

Office of Independent Internal Audit

LAVOIS CAMPBELL, CHIEF AUDIT EXECUT IV E

FINAL

June 14, 2024

Zachary L. Williams, CEO/Executive Assistant DeKalb County Government 1300 Commerce Drive Decatur, Georgia 30030 Michelle Butler
Chief Procurement Officer, Purchasing and
Contracting Department
DeKalb County Government
1300 Commerce Drive
Decatur, Georgia 30030

RE: 2nd Follow-up Report on the Local Small Business Enterprise (LSBE) Program - Report No. 2017-020-PC.

Dear Mr. Williams and Ms. Butler:

As required by DeKalb County, Georgia – Code of Ordinances/Organizational Act Section10A - Independent Internal Audit (I), the Office of Independent Internal Audit (OIIA) has completed a follow-up of the audit noted above. I have attached OIIA's report on the status of management actions taken to address the finding contained in the referenced audit report. The conclusions in this follow-up report are limited to the status of the implementation and not the effectiveness of the completed action plans, which may be assessed in a future audit.

Status of Audit Findings

Based on our review of management responses to the findings, we concluded that the findings cited in the audit report are either "Partially Complete" or "Complete Pending OIIA Verification", as shown in Figure 1 below. The main outstanding item relates to the finalization of the revised draft LSBE standard operating procedures. **Details of the status of action plans are attached on page 3 of this report**. Management has indicated that all action plans will be completed by October 2024.

Figure 1 - Status of Management Actions Plans

Finding No.	Report Finding	Status of Management Action Plans September 2021	Status of Management Action Plans <u>June 2024</u>
1	Lack of Formal Operating Procedures	Partially Complete	Partially Complete
2	Insufficient Monitoring/Oversight of LSBE Program Services	Partially Complete	Partially Complete
3	Program Administration Reporting Requirements Not Fulfilled	Partially Complete	Partially Complete
4	LSBE Applications Certified/Recertified Without Required Documentation	Partially Complete	Partially Complete
5	Non-Conformity with LSBE Graduation Requirements	Partially Complete	Partially Complete
6	Lack of Documentation to Support Consistent Contract Compliance	Partially Complete	Partially Complete
7	No Evidence to Demonstrate Enforcement of Mentor-Protégé Initiative	Partially Complete	Partially Complete
8	All Users Granted Administrator Rights to DeKalb Links Software	Partially Complete	Complete Pending OIIA Verification
9	Incomplete Vendor Profile Information in DeKalb Links Software	Partially Complete	Partially Complete

Please contact me if you require additional information.

Regards,

Lavois Campbell, CIA, CISA, CFE, CGA-CPA

Chief Audit Executive

Attachment: Audit Findings Status Update Form

cc. Michael L. Thurmond, Chief Executive Officer

Robert Patrick, Board of Commissioners District 1

Michelle Long Spears, Board of Commissioners District 2

Steve Bradshaw, Board of Commissioners District 4

Mereda Davis Johnson, Board of Commissioners District 5

Ted Terry, Board of Commissioners District 6

Gloria Gray, Chairperson, Audit Oversight Committee

Adrienne McMillion, Vice-Chairperson, Audit Oversight Committee,

Tanja Christine Boyd-Witherspoon, Pro-Tem, Audit Oversight Committee

Lisa Earls, Audit Oversight Committee

Harold Smith Jr., Audit Oversight Committee

La'Keitha D. Carlos, CEO's Chief of Staff

Kwasi K. Obeng, Chief of Staff, Board of Commissioners

Michelle Butler, Chief



	Dekalb County Government						
	Office of Independent Internal Audit						
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Da	te: June 13, 2024			Prepared by	: Audrey Pogue		
		Audit Find	ings Status Up	date Form			
	Status Date	Report #			rt Title		
	6/13/24	2017-020-PC	Follow-up Report o	=	ntracting Department Local Small Business _SBE) Program		
	Contact Person	Titl	e	Phone No.	Email Address		
	Michelle N. Butler	Chief Procurer	ment Officer	(404) 687-3581	mnbutler@dekalbcountyga.gov		
	Activity	Account	ability		Schedule		
	LSBE	Responsib	ole Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made		
		Purchasing and	l Contracting	No	October 2024		
	Finding						
	No. 1			Finding Detail			
Date 2/27/20							
	Finding	Lack of Formal Operating	Procedures				
Recommendation		 Finalize and implement the written standard program operating procedures to administer the LSBE program in a timely manner. The procedures should include: Oversight of the certification and recertification. Monitoring of contract performance compliance. Evaluation of LSBE firms to ensure compliance with the graduation requirements. Administration of the mentor protégé initiative. Reassess staffing needs to ensure the accomplishment of program objectives as outlined in the LSBE ordinance. Implement a formalized training program for staff on the finalized operating procedures evidenced by either a training certificate of completion/attendance or sign-in sheet, etc. 					
	Manage Response	Agreed. New P&C leadership is currently working to develop and implement written standard operating procedures and assess staffing needs. The administration is committed to implementing a formalized training program for LSBE staff once the standard operating procedures are finalized.					
	Status Update - September 2021	Draft Operating Procedures have been written and will be finalized upon decision as to whether the services will be					
	Open Management/Agency Assumes Risk	brought in-house or cont We have realigned some			DC add staff. We now have one additional		
х	Partially Complete				vith regard to the utilization of the DeKalb links		
	Complete Pending Verification by OIIA Closed	system. In the past, there	has been someone or	ly supporting the certif	ication application process.		
	Status Update - June 2024	The current LSBE Program Team Manager has provided a newly drafted standard operating procedure (SOP) as of					
	Open Management/Agency Assumes Risk	April, 2024 under P&Cs newly appointed Director of Purchasing and Contracting (P&C). This draft is currently under review and being tested internally by P&Cs Internal Audit Team (IAT) to determine if the document explains and/or					
X	Partially Complete Complete Pending Verification by OIIA Closed	shows how the following will occur: oversight of the certification and re-certification process, monitoring of contract					



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	Office of Independent Internal Audit							
Da	ite: J	une 13, 2024		-	Prepared by	y: Audrey Pogue		
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	Status Date Report # Report Title							
		6/13/24	2017-020-PC	Follow-up Report o	-	ontracting Department Local Small Business LSBE) Program		
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	М	ichelle N. Butler	Chief Procurer	ment Officer	(404) 687-3581	mnbutler@dekalbcountyga.gov		
		Activity	Account	ability		Schedule		
		LSBE	Responsib	ole Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made		
			Purchasing and Contracting		No	October 2024		
		Finding						
	No.	2		Finding Detail				
	Date	2/27/20						
		Finding	Insufficient Monitoring/C	Oversight of LSBE Progr	am Services			
	Recommendation		We recommend that P&C management: • Develop and implement written standard operating procedures which include monitoring and oversight procedures of the LSBE Program. • Reassess their staffing needs to ensure adequate staff is available to provide sufficient monitoring and oversight of the LSBE program services.					
		<u> </u>	Agreed. New P&C leadership is currently working to develop and implement written standard operating procedures and assess staffing needs. Additionally, there has been a restructuring of the LSBE office and P&C is conducting an internal audit.					
		pdate - September 2021	Draft Operating Procedures have been written and will be finalized upon decision as to whether the services will be					
Open Management/Agency Assumes Risk We've realigned some of our staffing and we've requested that GMSDC add staff. We now have one addit member on the GMSDC side that supports the calls that come in with regard to the utilization of the DeKa system. In the past, there has been someone only supporting the certification application prodess. Bi-wee meetings have started and currently being carried out with the Georgia Minority Supplier Development Co (GMSDC) and P&C.				egard to the utilization of the DeKalb links fication application prodess. Bi-weekly				
Status Update - June 2024 The newly drafted SOPs are currently under review and being test			=					
х	Partially (nent/Agency Assumes Risk Complete Pending Verification by OIIA	document shows how risks are mitigated in relation to monitoring/oversight of LSBE program services related to certificiation and recertification, benchmarks and incentitives, good faith efforts, graduation requirements and mentor protege initiatives. After a thorough assessment of GMSDC staffing needs, P&C moved forward with bringing those outsourced services in-house which created four new positions; two Senior Contract Compliance Officers and two additional Administrative Specialists. With the decision to bring the outsourced services in-house, P&C methodology seeks to have better control over the LSBE Program Management to include oversight of certification, recertification, benchmarks and incentitives, good faith efforts, graduation requirements, and mentor protege initiatives.					



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Date: June 13, 202	24		•	Prepared by:	: Audrey Pogue	
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Status Date		Report #		Repo	rt Title	
6/13/24		2017-020-PC	Follow-up Report or	_	ntracting Department Local Small Business LSBE) Program	
Contact Person	ı	Titl	e	Phone No.	Email Address	
Michelle N. Butle	er	Chief Procurer	ment Officer	(404) 687-3581	mnbutler@dekalbcountyga.gov	
Activity		Account	ability		Schedule	
LSBE		Responsib	ole Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made	
		Purchasing and	l Contracting	No	October 2024	
Finding						
No.				Finding Detail		
Date 2/27	//20					
Finding		Program Administration Reporting Requirements Not Fulfilled				
Recommendatio	n	We recommend P&C management: • Submit timelier semi-annual LSBE program reports to the CEO and BOC for their review. • Update the semi-annual LSBE program report to ensure it contains the information specified in the LSBE ordinance.				
Management Respo	onse	Agreed. New P&C leadership is currently working to ensure timely submittal of complete semi-annual LSBE reports in accordance with the current LSBE Ordinance.				
Status Update - Septemb	per 2021	Reports have been developed that can be run to provide to the Administration and BOC the required informaton.				
Open Management/Agency Ass	umes Risk	During the assessment, it was discovered there is a significant amount of bad data in DeKalb Links (GMSDC) and iSupplier (Oracle). The administration is considering the path for the program (outsourced, in-house, or hybrid) and				
X Partially Complete		the chosen solution may result in a need for a new software or additional revisions to DeKalb Links. It is anticipated				
Complete Pending Verification	ition by OIIA	that the implementation of the program changes will be completed by August 31, 2022 and cleanup of data in a new or revised system will be completed December 31, 2022. Types of bad data: (1) Number of LSBEs certified and de-certified; (2) Number and financial impacts of mentor/protege partnerships; (3) Evaluation of the effectiveness of the LSBE in relation to the achievement of DeKalb County's goals set forth under this article, including the utilization of LSBE's on contracts; (4) Number of LSBEs subcontracted by non-LSBE prime contractors; (5) Number of LSBEs contracted as a prime contractor; (6) Total LSBE contracted dollars and total contracted dollars				
Status Update - June 2024 As of April 2024, P&C's IAT is testing data housed in DeKalb Links to determine what data can be r						
Open Management/Agency Assu X Partially Complete		GMSDC DeKalb Links System. The test is to confirm the number of LSBEs certified/de-certified, number and financial impacts of mentor protege partnerships, achievements of benchmarks, number of LSBEs subcontracted by non-LSBE primes, number of LSBEs contracted as prime contractors, total LSBE dollars and total contracted dollars. In addition, IAT will confirm if the clean-up of data that occurred in 2022 was completed. Also, IAT is performing additional tests to				
Complete Pending Verifica	ition by OliA	determine what system u	pdates have been impling if the current softwa	lemented since the data are system (DeKalb Link	a clean-up in 2022. The LSBE Program Team (s) is providing the County with the necessary	



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		6/13/24	2017-020-PC	Follow-up Report or	_	ntracting Department Local Small Business .SBE) Program	
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	M	lichelle N. Butler	Chief Procurer	ment Officer	(404) 687-3581	mnbutler@dekalbcountyga.gov	
		Activity	Account	ability		Schedule	
		LSBE	Responsib	ole Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made	
			Purchasing and	l Contracting	No	October 2024	
		Finding					
	No.	4	Finding Detail				
	Date 2/27/20						
		Finding	LSBE Applications Certified/Recertified Without Required Documentation We recommend P&C management:				
Recommendation		ecommendation	 Implement standard operating procedures for processing LSBE applications to ensure vendor files are maintained and include appropriate documentation in support of the LSBE program certification/recertification eligibility. Perform program oversight procedures to ensure that the supporting documentation from the third-party service provider used to certify and recertify the LSBE applicants is maintained and only vendors with valid LSBE certifications are included on the certified vendor listing. Reformat online fillable documents to ensure all fields can be viewed and/or printed. 				
	Man	agement Response	Agreed. New P&C leadership is currently working to develop and implement written standard operating procedures and is performing a system review of software.				
Open brought in-house or Management/Agency Assumes Risk insure the Certified \			brought in-house or cont insure the Certified Vend The thrid party vendor ar	inued to be outsourced or List is correct before	 Until that time, additing posting. 	on decision as to whether the services will be ional reviews by P&C staff are occuring to cedures with responsibilities of each party	
Closed Closed			Supplier # assigned per	vendor and we have been cleaning up the			
X	Open Managen Partially	nent/Agency Assumes Risk Complete Pending Verification by OIIA	See response to Finding N	No. 1.			



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		Activity	Account	ability		Schedule		
		LSBE	Responsik	ole Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made		
			Purchasing and Contracting		No	October 2024		
		Finding						
	No. 5		Finding Detail					
	Date	2/27/20						
		Finding	Nonconformity With LSBE Graduation Requirements					
	Recommendation		We recommend P&C management implement procedures to ensure compliance with the graduation requirements and that only eligible firms remain in the program. These procedures should include obtaining and maintaining adequate documentation of the graduation requirements.					
	Mana	agement Response	Agreed. New P&C leadership is currently working to develop and implement written standard operating procedures.					
Open Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OllA Closed		nent/Agency Assumes Risk	Draft Operating Procedures have been written and will be finalized upon decision as to whether the services will be brought in-house or continued to be outsourced. P&C is currently reviewing each certification/recertification application to determine if the LSBE has met the graduation requirements as set forth in the Ordinance. All vendors are required to submit all application documents upon expiration to vet for a re-certification. Financials that exceed limits are provided a "Graduation Letter". 3-yrs tax returns Personal financial statements Business licenses Affidavit of valid info and docs					
Open completed Management/Agency Assumes Risk certificatio			completed in 2023. In add certification and recertific	re previously outsourced services that were performed by GMSDC have been brought in-house. This action was impleted in 2023. In addition, with the creation of four new positions, their responsibilities include completing rtification and recertification reviews and monitoring assigned contracts for reporting compliance and monthly porting. See response to audit Finding No. 2 which addresses if P&C's LSBE Program team is currently reviewing				
Ħ	-	Pending Verification by OIIA	each certification/recertification application to determine if the LSBE has met the graduation requirements as set forth in the Ordinance.					



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Date: June 13, 2	2024		•	Prepared by	/: Audrey Pogue		
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Status Da	te	Report #			rt Title		
6/13/24	Follow-up Report on the Purchasing & Contracting Department Local Small Busines Enterprise (LSBE) Program						
Contact Per	son	Titl	е	Phone No.	Email Address		
Michelle N. E	utler	Chief Procurer	ment Officer	(404) 687-3581	mnbutler@dekalbcountyga.gov		
Activity		Account	ability		Schedule		
LSBE		Responsik	ole Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made		
		Purchasing and	Contracting	No	October 2024		
Finding							
No.	6			Finding Detail			
	2/27/20	Lack of Documentation to	Support Consistent	Contract Compliance			
Finding		Lack of Documentation to We recommend P&C mar		Lontract Compliance			
Recommendation		 Develop and implement 	t standard operating p t of all contract compli- procedures should inclusion subcontract to ensure payment listing reports to substantiate the work tractor participation d and subcontractor list monitor the Finalized Nace with the ordinance	iance components, as reude, but not limited to: key components are in s along with check and in k and payments to the s uring the contract perio ting, attached to the pri Work Schedule required according to section 2.	the subcontract. nvoice copies, and subcontractor. d through site visits me contractor's I from prime contractors 207, item (c) of the		
Management Re	esponse	See response to Finding 5					
Status Update - September 2021 Open Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OIIA Closed Draft Operating Procedures have been written and will be finalized upon decision as to whether the service brought in-house or continued to be outsourced.					on decision as to whether the services will be		
Status Update - Ju Open Management/Agency A Partially Complete Complete Pending Ver Closed	Assumes Risk ification by OllA	Certification/recertification, benchmarks and incentives, good faith efforts, contract performance compliance,					



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		Activity	Account	ability		Schedule		
		LSBE	Responsik	ole Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made		
			Purchasing and Contracting		No	October 2024		
	Finding Findin							
	No.	7	Finding Detail					
	Date	2/27/20						
		Finding	No Evidence to Demonstrate Enforcement of Mentor - Protégé Initiative					
	Re	commendation	 We recommend that P&C management: Implement procedures for the LSBE mentor-protégé initiative requirement. Enforce the mentor-protégé initiative and ensure that prime contractors with contracts over \$5 million dollars are engaged in a mentor-protégé relationship and adhere to the mentorprotégé guidelines. Obtain quarterly reports from the mentor and the protégé, which should include information such as the protégé's growth, costs and expenditures, and completion of developmental activities or skills to help ensure that protégés benefit from the program. 					
	Mana	gement Response	See response to Finding 5.					
Status Update - September 2021 Open Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OllA Closed Draft Operating Procedures have been written and will be finalized upon decision as to whether the services will brought in-house or continued to be outsourced.					n decision as to whether the services will be			
X	Open Managem Partially (ent/Agency Assumes Risk complete Pending Verification by OIIA		ourced services that w	•	ine and/or confirm if the document shows re providing oversite per the Ordinance for the		



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	Dekalb County Government							
	Office of Independent Internal Audit							
Date: .	June 13, 2024			Prep	ared by:	Audrey Pogue		
	Audit Findings Status Update Form							
Status Date Report # Report Title								
	6/13/24	2017-020-PC	Follow-up Repor	t on the Purchasing Business Enterp		g Department Local Small ogram		
C	ontact Person	Titl	e	Phone No.		Email Address		
М	ichelle N. Butler	Chief Procurer	ment Officer	(404) 687-3581	mnbutler(ଅdekalbcountyga.gov		
	Activity	Account	ability		Sched	ule		
	LSBE	Responsible Area		Repeat Finding	-	ed Completion Date/Date stments will be made		
		Purchasing and Contracting		No		August 2022		
	Finding	Finding Detail						
No.	8							
Date	2/27/20							
	Finding	All Users Granted Administrator Rights to DeKalb Links Software						
Re	commendation	Note: The details of this finding are confidential under the exemptions noted in Georgia Open Records Act #50-18- 72(a). The details of this finding would put the organization at risk. Questions and further information should be requested from the Chief Audit Executive of the Office of Independent Internal Audit.						
Mana	agement Response	Agreed. New P&C leadership is currently performing a system review of software.						
Open Management/Agency Assumes Risk X Partially Complete		P&C has continued to work with the third party in continuing review of the software application in use and resolution of issues. Review of off-the-shelf compliance software is in process in the event it is decided to bring the services in-house.						
Complete Pending Verification by OIIA Closed								
Status Update - June 2024 Open Management/Agency Assumes Risk Partially Complete X Complete Pending Verification by OIIA		In May of 2024, the newly appointed Director of P&C requested further information from the Chief Audit Executive of OIIA to determine the details of this finding. The Director of P&C was able to convey to P&C's IAT Manger the details surrounding this particular finding. Although the results of this finding cannot be disclosed per the above-mentioned Open Records Act #50-18-72(a), through IATs assessment (testing of DeKalb Links).						

Closed





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Dekalb County Government Office of Independent Internal Audit Prepared by: **Audrey Pogue** Date: June 13, 2024 **Audit Findings Status Update Form Status Date** Report # **Report Title** Follow-up Report on the Purchasing & Contracting Department Local Small Business 6/13/24 2017-020-PC Enterprise (LSBE) Program **Contact Person** Title Phone No. **Email Address** Chief Procurement Officer (404) 687-3581 Michelle N. Butler mnbutler@dekalbcountyga.gov **Activity Accountability** Schedule **Anticipated Completion Date/Date Responsible Area Repeat Finding** Adjustments will be made **LSBE Purchasing and Contracting** No October 2024 Finding 9 No. **Finding Detail** Date 2/27/20 Incomplete Vendor Profile Information in DeKalb Links Software Finding We recommend P&C management implement operating procedures to ensure the prime contractors' profiles in DeKalb LINKS software are accurate and complete. We further recommend that the responsible staff verify that the system entries agree with the prime contractor information Recommendation provided. **Management Response** See response to Finding 4. Status Update - September 2021 Draft Operating Procedures have been written and will be finalized upon decision as to whether the services will be Open brought in-house or continued to be outsourced. Until that time, additional reviews by P&C staff are occuring to insure the profiles are accurate and complete. Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA Status Update - June 2024 The newly drafted SOP and DeKalb Links is currently being tested by IAT to ensure that all prime contractor's profiles are accurate and complete. Open Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA Closed