongoing NIGP consultant review** and **address all policy and procedural deficiencies noted in this audit report**.

Once finalized, the P&C Director must **submit** the framework to the Chief Executive Officer (CEO). Upon receipt, the CEO must ensure the formal adoption process is completed in accordance with applicable law. The **CEO** must formally approve the written operational procedures, as required by Part 2, Section II of the Purchasing Policy.

1.2 Establish a Permanent Governance Framework and Enforce Process Ownership

The newly adopted policy **must include a formal "Policy Governance" section** that establishes the P&C Director as the permanent **Process Owner**. This section must:

- Mandate a **recurring review schedule** (e.g., "annual review by P&C, formal re-approval every three years"),
- Include a formal process for version control and communication, and
- Explicitly authorize and require the P&C Director to **exercise their authority under Part 2, Section II** to identify necessary revisions and present them to the CEO for approval as needed to keep the manual aligned with operations.

1.3 Activate the Purchasing Advisory Committee (PAC)

Immediately ensure that the PAC is meeting as mandated by **Part 2, Section IV** of the County’s Purchasing Policy to:

- Review current purchasing procedures,
- Make recommendations for actionable process improvements, and
- Resolve operational conflicts between P&C and User Departments (UDs).

Management Response (Chief Procurement Officer):

Management Agreement	Description of Management’s Action Plan to Address Finding	Estimated Timeline to Implement Action Plan
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Following the Chief Procurement Officer’s (CPO) review and vetting of the NIGP policy, procedure, and process recommendations, the CPO will develop a phased implementation roadmap outlining how approved corrective measures and/or actions will be executed.	Within twelve (12) months of acceptance of final recommendations.



Additional Comments and/or Reason For Disagreement with finding:

While the CPO acknowledges the findings and agrees that the condition may have existed at the time of this engagement, additional context is warranted, as certain recommendations are currently in process and/or pending implementation.

Response to Recommendation No. 1.1: Develop a New Purchasing Framework

The CPO concurs with this recommendation. Currently, the Purchasing and Contracting (P&C) Department is engaged with the National Institute of Governmental Purchasing (NIGP) to assist in revising existing policies, procedures, and processes, as well as implementing accepted recommendations. The deliverables included in this engagement are expected to comprise the following:

- The County's Purchasing Policy
- The P&C Procedures Manual
- Process mapping

Response to Recommendation No. 1.2: Establish a Permanent Governance Framework and Enforce Process Ownership

This recommendation is in process. An upcoming memo, to be issued in April 2026, by the Chief Executive Officer (CEO) will establish more permanent governance, further clarifying and granting the CPO authority over enterprise-wide process ownership and full operational autonomy to manage and administer the Purchasing and Contracting (P&C) function in alignment with DeKalb County's (the County's) strategic direction. Within this framework, the CPO will have the authority to ensure that all policy and procedure enhancements—including recommendations from the Office of Independent Internal Audit (OIIA), the National Institute of Governmental Purchasing (NIGP), and P&C's Internal Audit Team (IAT) are appropriately evaluated, implemented, and aligned with the County's broader objectives.

The CPO will develop a comprehensive implementation roadmap incorporating a phased approach consisting of the following:

- Validation methods (e.g., live walkthroughs, post-session feedback, and time-to-complete task tracking), accompanied by a validation report, issue log, and recommendations for improvement
- Refinement and approval
- Training
- Implementation and go-live
- Post-implementation review

This roadmap will be presented to Executive Leadership for review, input, and appropriate vetting prior to acceptance and finalization.

Additionally, the CPO is conducting an evaluation of the Lexipol Policy Management System, a platform designed to support local government organizations in streamlining policy compliance, employee training, wellness initiatives, and risk management. The objective is to ensure a proactive and transparent approach to purchasing policies and procedures on an ongoing basis.

Response to Recommendation No. 1.3: Activate the Purchasing Advisory Committee (PAC)

The CPO cannot commit to this recommendation. Currently, the CPO is assessing past practices (e.g., the PAC Committee) to determine if those methodologies are advantageous to the County.

As P&C proceeds through the review process, all recommendations issued by NIGP, OIIA, and IAT will be thoroughly evaluated to support long-term sustainability and organizational viability



FINDING 2: INEFFECTIVE SYSTEM CONTROLS PREVENT RELIABLE TRACKING AND REPORTING (REPEAT FINDING)

We attempted to identify the total population of Low Bid Procurements through a query of the CV360 system; but were unable to ensure completeness. While P&C staff can locate specific ITBs **if provided with a known identifier (e.g., ITB Number)**, the system lacks a standardized field to aggregate *all* ITB records into a comprehensive report. As illustrated below, this lack of standardized data entry creates a "garbage in, garbage out" cycle. Because buyers inconsistently label entries (e.g., using "ITB" vs. "LB"), the system cannot produce a comprehensive listing for audit validation or monitoring.

Data Inconsistencies Undermine Tracking

Lack of standardized fields leads to unreliable data, incomplete listings, and reporting gaps

INPUT: DATA ENTRY ISSUES (Procurement, and Amendment (E&A))

Inconsistent Labeling

Variation in descriptions complicates retrieval:

ITB
Invitation to Bid
Low Bid
LB

No standardized dropdown field
Buyers use varying naming conventions

Manual Dependencies

Reliance on manual tagging by individual buyers
No validation rules or required fields
Human error leads to missing or incorrect tags

Keyword Search Limitations

Free-text queries miss records with variations
Search fails on typos, spacing, or phrasing
High risk of false negatives in population pulls

OUTPUT: REPORTING FAILURES

Incomplete Audit Listings

P&C unable to produce complete ITB list
Limits auditor ability to validate completeness
Prevents accurate population verification

Trend Analysis Impossible

Cannot reliably track volume or value over time
Historical data is fragmented and unstructured
Unable to assess departmental performance trends

Audit & Monitoring Gaps

Weakened control environment without reliable data
Inability to perform automated monitoring
Increased risk of undetected non-compliance

Systemic Consequence

Without standardized data-entry controls, the County cannot accurately monitor procurement activities, validate completeness, or make data-driven decisions regarding Low Bid Procurements.

Source: OIIA Testwork

This limitation is critical. As illustrated above, the ability to find a *single* record does not equate to the ability to monitor the *entire* process. A reliable targeted listing of the total ITB population cannot be generated since it relies on a keyword search, which is ineffective due to inconsistent manual tagging (e.g., "LB" vs. "ITB"), rather than a fixed "Procurement Type" field. Consequently, management cannot analyze year-over-year trends, and auditors cannot validate that the listing provided for review contains 100% of the actual activity.



This is a repeat finding previously communicated in previous procurement audits and the Independent Assessment. Management's corrective action plan stated that staff would be instructed to use the "ITB selection option" (a drop-down flex field) in the legacy **Oracle** system.

Although this feature was **carried forward** into the new system it was not configured to be mandatory or to allow the query of procurement activity by type. Furthermore, the users were not trained to utilize this field.

The GAO Green Book (Principle 13 – Use of Relevant, Reliable Information) states that management should obtain and use relevant, reliable, and timely data to fulfill its responsibilities and evaluate performance. Reliable data must be reasonably free from error and faithfully represent what it purports to represent.

The U.S. Government Accountability Office Standards for Internal Control in the Federal Government (Green Book) prescribe that an effective internal control system over information include the following attributes:

- relevant data based on the identified information requirements
- can be obtained in a timely manner
- reasonably free from error and bias
- faithfully represents what they purport to represent

Management should evaluate both internal and external data sources for reliability.

The lack of standardized data-entry controls and centralized oversight resulted in unreliable tracking and incomplete classification of procurement activities. Without a unique identifier for ITBs, the County cannot accurately monitor or report on Low Bid Procurements, making it difficult to validate completeness or analyze trends. As a result, management's ability to ensure compliance, assess performance, and make data-driven decisions is weakened, increasing the risk of oversight gaps and inefficiencies.

RECOMMENDATIONS:

To ensure Low Bid Procurements are properly identified, monitored, and reported, we recommend:

2.1 System Configuration (Immediate Fix)

The **Director of P&C** should collaborate with DOIT to configure or customize CV360 to ensure the **unique identifier** is mandatory for all procurement actions (e.g., a drop-down field to select "Emergency," "Competitive Bid," "Sole Source," etc.) and is an available field for querying and reporting. This field should be used to identify the procurement method at the earliest stage possible, ideally from the beginning of the processing not just at the purchase order or contract stage.

2.2 Process Update & Data Remediation (Short-Term Fix)

The Director of P&C should:



- Update all procurement procedures and provide mandatory training to all buyers on the new field to ensure consistent data entry.
- **Perform a data remediation exercise** to retroactively classify all *active* contracts in the system, ensuring immediate accuracy for current reporting.

2.3 Monitoring & Reporting (The Output)

P&C management should develop system-generated dashboards to track:

- **Volume & Value:** Total spend and count by procurement method (addressing the "Trend Analysis" gap).
- **Cycle Times:** Aging reports to ensure steps are completed in a timely manner.
- **Exception Tracking:** Formally assign responsibility for monitoring these dashboards and approving any process exceptions.

Management Response (Chief Procurement Officer):

<i>Management Agreement</i>	<i>Description of Management’s Action Plan to Address Finding</i>	<i>Estimated Timeline to Implement Action Plan</i>
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Following the CPO review and vetting of the NIGP policy, procedure, and process recommendations, the CPO will develop a phased implementation roadmap outlining how approved corrective measures and/or actions will be executed.	Within twelve (12) months of acceptance of final recommendations.

Additional Comments and/or Reason For Disagreement with finding:

While the CPO acknowledges the findings and agrees that the condition may have existed at the time of this engagement, additional context is warranted, as certain recommendations are currently in process and/or pending implementation.

Response to Recommendation No. 2.1: System Configuration (Immediate Fix)

The CPO concurs with this recommendation. Currently, the County’s current Financial Management System (FMIS) was upgraded in 2024 to include additional system controls that allow for more reliable tracking. The CPO has confirmed that when a contract purchase agreement (CPA) is being created there is a unique identifier (drop down box) available to select the type of procurement. The CPO will reinforce with internal team managers the requirement that all procurement professionals utilize the unique identifier when initiating a CPA. Targeted training will be provided, as needed, to ensure consistent understanding and compliance among staff responsible for this function. Additionally, when there are informal purchases that do not result in the creation of a CPA number, the CPO will collaborate with the County’s Information and Technology (IT) department to ensure that the County’s FMIS can adequately provide reporting with a unique identifier for those purchases.

Response to Recommendation No. 2.2: Process Update & Data Remediation (Short-Term Fix)

The CPO cannot commit to this recommendation. However, as part of an ongoing collaborative effort, P&C will work with its internal Operations Team and the County’s IT department to ensure that reporting is properly tracked and readily identifiable.

The CPO can confirm that training will be provided to internal staff to ensure compliance with all new and/or revised processes. Additionally, the CPO cannot undertake a data remediation effort without engagement with the County’s IT Department, which must assess and validate the feasibility of such an effort, as well as determine the resources required.

Response to Recommendation No. 2.3: Monitoring & Reporting (The Output)

The CPO confirms that dashboards are currently being implemented within P&C. The following three dashboards are included:

- Operational
- Buyer Productivity
- Supplier Registration



Each dashboard serves a specific purpose. The Operational Dashboard was created at the request of the Chief Financial Officer (CFO) and the Chief Executive Officer (CEO) to assist end users with department procurement processor access. This dashboard functions as a monitoring tool, providing users with a clear, visual representation of their transactions. The Buyer Productivity Dashboard was developed for procurement managers based on identified needs to better assess and manage staff workload. The Supplier Registration Dashboard was created to monitor the processing of supplier registration applications and change requests, supporting performance measurement and resource planning. Additionally, after evaluating pending recommendations from NIGP, OIIA, and IAT, the CPO will ensure that all recommendations align with newly implemented processes and procedures.

FINDING 3: SYSTEMATIC FAILURES IN PROCUREMENT FILE INTEGRITY AND RETENTION

We judgementally selected **a sample of 25 ITB files** and reviewed to assess whether supporting documentation existed as evidence that the required steps had been performed and properly approved where applicable.

100% of the ITB files reviewed did not contain sufficient documentation to confirm that P&C fully complied with the County purchasing policies and P&C procedures that require certain critical reviews, documentation, and approvals.

P&C Procedures Manual: Requires procurement activities to follow standardized processes to ensure policy compliance and transparency. It strictly mandates the creation and maintenance of a complete bid file, which must include original bids, solicitation documents, approvals, bid tabulations, attendance sheets, and all supporting documentation for each procurement stage.

County Purchasing Policy (Section III): Mandates that procurement activities promote open, fair, and transparent processes, ensure accountability in the use of public funds, and maintain safeguards for the integrity of County purchases.

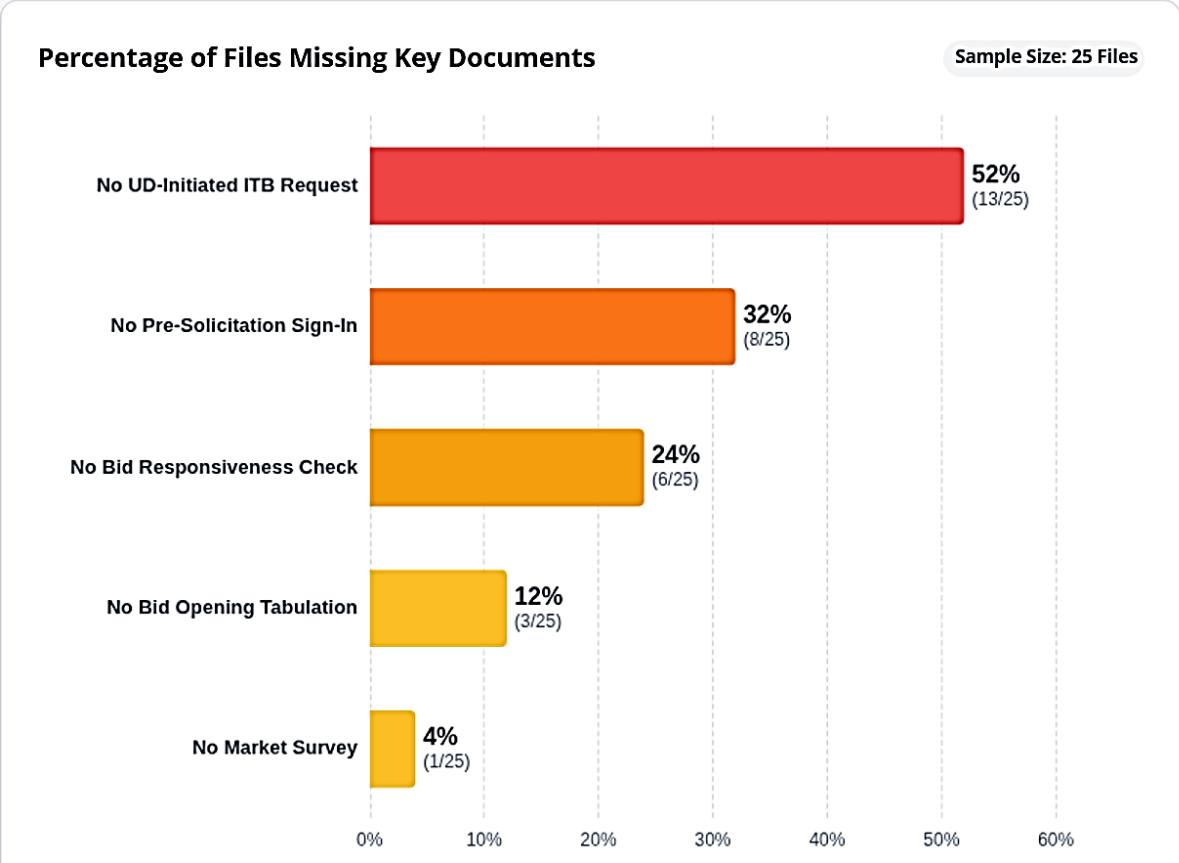
Key documents that were deficient or not available, which could indicate that they were not prepared, approved, or properly retained, are summarized in the following graphics on the next page.



(i) Evidence of Required Steps Being Performed

Missing Documentation Evidence

Review of Sampled ITB Files (n=25) reveals critical gaps in audit trail



Source: OIIA Testwork

⚠ Risk Implications

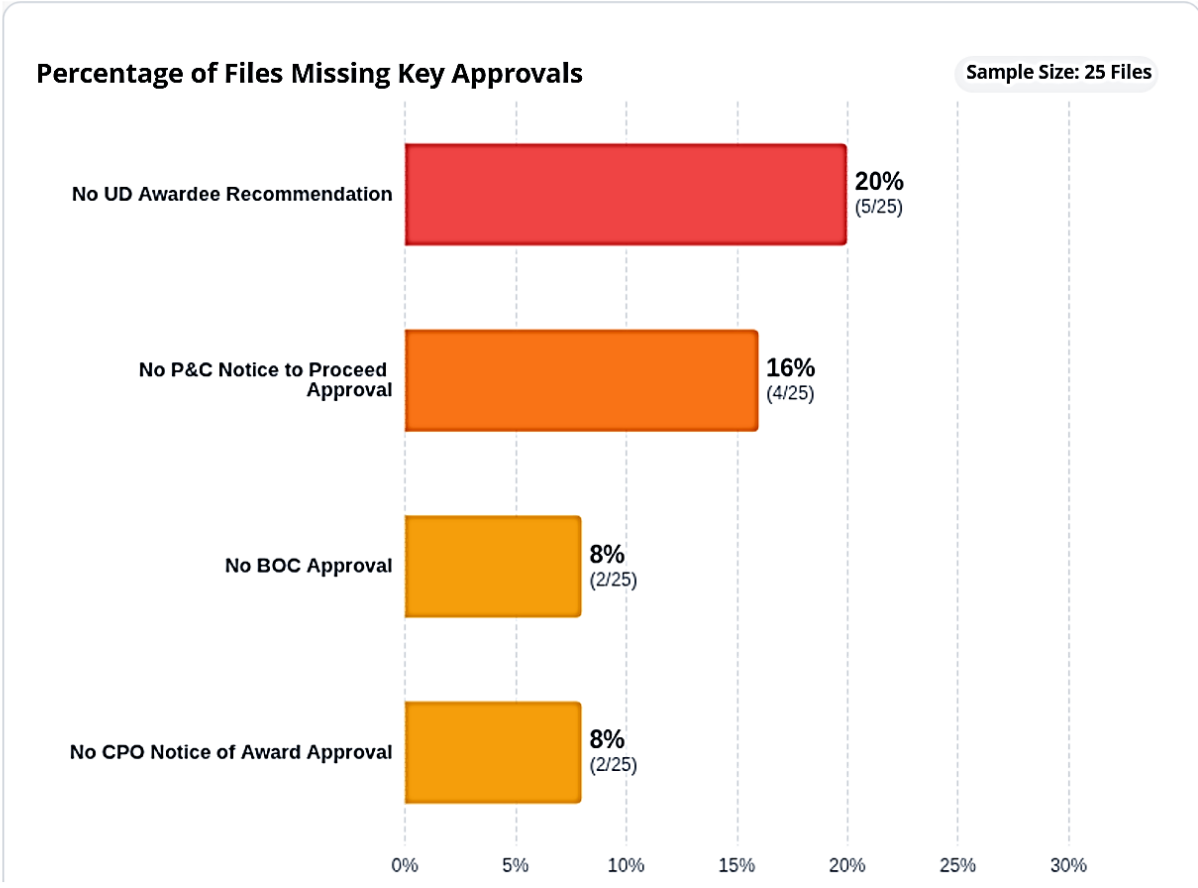
100% of the ITB files reviewed did not contain sufficient documentation to confirm full compliance. The absence of initial service requests (52%) fundamentally breaks the procurement audit trail.



(ii) Evidence of Proper Approval

Missing Approvals

Review of Sampled ITB Files (n=25) reveals gaps in authorization trail



Source: OIIA Testwork

⚠ Risk Implications
Missing approvals from the Board of Commissioners (BOC) and Chief Procurement Officer (CPO) expose the County to significant liability. Without documented authorization, contracts and awards may be legally unenforceable



(iii) Document not Signed or Dated

Documentation Deficiencies

Critical gaps in dates and signatures found in reviewed ITB files



MISSING DATES (UNKNOWN TIMING)



Market Surveys

81% (17 of 21 files)
 Had no date indicating when the survey was performed, preventing verification of pre-solicitation timing.



Price Schedule Bid Tabulations

28% (7 of 25 files)
 Documents were not dated by P&C, obscuring the timeline of price analysis.



Bid Opening Tabulations

24% (6 of 25 files)
 Bid opening records lacked P&C dates, creating gaps in the solicitation timeline.

MISSING SIGNATURES & APPROVALS



Bid Responsiveness Check

32% (8 of 25 files)
 Documents were neither signed nor dated by P&C, lacking evidence of formal review.



Tabulation Signatures

4% (1 of 25) Bid Opening Tabulation
4% (1 of 25) Price Schedule Tabulation
 Documents were not signed and dated by P&C.



Price Schedule Authorization

4% (1 of 25 files)
 Price Schedule Bid Tabulation was completely unsigned by P&C personnel.

Source: OIIA Testwork



Audit Trail Risk

Missing signatures and dates prevent auditors from verifying timeliness or proper authorization, significantly weakening the audit trail and accountability.

These weaknesses reduce accountability, limit P&C management and auditors' ability to verify the performance of required procurement steps and increases the risk of noncompliance. Incomplete documentation also undermines transparency and confidence in the County's procurement practices, potentially exposing the County to audit findings, vendor disputes, and reputational damage.

The root cause of these deficiencies is that P&C has not established or enforced a comprehensive document retention and review process. Contributing factors include inadequate management oversight before file closeout and a lack of automated "hard stops" in systems (CV360/OpenGov) to ensure mandatory uploads.

Contributing factors include:

- inadequate oversight by P&C management - verification that each ITB file contains the complete set of required documentation before closeout
- inconsistent understanding among procurement agents of the documentation standards outlined in the Procedures Manual



- absence of checklists and/or automated controls within the current electronic systems (CV360 and OpenGov) to ensure that required documents are uploaded and approved at each stage of the process
- missing or incomplete records, including service requests, market surveys, attendance sheets, bid tabulations, and approval documentation, significantly weaken the audit trail and transparency of the procurement process. Additionally, key documents often lacked required signatures and dates, preventing verification of timeliness or proper authorization.

It was also noted that the type of ITB, i.e. ITB (Simple), ITB with Pre-Bid Meeting, or ITB with Pre-Bid Meeting/Site Visit & Contract, were not indicated and could not be determined without inquiry of P&C. Because the requirements and timelines are different for each of these ITB types, not being able to easily identify the type makes audit and review for compliance inefficient.

RECOMMENDATIONS:

Given that document retention is an ongoing issue and to address the 100% documentation failure rate and ensure a complete audit trail, we recommend the **Director of Purchasing and Contracting (P&C)** strengthen documentation controls as follows:

3.1 Implement Automated Workflow Controls ("Hard Stops")

P&C Management must work with IT to configure procurement systems to prevent a file from advancing to the next workflow stage until mandatory documents (e.g., Service Requests, Market Surveys) are uploaded. The system must be configured to:

- **Enforce Mandatory Fields**
Prevent a file from advancing to the next workflow stage (e.g., from "Solicitation" to "Evaluation") until specific required documents—such as the **Initial Service Request**—are uploaded and validated.
- **Require Electronic Approvals**
Implement "hard stops" that prevent contract execution or PO issuance until all required electronic signatures (including BOC and CPO approvals) are captured within the system.

3.2 Develop Standardized Checklists & Project Classification

To address the ambiguity regarding ITB complexity, P&C must develop and mandate the use of a "Procurement Strategy Checklist" for every new file. This checklist must:

- **Define the ITB Type**
Require agents to explicitly select the specific procurement type at initiation (e.g., *ITB-Simple*, *ITB-Pre-Bid*, or *ITB-Site Visit*) to determine the applicable requirements.
- **Map Required Steps**
Clearly list all mandatory steps, documents, and approvals required for that specific ITB type, aligning directly with the P&C Procedures Manual.



- **Track Dates**

Include fields to record the date each step was completed, serving as the primary control document for future audits.

3.3 Establish 100% Interim Quality Assurance (QA)

Given the high error rate, the P&C Director must immediately implement a **100% pre-closeout review** as an interim control until system hard stops are fully tested.

- **Gatekeeper Review**

A Supervisor or designated QA lead must manually verify every ITB file against the new Standardized Checklist (Recommendation #2) before the file can be formally closed or archived.

- **Sign-Off Requirement**

Evidence of this review (e.g., a signed QA form) must be retained in the file to certify completeness.

3.4 Update Procedures & Governance

The P&C Procedures Manual must be updated to explicitly define:

- **File Construction Standards**

Clear instructions on the required file structure, standard naming conventions, and mandatory retention location to ensure files are accessible and reviewable.

- **Document Retention Policy**

A definitive list of which documents (e.g., unsuccessful bids, draft tabulations vs. final tabulations) must be retained to satisfy legal and audit requirements.

3.5 Targeted Staff Training

Provide mandatory refresher training to all procurement staff focused on "Audit Readiness." Training should cover:

- The specific "Risk Implications" of missing signatures and dates (as noted in the finding).
- Practical instruction on the new Standardized Checklist and File Setup requirements.

Management Response (Chief Procurement Officer):

Management Agreement	Description of Management's Action Plan to Address Finding	Estimated Timeline to Implement Action Plan
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Following the CPO review and vetting of the NIGP policy, procedure, and process recommendations, the CPO will develop a phased implementation roadmap outlining how approved corrective measures and/or actions will be executed.	Within twelve (12) months of acceptance of final recommendations.
Additional Comments and/or Reason For Disagreement with finding: While the CPO acknowledges the findings and agrees that the condition may have existed at the time of this engagement, additional context is warranted, as certain recommendations are currently in process and/or pending implementation.		



Response to Recommendation No. 3.1: Implement Automated Workflow Controls ("Hard Stops") (Enforce Mandatory Fields) (Require Electronic Approvals)

In February 2025, P&C transitioned from a manual solicitation process to a cloud-based automated platform, OpenGov. The purpose of this transition was to increase efficiency and proactively address previously identified internal control deficiencies. The CPO does not need to work with the County's IT Department to create "hard stops" within the procurement system, as the system is maintained by OpenGov administrators; any additional system configurations must be implemented through that platform.

Additionally, when OpenGov was implemented, managerial approval permissions were established at various stages within the solicitation workflow. For example:

A manager must approve the draft solicitation.

A manager must approve the final solicitation prior to advertisement.

After a solicitation is awarded by the Board of Commissioners (BOC), a contract purchase agreement (CPA) is created in the County's FMIS, then a Notice of Award (NOA) is issued through OpenGov. Once the NOA is issued, P&C schedules the notice to proceed (NTP), after a formal written contract has been routed and electronically signed by all required parties, the executed contract is uploaded into the County's FMIS, allowing the user department (UD) to create a requisition. Once P&C receives the requisition, a purchase order (PO) is created in the County's FMIS for the UD.

P&C notes that certain anomalies may occur before the first PO can be created and issued. These anomalies involve processes and procedures external to P&C. As the CPO continues to evaluate pending recommendations from NIGP, OIIA, and IAT, the CPO will ensure that all recommendations align with newly implemented processes and procedures, as well as applicable laws, regulations, and procurement best-practice standards.

Response to Recommendation No. 3.2: Develop Standardized Checklists & Project Classification (Map Required Steps) (Track Dates)

This recommendation is already an active process within P&C. All procurement professionals are required to use the Responsive Checklist (pre award) and the Contract Checklist (post-award). The CPO will confirm if all procurement professionals are using the required internal templates, if determined there are any deviations from this process mandatory team training will be provided.

The CPO cannot commit to map required steps and track dates, however, as the CPO continues to evaluate pending recommendations from NIGP, OIIA, and IAT, the CPO will ensure that all recommendations align with newly implemented processes and procedures, as well as applicable laws, regulations, and procurement best-practice standards.

Response to Recommendation No. 3.3: Establish 100% Interim Quality Assurance (QA)

The CPO can agree that there is a need to formalize and standardize a pre-closeout review and provide periodic reporting to Executive Management related to procurement matters. However, the CPO does not agree with a gatekeeper review and sign-off requirement because it is not required in OpenGov. Furthermore, interval management approvals are pre-set in the workflow process within OpenGov. If it is determined that additional managerial levels are needed within the solicitation workflow process that need will be assessed after reviewing NIGP policy and procedure recommendations.

Response to Recommendation No. 3.4 and 3.5: (Update Procedures & Governance) (Targeted Staff Training)

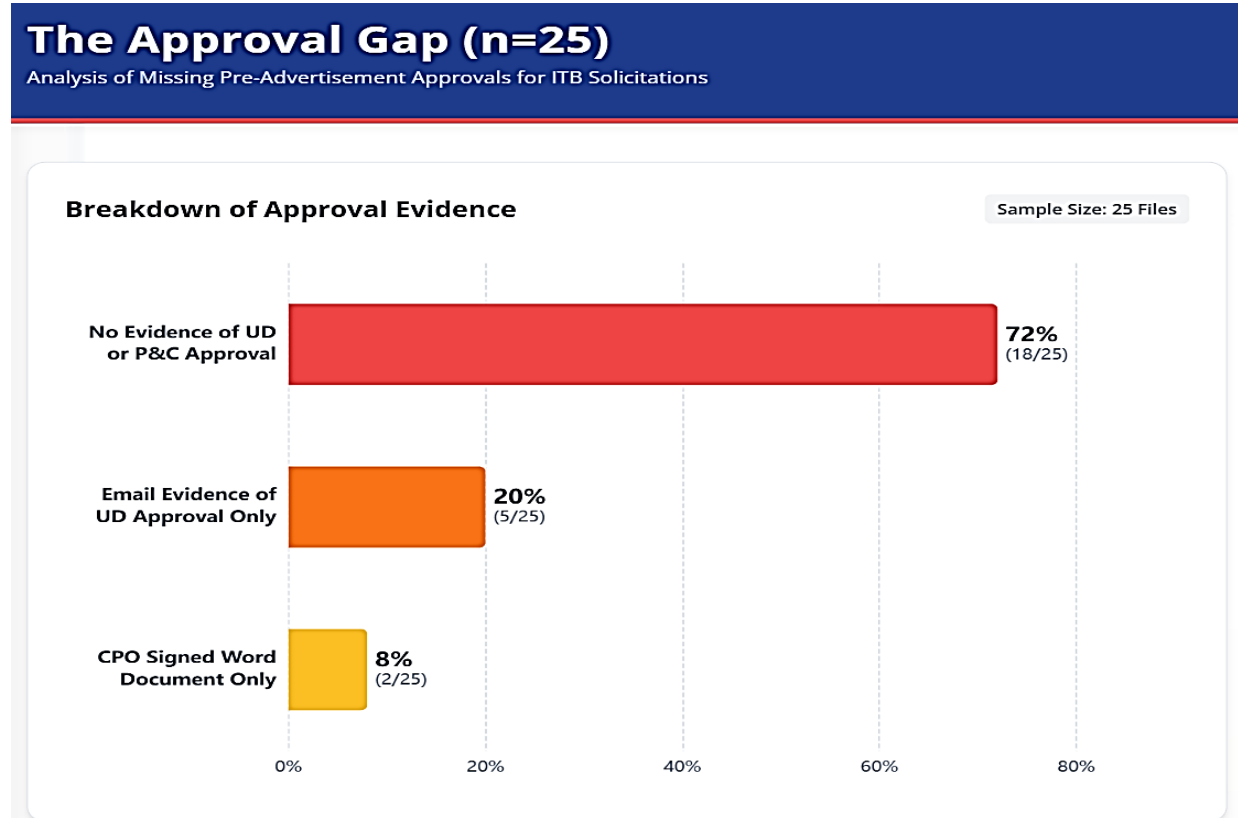
As previously stated, P&C is engaged with NIGP to assist in revising existing policies, procedures, and processes, as well as implementing accepted recommendations. Once all recommendations have been accepted and properly vetted, the required training will be provided to ensure departmental compliance.



FINDING 4: UNDEFINED REQUIREMENTS FOR ITB SOLICITATION APPROVAL

The procedures manual requires written approval by P&C management and the UD **prior to** the advertisement of the ITB solicitation but does not define the method for providing the approval. The current process for capturing this "gatekeeper" approval is undefined and inconsistently applied.

The graphic below summarizes the deficiencies observed in the 25 ITBs reviewed.



Source: OIIA Testwork

The P&C Procedures Manual mandates "written approval" but fails to define the acceptable format (e.g., electronic workflow, specific form, or digital signature). This ambiguity leads staff to rely on informal, non-standardized methods that are often not properly documented and retained in the ITB file.

The absence of standardized approval evidence constitutes a significant **control bypass** in the procurement lifecycle. Because approvals were missing or inconsistently documented, there is insufficient evidence that solicitations were authorized before being released to the public. This creates three critical levels of risk as follows:

- **Operational Risk:** The premature release of solicitations containing errors, budgetary misalignments, or unapproved terms necessitates costly cancellations and re-advertisements.



- **Legal & Financial Risk:** Exposure to vendor disputes and potential litigation if the County is perceived to have advertised terms that were not internally vetted or authorized.
- **Governance Risk:** A weakened internal control framework that limits the ability of P&C Management and Auditors to verify compliance, ultimately undermining transparency and public confidence in the County’s procurement integrity.

The P&C Procedures Manual prohibits the advertisement of an Invitation to Bid (ITB) until written approval is obtained from both the User Department and the P&C Manager. Furthermore, the manual requires documented review, concurrence, and approval at every critical stage of the procurement lifecycle before advancing to the subsequent phase.

RECOMMENDATIONS:

We recommend that P&C management do the following to ensure that there is a clear understanding of the approvals required and the acceptable method.

- 4.1 Formalize Approval Methods:** Revise the Procedures Manual to explicitly define the "Authorized Form of Approval" (e.g., a specific PDF approval form or an electronic workflow trigger in OpenGov).
- 4.2 Standardize Signatory Requirements:** Clearly state that advertisement is prohibited until *both* the UD and P&C Management signatures are digitally captured and attached to the solicitation record.
- 4.3 Deploy Pre-Ad System Workflows:** Configure the procurement system to "lock" the advertisement/publish function until the required approval fields are populated.
- 4.4 Stakeholder Training:** Conduct targeted training for both P&C staff and User Departments on the new authorization standards to ensure they understand that informal emails no longer constitute valid "permission to advertise."

Management Response (Chief Procurement Officer):

Management Agreement	Description of Management’s Action Plan to Address Finding	Estimated Timeline to Implement Action Plan
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Following the CPO review and vetting of the NIGP policy, procedure, and process recommendations, the CPO will develop a phased implementation roadmap outlining how approved corrective measures and/or actions will be executed.	Within twelve (12) months of acceptance of final recommendations.
<p>Additional Comments and/or Reason For Disagreement with finding:</p> <p>While the CPO acknowledges the findings and agrees that the condition may have existed at the time of this engagement, additional context is warranted, as certain recommendations are currently in process and/or pending implementation.</p>		



Response to Recommendation No. 4.1: Formalize Approval Methods

The CPO concurs with this recommendation. Currently, P&C is engaged with NIGP to support the revision of existing policies, procedures, and processes, as well as the implementation of accepted recommendations. Deliverables associated with this engagement include updates to the County's Purchasing Policy, the P&C Procedures Manual, and process mapping.

As part of this effort, the revised Procedures Manual will further clarify and formally define the authorized methods of approval. In parallel, OpenGov will be actively utilized to facilitate managerial approvals through established workflow checkpoints embedded throughout the procurement process. These system-based approval points are designed to promote efficiency, streamline review timelines, and provide clear visibility into approval status.

P&C will continue to evaluate and monitor the effectiveness of these approval checkpoints to ensure they remain adequate and aligned with operational needs. Additionally, updates to policies and procedures will be made on an ongoing basis to reflect current system functionality and reinforce consistent application of approval requirements. Together, these efforts are intended to enhance efficiency, promote consistency, and eliminate ambiguity in the approval process.

Response to Recommendation No. 4.2: Standardize Signatory Requirements

The CPO cannot commit to this recommendation. While P&C supports standardizing signatory requirements, requiring a User Department (UD) signature prior to advertisement may extend the overall solicitation timeline due to the additional coordination and approval step. It is also important to note that a pre-solicitation meeting is held with the UD for review and input prior to solicitation drafting. It would be counterproductive for a UD to approve to form procurement templates that they are not the subject matter expert of. Collaboration with UD is embedded within the procurement process through review and consultation points prior to solicitation development. As such, requiring a UD representative signature prior to advertisement would be duplicative of existing engagement and approval steps. P&C will continue to evaluate process efficiencies to minimize delays while ensuring appropriate review, accountability, and compliance throughout the solicitation lifecycle.

Response to Recommendation No. 4.3: Deploy Pre-Ad System Workflows

System enhancements and configurations are ongoing to support the continued deployment and refinement of pre-advertisement workflows. Specifically, the procurement platform is configured to incorporate required approval fields and approval tracking functionality without restricting advertisement/publishing capabilities.

The procurement process includes a dual managerial approval structure to support the advertisement requirements for solicitations to be published in both OpenGov and the County's legal organ, The Champion Newspaper. Under this process, managerial approval is required prior to release of solicitation in OpenGov and is also required prior to submission for publication in the legal organ. P&C's Operations Team is responsible for coordinating legal organ publication and verifying that all required approvals have been obtained before proceeding, ensuring compliance with statutory advertisement requirements.

Ongoing enhancements to the procurement platform will incorporate required approval fields and approval tracking functionality to strengthen visibility and accountability within this process.

Response to Recommendation No. 4.4: Stakeholder Training

P&C will continue to provide training to staff to clearly communicate and reinforce approval requirements, including the methods for establishing and maintaining approval permissions.



FINDING 5: LACK OF ADEQUATELY DEFINED TIMELINES, TRACKING, AND OVERSIGHT OF ITB PROCUREMENT PROCESS

The procedures manual establishes a target for Invitations to Bid (ITBs) to be completed **within 25 to 90 days**. However, our analysis determined that adherence to this timeline cannot be reliably measured or enforced because the **manual does not define what constitutes the formal start or end of the ITB process**. In addition, there are no established step-level milestones, documentation requirements, or exception checkpoints to ensure accountability and oversight. For audit purposes, we defined the **start** as the **initial request** and the **end** as issuance of the **first approved purchase order (PO)**.

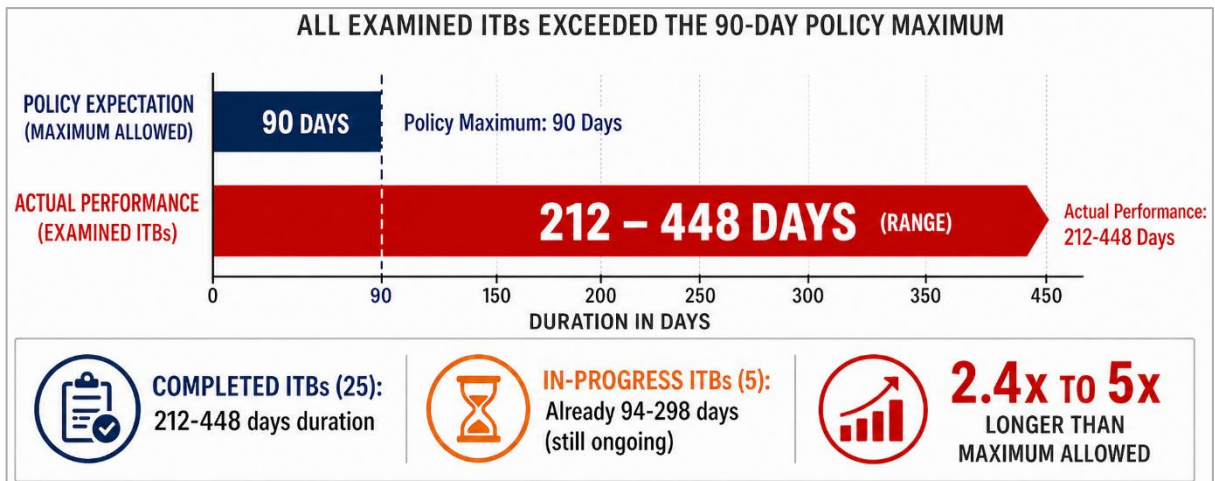
Key policy gaps include:

- **Undefined Parameters:** The manual provides a time range but does not define the trigger event (Start) or completion criteria (End), creating ambiguity in performance measurement.
- **Missing Milestones:** Without step-level Service Level Agreements (SLAs), staff lack clear operational targets for managing daily progress.
- **Weak Accountability:** There are no formal requirements to document delays or obtain management approval for timeline exceptions.

We examined a sample of **30 ITBs** (25 completed and 5 in progress) to calculate elapsed time between major steps using documentation provided by P&C. Missing documentation limited the full step-level bottleneck analysis for all sampled ITBs; therefore, we summarized in a step-level aging only where the documentation was provided. Our timeline analysis found ITB projects routinely exceeded the prescribed 25–90-day completion window, with overall timelines ranging from **212 to 448 days**.

Results of Sample Review

(i) Excessive Cycle Times



Source: OIIA Testwork



- **Completed ITBs (25):** Durations (measured from the Pre-Solicitation meeting due to missing Request dates) ranged from **212-448 days**, with **100% exceeded the 90-day goal**. Notably, the initial request date could not be identified for **70%** of the ITBs due to missing documentation.
- **In-progress ITBs (5):** Even projects initiated **after** implementation of the **PRSS ticket-based tracking system in January 2025** ranged from **94 to 298 days**, with 100% exceeding the 90-day threshold while still underway at the time of audit.

(ii) Data Integrity Issues (Missing Documentation)

- **67% Gap:** The “Request to Pre-Solicitation” step is the official start of the ITB process; however, **67% of files** lacked this initial request document. Therefore, the County cannot reliably measure the total time spent on two-thirds of its procurements.
- **Measurement Failure:** Due to missing start dates, the County cannot reliably measure total cycle time for two-thirds of its procurements.
- **Audit Limitation:** Missing documentation limited our ability to perform a full bottleneck analysis, requiring step-level aging to be summarized only where records were available.

(iii) Process Sequencing and Compliance Failures

The procedures manual dictates that the Contract Purchase Agreement (CPA) must be created and approved prior to the Notice of Award (NOA) being issued.

Policy compliance issues observed where required steps occurred out of order:

 ADDITIONAL CONTROL WEAKNESSES IDENTIFIED	
 15 OF 30 ITBs:	NOA issued before CPA creation
 3 CPAs:	Created prior to Board of Commissioners approval
 1 INSTANCE:	Review activity before user department recommendation
 1 INSTANCE:	Purchase Order created before Notice to Proceed

These conditions indicate weaknesses in compliance with established procedures.

Timeliness Issues by Critical Step

The table summarizes **where OIIA had no documented evidence of the date some ITB steps were performed or completed** across the 30 ITBs reviewed. The largest documentation gaps occurred from **Request to Pre-Solicitation (67% missing)**, **NTP to First Purchase Order (50% missing)**, and **Pre-Solicitation to Advertisement (47% missing)**.



For ITBs with documented evidence of the step date, the longest delays occurred from **Bid Opening to Awardee Recommendation** (8 projects over 90 days; max 337 days), **Awardee Recommendation to BOC Approval** (6 projects over 90 days; max 216 days), and **NTP to First Purchase Order** (6 projects over 90 days; max 280 days).

ITB Process Step	# Projects (Where Evidence of Date for Step was Missing)	% Missing Evidence of Date for Step	# of Projects over 90 Days (Where Step Date Evidence Exists)	Max Days to Complete THIS Step (Where Date Evidence Exists)
1. Request → Pre-Solicitation	20 of 30	67%	1	112 days
2. Pre-Solicitation → Advertisement	14 of 30	47%	1	186 days
3. Advertisement → Bid Opening	2 of 30	7%	1	121 days
4. Bid Opening → Awardee Recommendation	8 of 30	27%	8	337 days
5. Awardee Recommendation → BOC Approval	9 of 30	30%	6	216 days
6. BOC Approval → CPA	6 of 30	20%	2	169 days
7. CPA → NOA	7 of 30	23%	0	35 days
8. NOA → NTP	11 of 30	37%	3	117 days
9. NTP → 1st Purchase Order	15 of 30	50%	6	280 days

Note: Max Days values are calculated only from ITBs with documented date evidence for that specific step.

Source: OIIA Analysis of 30 ITB Sample

Source: OIIA Testwork

DATA QUALITY

67% of "Request to Pre-Solicitation" dates are missing. Over 50% of dates are missing for "OIIA Review" and "NTP to 1st PO" steps, severely hampering process tracking.

PROCESS SEQUENCING

Significant sequencing issues detected. In 15 instances, the timeline from "CPA to NOA" was negative, indicating steps occurring out of order or data entry errors.

EXTREME DELAYS

Maximum days for steps routinely exceed 120 days. **Bid Opening to Awardee Rec** took up to **337 days**, and 5 projects in this phase alone exceeded 4 months.

Source: OIIA Testwork

Root Causes & Contributing Factors

The inability to meet timeliness targets stems from a combination of structural policy deficiencies and operational challenges.

Structural Deficiencies

- Undefined Start & End Points**
 The procedures manual provides a 25-90 day range but does not define the trigger event (Start) or the completion criteria (End), creating ambiguity in measurement.
- No Step-Level Milestones**



Timelines are not defined for critical intermediate steps. Without step-level SLAs, staff lack clear targets for daily progress management. This lack of defined parameters, combined with incomplete documentation, ineffective tracking mechanisms, and limited management oversight, hinders the accurate monitoring of progress and the identification of bottlenecks.

- **Weak Escalation & Approval**

No formal requirements exist for documenting delays or obtaining management approval for timeline exceptions, reducing accountability.

- **Ineffective Tracking Tools**

Reliance on manual processes without an automated tracking mechanism prevents real-time identification of bottlenecks.

Operational Factors

- **Staff Turnover**

Frequent changes in personnel lead to loss of institutional knowledge and disruptions in ongoing procurement cycles.

- **Learning Curve**

New staff require time to master complex ITB procedures, leading to slower processing times and potential errors during the onboarding phase.

- **Workload Imbalance**

Short staffing and uneven distribution of assignments create bottlenecks where specific individuals become process constraints.

- **Missing Documentation**

Inconsistent document retention (e.g., missing Initial Request dates) prevents P&C from verifying timeliness or explaining delays.

Recent Technology investments (OpenGov and PRSS)

Purchasing & Contracting has implemented digital platforms such as OpenGov and PRSS to streamline procurement operations. However, the delays observed in post-PRSS ITBs indicate that digitization has not yet resulted in meaningful cycle-time improvement.

Management attributed delays primarily to staff turnover and onboarding learning curves but reported limited visibility into specific bottlenecks due to ineffective tracking controls currently in place. As a result, technology investments have not yet achieved their intended performance and oversight objectives.

Operational & Strategic Impact

The lack of defined timelines and oversight creates cascading risks that extend beyond simple process delays, affecting financial stability and organizational reputation. The inconsistent and prolonged cycle times increase the risk of procurement delays, project cost escalations, and stakeholder dissatisfaction.



Prolonged Cycle Times **HIGH SEVERITY**

Inconsistent and prolonged cycle times significantly increase the risk of procurement delays. With cycles extending up to **448 days**, critical projects are stalled, directly impacting service delivery to County residents.

→ Result: Delayed Project Awards



Cost Escalation

Extended timelines expose the County to price volatility. Delays often result in missed market opportunities and vendor price increases between bid submission and award.



Compliance & Audit Risk

Poor document retention (missing dates) and weak exception management increase the risk of non-compliance findings and inability to defend procurement decisions during audits.



Stakeholder Frustration

Unexplained delays and a lack of transparency lead to dissatisfaction among internal departments that rely on goods/services and among external vendors participating in the process.



Inability to Forecast

The lack of reliable data impedes trend analysis. Management cannot accurately forecast workload, allocate resources effectively, or identify systematic bottlenecks.

Source: OIIA Testwork

RECOMMENDATIONS:

We recommend the following actions be taken to ensure that accountability and responsibility for timely ITB processing are assigned and monitored effectively.

5.1 Policy Revisions & Codification (The Standard)

P&C management must revise the procedure manual to eliminate ambiguity and establish clear performance standards:

- **Define Process Anchors:** Clearly define the official "Start" of the ITB process as the **Receipt of Initial Request** and the "End" as the **Issuance of the First Purchase Order (PO)**.
- **Establish Sequential Milestones:** Create standardized, enforceable step-level milestones (e.g., target days) for each major phase. These must be structured as mandatory sequential steps to prevent the "out of order" compliance failures observed (e.g., explicitly stating that CPA approval is a prerequisite for NOA issuance).
- **Mandate Documentation:** Require mandatory documentation of the date each milestone is completed to resolve the 67% data gap currently preventing accurate measurement.



5.2 System and Tracking Implementation (The Tool)

P&C management must work with IT to fully leverage the capabilities of PRSS/CV360 to enforce the new policy:

- **Implement "System Gates":** Configure the system with "hard stops" that prevent users from advancing to subsequent steps out of order. Specifically, the system should technically prevent the generation of a Notice of Award (NOA) until the Contract Purchase Agreement (CPA) field is populated and approved.
- **Enforce Mandatory Fields:** Configure the "Initial Request Date" as a mandatory field required to initiate a file, ensuring that 100% of new procurements have a valid start date for tracking purposes.
- **Automate Exception Alerts:** Configure the system to automatically generate alerts for overdue steps, reducing the manual tracking burden and providing real-time visibility into bottlenecks.
- **Dashboarding:** Develop a management dashboard to monitor recurring bottlenecks and identify workload imbalances in real-time.

5.3 Training and Governance (The Enforcement)

P&C should provide mandatory training to staff and management on the revised procedures and documentation standards.

- **Exception Reporting:** Management must implement a formal "Delay Justification" process where staff must document reasons for any project exceeding step-level milestones, addressing the current lack of formal escalation requirements.
- **Performance Integration:** Management must formally integrate compliance with these new timelines into periodic performance reviews to enforce accountability and ensure consistent adherence.

5.4 Resource Management Review (Staffing)

P&C Management, in coordination with the Chief Operating Officer (COO), must utilize the data from the new tracking mechanisms (Recommendation #2) to conduct a formal, quarterly workload and staffing analysis.

- **Targeted Action:** Management must take appropriate action to address identified resource deficits, including reviewing training programs to shorten the "new staff learning curve" and addressing "workload imbalances" through temporary contract staff or strategic reassignment.

Management Response (Chief Procurement Officer):

Management Agreement	Description of Management's Action Plan to Address Finding	Estimated Timeline to Implement Action Plan
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Following the CPO review and vetting of the NIGP policy, procedure, and process recommendations, the CPO will develop a phased implementation roadmap outlining how approved corrective measures and/or actions will be executed.	Within twelve (12) months of acceptance of final recommendations.



Additional Comments and/or Reason For Disagreement with finding:

While the CPO acknowledges the findings and agrees that the condition may have existed at the time of this engagement, additional context is warranted, as certain recommendations are currently in process and/or pending implementation.

Response to Recommendation No. 5.1- 5.3:

- **Policy Revisions & Codification (The Standard)**
- **System and Tracking Implementation (The Tool)**
- **Training and Governance (The Enforcement)**

The CPO has previously concurred with the recommendation and remains actively engaged with NIGP to revise existing policies, procedures, and processes to ensure alignment with newly implemented practices, including PRSS and OpenGov. P&C has received draft documentation and is currently conducting a thorough review and evaluation to determine the extent to which the proposed recommendations are beneficial. System tracking capabilities have been identified within PRSS and OpenGov to facilitate more reliable reporting, and P&C will continue to assess the need for any additional reporting requirements. Furthermore, in conjunction with any new implementations, all P&C procurement professionals will undergo formal training to ensure full compliance.

Because P&C is actively engaged and in the process of revising existing policies, procedures, and processes, The CPO

will continue to evaluate pending recommendations from NIGP, OIIA, and IAT, and the CPO will ensure that all recommendations align with newly implemented processes and procedures.

Response to Recommendation No. 5.4: Resource Management Review (Staffing)

See previous response to recommendation no. 1 – 3.

Response to: Targeted Action

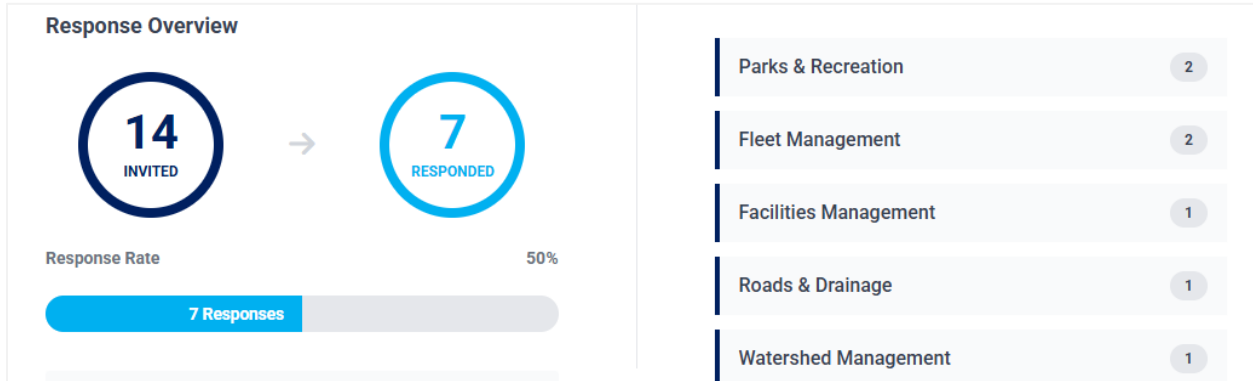
The CPO supports the use of data-driven analysis to inform staffing and workload decisions; however, this targeted action is already underway. P&C has taken proactive steps within its authority to address resource constraints and workload demands. To further mitigate current capacity challenges, P&C has engaged augmented staff from NIGP to provide immediate operational support and help balance workloads. This approach is intended to stabilize operations while longer-term staffing and process improvements are implemented.

Additionally, since January 2026, P&C has onboarded a total of six full-time equivalent (FTE) employees across the department. Despite existing budget constraints, P&C has maximized the use of available resources to enhance operational capacity and maintain continuity of services.

FINDING 6: USER DEPARTMENT PERSPECTIVES ON PROCUREMENT DELAYS: COMMUNICATION GAPS AND POST-APPROVAL BOTTLENECKS

An effective procurement process should include defined roles and responsibilities, transparent ownership and status throughout the lifecycle, and timely execution after approval. Stakeholders should have a clear process for obtaining status, escalating concerns, and receiving timely responses.

To better understand what User Departments (UDs) believe contributes to known procurement delays, we solicited feedback from departments with recent ITB involvement. A survey was sent to UD's. All respondents indicated they engage in ITB procurement activities more than two times per year.

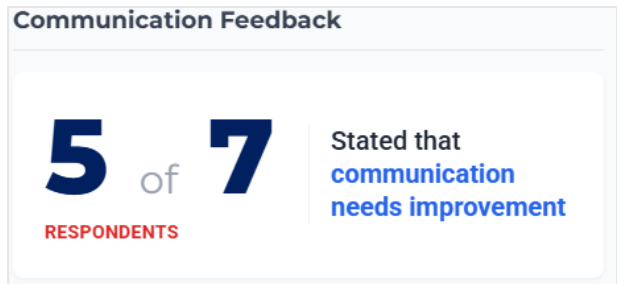


Source: OIIA Testwork

Survey responses identified the **four (4) perceived contributors to delays:**

1. Communication Gaps Outweigh Support Satisfaction:

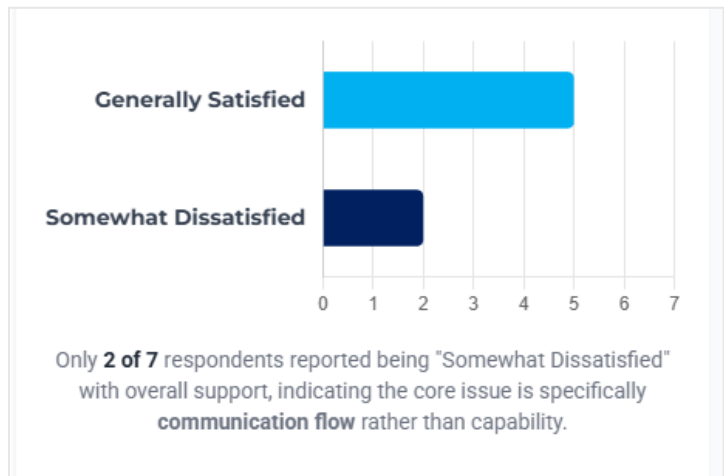
While general satisfaction with P&C support remains net positive, respondents consistently flagged communication transparency and accessibility as major friction points during the procurement lifecycle.



Source: OIIA Testwork

Reported Pain Points

- **Accessibility Challenges.** Difficulty reaching P&C staff and significant wait times for responses.
- **Development Assistance.** Limited hands-on support for developing complex Scopes of Work (SOW).
- **Black Box Workflow.** Lack of visibility into ticket assignment and status after initial submission.



Source: OIIA Testwork

Cycle Times Exceed Expectation:

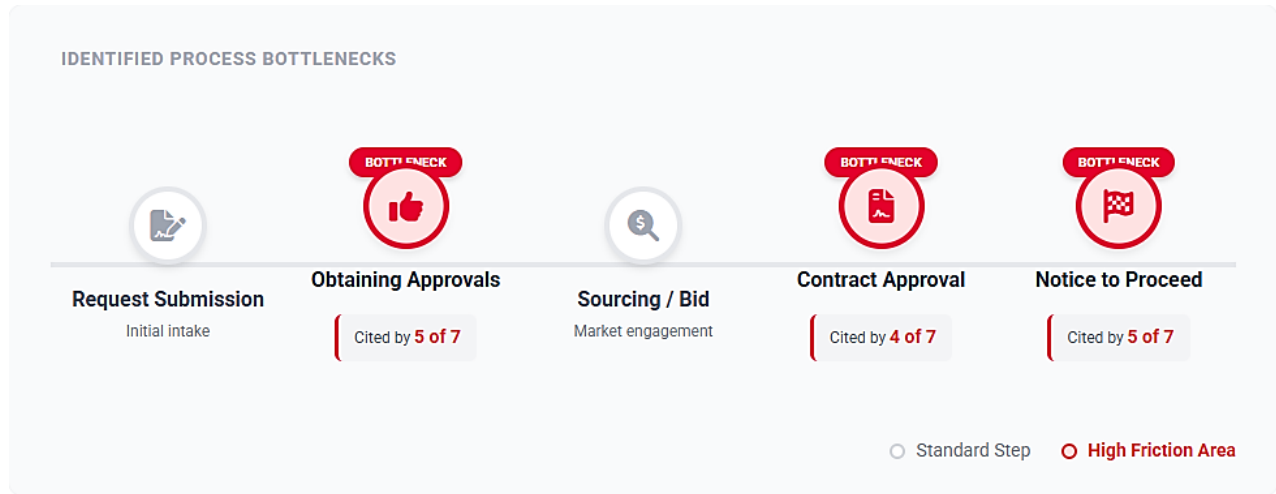
Most respondents reported that the time from initial request to Notice to Proceed (NTP) takes longer than desired. Delays are not evenly distributed but cluster around specific approval and finalization phases.

“*On average, it takes a year to get from the start of the ITB process to an NTP.*”
 — User Department Respondent

Source: OIIA Testwork



Identified Process Bottlenecks



Source: OIIA Testwork

2. Post-BOC Approval Phase Delays.

Most respondents (5 of 7) reported that even after Board of Commissioners (BOC) approval, the process often stalls. Respondents identified the transition from "Approved" to "Executed" as a critical blind spot involving signature routing, agenda scheduling, and system visibility.

4. Vendor Concerns and Impacts: Process Barriers Reducing Competition

Respondents indicated that current process inefficiencies are actively discouraging vendor participation and leading to direct cost escalations due to expired pricing holds.

Major Vendor Issues:

a. Cost Escalation

Construction costs increase when execution is slow; vendors cannot hold pricing indefinitely.

b. Rigid Bureaucracy

Vendors deemed "nonresponsive" for minor format issues (e.g., price list folder), leading to multi-year lockouts.

c. Access & Complexity

Difficulty contacting P&C and cumbersome ITB packages make the County less attractive than peers.

“

"Contract execution after BOC approval takes longer than the ITB process itself."

— USER DEPARTMENT RESPONDENT

“

"Everything going through one person causes a bottleneck."

— STRUCTURAL FLAW OBSERVATION



Some UD comments may reflect experiences prior to recent system changes (PRSS/OpenGov). However, respondents consistently identified communication transparency and the post-BOC approval phase as persistent delay drivers.

OIIA Testwork

Source:



Based on UD feedback, perceived contributors to delays include inconsistent visibility into ownership and status after request submission, limited responsiveness during key transitions, and prolonged contract execution activities after BOC action (e.g., routing, legal/signature steps, and document availability). These conditions indicate the need for clearer service expectations, better-defined handoffs, and stronger escalation mechanisms—especially during the post-BOC approval phase which is consistent with the results and issues identified in finding 5.

If communication gaps and post-BOC approval phase delays persist, the County increases the risk of:

- **Cost Escalation:** Vendors are unable to hold pricing during prolonged execution.
- **Vendor Dissatisfaction:** Reduced competition due to perceptions that the process takes too long compared to other municipalities.
- **Payment Term Challenges:** Difficulty meeting NET 30 terms when PO issuance lags execution timelines.
- **Reduced UD Confidence:** Increased administrative burden on departments to obtain status and resolve issues.

According to the Procedures Manual

- The Procedures Manual requires coordination with user departments, including:
 - **Pre-solicitation meetings**
 - Clear communication of **scope, timelines, and responsibilities**
- Procurement processes require **defined roles and communication between P&C and user departments** throughout the procurement lifecycle.

RECOMMENDATIONS:

To address the communication, support, and "final mile" bottlenecks, we recommend:

6.1 Enforce role accountability and communication using existing PRSS workflow controls.

P&C management should require consistent use of PRSS as the system of record for request ownership and status. Because PRSS already generates automated email notifications when a ticket is assigned, moved between major phases, or requires UD input, management should implement controls to ensure (a) tickets are timely assigned



and updated within PRSS, and (b) appropriate UD stakeholders are correctly identified/subscribed so notifications are received by the right individuals.

- **Service level expectations**

Establish and publish a maximum response time (e.g., within **48 hours**) for P&C to acknowledge UD inquiries and/or PRSS requests.

- **Quality checks**

Perform periodic quality reviews of PRSS tickets (assignment timeliness, completeness of status updates, and confirmation of UD notification recipients) and address gaps through training and supervision.

6.2 Streamline the post-BOC approval phase (BOC Approval → CPA → Notice of Award (NOA) → NTP → 1st PO).

The Chief Operating Officer (COO), in coordination with P&C leadership, Legal counsel, Finance, and affected user departments, should convene the appropriate stakeholders to review and re-engineer the post-BOC approval phase to reduce routing delays and improve accountability. As process owner for the procurement lifecycle, P&C should help coordinate this effort and support implementation of agreed-upon improvements. This effort should establish:

- **Defined milestones**

Measurable timelines for contract routing, Legal review/sign-off, signature execution, and other key post-BOC handoffs, as applicable.

- **Contract accessibility SLA**

A service-level expectation requiring executed contracts to be posted and accessible in the system for user department use no later than 48 hours after final signature.

- **Ownership clarity**

Defined responsibility for each handoff in the post-BOC approval phase, including escalation procedures when timelines are exceeded.

6.3 Clarify service levels and strengthen UD support (including SOW assistance and training)

P&C management should document service expectations between P&C and UDs, including written guidance that clarifies P&C's role in Scope of Work (SOW) development and the level of assistance to be provided. In addition, P&C should provide accessible, ongoing training resources (e.g., job aids, step-by-step guides, and/or short online modules) for OpenGov/PRSS so staff who miss single-day sessions can still obtain required knowledge.

6.4 Formalize UD feedback and governance (PAC or dedicated forum)

P&C management should use the Purchasing Advisory Committee (PAC)—or establish a comparable forum—to enable formal, documented UD input into the development and refinement of procurement procedures. The forum should review recurring UD/vendor concerns, including procurement package complexity and solicitation requirements or



responsiveness criteria that may be unnecessarily restrictive, and track agreed-upon corrective actions through completion.

Management Response (Chief Procurement Officer):

Management Agreement	Description of Management’s Action Plan to Address Finding	Estimated Timeline to Implement Action Plan
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Following the CPO review and vetting of the NIGP policy, procedure, and process recommendations, the CPO will develop a phased implementation roadmap outlining how approved corrective measures and/or actions will be executed.	Within twelve (12) months of acceptance of final recommendations.
<p>Additional Comments and/or Reason For Disagreement with finding:</p> <p>While the CPO acknowledges the findings and agrees that the condition may have existed at the time of this engagement, additional context is warranted, as certain recommendations are currently in process and/or pending implementation.</p> <p>Response to Recommendation No. 6.1: Enforce role accountability and communication using existing PRSS workflow controls</p> <p>Training with UD was conducted in December 2024, with implementation effective January 2025. PRSS serves as the primary automated internal control system through which UD’s initiate procurement requests, as well as communicate, track, monitor, and receive updates on all procurement-related matters. Managers are currently responsible for verifying that open tickets are assigned and closed tickets are updated in a timely manner within PRSS. UD representatives who are unable to effectively utilize the system may obtain additional training through the County’s IT Department, which is also responsible for addressing any system-related issues that may hinder full utilization of PRSS.</p> <p>Response to: Service level expectations</p> <p>The recommendation is currently in process. The CPO has disseminated communication guidelines to the department; additionally, PRSS includes embedded date and time stamps to support communication tracking.</p> <p>Response to: Quality Checks</p> <p>This recommendation is currently in process. The CPO will confirm that all procurement managers are conducting periodic quality assurance reviews of timely communication responsiveness. If determined that such reviews are not performed consistently, the CPO will immediately issue a formal memorandum to the management team reinforcing this requirement.</p> <p>Response to Recommendation No. 6.2: Streamline the post-BOC approval phase (BOC Approval → CPA → NOA → NTP → 1st PO).</p> <p>Upon issuance of the Notice to Proceed (NTP) by P&C, the solicitation process is considered “cradle to grave,” encompassing the full lifecycle of the solicitation from initiation through completion.</p> <p>It is important to note that P&C cannot create a PO until a requisition is received from the UD; any other factors that may contribute to process bottlenecks are not addressed herein.</p> <p>Additionally, the recommendation regarding defined milestones falls outside the purview of the CPO. Any actions related to this recommendation should be directed to Executive Leadership, which would need to collaborate with the appropriate external departments to redefine contract routing milestones in a manner that is effective and equitable for all parties.</p>		



Response to: Contract Accessibility SLA

Upon completion of the routing process, all finalized documents, including the executed contract, are uploaded into the County’s FMIS. These documents are then available for use. It is important to note that the upload of the executed contract into FMIS does not delay the UD from creating a requisition; past practice indicates that UDs typically begin the requisition process concurrently with the routing process.

The CPO will verify the timeliness of finalized document uploads into FMIS to determine whether any additional corrective measures are necessary within P&C’s current processes.

Response to: Ownership Clarity

The CPO disagrees with this recommendation, as there is no need to further define handoff responsibilities; the current procedure already delineates the process, including BOC award, NOA issuance, CPA creation, and the conduct of the NTP meeting. The CPO will, however, reconsider and/or reevaluate this position following a comprehensive assessment of pending recommendations from NIGP, OIIA, and IAT.

Response to Recommendation No. 6.3: Clarify service levels and strengthen UD support (including SOW assistance and training)

The CPO agrees that service levels to strengthen UD support can be improved upon. The County’s IT Department provides Oracle training through CV360 to address learning curves and to help bridge the gap of communication with all end users.

Currently, P&C is actively addressing communication gaps by further supporting IT efforts by:

- Procurement Professionals attending informational sessions hosted by their assigned UD
- Holding monthly/quarterly UD meetings to address pending project concerns
- P&C providing in-person training(s) upon request
- As of April 6th, the Capital Improvement Team (CIP) is providing on-site procurement assistance to better serve their UD (Department of Watershed Management (DWM) to expediate consent decree (CD) projects
- Using OpenGov’s eProcurement solution and training
- Providing Purchase2Pay Procurement training sessions
- P&C providing quarterly virtual training sessions (Mission Procurement – a procurement overview) to all end-users
- Other training courses, including but not limited to, I-Supplier and Invoicing and Payment training

The CPO concurs that additional training and educational materials may be beneficial to further clarify P&C’s role as it relates to the development of a SOW. It is important to note that the UD serves as the subject matter expert for the project; therefore, responsibility for drafting the SOW resides with the UD.

While procurement professionals may provide limited guidance or advisory input to help ensure the SOW aligns with procurement standards, they do not author or develop the substantive scope. However, procurement professionals can provide expertise on procurement-related matters, including compliance, structure, clarity, and alignment with applicable policies and procedures additionally, the CPO will have required supplemental PRSS training and materials to aid in use optimization.

Response to Recommendation No. 6.4: Formalize UD feedback and governance (PAC or dedicated forum)

The CPO concurs with this recommendation. P&C recognizes the value of structured feedback from UD and external stakeholders in strengthening procurement processes and outcomes. In considering this recommendation, the CPO also notes the importance of incorporating input from stakeholders who are not subject matter experts in procurement, ensuring that governance mechanisms remain accessible, practical, and supportive of operational needs.



Rather than establishing a new formal body, the CPO will evaluate existing governance structures, including the PAC, as well as other potential forums or touchpoints, to determine the most effective and efficient method for capturing and incorporating UD feedback on procurement-related matters. The intent is to ensure stakeholder input is consistently considered while maintaining clarity of roles, avoiding unnecessary duplication, and preserving process efficiency.

AUDITOR'S COMMENTS: RECOMMENDATION 6.2

OIIA acknowledges that the post-BOC approval phase involves multiple parties and that certain corrective actions may require coordination beyond P&C alone. However, as process owner for the procurement lifecycle, P&C is appropriately positioned to coordinate and help drive a cross-functional effort to improve the timeliness and accountability of the post-BOC process. The existence of multiple handoffs and dependencies does not diminish the need for defined milestones, ownership clarity, escalation procedures, and timely system access to executed contracts; rather, it reinforces the importance of a coordinated process improvement effort. Accordingly, OIIA maintains that this recommendation remains valid and should be addressed through collaboration among Executive Leadership, P&C, Legal, Finance, and user departments.



APPENDICES

Appendix I – Objective, Scope, and Methodology

Objective

The objective of this audit was to evaluate the adequacy and effectiveness of internal controls over the County’s Low Bid Procurement process to determine whether:

1. Documented policies and procedures align with current practices and incorporate applicable County policies.
2. All steps in the process were completed and approved as required
3. Process is free of inefficiencies and bottlenecks

Scope

The audit scope included a review of:

- Current Low Bid Procurement policies, procedures, and training materials.
- Low Bid Procurement processed from January 1, 2023, through December 31, 2024.
- Currently in progress Low Bid Procurement.

Methodology

To achieve the audit objectives, we performed the following procedures:

- Assessed the alignment of policies and procedures with actual and best practices.
- Tested a sample of requests for compliance with policies.
- Surveyed select user departments for feedback related to the efficiency of the process.



Appendix II – Key Definitions and Abbreviations

CPA (Procurement Agreement): The senior official with authority over procurement operations and approvals.

ITB (Invitation to Bid): The low bid solicitation method is used to procure goods/services.

NOA (Notice of Award): The formal notice issued to the selected vendor stating they won the ITB.

NTP (Notice to Proceed): The official authorization for the vendor to begin work.

Open Gov (Open Government): The software platform used for posting solicitations, managing bids, approvals, and public transparency.

PAC (Purchasing Advisory Committee): The internal committee that reviews and approves solicitations, awards, and major procurement actions before they move forward.

PRSS (Procurement Request Submittal System): The internal system used to initiate purchase requests, route approvals, and document sourcing.

SLA (Service Level Agreement): Contractual performance standards (response time, deliverables, etc.).



Appendix III – Management Response Memo



04/20/2026

Lavois Campbell
Chief Audit Executive
Office of Independent Internal Audit
1300 Commerce Drive, Suite 300
Decatur, Georgia 30030

RE: **Management Response to “Low Bid Procurement Audit No. IA-2024-0237-PC”1**

Dear Mr. Campbell:

In accordance with DeKalb County, Georgia – Code of Ordinances / Organizational Act Section 10A- Independent Internal Audit, this is our response to the audit named above provided in this document. As required by the ordinance, our response includes 1) a statement regarding our agreement or disagreement along with reasons for any disagreement, 2) our plans for implementing solutions to issues identified, and 3) the timetable to complete such plans. Additionally, the Chief Procurement Officer (CPO) has provided a Management Response Memorandum to precede the individual audit responses.

If you have any questions about this response, please contact me.

Sincerely,

Michelle
Butler

Digitally signed by
Michelle Butler
Date: 2026.04.20
15:59:51 -04'00'

Michelle Butler, Chief Procurement Officer
Purchasing and Contracting



Appendix III – Management Response Memo (continued)



Management Response Memo

Upon review of *Audit Report No. 2024-0237PC – Low Bid Procurement*, the Chief Procurement Officer (CPO) acknowledges the audit findings and appreciates the comprehensive review of the County's Low Bid Procurement process. The CPO would like to formally request that this memo precede the individual audit responses as a reference for additional context.

Purchasing and Contracting (P&C) recognizes that existing internal controls may require strengthening to address process and procedural deviations cited in the above-mentioned audit report, particularly in the areas of documentation retention, approval tracking, and process execution. P&C agrees that these areas present opportunities for improved standardization, oversight, and accountability.

In addition, P&C has identified operational bottlenecks that were not explicitly captured in the report but have contributed to variations in process execution. These include capacity constraints, competing workload demands, transitional impacts associated with system implementations, and the need to update and realign certain internal procedures to reflect current systems and operational practices. While these factors do not negate the need for improved consistency and documentation, they provide important context for understanding the conditions under which procurements were executed.

These conditions do not reflect a systemic breakdown of the procurement control environment. The County has established policies, procedures, and systems that provide a functional framework for competitive procurements, and these controls continue to support the integrity, transparency, and fairness of the process.

The issues identified are largely the result of a combination of outdated procedural documentation, ongoing system enhancements, and variations in operational execution, rather than a lack of controls. As noted in the audit, P&C has implemented systems (including PRSS and OpenGov) along with foundational processes intended to strengthen procurement operations, tracking, and compliance.

P&C is actively addressing these challenges through ongoing enhancements and process improvements. Efforts currently in progress or planned include:

- Engagement with the National Institute of Governmental Purchasing (NIGP) to update and align the Purchasing Policy and Procedures Manual to reflect current operations, systems, best practices, and roles
- Enhancing system configurations to improve visibility, tracking, and consistency in data entry and approval documentation
- Deploying refined workflows that incorporate approval tracking and clearer process sequencing
- Strengthening internal quality assurance and oversight practices



Appendix III – Management Response Memo (continued)



- Providing ongoing, targeted staff training to reinforce compliance with established procedures and documentation standards

These actions are intended to improve consistency in execution, strengthen internal controls, and enhance overall process efficiency without disrupting operational continuity.

In summary, while P&C acknowledges the deviations identified in the audit, the Department maintains that a foundational control structure is in place and functioning effectively. Moving forward, the focus will be on maturing and standardizing these processes through deliberate, ongoing improvements to ensure long-term sustainability, compliance, and operational effectiveness. This effort is undertaken with the overarching goal of strengthening external and internal relationships while continuing to provide and demonstrate solicitation transparency to DeKalb constituents, thereby ensuring fairness, accountability, and integrity throughout the procurement process.

Sincerely,

Michelle
Butler

Digitally signed by
Michelle Butler
Date: 2026.04.20
16:00:09 -04'00'

Michelle Butler, Chief Procurement Officer
Purchasing and Contracting



DISTRIBUTION

Action Official Distribution:

Michelle Butler, Chief Procurement Officer

Willie Moon, Deputy Procurement Director

Statutory Distribution:

Lorraine Cochran-Johnson, Chief Executive Officer

Robert Patrick, Board of Commissioners, District 1

Michelle Long-Spears, Board of Commissioners, District 2

Nicole Massiah, Board of Commissioners, District 3

Chakira Johnson, Board of Commissioners, District 4

Mereda Davis Johnson, Board of Commissioners, District 5

Ted Terry, Board of Commissioners, District 6

Dr. LaDena Bolton, Board of Commissioners, District 7

Tanja Christine Boyd-Witherspoon, Chairperson, Audit Oversight Committee

Adrienne T. McMillion, Vice-Chairperson, Audit Oversight Committee

Lisa Earls, Audit Oversight Committee

Michael Lopata, Audit Oversight Committee

Petrina Bloodworth, Audit Oversight Committee

Information Distribution:

Zachary L. Williams, Chief Operating Officer/ Executive Assistant

Leah Davis, CEO's Chief of Staff

Terry G. Phillips, Interim County Attorney



PROJECT TEAM

This report was submitted by:

Kesha Hall

Kesha Hall, MAcc
Internal Auditor Senior
Office of Independent Internal Audit

4/29/26

Date

The report was reviewed by:

Donna Jackson

Donna G. Jackson, CPA, CIA
Internal Auditor Manager
Office of Independent Internal Audit

4/29/26

Date

The report was approved by:

Lavois Campbell

Lavois Campbell, CIA, CISA, CFE, CGA
Chief Audit Executive
Office of Independent Internal Audit

4.29.26

Date



STATEMENT OF ACCORDANCE

Statement of Accordance

The mission of DeKalb County is to make the priorities of the citizens of DeKalb County; the priorities of County government - by achieving a safer DeKalb, building stronger neighborhoods, creating a fiscally accountable and more efficient County government and uniting the citizens of DeKalb County.

The mission of the Office of Independent Internal Audit is to provide independent, objective, insightful, nonpartisan assessment of the stewardship or performance of policies, programs and operations in promoting efficiency, effectiveness and integrity in DeKalb County.

This performance audit was prepared pursuant to DeKalb County, Georgia – Code Ordinances/Organizational Act Section 10A- Independent Internal Audit. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This report is intended for the use of the agency to which it was disseminated and may contain information that is exempt from disclosure under applicable law. Do not release without prior coordination with the Office of Independent Internal Audit.

Please address inquiries regarding this report to the Office of Independent Internal Audit at 404-831-7946.