
Audit Recommendation Follow-Up Report

*STATUS UPDATE AS OF
December 31, 2020*

Office of the City
Auditor

City of San Diego





THE CITY OF SAN DIEGO

DATE: April 12, 2021

TO: Honorable Members of the Audit Committee

FROM: Andy Hanau, City Auditor

SUBJECT: Recommendation Follow-Up Report

Attached is the Office of the City Auditor's Recommendation Follow-Up Report, which provides the status of open recommendations as of December 31, 2020. We will continue reporting on open recommendations semiannually for periods ending around June 30th and December 31st.

We have provided a short summary of data and attached the status updates for all recommendations. We look forward to presenting this report at the April 21, 2021 Audit Committee meeting.

The intent of this report is to keep the Audit Committee informed about the implementation status of recommendations made by the Office of the City Auditor. We welcome any suggestions or recommendations for improving this report to enhance your ability to monitor the effective implementation of City Auditor recommendations.

We would like to thank all the staff from the various departments that provided us with information for this report. All of their valuable time and efforts are greatly appreciated.

cc: Honorable Mayor Todd Gloria
Honorable City Councilmembers
Jay Goldstone, Chief Operating Officer
Matthew Vespi, Chief Financial Officer
Rolando Charvel, Department of Finance Director and City Comptroller
Jeff Peelle, Assistant Director, Department of Finance
Matthew Helm, Chief Compliance Officer
Deputy Chief Operating Officers
Department Directors



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SUMMARY

The Administration has continued to make progress towards implementing open audit recommendations. During this reporting period, the Administration implemented 29 of the outstanding recommendations. Additionally, we issued seven reports and added 58 new recommendations, and the Administration agreed to implement all of the new recommendations.

We asked all departments with outstanding recommendations to provide a current target implementation date; however, there are recommendations in this report with dates that are past due. We have included Attachment C – Recommendations Deemed as In Process With Past Due Original Target Dates so that past due recommendations can be easily identified.

We will continue to follow up on these recommendations during our next reporting period. Also, during this reporting period, the automatic email notification to remind departments about past or upcoming due dates was inadvertently disabled. We are working to reestablish connectivity so emails will be sent to departments as due dates pass or are coming due.

Going forward, we will be asking departments to provide a detailed Recommendation Implementation Work Plan (RIWP) for each new audit or investigative recommendation to advance effective implementation. We will consult with the Audit Committee regarding whether RIWPs should be required for prior recommendations, such as those that are high priority and/or are significantly past due.

Additionally, we are concurrently following up on 45 outstanding confidential recommendations resulting from 10 confidential reports. We will be issuing a confidential recommendation follow-up report in May. As we move forward, we will follow up on both public and confidential recommendations concurrently to align all outstanding recommendations' statuses.

We greatly appreciate the Administration's efforts to implement audit recommendations to improve City operations and mitigate the risks identified during our audits and investigations.

IMPLEMENTATION STATUS OF OPEN RECOMMENDATIONS

This report reflects the status of all Office of the City Auditor open audit recommendations as of December 31, 2020. We contacted departments directly to gather recommendation status information, reviewed all outstanding recommendations, and placed the recommendations into the following status categories:

Implemented	City staff provided sufficient and appropriate evidence to support all elements of implementing the recommendation;
In Process	City staff provided some evidence; however, either elements of the recommendation were not addressed or the department has agreed to implement the recommendation but has not yet completed the implementation;
Will Not Implement	The Administration disagreed with the recommendation, did not intend to implement, and no further action will be reported; and

Not Implemented Circumstances changed to make the recommendation not applicable.
– N/A

As of our last recommendation follow-up report for the period ending June 30, 2020, there were 144 open recommendations. Since then, we have issued six performance audit reports and one agreed upon procedures report which added 58 new recommendations for a total of 202 outstanding recommendations for the period ending December 31, 2020. The table below summarizes this activity:

Activity for the Period Ending December 31, 2020	Number of Recommendations
Recommendations In Process as of June 30, 2020	144
Recommendations Issued July 1, 2020 through December 31, 2020	58
Total Outstanding Recommendations as of December 31, 2020	202

During this reporting cycle, we verified that departments and related entities have implemented 29 recommendations out of 202 (14 percent) since our last report. The results of our review for this reporting cycle are as follows for the 202 recommendations:

Number of Recommendations	Status of Recommendations
29	Implemented
103	In Process – With Past Due Original Target Dates
70	In Process – With Original Target Dates Not Due
202	Total

This report provides information about the recommendations in the following exhibits:

- **Exhibit 1** – Summarizes the status of the 202 recommendations by audit report in chronological order.
- **Exhibit 2** – Summarizes the distribution of the 29 recommendations in Attachment B that were **Implemented** by Department/Agency.
- **Exhibit 3** – Summarizes the distribution of the 103 recommendations in Attachment C that are **In Process – With Past Due Original Target Dates** by Department/Agency.
- **Exhibit 4** – Summarizes the distribution of the 70 recommendations in Attachment D that are **In Process – With Original Target Dates Not Due** by Department/Agency.
- **Exhibit 5** – Breaks down the 202 recommendations by their status and the length of time the recommendation remains open from the original audit report date.

- **Exhibit 6** – Audit Recommendation Activity for the Period Ending December 31, 2020.

This report also provides detailed information about the recommendations in the following Attachments:

Attachment A – Recommendations Highlighted for the Audit Committee’s Attention

Generally, these recommendations include: (a) those where the Administration **disagreed** with implementing the recommendation, (b) the status update significantly varied from previous updates provided by the Administration, (c) a recommendation may need some type of further action, or (d) a recommendation is determined to be **Not Applicable** (N/A) any longer and should be dropped.

Attachment B – Recommendations Deemed as Implemented

This schedule includes all outstanding recommendations as of December 31, 2020 that have been deemed as **Implemented** by City Auditor staff based on sufficient and appropriate evidence provided by the departments to support all elements of the recommendation.

Attachment C – Recommendations Deemed as In Process With Past Due Original Target Dates

This schedule includes all recommendations with past due original target dates as of December 31, 2020 that are **In Process** of implementation based on the status information provided.

Attachment D – Recommendations Deemed as In Process – Not Due

This schedule includes all recommendations with original target dates that are not due as of December 31, 2020 that are **In Process** of implementation based on the status information provided.

FUTURE RECOMMENDATION FOLLOW-UPS

The Office of the City Auditor will conduct semi-annual follow-ups, with reporting periods ending June 30th and December 31st. For the next report, we will continue to request that departments establish target implementation dates for new audit recommendations, and we will provide information on the recommendations that become past due or the target implementation date has changed. We will also highlight recommendations where there is disagreement and seek resolutions.

Moving forward, the Office of the City Auditor will ask departments to provide a Recommendation Implementation Work Plan (RIWP) for each new audit or investigative recommendation to advance effective implementation. In addition, the Office of the City Auditor or the Audit Committee may request RIWPs for selected past recommendations that are high priority and/or where implementation progress is behind schedule. Elements of the RIWP will include designating the person responsible for the implementation and updates, the milestones needed to fully implement each recommendation, and timelines for each milestone until full implementation is achieved.

The intent of this report is to keep the Audit Committee informed about the implementation status of recommendations made by the Office of the City Auditor. We welcome any suggestions or recommendations for improving this report to enhance your ability to monitor the effective implementation of City Auditor recommendations.

Exhibit 1 below summarizes the status of the 202 recommendations by audit report in chronological order.

EXHIBIT 1: Audit Reports and Recommendation Status

Report No.	Report Title	Implemented	In Process
12-015	Performance Audit of the Development Services Department's Project Tracking System		3
13-009	Performance Audit of the Real Estate Assets Department		1
14-006	Performance Audit of Police Patrol Operations	1	
14-019	Performance Audit of the Real Estate Assets Department - Residential Property Leases		1
15-012	The City Needs to Address the Lack of Contract Administration and Monitoring on Citywide Goods and Services Contracts		2

Report No.	Report Title	Implemented	In Process
15-016	Performance Audit of Citywide Contract Oversight		5
16-011	Performance Audit of the City's Street Preservation Ordinance		1
16-016	Citywide Contract Oversight II - Contract Review		2
17-003	Performance Audit of the San Diego Housing Commission – Affordable Housing Fund		1
17-006	Performance Audit of The City's Programs Responsible For Improving Pedestrian Safety	1	
17-009	Performance Audit of Street Light Repair	1	
17-010	Performance Audit of the Affordable / In-Fill Housing and Sustainable Buildings Expedite Program		3
17-013	Performance Audit of The San Diego Convention Center		1
17-021	Hotline Investigation of Recreation Activity Permit Calculation Errors and Abuse		1
18-007	Performance Audit of the Economic Development Department's Business Cooperation Program		2
18-013	Fraud Hotline Investigation Report of Waste in the Transportation Alternatives Program		1
18-015	Performance Audit of the Economic Development Department's Business and Industry Incentives Program	4	2
18-023	Performance Audit of the Storm Water Division	1	3
19-002	Performance Audit of the Real Estate Assets Department's Portfolio Management Practices		2
19-003	Performance Audit of The Public Utilities Department's Water Billing Operations	1	4

Report No.	Report Title	Implemented	In Process
19-005	Performance Audit of the Public Utilities Department's Water Meter Cover Replacement Program	2	1
19-007	Performance Audit of the Fleet Operations' Vehicle Acquisition Process		1
19-008	Hotline Report of Jury Duty Service Fraud		1
19-011	Performance Audit of Development Services' Accela Permitting System Implementation		3
19-013	Performance Audit of Community Planning Groups		2
19-015	Performance Audit of City Employee Pay Equity	1	5
19-016	Performance Audit of the City's Administration of Joint Use Agreements with San Diego Unified School District		4
19-018	Performance Audit of the City's Right-of-Way Tree Trimming Maintenance Program	1	
19-019	Performance Audit of the Public Utilities Department Customer Support Division Customer Service Office (Call Center)	1	5
20-001	Hotline Report of Improper Free Trash Collection at Short-Term Residential Occupancy Units		1
20-002	Performance Audit of Public Utilities Department's Advanced Metering Infrastructure Implementation		10
20-003	Hotline Report of Abuse Related to the Unfair Award of a Multi-Million-Dollar Contract	1	5
20-007	Hotline Report of Public Records Act Responses		4
20-008	Performance Audit of Development Services Department Administration of Deposit Accounts for Development Projects	2	9

Report No.	Report Title	Implemented	In Process
20-009	Performance Audit of the City's Efforts to Address Homelessness	4	7
20-010	Hotline Investigation of Gift Received by a City Employee		2
20-011	Performance Audit of Strategic Human Capital Management	1	13
20-013	IT Performance Audit of Citywide Data Classification and Sensitive Data Encryption		5
20-015	Performance Audit of the City's Management of Public Liabilities	4	5
21-001	Follow-Up Performance Audit of the Public Utilities Department's Industrial Wastewater Control Program	1	8
21-002	Agreed-Upon Procedures Related to the Central Stores Physical Inventory - Fiscal Year 2020		2
21-003	Performance Audit of the Transportation and Stormwater Department's Street Sweeping Section		4
21-004	Performance Audit of San Diego Police Department's Data Analysis	2	7
21-005	Performance Audit of the Purchasing and Contracting Department's Small Local Business Enterprise Program		12
21-006	Performance Audit of Strategic Human Capital Management II: Employee Performance Management		11
21-007	IT Performance Audit of Legacy Applications		11
GRAND TOTAL		29 (14%)	173 (86%)

Exhibit 2 summarizes the distribution of the 29 recommendations in Attachment B that were **Implemented** by Department/Agency as of December 31, 2020.

EXHIBIT 2: Number of Recommendations Implemented by Department/Agency

Number of Recommendations Implemented	Department/Agency	Number of Recommendations Implemented	Department/Agency
2	Chief Compliance Officer	1	Human Resources COO
1	Chief Operating Officer	5	Public Utilities
2	Development Services	2	Risk Management Chief Compliance Officer
4	Economic Development	3	San Diego Police Department
4	Homelessness Strategies Division	3	Transportation & Storm Water
4	Human Resources	1	Transportation & Storm Water - Streets Division

Exhibit 3 summarizes the distribution of the 103 recommendations in Attachment C that are **In Process - With Past Due Original Target Dates** by Department/Agency as of December 31, 2020.

EXHIBIT 3: Number of Recommendations In Process - With Revised or Past Due Target Dates by Department/Agency

Number of Recommendations Outstanding	Department/Agency	Number of Recommendations Outstanding	Department/Agency
1	Assistant Chief Operating Officer	2	Human Resources
3	Chief Compliance Officer	5	Parks & Recreation
7	Chief Operating Officer	3	Personnel
3	Chief Operating Officer Environmental Services Chief Financial Officer	1	Personnel COO Human Resources City Attorney
1	Chief Operating Officer Engineering & Capital Projects	1	Personnel Human Resources City Attorney
4	Communications Department	2	Planning Department
1	Department of Finance ¹	24	Public Utilities
3	Department of Information Technology	8	Purchasing & Contracting
17	Development Services	4	Real Estate Assets
4	Economic Development	1	Risk Management Department
1	Fleet Operations	2	Transportation & Storm Water
5	Homelessness Strategies Division		

¹ Formerly known as Office of the Comptroller and/or Financial Management

Exhibit 4 summarizes the distribution of the 70 recommendations in Attachment D that are **In Process – With Original Target Dates Not Due** by Department/Agency as of December 31, 2020.

EXHIBIT 4: Number of Recommendations In Process - Not Due by Department/Agency

Number of Recommendations Outstanding	Department/Agency	Number of Recommendations Outstanding	Department/Agency
1	Chief Compliance Officer Transportation & Storm Water Department	2	Human Resources Personnel
5	City Clerk Performance and Analytics Department Department of Information Technology	1	Human Resources COO Personnel City Attorney
1	Department of Finance	3	Personnel
11	Department of Information Technology	1	Personnel Human Resources
2	Homelessness Strategies Division	4	Public Utilities
11	Human Resources	14	Purchasing & Contracting
1	Human Resources Performance and Analytics Department	7	San Diego Police Department
1	Human Resources Department of Information Technology	5	Transportation & Storm Water

Exhibit 5 breaks down the current 202 open recommendations and the 170, 142, 141, 145, 143, 160, 160, 169, 137, 123, 140 and 152 prior reports' recommendations by their status and the length of time a recommendation remains open from the original audit report date for both the current and prior report.²

We are no longer utilizing the *Not Implemented* status. All open recommendations are either categorized as *Implemented*, *In Process*, *Not Implemented - N/A* or *Will Not Implement*.

EXHIBIT 5a: Current Report Audit Recommendations Implementation Aging for December 31, 2020 period

Timeframe	Implemented	In Process	Total
0 - 3 Months	2	45	47
4 - 6 Months	1	10	11
6 - 12 Months	11	41	52
1 to 2 Years	4	34	38
Over 2 Years	11	43	54
Total	29	173	202

EXHIBIT 5b: Current Report Audit Recommendations Implementation Aging for June 30, 2020 period

Timeframe	Implemented	In Process	Not Implemented-N/A	Total
0 - 3 Months	0	28	0	28
4 - 6 Months	3	24	0	27
6 - 12 Months	2	21	0	23
1 to 2 Years	11	36	1	48
Over 2 Years	2	35	7	44
Total	18	144	8	170

² Timing is rounded to the month.

EXHIBIT 5c: Audit Recommendations Implementation Aging for December 31, 2019 period

Timeframe	Implemented	In Process	Not Implemented-N/A	Will Not Implement	Total
0 - 3 Months	1	12	2	0	15
4 - 6 Months	4	20	0	0	24
6 - 12 Months	2	11	0	1	14
1 to 2 Years	4	36	0	1	41
Over 2 Years	14	34	0	0	48
Total	25	113	2	2	142

EXHIBIT 5d: Audit Recommendations Implementation Aging for June 30, 2019 period

Timeframe	Implemented	In Process	Not Implemented-N/A	Will Not Implement	Total
0 - 3 Months	0	20	0	0	20
4 - 6 Months	0	4	0	0	4
6 - 12 Months	14	26	0	0	40
1 to 2 Years	5	17	0	0	22
Over 2 Years	6	46	2	1	55
Total	25	113	2	1	141

EXHIBIT 5e: Audit Recommendations Implementation Aging for December 31, 2018 period

Timeframe	Implemented	In Process	Total
0 - 3 Months	0	13	13
4 - 6 Months	5	25	30
6 - 12 Months	8	17	25
1 to 2 Years	11	21	32
Over 2 Years	4	41	45
Total	28	117	145

EXHIBIT 5f: Audit Recommendations Implementation Aging for June 30, 2018 period

Timeframe	Implemented	In Process	Not Implemented- N/A	Total
0 - 3 Months	3	11	0	14
4 - 6 Months	4	7	0	11
6 - 12 Months	17	17	0	34
1 to 2 Years	6	27	0	33
Over 2 Years	17	33	1	51
Total	47	95	1	143

EXHIBIT 5g: Audit Recommendations Implementation Aging for December 31, 2017 period

Timeframe	Implemented	In Process	Not Implemented- N/A	Total
0 - 3 Months	6	32	0	38
4 - 6 Months	2	2	0	4
6 - 12 Months	14	19	0	33
1 to 2 Years	14	22	0	36
Over 2 Years	5	43	1	49
Total	41	118	1	160

EXHIBIT 5h: Audit Recommendations Implementation Aging for June 30, 2017 period

Timeframe	Implemented	In Process	Not Implemented- N/A	Will Not Implement	Total
0 - 3 Months	1	26	0	0	27
4 - 6 Months	3	4	0	0	7
6 - 12 Months	18	27	0	0	45
1 to 2 Years	7	18	0	1	26
Over 2 Years	13	40	2	0	55
Total	42	115	2	1	160

EXHIBIT 5i: Audit Recommendations Implementation Aging for December 31, 2016 period

Timeframe	Implemented	In Process	Not Implemented- N/A	Total
0 - 3 Months	9	36	0	45
4 - 6 Months	17	9	0	26
6 - 12 Months	8	14	0	22
1 to 2 Years	3	31	0	34
Over 2 Years	5	36	1	42
Total	42	126	1	169

EXHIBIT 5j: Audit Recommendations Implementation Aging for June 30, 2016 period

Timeframe	Implemented	In Process	Not Implemented	Not Implemented- N/A	Total
0 - 3 Months	7	17	1	0	25
4 - 6 Months	8	3	1	0	12
6 - 12 Months	5	12	0	0	17
1 to 2 Years	6	32	1	0	39
Over 2 Years	12	31	0	1	44
Total	38	95	3	1	137

EXHIBIT 5k: Audit Recommendations Implementation Aging for December 31, 2015 period

Timeframe	Implemented	In Process	Not Implemented	Not Implemented- N/A	Total
0 - 3 Months	6	14	0	0	20
4 - 6 Months	1	3	0	0	4
6 - 12 Months	3	24	1	0	28
1 to 2 Years	6	24	0	1	31
Over 2 Years	5	35	0	0	40
Total	21	100	1	1	123

EXHIBIT 5l: Audit Recommendations Implementation Aging for June 30, 2015 period

Timeframe	Implemented	In Process	Not Implemented	Not Implemented-N/A	Will Not Implement	Total
0 - 3 Months	4	12	3	0	0	19
4 - 6 Months	2	13	0	0	0	15
6 - 12 months	2	18	2	0	0	22
1 to 2 Years	12	27	0	0	0	39
Over 2 Years	18	25	0	1	1	45
Total	38	95	5	1	1	140

EXHIBIT 5m: Audit Recommendations Implementation Aging for December 31, 2014 period

Timeframe	Implemented	In Process	Not Implemented	Not Implemented-N/A	Total
0 - 3 Months	0	3	6	0	9
4 - 6 Months	8	13	0	0	21
6 - 12 Months	5	19	2	0	26
1 to 2 Years	9	21	0	0	30
Over 2 Years	22	42	0	2	66
Total	44	98	8	2	152

Exhibit 6 displays a summary of the recommendation activity for this reporting period.

EXHIBIT 6: Audit Recommendation Activity for the Period Ending December 31, 2020

Activity for the Period Ending December 31, 2020	Number of Recommendations
Open Recommendations Carried Forward from Period Ending June 30, 2020	
Recommendations In Process as of June 30, 2020	144
Recommendations issued July 1, 2020 through December 31, 2020	58
Total Outstanding Recommendations as December 31, 2020	202
Recommendations Implemented	29
Recommendations Resolved for Period Ending December 31, 2020	29
Carry Forward Open Recommendations	173

December 2020

ATTACHMENT A

Recommendations for the Audit Committee's Attention

Attachment A includes recommendations highlighted for the Audit Committee's attention. Generally, these recommendations include: (a) those where the Administration **disagreed** with implementing the recommendation, (b) the status update significantly varied from previous updates provided by the Administration, (c) a recommendation may need some type of further action, or (d) a recommendation is determined to be **Not Applicable** (N/A) any longer and should be dropped.

ATTACHMENT A
RECOMMENDATIONS FOR THE AUDIT COMMITTEE'S ATTENTION

For this reporting period, OCA does not have any recommendations that require Audit Committee attention separate from accepting the report and discussing recommendations in Attachment C.

December 2020

ATTACHMENT B

Recommendations Deemed As Implemented

This schedule includes all recommendations as of December 31, 2020 that have been deemed as **Implemented** by City Auditor staff based on sufficient and appropriate evidence provided by the departments to support all elements of the recommendation.

ATTACHMENT B
RECOMMENDATIONS DEEMED AS IMPLEMENTED

14-006 PERFORMANCE AUDIT OF THE POLICE PATROL OPERATIONS

(NO)

#1 The San Diego Police Department should analyze dispatch data to identify potential improvements to operations. It should use the results of these analyses to refine its staffing model and to evaluate patrol response to various types of incidents.

Implemented The evidence is sufficient and appropriate to consider the recommendation implemented. The department shared several examples of utilizing analyses of dispatch data, using information to refine its staffing model, and evaluating patrol response to various types of incidents. For example, a section starting on page 5 of the document Patrol Ops Audit attests to work the department performed with the help of Performance and Analytics to refine its staffing model and several operational adjustments. Page 1 of the document "2 – Alternative Response Doc 2" displays evidence of an analysis of several dozen different call types, their relative frequency, and the amount of time dedicated to different incident types. The analysis is very similar to OCA's analysis shown in Exhibit 9 of the original audit report. The department also provided other documents: the document "2 – Alternative Response Doc 1" is an internal communication regarding the efforts of a committee of over 20 department members regarding evaluating different calls for service, with proposed operational adjustments. Additionally, OCA managers consulted on the material shared, and agreed that overall, the evidence is reasonable, sufficient, and appropriate to consider the spirit of the recommendation implemented.

17-006 PERFORMANCE AUDIT OF THE CITY'S PROGRAMS RESPONSIBLE FOR IMPROVING PEDESTRIAN SAFETY

(AH) (DN)

#5 The San Diego Police Department (SDPD) should set a measurable goal to increase enforcement of the driver violations that are most likely to result in pedestrian injuries and fatalities in the City. This goal should be included in the City's Vision Zero Strategic Plan. To ensure that the enhanced enforcement of certain traffic violations is as effective as possible at improving pedestrian safety, the City should:

- Use a combination of data analysis and SDPD's expertise to determine the violations that SDPD should prioritize.
- Use a method to ensure the public is aware of the violations being targeted.
- Publicly report SDPD's performance towards meeting its measurable goals on at least an annual basis.

Implemented

This recommendation has been implemented. The Traffic Division has analyzed data to determine which violations are most likely to cause harm to pedestrians, and has issued an email to the Captains of the various SDPD divisions providing maps detailing locations in each division with high rates of pedestrian collisions, as well as certain pedestrian and driver violations that should be enforced at those locations. The email instructs Captains to have officers incorporate enforcement of violations committed by or against pedestrians at the mapped locations into their daily activities "to the greatest extent possible." In addition, in July 2018, Patrol Captains were informed to direct their officers to include enforcement and education specifically related to Vision Zero as part of their community engagement efforts. Specifically, this is to be done three days per week during first to second watch, and second to third watch overlap for one-half hour, as time is permitted, with the understanding that lower staffing, higher priority radio calls, necessary pro-active part one and part two crime enforcement might affect these efforts at times.

Regarding public outreach, a link to the City of San Diego Vision Zero webpage has been placed on SDPD's webpage. An SDPD PSA has been posted on the Vision Zero website to inform the public of SDPD's focus on pedestrian safety. The Traffic Division has also been issuing press releases for its targeted pedestrian safety enforcements. In addition to planned media press conferences and releases, citation data has been posted on the Vision Zero website's Resources page. The citation data is broken down by division and year. According to the Traffic Division, this data includes citations issued at locations identified as having three or more injury crashes, and includes citations issued at those locations during all time periods, not just during the Traffic Division's targeted pedestrian safety enforcement events.

The City's Vision Zero Strategic Plan 2020-2025 has been finalized and posted on the City's Vision Zero website. The Vision Zero Strategic Plan has been updated to formally include SDPD's measurable goal of increasing enforcement (time spent focusing on pedestrian safety) of the most likely violations, in the most common locations, contributing to pedestrian and bicycle accidents by 10%. This includes a minimum of two Traffic Division grant funded enforcement/educational details per month in the identified

areas. Additionally, proactive enforcement, on the part of patrol officers assigned to the identified areas, augments the Traffic Division's efforts and assists with increasing awareness through education and enforcement. According to the Traffic Division, data is being utilized and the public is being educated prior to and during enforcement details.

17-009 PERFORMANCE AUDIT OF STREET LIGHT REPAIR

(RG)

#6 To ensure the City has accurate asset data used for street light repairs, the Street Division Deputy Director should: prioritize hiring of asset management positions; update street light asset information to include fixture and pole data needed to make street light repairs more efficient; and develop operational guidelines for updating street light asset data when the City makes modifications to assets, and if asset additions and removals occur.

Implemented The Transportation and Storm Water Department has filled all the permanent positions in the section that maintains the database for street lighting infrastructure. They are now sufficiently staffed and have met the criteria and intent of the recommendation.

**18-015 PERFORMANCE AUDIT OF THE ECONOMIC DEVELOPMENT
DEPARTMENT'S BUSINESS AND INDUSTRY INCENTIVES PROGRAM**

(AH) (DK)

#5 EDD should develop policies and procedures governing application and information requirements for companies seeking BII incentives. Specifically, for a smaller company receiving lower value expedited permitting and minimal technical assistance, EDD management should collect and certify the information used to justify the incentive award. For larger companies receiving more extensive technical assistance, more valuable expedited permits, or other incentives of more substantial value, EDD should require application submittals from companies seeking services or incentives related to the BII, similar to the 'Economic Development Project Information' form that EDD has required for businesses receiving other EDD services.

The information collected by EDD via self-certification or an application submittal should include supporting documentation that would be used in the determination of whether to award an incentive including: the location of the business; the number and types of jobs being created; potential tax

revenue; estimated capital investment; and the industry category of the applicant.

Implemented This recommendation has been implemented. EDD has created a BIP Procedural Guideline that specifies steps for application review, the awarding process, and post-award reviews. The document specifies the applicant requirements as: 1) BIP preliminary application, 2) supporting financial information, and 3) Economic Impact Models (if necessary). The guide states that an assigned Business Development Officer shall evaluate the applicant's eligibility and may reach out directly to the applicant to obtain more specific information prior to rendering a decision on eligibility.

#6 EDD should implement policies and procedures to require the performance of the following steps when analyzing and documenting applications or requests for incentives, including (1) the determination of whether the company satisfies the criteria established in Council Policy 900-12 and the Economic Development Strategy; and (2) Specific benefits the City expects the business to generate, including evaluation of the tax base impact, number and type of jobs created, estimated capital investment, and benefits to the surrounding neighborhood. This analysis and supporting documentation should be documented in the case management system.

Implemented The recommendation has been implemented. EDD records BIP applications and assessments of applicant eligibility in Salesforce, the case management system. The BIP Procedural Guidelines state the Business Development Officer may propose certain incentives or inform the applicant that an incentive proposal was deemed ineligible based on the criteria in Council Policy 900-12. For eligible applicants, the Procedural Guidelines state the Business Development Officer will prepare a brief report that includes: 1) an analysis of the cost of the Incentive compared to the economic benefits the project is expected to produce for the City, 2) a determination of the impact of the project on the City's tax base, 3) a determination that the project is not expected to shift economic activity from one area of the City to another, and 4) an analysis of whether the project would proceed if the Incentive was not provided.

#7 EDD should develop policies and procedures for analyzing potential financial incentives which requires that a detailed 'but for' analysis be completed as a component of the cost-benefit analysis. The complexity of the 'but for' analysis should be scaled based on the size of the incentive provided and be designed to determine whether a financial incentive being considered is likely to influence the target business's decision-making regarding whether to remain or expand within the City, and to determine the ideal amount to be offered to influence the business' decision.

This analysis should include a quantitative analysis based on various business characteristics and location needs, and may incorporate narrative discussion of other non-quantifiable intangibles, such as the value of maintaining positive relationships. For incentive packages with an aggregated value in excess of \$1 million, EDD should require the business potentially requiring the incentive to assume the cost of an independent consultant selected by the City to perform the analysis, consistent with Council Policy 900-12.

Implemented This recommendation has been implemented. Council Policy 900-12 requires a Gap Analysis should City staff recommend an Incentive that exceeds \$100,000. The Council Policy also states the results of the Gap Analysis must be included in the recommendation to the Mayor or designee. EDD has not yet received an application greater than \$100,000, therefore no Gap Analysis has been conducted yet. EDD confirmed that should incentive funding of \$100,000 or more be requested, a Gap Analysis will be conducted using IMPLAN economic modeling to estimate the cost and benefits to the business and the impact on the City prior to going to Council with a recommendation.

#9 EDD should propose a revision to Council Policy 900-12 that:

- a) Specifies that the basic form application / agreement discussed above should require each program beneficiary to provide basic information about the business on a periodic basis, such as capital investments and jobs created, when necessary to allow EDD to analyze the effectiveness of the BII
- b) Requires EDD to establish specific performance measures for the BII, and to report the BII's performance on the measures to the City Council annually, such as through EDD's annual report. In addition, EDD should document and implement a written, clearly defined monitoring process, using data acquired from businesses using the BII and from other sources, in order to evaluate and report on the BII's performance against the measures identified above.

Implemented This recommendation has been implemented. Council Policy 900-12 requires City staff to monitor Recipients' progress to ensure Recipients meet all Business Incentive Workplan criteria. At a minimum, City staff must conduct a semi-annual evaluation to determine each Recipient's contractual compliance. The Council Policy requires the City to post information on awarded Incentives on its website within 30 days of an award as well as map subsidies against patterns of economic need and other relevant economic patterns. The Council Policy states that on an as-needed basis, City staff shall

provide to Council a written evaluation of the additional criteria in the Business Incentive Workplan and recommend, where appropriate, revisions to the Business Incentive Workplan. To date, there has not yet been an applicant that qualifies for BIP funding, therefore no updates have been posted to the City website. At the 07.24.2018 Council Meeting, when Council Policy 900-12 was approved, Council requested a biennial update to the ED&IR Committee on BIP with the first update before the end of 2019. In November 2019 EDD presented the status of BIP to the ED&IR committee, who confirmed the requirement of future biennial updates on BIP.

18-023

PERFORMANCE AUDIT OF THE STORM WATER DIVISION

(AH) (MJ) (DN)

#5

To ensure that the City meets its municipal permit requirements, minimizes the risk of noncompliance, appropriately maintains the storm drain system, and avoids additional deferred maintenance costs, the Transportation and Storm Water Department Storm Water Division (SWD) should initiate the development of a long-term funding strategy to meet its present and future capital and operational needs identified in the Watershed Asset Management Plan (WAMP) and Jurisdictional Runoff Management Plan (JRMP). The funding strategy should be finalized and publicly documented once the WAMP and JRMP have been updated to reflect future compliance costs, to be determined upon completion of SWD's current negotiations with the San Diego Regional Water Quality Control Board regarding SWD's request to utilize the Integrated Planning Framework program. SWD should work with the City of San Diego's Independent Budget Analyst to review long-term funding options, such as: continued / increased reliance on the General Fund, general obligation bonds, a general tax measure, increasing the storm water fee, and any other options that may significantly contribute to closing the existing funding gap. Additionally, SWD should consult with the Office of the City Attorney to ensure that the selected funding mechanism(s) meet legal requirements. When developing its funding strategy, SWD should:

- Identify stakeholders' preferences, priorities, and satisfaction levels. Such efforts should occur before a decision has been made, or to test various ideas and approaches. To elicit public input, SWD may use (but is not limited to) the following mechanisms:
 - Focus groups;
 - Interviews;
 - Comment (or point-of-service) cards;

- Public meetings, such as hearings, “town hall” meetings, and community vision sessions;
- Interactive priority setting tools;
- Creating public or neighborhood advisory groups, committees, or task forces; or
- Hire a consultant to conduct surveys.

Present the funding strategy to the City Council upon completion. The funding strategy should include a plan to pursue the desired funding mechanism(s) based on consideration of information obtained from stakeholders, expert knowledge, objective data, and using the success factors identified by other municipalities in our report.

Implemented This recommendation has been implemented. The Stormwater Division has completed an extensive Funding Strategy to address its present and future stormwater capital and operational needs. This Funding Strategy includes a plan to evaluate the viability of a stormwater-relate ballot measure or similar dedicated stormwater funding mechanism. The plan will be developed with stakeholder input and consideration of success factors that allowed other municipalities to pass post-Proposition 218 stormwater property-related fees or special taxes. With Council’s approval of a resolution on February 9, 2022 recommending that the Stormwater Division evaluate the viability of a stormwater-relate ballot measure or similar dedicated stormwater funding mechanism, the Stormwater Division plans to take steps in the next several months to gain stakeholder input through a robust stakeholder engagement program and ultimately plans to have a ballot measure ready in 2022.

19-003 PERFORMANCE AUDIT OF THE PUBLIC UTILITIES DEPARTMENT’S WATER BILLING OPERATION

(SG) (JP)

#8 The Public Utilities Department's Customer Support Division (CSD) should strengthen its supervisory review of meter reader accuracy. Specifically, to facilitate a determination about whether skipping the meters was appropriate, and to facilitate remedial action for affected meters, CSD should revise the supervisor review form to include trouble code information in addition to skip code information.

Implemented This recommendation is implemented. The Public Utilities Department (PUD) has completed the task of strengthening its supervisory review of meter reader accuracy as recommended. It has developed a Standard Operating Procedure describing expectations for supervisory review of skip and trouble

codes. PUD has also enhanced the Supervisor Route Review Form to include trouble code and skip code information. Improved daily reports were realized through the enhancements of the Supervisor Route Review Forms, which are completed daily to ensure supervisors are reviewing performance reports for certain performance areas including use of skip and trouble codes to determine if skipping the meter was appropriate. Additionally, trouble and skip codes are prioritized by the groups performing the subsequent action within their functional area. Furthermore, supervisors conduct field spot checks of entered skip and trouble codes to facilitate a determination about whether skipping the meters was appropriate and to facilitate resolution of meter issues identified in the field. Lastly, staff have been trained on these new directives.

19-005 PERFORMANCE AUDIT OF THE PUBLIC UTILITIES DEPARTMENT'S WATER METER COVER REPLACEMENT PROGRAM

(AH) (LB)

#4 To hold employees accountable for delivering expected performance, PUD should include the results of the reports from Recommendation 3 in the normal process of evaluating employees' performance. If management finds employees are deficient, PUD should use formal performance plans and discipline methods as appropriate.

Implemented This recommendation has been implemented. The Public Utilities Department has incorporated an assessment specific to the performance targets adopted in response to Recommendation 1 into the normal process of evaluating individual employee performance.

#10 PUD should develop a more efficient routing procedure for box/lid replacements. For example, every work day, the box/lid supervisor could group service requests in one specific area of the City and assign crews to complete replacement work there that day. To ensure work is completed throughout the City, the crews could have a rotation of work areas that would take them to a different area every day. One application of this approach might be to group service requests within the same Council District and work in a different Council District every day.

Implemented Audit staff discussed the work assignment process with PUD staff and observed the process in a live demonstration. The process of assigning work to crews involves the use of a mapping feature, which facilitates the efficient grouping of work orders (by being able to control geographic spread and

thus driving time). While emergency notifications can still disrupt work grouping efficiency, based on data from the work order system, audit staff determined that the work assignment process is resulting in work locations that are generally more efficient than what had been observed during the audit.

19-015 PERFORMANCE AUDIT OF PAY EQUITY

(NO)

#6 In preparation for upcoming labor renegotiations, HR should request from each union a set of written ideas and suggestions for how earnings gaps may be addressed.

These suggestions should be incorporated into the City's pay equity action plan if/as appropriate.

Implemented The evidence is sufficient and appropriate to consider the spirit of the recommendation implemented. City Administration provided a memo to City Council stating that HR had provided notice the City's six recognized employee organizations to provide ideas and suggestions on how to address earnings gaps, by August 16, 2019. HR confirmed that they did not receive any input by August 16, 2019.

19-018 PERFORMANCE AUDIT OF THE CITY'S RIGHT-OF-WAY TREE TRIMMING MAINTENANCE PROGRAM

(CK)

#4 We recommend that the Transportation & Storm Water Department Urban Forestry Program should develop a mechanism for reporting service notification performance measures to City leadership and the public. The key performance indicators should be reported in a formal document, such as the City's Annual Budget and/or an annual report to relevant City boards and committees. At a minimum, the total number of service notifications received, closed, and average response time should be reported in the City's Annual Budget along with other Transportation & Storm Water Department key performance indicators.

Implemented The Urban Forestry FY2020 Program Update was distributed to City Council on February 16, 2021. It reports incoming and completed service notification information as well as response times based on the tree request type. The

Department has also incorporated tree trimming key performance indicators on the City of San Diego Performance Dashboard.

**19-019 PERFORMANCE AUDIT OF THE PUBLIC UTILITIES DEPARTMENT
CUSTOMER SUPPORT DIVISION CUSTOMER SERVICE OFFICE (CALL
CENTER)**

(MJ)

#4 To ensure that Customer Service Representatives (CSRs) consistently enter the correct reasons for customer calls into the Call Center system, the Public Utilities Department's Customer Support Division (CSD) should develop written guidance that standardizes the types of call activities that should be categorized under each call reason type.

Implemented This recommendation has been implemented. The Public Utilities Department (PUD) has developed and implemented a Standard Operating Procedure that guides customer service representatives (CSRs) on how to categorize call activities in PUD's Customer Care System (CCS). On a micro level, the procedure provides for several call monitoring activities, including supervisory review of active and recorded calls to ensure that calls are accurately categorized, and complaints appropriately addressed. On a macro level, the procedure directs supervisors to run weekly and monthly reports of complaint data by category and CSR to ensure billing accuracy of complaint reporting, identify performance deficits, and guide training and operational decision-making. The procedure also requires staff training on how to log calls and record notes in CCS and the trainings will be recorded in Success Factors. Taken together, these methods will ensure that calls are logged appropriately and corrected as necessary.

**20-003 HOTLINE REPORT OF ABUSE RELATED TO THE UNFAIR AWARD OF A
MULTI-MILLION-DOLLAR CONTRACT**

(AH)

#3 We recommend that the Chief Operating Officer ensure that the Human Resources Department reviews the HR Contracting Out Form related to the identified contract to determine if City policy or agreements with recognized employee organizations were violated, and take the appropriate corrective action.

Implemented The HR Department conducted an internal investigation regarding the HR Contracting Out Form and took corrective action to modify the HR Contracting Out Form to require the Appointing Authority be an approver on the Form, which will ensure that the information provided to the HR Department is as accurate as possible and has been approved by the requesting Department's Appointing Authority. Therefore, this recommendation has been implemented.

20-008 PERFORMANCE AUDIT OF DSD ADMINISTRATION OF DEPOSIT ACCOUNTS FOR DEVELOPMENT PROJECTS

(CK) (MG) (ZA)

#4 We recommend Development Services Department train project managers on the new policy for establishing the authority and approvals for setting and changing the MRB in project tracking system or Accela.

Implemented This recommendation is implemented. DSD has implemented the appropriate policies and procedures and training to ensure that staff are aware of the authority and approvals for setting and charging the minimum required balance in project tracking system. Additionally, DSD has provided evidence to show that staff are following the policies.

#8 We recommend Development Service Department review current deposit accounts with deficit balances and immediately invoice past due amounts.

Implemented DSD has created internal work instructions for billing past due deposit accounts and generated invoices in calendar year 2020 totaling \$740,549 of which \$426,702 has been paid.

In addition, the department reported that they hired a new analyst in December of 2020 specifically to monitor these accounts; created a new Administrative Regulation that clearly specifies DSD's and ECP's Deposit Account responsibilities, currently being reviewed by ECP; created 175 FICA invoices in calendar year 2020 for accounts in deficit; and have been working closely with ECP's analyst to communicate on accounts that are in deficit.

20-009

PERFORMANCE AUDIT OF THE CITY'S EFFORTS TO ADDRESS HOMELESSNESS

(DN) (LB)

#5

In accordance with the City of San Diego Community Action Plan on Homelessness, the City should formally establish and document procedures for publicly reporting on its progress in implementing the plan, and should publicly report this information and present it to City Council, at least annually.

Implemented

This recommendation has been implemented. The City, as part of the Implementation Team of the Community Action Plan on Homelessness, has a structure in place to report to the City Council on progress made with respect to the Action Plan. According to the Homelessness Strategies Division, the Project Manager for the Action Plan, employed by the Housing Commission, is responsible for ongoing reporting. The Implementation Team presented its first annual report to the City Council on October 27, 2020. The presentation included information on progress made in implementing the plan.

#6

In accordance with the City of San Diego Community Action Plan on Homelessness, the City should formally establish and document procedures for publicly reporting on how the City is performing in regard to the system performance measures outlined in the plan.

Implemented

This recommendation has been implemented. The City, as part of the Implementation Team of the Community Action Plan on Homelessness, has a structure in place to report to the City Council on progress made with respect to the Action Plan. The Project Manager for the Action Plan, employed by the Housing Commission, is responsible for ongoing reporting. The Implementation Team presented its first annual report to the City Council on October 27, 2020. The presentation included information on performance measures. Specifically, the presentation included information on progress towards the three goals within reach: (1) decrease unsheltered homelessness by 50%; (2) end veteran homelessness; and (3) prevent and end youth homelessness. In addition to the presentation, the San Diego Housing Commission's website includes a dashboard tool displaying progress on the 3-year goals. The reported progress from 2019 to 2020 included a 12% decrease in unsheltered homelessness, a 44% decrease in unsheltered veteran homelessness, and a 37% decrease in unsheltered youth homelessness.

#8

While the regional outreach approach is being developed through the Regional Task Force on the Homeless, the City should conduct an analysis, or initiate an analysis through the San Diego Housing Commission, to determine whether the current level of City-funded non-law enforcement outreach workers is sufficient to execute the comprehensive homeless outreach strategy produced in response to Recommendation 7, and fund additional outreach positions for City-wide outreach, as needed.

Implemented

This recommendation has been implemented. The City allocated a one-year allotment of \$1.5 million in the FY21 budget to fund person-centered outreach to complement outreach currently being conducted through its various contracted providers. According to the Homelessness Strategies Division, these new outreach teams have flexibility to provide person-centered outreach for street outreach and encampment abatements.

The new outreach teams are part of the City's new Coordinated Street Outreach Program and are operated by People Assisting the Homeless (PATH). The program comprises two sets of teams, one is proactive and the other is reactive. The Mobile Homelessness Response Teams (the proactive team) embeds outreach workers in neighborhoods with high concentrations of people experiencing unsheltered homelessness and provide ongoing, intensive case management aimed at breaking down barriers and connecting clients to services and permanent housing. The Rapid Response Team (the reactive team) focuses on areas of high concentration and responds to community referrals, providing immediate intervention and problem-solving activities. According to the San Diego Regional Task Force on the Homeless (RTFH), which adopted Policy Guidelines for Regional Response for Addressing Unsheltered Homelessness and Encampments, this coordinated approach follows the new RTFH outreach policies and standards.

The success of an outreach program is not dictated solely by the number of outreach workers; the quality of outreach depends also on how the workers are trained and how the resource is deployed, among other factors. The City must ensure it employs effective outreach practices in order to be good stewards of limited funds and instill faith in the system for clients agreeing to shelter and services. As such, Management will continue to evaluate if the \$1.5 million in additional funding is the appropriate level of enhanced investment, including how the City could continue to fund this need in future years, and will make adjustments based on an evaluation of these efforts. The City will also undertake efforts to better coordinate outreach, ensure the workers are properly trained and equipped with resources, and that the approach be consistent with the Action Plan and regional efforts.

#11

The City should, in consultation with the City Attorney's Office, identify or establish and fund additional non-law enforcement outreach teams to implement the outreach and encampment protocol produced in response to Recommendation 10.

Implemented

This recommendation has been implemented. The City allocated a one-year allotment of \$1.5 million in the FY21 budget to fund person-centered outreach to complement outreach currently being conducted through its various contracted providers. According to the Homelessness Strategies Division, these new outreach teams have flexibility to provide person-centered outreach for street outreach and encampment abatements.

The new outreach teams are part of the City's new Coordinated Street Outreach Program and are operated by People Assisting the Homeless (PATH). The program comprises two sets of teams, one is proactive and the other is reactive. The Mobile Homelessness Response Teams (the proactive team) embeds outreach workers in neighborhoods with high concentrations of people experiencing unsheltered homelessness and provide ongoing, intensive case management aimed at breaking down barriers and connecting clients to services and permanent housing. The Rapid Response Team (the reactive team) focuses on areas of high concentration and responds to community referrals, providing immediate intervention and problem-solving activities. According to the San Diego Regional Task Force on the Homeless (RTFH), which adopted Policy Guidelines for Regional Response for Addressing Unsheltered Homelessness and Encampments, this coordinated approach follows the new RTFH outreach policies and standards.

The success of an outreach program is not dictated solely by the number of outreach workers; the quality of outreach depends also on how the workers are trained and how the resource is deployed, among other factors. The City must ensure it employs effective outreach practices in order to be good stewards of limited funds and instill faith in the system for clients agreeing to shelter and services. As such, Management will continue to evaluate if the \$1.5 million in additional funding is the appropriate level of enhanced investment, including how the City could continue to fund this need in future years, and will make adjustments based on an evaluation of these efforts. The City will also undertake efforts to better coordinate outreach, ensure the workers are properly trained and equipped with resources, and that the approach be consistent with the Action Plan and regional efforts.

20-011 PERFORMANCE AUDIT OF STRATEGIC HUMAN CAPITAL MANAGEMENT

(NO) (GT)

#3 To mitigate employee dissatisfaction over low base pay, the Human Resources and Personnel Departments should build on their work to periodically communicate to employees the total value of their overall compensation and benefits—for example, via a periodic benefits summary or individual benefits statement.

Implemented The recommendation is implemented. HR shared benefits summaries for employees in each of the City's labor groups as well as for unrepresented employees. The benefits summaries vary by labor group, and include elements such as leave, healthcare benefits, and professional development opportunities. According to HR, the strategy is to notify employees that the summaries are available online under Employee Benefits and to provide summaries to the REO labor groups. The spirit of the recommendation was for the City to enhance communication of existing benefits and compensation.

20-015 PERFORMANCE AUDIT OF THE CITY'S PUBLIC LIABILITY MANAGEMENT

(AH) (GT)

#3 The City's enterprise risk management (ERM) manager and Risk Oversight Committee should provide City departments incurring City vehicle accident liabilities with sufficient information and resources to identify and mitigate public liability risks based on a proactive approach to risk mitigation.

- a. The City's ERM manager and Risk Oversight Committee should ensure the City is taking a comprehensive and consistent approach to vehicle accident mitigation efforts by assisting departments in monitoring trends and patterns in the cause of accident by department and type of vehicle involved. This information should be used to develop more robust and consistent department-specific and City-wide proactive vehicle trainings.
- b. The City's ERM manager and Risk Oversight Committee should evaluate the resources the City provides to the Risk Management Department for the development and implementing of City-wide proactive vehicle trainings.
- c. The Risk Management Department should provide its proactive vehicle training course, "Being Safe While Working for the City of

San Diego,” on an annual basis to City departments experiencing the highest number of City vehicle accidents.

Implemented Risk Management submitted sufficient and appropriate evidence to deem this recommendation as implemented. The revised City Vehicle Accident Annual Report shows more detailed vehicle accident information such as most common cause of accidents as well as type of vehicles involved. The Driver Safety Training Program overview details training requirements of new employees, existing employees, and supervisors. The Course Catalog lists various vehicle safety training courses provided by the City both in-person and online. Additionally, Risk Management has scheduled the applicable departments for the Being Safe While Working for the City of San Diego training. Lastly, Risk Management met with the COO and discussed current department resources. Subsequent to that meeting, Risk Management has submitted a request for an additional Safety Training Manager through the budget process.

#4 The City’s enterprise risk management (ERM) manager, Risk Oversight Committee, and Risk Management Department should work with the Performance and Analytics Department to construct a dashboard to provide City departments with comprehensive and department-specific claims data. This should include the following:

- a) The City’s ERM manager, Risk Oversight Committee, and Risk Management Department should consult with the top five liability-incurring City departments to determine the type of data to be tracked and aggregated through the dashboard system.
- b) The City’s ERM manager, Risk Oversight Committee, and Risk Management Department should work with City departments to determine the most effective and timely method to communicate relevant public liability trend-related data and analyses and formalize the frequency and method in which this information will be provided, such as through the Risk Management Department’s bi-annual presentations to City departments and its annual report to City Council.
- c) The Risk Management Department should include relevant public liability trend-related data and analyses, such as trends for the most frequent types of public liability claims or the types of public liability claims with the highest costs, in its Annual Report to the City Council. Trends should be reported over at least a five-year period.

Implemented This recommendation is implemented. Risk Management provided sufficient documentation which included the:

- FY20 Public Liability Annual Report - This report has been modified to include graphs depicting 5-year claim and claim costs trends both Citywide and within individual City departments (top claim/claim cost-incurring departments), which are intended to assist City management in prioritizing resources.
- ClaimStat Screenshots (TSW, Police) - The ClaimStat dashboard includes charts/graphs showing the percentage of claim payments by loss code (type of claim), maps that identify trending and liability location hot spots, and a 10-year trend of total number of claims broken down by claim type (e.g., vehicle accidents, trip & fall, etc.). According to Risk Management, the department presents this information to assist City departments in better understanding their risk portfolios.
- Fleet Operations Balanced Scorecard Work Session - This report details specific metric baseline targets, major quarterly milestones for FY21–FY22, and the status of assistance needed from other departments. For example, the report details Fleet's goals/objectives for its customer satisfaction survey ratings, which includes a target of 85%, highlighting milestones such as distributing survey to user departments in August 2020, and identifying PandA as a required department for launching follow-up surveys.
- Balanced Scorecard Work Sessions - This document includes a 2020–2021 schedule for all scorecard work sessions for City departments as well as links for the departments' scorecard work session report.
- Risk Management's presentations to City departments' schedule - Includes dates of public liability presentations (present claims' data to departments)

The documentation and written explanations provided by Risk Management regarding this information generally meet the requirements and expectations of this recommendation. Therefore, the evidence provided is sufficient, reasonable, and appropriate to consider the spirit of the recommendation implemented.

#7

The City's ERM manager and Risk Oversight Committee should develop and execute a roll out plan to implement a proactive risk management framework, such as ERM, on a City-wide basis. The roll out plan should target one to two operational departments for initial implementation of the framework, establish an employee engagement plan to facilitate change in the City's organizational culture, and develop and implement a process to continually review and monitor the program.

Implemented Executive Management provided DCOO briefing materials from nine City departments that include an overview of what a balanced scorecard is and how it works, barriers to achieving priority initiatives, status of departments' action items, and the current state of the department. These meetings, and the corresponding material, are part of the City's Operational Framework rollout plan. Also, Management provided a sample branch risk assessment for several departments that identifies risks areas, risk mitigation plans, and current status of mitigation plans for these departments.

Therefore, the evidence provided is sufficient, reasonable, and appropriate to consider the spirit of the recommendation implemented.

#8 The City's ERM manager and Risk Oversight Committee should develop curriculum and trainings to educate City leaders at the senior executive level of the strategic and operational benefits of a proactive risk management framework.

Implemented Executive Management provided DCOO briefing materials from nine City departments that include an overview of what a balanced scorecard is and how it works, barriers to achieving priority initiatives, status of departments' action items, and the current state of the department. These meetings, and the corresponding material, are part of the City's Operational Framework rollout plan. Also, Management provided a sample branch risk assessment for several departments that identifies risks areas, risk mitigation plans, and current status of mitigation plans for these departments.

Therefore, the evidence provided is sufficient, reasonable, and appropriate to consider the spirit of the recommendation implemented.

**21-001 FOLLOW-UP PERFORMANCE AUDIT OF THE PUBLIC UTILITIES
DEPARTMENT'S INDUSTRIAL WASTEWATER CONTROL PROGRAM**

(LB) (SM)

#3 The Public Utilities Department should perform a fee study to determine fee levels that achieve full cost recovery for all IWCP activities, including all labor and materials required for application review and permitting, inspections, monitoring, and sample analysis, as well as overhead and non-personnel expenses. The Public Utilities Department should ensure that methodologies used to calculate fees are adequately documented and consult with the Office of the City Attorney to meet all applicable legal requirements, including those established by Proposition 218.

Implemented The Public Utilities Department, through an outside consultant, completed a fee study for the Industrial Wastewater Control Program (IWCP) on November 23, 2020. The fee study includes updated fee levels for the program's functional areas, including permits and enforcement. The fees proposed by the study are meant to achieve full cost recovery for the program, less an adjustment made to account for the benefit that IWCP provides to all customers. While updated fees have not been presented or approved by the City Council (per Recommendation 5), the completed fee study meets the intention of Recommendation 3.

21-004 PERFORMANCE AUDIT OF SAN DIEGO POLICE DEPARTMENT'S DATA ANALYSIS

(SG) (JP) (ZA)

#1 The San Diego Police Department (SDPD) should have an independent third party, such as the Federal Bureau of Investigation (FBI), validate the data reliability of SDPD's crime report systems after SDPD completes its transition to the National Incident-Based Reporting System (NIBRS).³ Additionally, SDPD should report and present the outcome of the FBI's data reliability audit to the Audit Committee. If the transition is not completed by December 31, 2020, OCA will conduct data reliability testing of SDPD's crime data following the end of the COVID-19 emergency.

Implemented This recommendation is has been implemented.

SDPD provided evidence that the FBI approved its NIBRS certification on October 23, 2020. As part of this certification, the FBI conducted data reliability testing on six months of data totaling 33,593 records.

#3 The San Diego Police Department (SDPD) should update their Racial and Identity Profiling Act FAQ documentation to specify that the "outcome of stop" data field should include all stop outcomes. SDPD should provide additional training across all Divisions to help ensure data consistency throughout the City. SDPD should also formally communicate the potential variation to the Center for Policing Equity, to prevent drawing erroneous conclusions from the data to their contracted analyst.

³ As part of the NIBRS certification process, the FBI conducts a review of applicant agencies' data for completeness and accuracy.

Implemented This recommendation is implemented. SDPD updated the FAQ document and instructed commanders to inform officers of the revision.

December 2020

ATTACHMENT C

Recommendations Deemed As In Process With Past Due Original Target Dates

Sorted by Department

This schedule includes all recommendations with past due original target dates as of December 31, 2020 that are **In Process** of implementation based on the status information provided.

ATTACHMENT C
RECOMMENDATIONS DEEMED AS IN PROCESS – WITH REVISED TARGET DATES

Assistant Chief Operating Officer

19-008 HOTLINE REPORT OF JURY DUTY SERVICE FRAUD

(AH)

#2 We recommend that the Assistant Chief Operating Officer consider whether City employees should serve the minimum frequency of jury duty required, or that the service should be performed as often as summoned, or that the appointing authorities in each City department should exercise their discretion regarding the frequency of jury duty service, in consultation with the employee.

In Process No change in status since the last reporting period. Response from former DCOO Robert Vacchi, Deputy Chief Operating Officer: Management agrees with this recommendation. Management will consider options for a policy that include City employees serving the minimum frequency of jury duty required, serving as often as summoned, or a discretionary policy allowing individual department appointing authorities to make the decision on serving in consultation with the employee. It is not our intent to create a policy that restricts an employee in any way from participating in jury duty pursuant to applicable State and Federal laws. Development of the policy will require consultation with all of the affected Representative Employee Organizations.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	September 28, 2018	March 2019	March 2019
			December 2020
			Unknown

Chief Compliance Officer

20-015 PERFORMANCE AUDIT OF THE CITY'S PUBLIC LIABILITY MANAGEMENT

#1 The City should implement a proactive enterprise risk management (ERM) framework to manage and address its public liability risks. This should include the following:

I.) The City should create an Executive-Level Risk Oversight Committee, headed by a sufficiently empowered executive official (ERM manager), that has

sufficient authority and resources to direct, coordinate, and support the work of departments that incur public liabilities for the City. The City should codify this authority through an appropriate mechanism, such as an Administrative Regulation.

II.) The City's ERM manager and Risk Oversight Committee's role in directing and coordinating the operations of liability-incurring departments should include, but not be limited to, the following responsibilities:

- a.) Requiring the top five City departments incurring the highest public liability claims costs to perform an annual risk assessment for all claim types incurring cumulative costs of \$500,000 or more in the preceding three fiscal years. Specifically, this should include identifying risks, the likelihood and impact of identified risks, and mitigative measures to address such risks (see Appendix D for a sample risk assessment template).
- b.) Assisting City departments to develop annual public liability risk assessments and monitoring City departments' implementation of mitigation plans to ensure risks are effectively identified and mitigation measures are effective. Information on mitigation measures employed and their effectiveness should be aggregated and included in the City's Risk Management Annual Report to City Council, such as the number and percent of City vehicle drivers that attended the Risk Management Department's proactive vehicle driving course.
- c.) Supervising the collection, processing, and presentation of City-wide liability data to the top five liability-incurring City departments through dedicated risk management reports, information-sharing sessions, and trainings.
- d.) Requiring and facilitating collaboration between liability-incurring departments, such as through the recently created City-wide Risk Oversight Committee, to identify, develop, and implement risk mitigation strategies for specific categories of public liabilities (e.g., City vehicle accidents, trip & falls, storm drain backups, etc.)

In Process

The Risk Oversight Committee paused meetings to realign following mayoral transition, onboarding of interim COO, and realignment of DCOO portfolios. Risk Oversight Committee meetings will commence in the upcoming fiscal year beginning in July 2021. Reflection of employed risk mitigation measures will also be included in the RM Annual Report beginning December 2021. Department Balanced Scorecard progress is readily available on the CityNet Operational Framework webpage.

Additionally, the Operational Framework (now referred to as Perform SD) meetings have continued throughout the period since the audit, and engagement with the Risk Oversight Committee will re-commence in FY 2022. Elements of the recommendation have been addressed through the ongoing

Perform SD work sessions, and progress on each department's Balanced Scorecard, including areas of public liability risk is detailed on the Perform SD site of the Citynet website.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	June 11, 2020	December 2020	December 2020 December 2021

#6

The City's ERM manager and Risk Oversight Committee should document and implement a process to periodically identify and categorize risks that could impact the City's ability to achieve high-priority initiatives (e.g., homelessness, Climate Action Plan, infrastructure projects, etc.).

- a) City-wide risks should be documented and assessed for likelihood, impact, and risk appetite, and monitored to ensure strategic risks are mitigated through the completion and submittal of annual risk assessment plans to the Risk Oversight Committee for approval.

In Process

No update was provided for this recommendation. OCA will continue to follow up on this recommendation during the next recommendation follow up cycle.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	June 11, 2020	December 2020	December 2020

#9

The City's ERM manager and Risk Oversight Committee should lead the City's efforts in conducting and formulating regular enterprise risk assessments of business processes or programs, and overseeing processes that identify, assess, prioritize, respond to, and monitor enterprise risks. In conducting these duties, the City's ERM manager and Risk Oversight Committee should ensure that reviews take place regularly, necessary data and staff support are obtained, and ensure that risks are communicated appropriately to internal and external stakeholders.

In Process

No update was provided for this recommendation. OCA will continue to follow up on this recommendation during the next recommendation follow up cycle.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	June 11, 2020	December 2020	December 2020

Chief Operating Officer

17-013 PERFORMANCE AUDIT OF THE SAN DIEGO CONVENTION CENTER

(CN)

#4 The City of San Diego Chief Operating Officer or designee should continue discussions with the Unified Port of San Diego to develop a financing plan that addresses the capital projects funding gap and recognizes the shared responsibility and benefit to the region.

In Process No change in status since the last reporting period. With the potential of a ballot measure for an expanded Convention Center being discussed, the Port District and City officials determined it was best to hold off on any final decisions on the funding until such time it was determine if the measure would be forthcoming or not.

If there is no ballot measure, a final plan may be adopted within 90-days of the notification.

Priority 2	Issue Date:	Original Target Date:	Current Target Date:
	January 18, 2017	December 2017	December 2017
			June 2018
			December 2018
			Unknown

18-007 PERFORMANCE AUDIT OF THE BUSINESS COOPERATION PROGRAM

(AH) (DK)

#1 The Chief Operating Officer should determine which department, such as the Economic Development Department or the Financial Management Department, has the best ability to manage the portion of the Business Cooperation Program that targets construction activity. This department should develop a documented process to focus on the systematic identification, recruitment and enrollment of contractors and subcontractors working on large public and private construction projects to capture use taxes before allocation to the County pool. In addition, the COO should determine how to fund program related expenditures-such as staff FTEs, consultant commissions, and rebates for certain program participants-during the annual budget process.

In Process EDD has indicated the Department of Finance has been in communication with MuniServices, a sales tax consultant, who can assist with BCP services under their current contract. To mark this recommendation as implemented, OCA will need to see supporting documentation of the communication with MuniServices, the terms of the agreement, and clarification of which department will maintain the responsibility of managing the BCP services with MuniServices. OCA will also need to see documentation of MuniServices' efforts in pursuing contractor participation in the BCP program.

Priority 1	Issue Date:	Original Target Date:	Current Target Date:
	September 28, 2017	October 2018	October 2018
			April 2019
			December 2020
			Unknown

19-015 PERFORMANCE AUDIT OF PAY EQUITY

(NO)

#1 The City Administration, working collaboratively with the Human Resources (HR) Department, Personnel, the Civil Service Commission, and the City Attorney's office, should implement a requirement for the City to conduct a detailed City employee pay equity study at least every three years, identifying earnings gaps amongst employee groups, including, but not limited to genders and racial/ethnic groups. The requirement could take the form of an adjustment to the Municipal Code, a Council Policy, an Administrative Regulation, or other form determined in collaboration with the City Attorney's Office. The requirement should include the pay equity study to be conducted by appropriately-qualified City staff or a consultant, and should include:

- a) Calculation of unadjusted earnings gaps amongst employee groups;
- b) Calculation of adjusted earnings gaps amongst employee groups, using appropriate analytical techniques such as multi-variate regression analysis; with potential explanatory variables such as age, years of service, education, and other variables as appropriate;
- c) Historical results from previous City pay equity studies;
- d) A determination of the appropriate frequency of the study, not less often than every 3 years;
- e) Assigning responsibility for review of unadjusted earnings gaps and statistically-significant adjusted earnings gaps to identify root causes; and

- f) Collaborative consultation with the Office of the City Attorney to develop a unified plan of action to mitigate earnings gaps identified if/as appropriate.

The requirement may provide for independent departments, such as the Office of the City Attorney, to conduct their own pay equity analyses, provided that these studies are consistent with the parameters outlined above. The requirement should also include that the results of each pay equity study, along with the status of measures identified to mitigate previously-identified earnings gaps, be presented to the City Council in a public meeting.

In Process

The department reported that the City completed its first Pay Equity Study in 2020 with the results being provided to City Council during open session in March 2021. The study was conducted by Analytica Consulting and included the information contained in the City Auditor's recommendation. The Human Resources Department, Personnel, Performance & Analytics, and City Attorney's Office are currently evaluating an appropriate mechanism for requiring the study to be repeated every three years as recommended by the City Auditor.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 8, 2019	December 2019	December 2019 Unknown

#4

The City Administration should utilize qualified City staff or a consultant to investigate and identify the root causes of the existing adjusted earnings gaps among the employee groups identified in the audit, and consult with the Office of the City Attorney, HR, and Personnel to develop a plan of action to mitigate the gaps, if/as appropriate. Specific issues that should be investigated include, but are not limited to:

- a) Whether opportunities for overtime are equally accessible across employee groups, particularly for Water Systems Technicians, Fire Fighters, and Police Officers;
- b) Whether promotional opportunities and pay increases are awarded fairly;
- c) Any other potential causes, as appropriate.

The study should be based in part on a survey of employees in groups that had adjusted pay gaps, in order to solicit employee opinions on whether overtime and promotional opportunities are fairly awarded, and suggestions on how these gaps could be mitigated.

The review above may provide for independent departments, such as the Office of the City Attorney, to conduct their own pay equity analyses, provided that these reviews are consistent with the parameters outlined above.

The results of the review above, including any mitigation measures as necessary, should be presented to the City Council in a public meeting.

In Process

The department reported that in March 2021 the Performance and Analytics Department presented the results of the first Pay Equity Study completed by Analytica Consulting to the San Diego City Council. Based on the findings, the Human Resources Department has begun working with the Personnel and Performance and Analytics departments to build a working group of key stakeholders to develop an action plan to address key findings outlined in the report.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	April 8, 2019	April 2020	April 2020 Unknown

20-001

HOTLINE REPORT OF IMPROPER FREE TRASH COLLECTION AT SHORT-TERM RESIDENTIAL OCCUPANCY UNITS

(AH)

#1

Because the City Attorney's Office determined that free trash collection for short term residential occupancy (STROs) is "very likely" prohibited by the People's Ordinance, and the City continues to provide trash service to STROs at no cost, we recommend that the Chief Operating Officer implement one or more of the following solutions (Priority 1):

- a) identify and remove free trash service for City households generating "nonresidential refuse;"
- b) recommend that the Council submit an initiative proposing a repeal of the People's Ordinance; and/or
- c) recommend that the Council submit an initiative proposing to amend the People's Ordinance to allow "nonresidential refuse" collection from STROs, which could include cost recovery.

In Process

No update was provided for this recommendation. OCA will continue to follow up on this recommendation during the next recommendation follow up cycle.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 10, 2019	December 2020	December 2020

20-003

HOTLINE REPORT OF ABUSE RELATED TO THE UNFAIR AWARD OF A MULTI-MILLION-DOLLAR CONTRACT

(AH)

#1 We recommend that the Chief Operating Officer ensure that Administrative Regulation 35.11 regarding the Citywide Department Use of Cooperative Procurement Contracts be revised to require documentation of a business case analysis listing other vendors that provide the goods or services, an analysis of the costs and benefits of a competitive procurement process, an evaluation of other cooperative procurement contracts available from other vendors, a certification that the City's process was fair to other vendors, and a signature by the City employee submitting the Certification declaring that the facts and information presented are true and correct.

In Process No update was provided for this reporting period. OCA will continue to follow up on this recommendation during our normal recommendation follow up process.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	September 11, 2019	February 2020	February 2020 Unknown

#2 We recommend that the Chief Operating Officer review the details from our Confidential report, conduct an independent investigation, and take the appropriate corrective action with respect to any identified City employees.

In Process No update was provided for this reporting period. OCA will continue to follow up on this recommendation during our normal recommendation follow up process.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	September 11, 2019	February 2020	February 2020 Unknown

#5 We recommend that the Chief Operating Officer, in consultation with the City Attorney's Office, update SDMC §§ 22.3205 and 23.1801, requiring a review of all service contracts by the Civil Service Commission, to reflect the current practice.

In Process This recommendation is in process. The Personnel Department will consider recommending to the Civil Service Commission to delete Civil Service Rule XVII (Review of Contracts for Services), upon a written request from the Office of the Mayor and a draft ordinance from the Office of the City Attorney. City Charter Section 118 sets forth the procedure for the amendment of a Civil Service Rule by the City Council as follows: No rule or amendment shall be effective until it is adopted by ordinance after a noticed public hearing; following such public hearing the City Council may adopt, amend, or reject the rule or amendment as recommended by the Civil Service Commission.

OCA will continue to follow up on this recommendation during our normal recommendation follow up process.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	September 11, 2019	May 2020	May 2020 Unknown

#6 We recommend that the Chief Operating Officer, in consultation with the City Attorney's Office, revise Administrative Regulation 35.11 and relevant SDMC sections to clarify whether or not a cooperative procurement process may be used for consultant contracts.

In Process No change in status since the last reporting period. Purchasing and Contracting (P&C) indicated that the San Diego Municipal Code was updated to reflect that a cooperative procurement process may not be used for consultant contracts. The update went into effect the beginning of the current fiscal year, and P&C will be working on updating the Administrative Regulation as well.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	September 11, 2019	February 2020	February 2020 November 2020 Unknown

#7 We recommend that the Chief Operating Officer ensure that Administrative Regulation 35.11 regarding the Citywide Department Use of Cooperative Procurement Contracts, and other relevant policies, be revised to prohibit the City from receiving free consultation, goods, or services from vendors if doing so may reasonably be perceived to lead to favorable treatment for a particular vendor, or potentially violate State law.

In Process No change in status since the last reporting period. Purchasing and Contracting indicated the Administrative Regulation update is in process.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	September 11, 2019	February 2020	February 2020 November 2020 Unknown

20-010 HOTLINE INVESTIGATION OF GIFTS RECEIVED BY A CITY EMPLOYEE

(GR)

#1 We recommend that the Chief Operating Officer present a revision of SDMC §26.0413(a)(4) to the City Council to include Classified employees who file SEIs be under the jurisdiction of the Ethics Commission for both education and enforcement purposes.

In Process No update was provided for this recommendation. OCA will continue to follow up on this recommendation during the next recommendation follow up cycle.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 13, 2020	December 2020	December 2020

#4 We recommend that the Chief Operating Officer consider permanent debarment for Vendor B for lack of business integrity. Under SDMC 22.0807 Grounds for Permanent Debarment, (1) (B) states, “any offense, action, or inaction indicating a lack of business integrity or business honesty.”

In Process No update was provided for this recommendation. OCA will continue to follow up on this recommendation during the next recommendation follow up cycle.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	April 13, 2020	August 2020	August 2020

Communications Department

20-007 HOTLINE REPORT OF PUBLIC RECORDS ACT RESPONSES

(AH)

#1 We recommend that the Assistant Chief Operating Officer coordinate citywide training regarding the obligation to search for and produce responses to requests for public records on personal devices and accounts, and other aspects of the PRA.

In Process According to Staff, they created video for PRA compliance training. They contacted the DCOO regarding the request to recommend as citywide training. They are working with HR and DoIT to add video training to Success Factors. In March the COO approved as citywide training for all employees.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	December 13, 2019	June 2020	June 2020 December 2020 June 2021

#2

We recommend that the Assistant Chief Operating Officer, in consultation with the City Attorney's Office, revise Administrative Regulation 95.21, titled "Responding to California Public Records Act Requests" to:

- a) clarify that the three actions the City is required to take to assist requesters, according to the PRA, includes the phrase "shall do all of the following, to the extent reasonable under the circumstances"
- b) include the four factors City staff should consider regarding writings kept in personal accounts: the content, purpose, audience, and whether the writing was within the scope of his or her employment
- c) clarify the requirement that PRA denials, in whole or in part, include the names and titles or positions of "each person" responsible for the denial
- d) specifically address whether City employees who are asked to search for responsive records must determine whether they have responsive "public records" residing on their personal devices and accounts only when the request specifically includes references to private devices and accounts, or whether the requirement is presumed for all requests (whether or not the personal devices and accounts are specifically referenced in the request)

In Process

Staff indicated additional language and changes are necessary after internal discussions and discussions with OCA. The department has provided an revised target date to allow time for these additional edits and the review process. OCA will continue to follow up on this recommendation.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	December 13, 2019	December 2020	December 2020 June 2021

#3

We recommend that the Assistant Chief Operating Officer, in consultation with the City Attorney's Office, review the contents, legal implications, and necessity of the confidentiality agreement referenced in Administrative Regulation 95.21, titled "Responding to California Public Records Act Requests."

In Process Staff indicated additional language and changes are necessary after internal discussions and discussions with OCA. The department has provided an revised target date to allow time for these additional edits and the review process. This recommendation will be reviewed as part of Recommendation 2 to determine the extent to which the intent of this recommendation has been implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	December 13, 2019	December 2020	December 2020 June 2021

#4 We recommend that the Communications Department Director develop PRA Program policies and procedures to ensure that City staff processes PRA requests in a manner consistent with the Public Records Act and City policy. Specifically, the document should include, but not be limited to:

- a) a definition of terms
- b) procedure steps related to the use of the PRA Program's software
- c) whether requests from the media or any other group will be handled differently from public requests
- d) a policy regarding embargoing responses
- e) whether all responsive documents will be posted online or not
- f) details regarding the information that is required to be provided to requesters within the statutory timeframes
- g) escalation procedures if City staff are not providing timely responses
- h) the information required to be provided to requesters in order to justify an extension of time for a response
- i) operational definitions of the compliance metric(s) used to evaluate the effectiveness of the PRA Program
- j) a policy regarding the electronic format used to provide email messages

In Process The Interim Communications Department Director indicated that the review has been completed and the changes will be reflected in an updated version of Administrative Regulation 95.21. This recommendation will be reviewed as part of Recommendation 2 to determine the extent to which the intent of this recommendation has been implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	December 13, 2019	June 2020	June 2020 June 2021

Department of Finance⁴

15-016 PERFORMANCE AUDIT OF CITYWIDE CONTRACT OVERSIGHT

(SG) (MJ)

#2

The Chief Operating Officer should establish procedures detailing requirements for contract administrators, defining the responsibilities they have to complete prior to approving invoices for payment and submitting them to Comptrollers for processing. Specifically, the procedures should include:

- a) Develop analytical procedures to ensure that payments are made in compliance with contractual costs and fees.
- b) Attach the pertinent documentation supporting the payment approval in the SAP Invoice as defined in the contract's Quality Assurance Surveillance Plan to ensure the payment can be verified as appropriate.
- c) Establish responsibility for training contract administrators on procedures that must be accomplished prior to recommending or approving invoices for payment.
- d) Establish responsibility for monitoring the contract administrators' responsibilities prior to recommending or approving invoices for payment.
- e) An annual review of the City's contract administration invoice approval process to ensure it is working as intended and effective; additionally, the policies and procedures should be updated as necessary resulting from this review.

In Process

This recommendation is in process as Purchasing and Contracting still updating a contract compliance manual with procedures and responsibilities for contract administrators that will address the recommendations in 2(a), 2(c), 2(d), and 2(e). Although the Department of Finance has provided an update with regard to recommendation 2(b), OCA is still reviewing evidence to determine whether this part has been implemented. OCA will continue to follow during the next recommendation follow-up cycle.

⁴ Formerly Financial Management Department and/or the Office of the Comptroller

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 25, 2015	November 2015	November 2016 June 2017 December 2020 Unknown

Department of Information Technology

19-011 PERFORMANCE AUDIT OF DEVELOPMENT SERVICES' ACCELA PERMITTING SYSTEM IMPLEMENTATION

(SG)

#1 The office of the Chief Operating Officer (COO) should develop an Administrative Regulation (AR) defining the authority of the Chief Information Officer (CIO). Specifically, the AR should provide the CIO with sufficient authority to define and enforce Enterprise IT Governance in accordance with standards across the entire user environment of the City through the information system lifecycle, including the procurement, implementation, maintenance, and retirement of information systems.

In Process Administrative Regulation 90.68 was developed and defines the authority and enforcement of Enterprise IT Governance in the City through the entire system lifecycle. The new AR has completed routing and has received approvals from Internal Controls, City Attorney, and Department Directors and is in the final stages of being adopted and published.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	November 16, 2018	June 2019	June 2019 December 2020 April 2021

#2 The Chief Information Officer (CIO) should expand their System Implementation Governance model to facilitate best practice system implementations for City Departments. This model must meet COBIT 5's Build, Acquire, and Implement Domain requirements to ensure compliance with best practice. Specifically, the CIO should:

- Provide required steps to implement a new system that cannot be bypassed;
- Further develop guidance for each phase of a system

implementation appropriate to its scope and impact to the City;

- c) Track alignment of business IT controls and enterprise IT controls throughout the system development lifecycle with a high-level review at key points in the implementation process; and
- d) Analyze process impacts to current Department of IT Team staffing and allocate resources appropriately to ensure additional implementation process requirements do not overly burden existing staff workload.

In Process

The recommendation has been implemented and OCA has noted that this item will be deemed completed with the publishing of the new AR 90.68 that has completed routing and approvals and is pending final publishing with a projected completion date of 4/30/2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	November 16, 2018	April 2019	April 2019
			December 2020
			April 2021

#3

The Department of Information Technology (DoIT) should maintain a central repository to track current system information to establish controls to maintain current system documentation. Additionally, DoIT should analyze this process impact to current IT Team staffing and allocate resources appropriately to minimize impact to their operations. This repository should:

- a) Track Information System Data from cradle to grave in a centralized, searchable, tracking repository system; while DoIT is automating this process, they should record this information using available resources; and
- b) Integrate with the system implementation process data created during the implementation phase.

In Process

The Department of IT is currently meeting the documentation requirements by leveraging the SharePoint repository. City departments are required to store all documentation in a logical structure similar to the current application portfolio managed by our vendor CGI.

The long term solution will be provided within the City's ServiceNow system that will be implemented with the City's new IT Services contracts that are in the final stages of negotiations following an RFP. After approval of the new IT services contracts, a transition will begin to transfer documentation over to the new ServiceNow system for full, automated tracking. Based on the

current schedule for RFP awards and transition of services for the new IT contracts, the transition to the new documentation system in ServiceNow is targeted for April 2022.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	November 16, 2018	September 2020	September 2020 April 2022

Development Services Department

12-015 **PERFORMANCE AUDIT OF THE DEVELOPMENT SERVICES DEPARTMENT'S PROJECT TRACKING SYSTEM**

(SG)

- #1 The Development Services Department (DSD) must immediately implement controls in the Project Tracking System (PTS) Production Environment to prevent inappropriate modifications to PTS. Specifically, DSD should instruct the Database Administrator to:
- a) Remove the IT Program Manager position's programmer account and ability to directly log into the system's database.
 - b) Remove programmer access to the Production Environment.
 - c) Remove programmer access to privileged accounts, except those used by the database administrators and for emergency fixes, by
 - d) locking the accounts and changing the passwords. Where privileged accounts are required for emergency fixes, DSD should limit programmer access through a restricted number of highly monitored accounts. In addition, the permissible use of these accounts should be governed through formal policies.
 - e) Ensure that programmers do not have access to modify or disable system triggers in the Production Environment.
 - f) Ensure PTS records a detailed audit trail of key information, including the prior data entries, the username of the person who changed the data and the timestamp noting when the change occurred.

DSD should also direct the System Administrator to comprehensively document the Software Change Management processes, and associated risks and controls for each environment.

In Process

According to the department, DSD is transitioning from its in-house Project Tracking System (PTS) to Accela, a cloud-based project tracking system. PTS controls are in place as previously reported. PTS will be retired from production once Accela is fully implemented in Q2 2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	June 29, 2012	Disagreed	May 2017 December 2017 April 2018 February 2020 November 2020 June 2021

#2

In order to reduce the risk of inappropriate system use by an employee, DSD should perform a Separation of Duties (SOD) assessment to ensure that employees only have the access they need to perform their functions, complying with the principle of least privilege. Specifically, DSD should:

- a) Review all PTS user roles and limit the capabilities for roles that provide broad access to PTS' functions.
- b) Review current user access to PTS' roles and restrict access to only those roles necessary and appropriate for each user's function. This includes restricting the DSD Director's access to a more appropriate level, such as "read-only."
- c) Review current role combinations to ensure that no combination
- d) grants excessive or inappropriate access, and immediately remove any conflicting combinations.
- e) Create a comprehensive policy that identifies all prohibited role combinations and documents compensating controls to mitigate any risk when a segregation of duty conflict must exist for business purposes.

In Process

According to the department, DSD is transitioning from its in-house Project Tracking System (PTS) to Accela, a cloud-based project tracking system. PTS controls are in place as previously reported. PTS will be retired from production once Accela is fully implemented in Q2 2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	June 29, 2012	April 2017	May 2017 December 2017 April 2018 February 2020 November 2020 June 2021

#13

The Development Services Department should develop a formal, written five-year information technology strategic plan. This plan should include, but not be limited to, an analysis and identification of:

- a) Current and anticipated business needs;
- b) Internal and external customer requirements;
- c) Current trends in system functionalities and security, including services that can be offered via the internet;
- d) Options to meet business and customer requirements cost-effectively, including a cost benefit analysis of retaining PTS over the long term or replacing it with a new system—either developed in-house or a customized commercial software system; and
- e) Anticipated funding needs and source of funds.

In Process

The department reported this recommendation as implemented; however, when OCA requested the supporting documentation to verify the implementation, no support was received in time for this publication.

According to the department, DSD has a 5-year innovation, information and technology plan to support a #Digital DSD transformation that assess business requirements; includes equipment, security, application and training needs; contract schedules; and budget requirements. DSD relies upon enterprise-wide IT support from DoIT and coordinates as required to meet department needs.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	June 29, 2012	December 2017	May 2017 December 2017 April 2018 February 2020 January 2021

16-011 PERFORMANCE AUDIT OF THE CITY'S STREET PRESERVATION ORDINANCE

(SM)

#7 The Development Services Department should configure their new permitting system so it can identify and report on Street Damage Fees and the corresponding permits.

In Process According to the department, Transportation Storm Water maintains a template that calculates the required Street Damage Fee amounts. These calculations will be applied in Accela and tracked.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	March 3, 2016	March 2017	March 2017 July 2017 February 2020 June 2021

17-003 PERFORMANCE AUDIT OF THE SAN DIEGO HOUSING COMMISSION – AFFORDABLE HOUSING FUND

(CK) (LB)

#2 The Development Services Department implement controls within Accela such as a default to the total number of units within the development to calculate the inclusionary fee. Additionally, we recommend DSD initiate a control within Accela to ensure that the Inclusionary Affordable Housing Fee will be assessed and collected within the first building permit phase of all future phased developments.

In Process According to the department, DSD is transitioning from its in-house Project Tracking System (PTS) to Accela, a cloud-based project tracking system. The recommendation will be included in the Accela permit modules once Accela is fully implemented in Q2 2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	July 21, 2016	May 2017	May 2017 July 2017 February 2020 June 2021

17-010 PERFORMANCE AUDIT OF THE AFFORDABLE / IN-FILL HOUSING AND SUSTAINABLE BUILDINGS EXPEDITE PROGRAM

(NO)

#1 The Development Services Department should ensure that the Accela software has the capability to track performance data specifically for the individual cycle review disciplines and staff in the context of the Expedite Program.

In Process According to the department, DSD is transitioning from its in-house Project Tracking System (PTS) to Accela, a cloud-based project tracking system. The recommendation will be included in the Accela permit modules once Accela is fully implemented in Q2 2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	December 2, 2016	March 2017	July 2017 March 2019 February 2020 November 2020 June 2021

#2 The Development Services Department should utilize established managerial best practice frameworks-such as Project Time Management and the Critical Path Method- to prepare managerial reports on timeframes for individual cycle reviewers and develop a process to periodically use this information to determine whether specific deadlines should be changed to improve overall timely project completion.

In Process According to the department, DSD is transitioning from its in-house Project Tracking System (PTS) to Accela, a cloud-based project tracking system. The recommendation will be included in the Accela permit modules once Accela is fully implemented in Q2 2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	December 2, 2016	March 2017	March 2017 March 2019 February 2020 November 2020 June 2021

#3 The Development Services Department (DSD) should ensure that project data maintained is coherent and revise its Performance Measurement Report (PMR) methodology to track both the timeliness of each milestone and the timeliness of the project timeliness from beginning to when the

permit is issued. DSD should also improve managerial quality control and review of the tracking data timeliness entries. DSD should articulate these steps in a written procedure and ensure that new staff are trained on the proper data collection methodologies.

In Process

According to the department, DSD is transitioning from its in-house Project Tracking System (PTS) to Accela, a cloud-based project tracking system. The recommendation will be included in the Accela permit modules once Accela is fully implemented in Q2 2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	December 2, 2016	April 2017	April 2017
			March 2019
			February 2020
			November 2020
			June 2021

20-008 PERFORMANCE AUDIT OF DSD ADMINISTRATION OF DEPOSIT ACCOUNTS FOR DEVELOPMENT PROJECTS

(CK) (MJ) (ZA)

#1

We recommend Development Services Department establish formal written policies establishing the authority and approvals for setting and changing the minimum required balance in project tracking system or Accela. This policy should describe the project managers roles, responsibilities, level of authority, required documentation and supervisory review and approval.

In Process

The department reported that DSD remains in agreement with the recommendation.

Implementation of this recommendation will occur along with implementation of DSD's new Accela permit tracking program for discretionary permits in Q2-2021. In March 2020, COVID-19 required DSD to change the ways permits were process by converting all new applications from paper to digital. DSD implemented a hybrid online permitting solution that uses Accela for application and plan intake and PTS for project tracking. The hybrid solution required the delay in developing the additional Accela modules planned for 2020, including the discretionary modules with deposit accounts. DSD has gathered the business requirements for the deposit account tool that will be developed in Accela. The business requirements include:

- Required balances are cumulative based on the approval types required for proposed project

- Leave current Initial Deposits (see IB 503) the same (initial account creation)
- Subsequent review and minimum balances automatically reduce to 60% of Initial Deposits
- Upon docketing for initial hearing (Processes 3-5) or sending Notice of Decision (Process 2), automatically reduce to 20% of Initial Deposit
- Require additional one-time deposit of \$4,000 for each appeal (CEQA or Project appeal)

Currently, PTS does not perform a calculation of the MRBs automatically and are instead calculated manually by Submittal Staff at the time of project set up based IB 503. These manual discretionary calculations will be reviewed and approved by DSD fiscal employees to vet accuracy and consistencies with policies in place while PTS remains in use. DSD does not believe it is feasible to invest in additional programming of automated calculations in PTS while the replacement software, Accela, is scheduled to go into production in the upcoming months.

Anticipated Completion: Q2-2021 for Discretionary permits in conjunction with finalization of the Accela Implementation Project.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 7, 2020	May 29, 2020	May 29, 2020 June 2021

#2 We recommend Development Services Department (DSD) automate minimum required balance (MRB) calculation in project tracking system or Accela. Specifically, the approval types should be tied to specific MRB amounts as set forth in DSD's information bulletins, 502 and 503.

In Process

DSD remains in agreement with the recommendation.

Implementation of this recommendation will occur along with implementation of DSD's new Accela permit tracking program for discretionary permits in Q2-2021. In March 2020, COVID-19 required DSD to change the ways permits were process by converting all new applications from paper to digital. DSD implemented a hybrid online permitting solution that uses Accela for application and plan intake and PTS for project tracking. The hybrid solution required the delay in developing the additional Accela modules planned for 2020, including the discretionary modules with deposit accounts.

DSD has gathered the business requirements for the deposit account tool that will be developed in Accela. The business requirements include

- Required balances are cumulative based on the approval types required for proposed project
- Leave current Initial Deposits (see IB 503) the same (initial account creation)
- Subsequent review and minimum balances automatically reduce to 60% of Initial Deposits
- Upon docketing for initial hearing (Processes 3-5) or sending Notice of Decision (Process 2), automatically reduce to 20% of Initial Deposit
- Require additional one-time deposit of \$4,000 for each appeal (CEQA or Project appeal)

Currently, PTS does not perform a calculation of the MRBs automatically and are instead calculated manually by Submittal Staff at the time of project set up based IB 503. These manual discretionary calculations will be reviewed and approved by DSD fiscal employees to vet accuracy and consistencies with policies in place while PTS remains in use. DSD does not believe it is feasible to invest in additional programming of automated calculations in PTS while the replacement software, Accela, is scheduled to go into production in the upcoming months.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 7, 2020	November 2020	November 2020 June 2021

#3 We recommend Development Services Department revise Information Bulletin 503 to clearly state that the specific minimum required balance (MRB) amounts for discretionary projects with multiple approval/policy types will be combined to calculate total required MRB. This process should also be automated in project tracking system and/or Accela.

In Process

DSD remains in agreement with the recommendation.

Implementation of this recommendation will occur along with implementation of DSD's new Accela permit tracking program for discretionary permits in Q2-2021. In March 2020, COVID-19 required DSD to change the ways permits were process by converting all new applications from paper to digital. DSD implemented a hybrid online permitting solution that uses Accela for application and plan intake and PTS for project tracking. The hybrid solution required the delay in developing the additional Accela modules planned for 2020, including the discretionary modules with deposit accounts.

DSD has gathered the business requirements for the deposit account tool that will be developed in Accela. The business requirements include

- Required balances are cumulative based on the approval types required for proposed project
- Leave current Initial Deposits (see IB 503) the same (initial account creation)
- Subsequent review and minimum balances automatically reduce to 60% of Initial Deposits
- Upon docketing for initial hearing (Processes 3-5) or sending Notice of Decision (Process 2), automatically reduce to 20% of Initial Deposit
- Require additional one-time deposit of \$4,000 for each appeal (CEQA or Project appeal)

Currently, PTS does not perform a calculation of the MRBs automatically and are instead calculated manually by Submittal Staff at the time of project set up based IB 503. These manual discretionary calculations will be reviewed and approved by DSD fiscal employees to vet accuracy and consistencies with policies in place while PTS remains in use. DSD does not believe it is feasible to invest in additional programming of automated calculations in PTS while the replacement software, Accela, is scheduled to go into production in the upcoming months.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 7, 2020	November 2020	November 2020 June 2021

#5 We recommend Development Services Department work with the Public Works Department to develop procedures that clearly define roles and responsibilities for setting the MRB in applicable ministerial deposit accounts and stopping work on projects with deficit deposit account balances.

In Process According to the department, a new Administrative Regulation (AR) was created which clearly specified Development Services Department and Engineering & Capital Projects (E&CP) Deposit Account responsibilities. E&CP is reviewing the AR. Additionally, DSD has been working closely with E&CP's analyst to communicate accounts that are in deficit.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 7, 2020	October 2020	October 2020 March 2021

#6 We recommend Development Services Department develop policies and procedures to suspend work on projects with a negative balance until a positive balance has been reestablished for projects with deficit deposit accounts.

In Process

While most recommendations rely on DSD's full implementation of the Accela software/automation, a number of enhancements have been made to current processes and specific training was implemented as a result of the audit in order to improve our performance in suspending work on any project with inadequate account balance. These enhancements are detailed in Recommendation #4, but they include:

- Institutionalized minimum \$3000 account balance prior to docketing for public hearing;
- DSD Procedures/Training Materials Enhanced;
- Training Conducted for DPMs;
- Staff Training Reinforced/Enhanced.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 7, 2020	October 2020	October 2020

#7

We recommend Development Services Department automate the following information technology controls in project tracking system (PTS) and/or Accela to:

- a. Fix the glitch in the PTS that causes the minimum required balance (MRB) to revert to \$0;
- b. Calculate the MRB automatically – e.g., tie approvals to the appropriate dollar amounts; and
- c. Notify staff to stop working on projects with deficit deposit account balances.

In Process

DSD remains in agreement with recommendation.

7a. Implementation of this recommendation will occur along with implementation of DSD's new Accela permit tracking program for discretionary permits in Q2-2021. As interim measure, accounting staff responsible for entering deposit account numbers into PTS have been trained to manually re-enter the MRB amount after entering the Internal Order number in PTS, as PTS cannot address an automated solution. As additional reinforcement, Development Project Managers (DPM) have been trained to check the deposit account balance in PTS at project assignment to ensure the balance did not get glitched to zero – if this were to occur, DPM would take immediate action to address as required by the duties/responsibilities embedded in the DPM Performance Plan and deposit account training materials (see attachments to Recommendation #4).

7.b/c: Implementation of this recommendation will occur along with implementation of DSD's new Accela permit tracking program for discretionary

permits in Q2-2021. In March 2020, COVID-19 required DSD to change the ways permits were process by converting all new applications from paper to digital. DSD implemented a hybrid online permitting solution that uses Accela for application and plan intake and PTS for project tracking. The hybrid solution required the delay in developing the additional Accela modules planned for 2020, including the discretionary modules with deposit accounts. DSD has gathered the business requirements for the deposit account tool that will be developed in Accela. The business requirements include

- Required balances are cumulative based on the approval types required for proposed project;
- Leave current Initial Deposits (see IB 503) the same (initial account creation);
- Subsequent review and minimum balances automatically reduce to 60% of Initial Deposits;
- Upon docketing for initial hearing (Processes 3-5) or sending Notice of Decision (Process 2), automatically reduce to 20% of Initial Deposit
- Require additional one-time deposit of \$4,000 for each appeal (CEQA or Project appeal)

Currently, PTS does not perform a calculation of the MRBs automatically and are instead calculated manually by Submittal Staff at the time of project set up based IB 503. These manual discretionary calculations will be reviewed and approved by DSD fiscal employees to vet accuracy and consistencies with policies in place while PTS remains in use. DSD does not believe it is feasible to invest in additional programming of automated calculations in PTS while the replacement software, Accela, is scheduled to go into production in the upcoming months.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 7, 2020	November 2020	November 2020 June 2021

#9

We recommend Development Service Department establish written procedures for monthly review and invoicing of deficit deposit accounts that includes criteria for number of months the account has been in deficit and whether to invoice for accounts where payments made have not resulted in a positive balance.

In Process

Development Services Department (DSD) reported they have completed the following:

- created new work instructions on how and when to create FICA invoices;

- hired a new analyst in December of 2020 specifically to monitor these accounts;
- created a new Administrative Regulation (AR) that clearly specifies DSD's and Engineering & Capital Projects (E&CP) Deposit Account responsibilities, and E&CP is currently reviewing the AR;
- created 175 FICA invoices in calendar year 2020 for accounts in deficit; and
- DSD has been working closely with ECP's analyst to communicate on accounts that are in deficit.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 7, 2020	July 2020	July 2020

#10

We recommend Development Service Department work with the Office of the City Treasurer, Department of Finance, and Department of Information Technology to implement direct invoicing of all deposit accounts through SAP to establish receivables for customers with outstanding balances.

In Process

Development Services Department (DSD) remains in agreement with recommendation.

In coordination with the implementation of DSD's new Accela permit tracking program for discretionary permits in Q2-2021, DSD will work with the Department of Finance (DoF), Department of IT (DoIT), and Office of the City Treasurer to implement direct invoicing of deposit accounts within SAP so that receivables, and their subsequent payments, and are more easily tracked.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 7, 2020	September 2020	September 2020 June 2021

#11

We recommend Development Service Department (DSD) automate the information technology controls in project tracking system and/or Accela to stop DSD permit issuance and/or Public Works Department completion of work for projects with deficit balances.

In Process

DSD remains in agreement with recommendation.

Implementation of this recommendation will occur along with implementation of DSD's new Accela permit tracking program for discretionary permits in Q2-2021. In March 2020, COVID-19 required DSD to change the ways permits were process by converting all new applications from paper to digital. DSD implemented a hybrid online permitting solution that uses Accela for application and plan intake and PTS for project tracking. The hybrid solution required the delay in developing the additional Accela modules planned for

2020, including the discretionary modules with deposit accounts. DSD has gathered the business requirements for the deposit account tool that will be developed in Accela. The business requirements include:

- Required balances are cumulative based on the approval types required for proposed project
- Leave current Initial Deposits (see IB 503) the same (initial account creation)
- Subsequent review and minimum balances automatically reduce to 60% of Initial Deposits
- Upon docketing for initial hearing (Processes 3-5) or sending Notice of Decision (Process 2), automatically reduce to 20% of Initial Deposit
- Require additional one-time deposit of \$4,000 for each appeal (CEQA or Project appeal)

Currently, PTS does not perform a calculation of the MRBs automatically and are instead calculated manually by Submittal Staff at the time of project set up based IB 503. These manual discretionary calculations will be reviewed and approved by DSD fiscal employees to vet accuracy and consistencies with policies in place while PTS remains in use. DSD does not believe it is feasible to invest in additional programming of automated calculations in PTS while the replacement software, Accela, is scheduled to go into production in the upcoming months.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 7, 2020	November 2020	November 2020 June 2021

Economic Development Department

18-007 PERFORMANCE AUDIT OF THE BUSINESS COOPERATION PROGRAM

(AH) (DK)

- #2 The department managing the portion of the Business Cooperation Program targeting construction activity should work with the Public Works Department, the Development Services Department, and Civic San Diego to develop procedures to allow Business Cooperation Program staff to become aware when projects with estimated construction costs of more than \$50 million are being proposed. This should also include notification when City capital improvement projects of more than \$25 million are planned.

In Process The Public Works Department portion of this recommendation has been implemented. To mark this recommendation as implemented, OCA will need to see the documented process demonstrating how EDD will target private construction projects over \$50 million for BCP participation.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	September 28, 2017	October 2018	October 2018 April 2019 December 2020 Unknown

18-015 PERFORMANCE AUDIT OF THE ECONOMIC DEVELOPMENT DEPARTMENT'S BUSINESS AND INDUSTRY INCENTIVES PROGRAM

(AH) (DK)

#1 EDD should develop a more comprehensive outreach strategy to spread information about the BII and other EDD programs. Specifically incorporating outreach to potential businesses located in older; underserved areas of the City as stated in Council Policy 900-12 and the Economic Development Strategy.

In Process This recommendation is in process. EDD has taken significant steps to expand BIP outreach, such as developing a webpage specific to BIP and promoting the BIP webpage on EDD's homepage. In calendar year 2019, staff attended and/or made presentations at over 25 outreach events, including within older, underserved areas of the City such as the Diamond Business Improvement District, Barrio Logan, and City Heights. Furthermore, in 2019 over 100,000 marketing inserts specific to BIP were mailed to business owners with their annual Business Tax Certificate renewals. These inserts have also been provided to DSD for distribution to customers. To consider this recommendation as implemented, OCA will need to see EDD's outreach strategy specifying continuous future BIP outreach to potential businesses located in older, underserved areas of the City.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	January 16, 2018	January 2019	January 2019 December 2020 Unknown

#2 EDD should develop a written internal process to ensure the Office of the City Treasurer, Development Services Department, and other departments provide information about the BII to new business and permit applicants.

In Process This recommendation is in process. In 2019, EDD worked with DSD and the Office of the City Treasurer to provide information on BIP to new businesses and permit

applicants. In 2019, EDD facilitated the inclusion of BIP flyers within the March mailing of Business Tax Certificates to approximately 100,000 businesses. EDD also provided approximately 2,500 BIP flyers to DSD, for customer distribution. To consider this recommendation as implemented, the OCA will need EDD's documented process to continue to work alongside the Office of the City Treasurer and DSD to provide BIP outreach, perhaps as part of their BIP outreach strategy.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	January 16, 2018	January 2019	January 2019 December 2020 Unknown

Fleet Operations Department

19-007 PERFORMANCE AUDIT OF THE FLEET OPERATIONS' VEHICLE ACQUISITION PROCESS

(JP)

#3 The Fleet Operations Department should establish Service Level Agreements or a City Administrative Regulation to define roles and responsibilities for City departments involved in the vehicle acquisition process.

In Process Fleet Operations has completed its review and drafting of the new Administration Regulation. Fleet Operations has started the routing process for creating a new Administrative Regulation.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	September 27, 2018	June 2020	June 2020 October 2020 Unknown

Homeless Strategies Division

20-009 PERFORMANCE AUDIT OF THE CITY'S EFFORTS TO ADDRESS HOMELESSNESS

(DN) (LB)

#1 The Homeless Strategies Division should work with the Communications Department to develop and execute a strategic communications plan designed to educate the public on the importance of addressing homelessness, specifically related to how best to fund the needs identified in the City of San Diego Community Action Plan on Homelessness.

In Process No change in since the last reporting period. The City has updated the City of San Diego's website to better offer resources for both people experiencing homelessness and for other constituents interested in learning more about the City's homeless serving programs. Additionally, during the COVID-19 pandemic, significant social media outreach and press conferences related to services offered allowed additional opportunities for City leadership to connect with citizens to provide an effective stream of information. The City will continue to develop and execute a strategic communications plan and intends to satisfy this recommendation by taking action through the implementation of the Community Action Plan, under which:

- Strategy 1 is to "Implement a systems-level approach to homeless[ness] planning,"
- Priority 3: under the strategy is to "Lead systems change through alignment, communication and strategy," and its components include:
 - "Creat[ing] a communications workgroup and plan and develop[ing] and provid[ing] quarterly reports to community stakeholders on progress against plan."

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	February 12, 2020	November 2020	November 2020 September 2021

#4 In accordance with the City of San Diego Community Action Plan on Homelessness (Strategic Plan on Homelessness), the City should immediately conduct a staffing analysis of all departments and offices involved in addressing homelessness and in implementing the plan.

Once the staffing analysis is completed, the City should dedicate adequate funding to support any additional positions that the analysis determines are needed.

In Process No change since the last reporting period. The City analyzed its staffing needs and proposed additions to the City Council as part of the FY20 budget process, which were denied at that time. The City again analyzed its staffing needs and proposed to the City Council the development of a Homelessness Strategies Department. The City Council has yet to formally approve that request. During the FY21 budget process, the City Council approved an additional four grant-funded FTEs, one of which is filled. The City is underway on the recruitment process for three positions. The City will continue to monitor workload and make staffing requests as appropriate.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	February 12, 2020	November 2020	November 2020 June 2021

- #7 The City should develop and implement a comprehensive homeless outreach strategy. This strategy should include:
- Formal direction and training to all City-funded outreach workers, including those under contract with the San Diego Housing Commission, to conduct their outreach in line with best practices (i.e., to perform persistent, person-centered outreach and use a by-name list); and
 - Guidance on how to determine where to conduct outreach and how to share data and information among outreach teams to avoid unnecessary overlap and promote additional coordination.

In Process No change since the last reporting period. The City and the San Diego Housing Commission are currently coordinating the work already being done by City-funded outreach workers in addition to the work that will be done as a result of additional investments in outreach.

The City, through contracts administered by the Housing Commission, already requires and retains control to implement best practices such as those named in the audit.

With respect to the element regarding coordination, the City currently promotes coordination in several ways. One is through SDPD's Homeless Outreach Team, which is the only entity that organizes regular coordinated outreach events, taking into account areas where there are a high number of individuals in need and bringing together institutional resources (such as public health and behavioral health care) and human resources (service providers both City-funded and otherwise) to provide focused attention to a specific neighborhood at each event. In addition, a formal outreach coordination strategy is outlined in each contract between the service providers and SDHC. SDHC staff hosts regular meetings with City-funded outreach workers to determine areas of need,

whether there are trends occurring in the field, and how to address obstacles that may arise.

City staff proposed, and the City Council approved, expenditure from a state grant to fund an Outreach Coordinator position, to carry forward these principles in a structured manner. Recruitment for that position is underway at this time.

Further, the City has participated in the development of regional outreach protocols, which have been adopted by the Regional Task Force on the Homeless and is in the process of participating in development of standards that will apply to outreach work - the standards are expected to provide additional specifications with respect to recommended training.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	February 12, 2020	October 2020	October 2020 September 2021

#9 The City should formalize the collection of data on reasons for refusal of service, establish responsibility and methodology for data collection and analysis, and identify how the data is to be shared with appropriate stakeholders. The City should utilize this data analysis to make improvements that address these concerns and increase rates of acceptance of services and shelter.

In Process No change since the last reporting period. The City and the San Diego Housing Commission mandate the collection of data and use the data to analyze programs. As part of its continual improvement process, the agencies are in discussions to further improve the collection of data already being done by City-funded outreach workers in order to share results with the Implementation Team. This relates to the work that the Outreach Coordinator will be responsible for.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 12, 2020	November 2020	November 2020 December 2021

#12 To improve data collection and inform decision-making related to homeless encampment abatement, in consultation with the City Attorney's Office, the City should:

- Clearly establish responsibility for tracking the number of homeless individuals contacted, offered, and provided services at each encampment abatement; and
- Formally establish responsibility and procedures for the data to be analyzed and shared with the Homelessness Strategies Division and other City

departments, offices, and regional stakeholders involved in addressing homelessness.

In Process No change since the last reporting period. The City, through contracts administered by the Housing Commission, already requires and retains control to have service providers performing outreach collect data, such as number of individuals contacted, those who refuse all offers of service, those who accept offers of service, those who accept offers of shelter, etc. The Homeless Outreach Team also collects such data.

Analysis of such data occurs regularly, and the City will recommend it be a part of the function of the Outreach Coordinator, for the purposes of informing future decisions regarding outreach work.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	February 12, 2020	December 2020	December 2020 December 2021

Human Resources Department

18-013 FRAUD HOTLINE INVESTIGATION REPORT OF WASTE IN THE TRANSPORTATION ALTERNATIVES PROGRAM

(AH)

#7 We recommend that TAP management work in coordination with the Human Resources Department to revise the current discount-pricing structure for Regional and Premium passes sold to members of the Municipal Employees Association. The revised discount should be applied consistently to all passes and included in future agreements with the Municipal Employees Association.

In Process During the Fiscal Year 2021 (FY21) Contract Negotiations, it was the intention of the City to move the remaining Recognized Employee Organizations (REO's) to the same subsidy rates as MEA and DCAA but due to COVID-19 pandemic and the unforeseen budget deficit, the proposal was placed on hold at the direction of the Mayor and approved by Council during contract negotiations. HR has since confirmed with Risk Management (RM) that it is still their recommendation to submit to City management as an economic proposal for consideration for FY22 Contract Negotiations to have the remaining REO's receive the same subsidy rates as MEA and DCAA. Specifically, RM is recommending to City management for FY22 Contract Negotiations that the 90% subsidy be expanded to not only the Premium passes, but to the Regional passes for all of the REO's as well. Please note, as these recommendations will have an impact to the City's budget, it will ultimately be up to the City management and City Council on whether or not this

will be proposed during the FY22 Contract Negotiations.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	December 22, 2017	August 2018	August 2018 July 2020 July 2021

20-011 PERFORMANCE AUDIT OF STRATEGIC HUMAN CAPITAL MANAGEMENT

(NO) (GT)

#10 The Human Resources Department should ensure the labor agreements currently being negotiated (in Spring 2020) do not preclude the possibility of re-negotiation once the City has developed more robust workforce analytics, which may identify particular areas of concern that need to be immediately addressed.

In Process No change since the last reporting period. On September 15, 2020, the Human Resources (HR) Department presented to Council several of the efforts they have underway to address SHCM issues raised by this audit. OCA does not believe this recommendation was implemented in time for the Spring 2020 renegotiations, but the spirit of the recommendation (using workforce information from this audit and other recommendations to inform contract negotiations) still applies to future negotiations. OCA will work with HR to gather more information about tangible evidence of progress.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 23, 2020	N/A	N/A

Parks and Recreation Department

17-021 HOTLINE INVESTIGATION OF RECREATION ACTIVITY PERMIT CALCULATION ERRORS AND ABUSE

(AH)

#4 We recommend that the Parks and Recreation Department:

- Improve software configuration to reduce permit processing errors and ensure compliance with the existing Fee Schedule and Departmental policies.

In Process The department reported that it has a new approach to correct the issues within ActiveNet building a secondary system which began in Spring 2020; currently, CGI and Department staff are building a comprehensive database platform that will enable the permitting of facilities and other park assets to occur. While the current method of generating and purchasing a permit/reservation in ActiveNet will remain unchanged, the database will be used as a reconciliation tool both during and after the creation of a permit/reservation to ensure that fees are calculated properly.

This database will provide a simplified front-end fillable form, capture completed permit details, secure and retain completed permits in a centralized repository, and be searchable and filterable for auditing purposes.

While the database is being developed, the Department will utilize a spreadsheet that provides a template draft of the user interface we are trying to accomplish.

Below are the updated key milestones for this effort:

- October 2020: New CGI Purchase Order approval
- February-May 2021: Design and development phase
- Late May 2021: Testing phase by select users
- June 2021: Training on the new platform begins
- July 2021: Database go-live date

The Department will be coordinating each of these milestones with CGI to ensure timely development, testing, and implementation of this alternate solution. The goal would be to implement in time for the Fall 2021 registration period, which covers permits and classes offered during the June-July-August quarter.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	June 12, 2017	July 2018	July 2018 July 2019 October 2019 January 2020 July 2021

19-016 PERFORMANCE AUDIT OF THE CITY'S ADMINISTRATION OF JOINT USE AGREEMENTS WITH SAN DIEGO UNIFIED SCHOOL DISTRICT

(CK)

#1 We recommend that the Parks and Recreation Department revise the MOU to reflect the vision and the shared goals of the City and the District.

During the revision process, the Parks and Recreation Department should work with the City Attorney's Office to determine an acceptable solution for any potential maintenance amounts that may be the District's responsibility per the requirements set forth in the existing MOU.

If an updated MOU is adopted, the Parks and Recreation Department should develop a contract template for the Joint Use Agreements.

In Process The department reported that Recommendation 1A - Revise Memorandum of Understanding (MOU).

The Parties are developing a draft Memorandum of Understanding (MOU) that would replace the 2002 MOU. Although this document continues to undergo changes, this current draft of the MOU follows this general outline:

1. Introduction
 - a. Background
2. Purpose
 - a. Joint Use Program
 - b. Mutual benefits
 - c. Consideration
 - d. Previous MOU and debt forgiveness
3. Objectives
 - a. Joint User Criteria
 - b. Joint User of Elementary and Middle Schools
 - c. Maintenance
 - d. Passive Use Designation
 - e. Public Input
 - f. Typical Joint Use Amenities
4. Execution
 - a. Consistency between MOU and Joint Use Agreements
 - b. Joint Use Agreement Template
 - c. Previous Joint Use Agreements
 - d. Expiring Agreements
5. Agency Communication
 - a. Communication

- b. Tracking system
- c. Standing Meetings
- d. Expansion of the Program

6. References

- a. City Policies and Procedures
- b. District Policies and Procedures

Currently, the City and District are negotiating the terms of the proposed MOU; at this moment, the City Attorney's Office is reviewing the current draft MOU. Staff intends to bring this policy forward to the City Council by September 2021.

1(d) Revise All Existing and Pending Agreements to Match New Contract Template
 the Parties are currently implementing the joint use agreement template for over 95 existing agreements and more than 25 future Play All Day joint use sites in design or construction. To date, the City Council has approved 21 Joint Use Agreements with the new template. The Department will continue to batch agreements for City Council consideration in 2021 based on the Joint Use Agreement Implementation Schedule, enclosed as Attachment 3. With existing resources, the Parties estimate that about six joint use agreements can be completed per month. Given this estimate, it will take approximately 18 months to revise all joint use agreements. Therefore, the new estimated timeframe to submit all agreements to the Board of Education and City Council is December 2022.

1(e) Determine Whether Any Amounts Are Owed between Agencies. As noted in 1a above, the MOU is intended to address consideration (Item 2C) and any amounts owed between City and District. As the MOU is targeted for completion in September 2021, the determination of amounts owed (if any) would be completed at the same time.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	April 9, 2019	July 2020	July 2020 December 2020 September 2021

#2 We recommend that the Parks and Recreation Department implement a tracking system for the Joint Use agreements for each site to include, but not be limited to: land, development, and maintenance cost; park location; acres; agreement start date; agreement expiration date; and, if applicable, parity calculations.

In Process The department reported this recommendation as implemented. The Parks and Recreation department is making progress on all recommendations related to

this audit. Parks and Recreation has implemented a tracking system for facility joint use agreements that includes all of the recommended elements with the exception of land, capital and maintenance costs. The tracking system does not contemplate these costs as they are part of a draft MOU which will address consideration for any amounts owed under the parity formula. We will continue to follow up on this recommendation.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 9, 2019	July 2020	July 2020

#3 We recommend the Parks and Recreation Department develop policies and procedures with a process narrative describing the Parks and Recreation Department, Planning Department, and other applicable City departments' responsibilities for the data inputs into the tracking system as described in Recommendation 2.

In Process Department staff are currently developing a process narrative that outlines the procedure for making updates to the shared spreadsheet and ensuring only certain staff have access to ensure the integrity of the spreadsheet. Staff intends to have this process narrative approved and in effect by December 2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 9, 2019	July 2020	July 2020 December 2020 December 2021

#4 We recommend the Parks and Recreation Department, with the assistance of the Planning Department and the City Attorney's Office, develop a proposal for City Council to consider revisions to Council Policy 700-35 to include, but not be limited to:

- Strategic vision for the joint use program;
- Joint use program objectives;
- City department responsibilities; and
- Annual reporting requirements for reports to City Council or Council Committee to include:
 - Report Due Date;
 - Number and Description of joint use sites approved by Council during previous fiscal year;
 - Total number and description of joint use sites opened during previous fiscal year;

- Prior fiscal year financial contributions by the City; and
- Total financial contributions by the City.

In Process

Revise City Council Policy 700-35 Department staff are developing a revised Council Policy to establish guidelines for the strategic vision, objectives, authority, responsibility and accountability for the development, administration and ongoing operations of the City's Joint Use Program with School Districts. The current draft of the Council Policy follows this general outline:

1. Purpose
2. Definitions
3. Policy
 - a. Strategic Vision of the Joint Use Program
 - b. Joint Use Program Objectives
4. City Department Responsibilities
5. Annual Reporting Requirements Staff intends to bring this policy forward concurrently with the proposed MOU and is targeting City Council consideration by September 2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 9, 2019	July 2020	July 2020
			April 2021
			September 2021

Personnel Department

19-015 PERFORMANCE AUDIT OF PAY EQUITY

(NO)

#3

As part of the development of the action plan recommended above, the Personnel Department, in collaboration with Human Resources, should work with departments – particularly within public safety - to evaluate strategies for increasing diversity in higher-paying positions if/as appropriate. Such strategies may include:

- a) Maintaining support for programs such as Fire-Rescue's Girls Empowerment Camp and Cadet Program, and SDPD's STAR/PAL program,

while reevaluating if they are sufficient to meet the City's workforce diversity goals;

- b) Evaluating if additional measures besides above are needed to increase diversity, such as job description requirements, middle-of-the-night on-call requirements etc.;
- c) Job advertisements in media which the City has not previously used, and that targets underrepresented groups; and
- d) Recruiting materials reflective of a diverse workforce.

In Process

The Personnel Department updated the Diversity, Equity, and Inclusion statement posted on the City of San Diego Job Opportunities webpage. Personnel Department staff work with hiring departments to evaluate methods to increase diversity. Personnel Department staff ensure our recruitment bulletins reflect job duties and minimum requirements accurately. Testing methods are evaluated to ensure they are valid and job-related.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 8, 2019	December 2020	December 2020

#5

The Personnel department, working collaboratively with HR and the City Administration, should collaborate as appropriate and consider entering employee education levels into SAP in order to facilitate more robust earnings gap analysis and improve the City's overall strategic human capital management. This could include simply tracking the minimum years of education requirements for each position, or could include more robust tracking such as years of education for each employee.

Similarly, but separately, Personnel, working collaboratively with HR and the City Administration, should consider identifying a way for employees to update their identified gender and race/ethnicity, if desired - for example, through the employee information update capabilities currently within SAP.

In Process

The Personnel Department and the Department of IT have determined that it is feasible to track educational attainment in SAP. Staff are evaluating methods to allow employees to record their educational attainment via self-service in SAP, while ensuring data is restricted for statistical purposes only. The Personnel Department updated the Personal Data Form so employees may change their listed gender (male, female, non-binary).

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 8, 2019	December 2020	December 2020

20-011 PERFORMANCE AUDIT OF STRATEGIC HUMAN CAPITAL MANAGEMENT

(NO) (GT)

#11 The Personnel Department should ensure that the summary analyses behind Special Salary Adjustment (SSA) requests are retained for a period of at least several years to substantiate decisions regarding SSAs.

In Process No change since the last reporting period. On September 15, 2020, the Personnel Department presented to Council several of the efforts they have underway to address SHCM issues raised by this audit. This discussion did not provide details, but OCA will work with Personnel to gather more information about tangible evidence of progress.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 23, 2020	N/A	N/A

#12 The Personnel Department (Personnel) should reform the way it calculates the rationale for whether Special Salary Adjustments (SSAs) are needed to conform with standard methodology employed by the U.S. Bureau of Labor Statistics. Personnel's methodology should include all employees who separated from City employment and use a more accurate measure of the average workforce size for the period in question when calculating turnover rates and quits rates.

a) If Personnel continues to perform their current methodology as well, the calculation should be referred to as something other than a "turnover" rate. The more standard definition of turnover and/or quits—as defined by U.S. Bureau of Labor Statistics—should accompany SSA analyses brought before the Civil Service Commission and other forums.

In Process The Personnel Department indicated it presents all quits numbers and rates to the Civil Service Commission for applicable salary studies. The average City workforce size is calculated to comply with the Auditor's recommendation. However, no documentation was provided to support their claim and OCA did not find any evidence posted with the Civil Service agenda for March or April 2021. OCA will continue to work with Personnel and follow up on this recommendation during the next reporting period.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	April 23, 2020	December 2020	December 2020

#13 Special Salary Adjustments should consistently present and include recruitment and retention information to the Civil Service Commission and other stakeholders in terms of rates, in addition to total number of employees.

In Process

The department reported this recommendation as complete, but no documentation was provided. OCA will work with the department to obtain and review supporting documentation for the next reporting period.

Priority
2

Issue Date:
April 23, 2020

Original Target Date:
December 2020

Current Target Date:
December 2020

Planning Department

19-013**PERFORMANCE AUDIT OF COMMUNITY PLANNING GROUPS**

(CK) (JP)

#1

To help ensure Community Planning Group (CPG) transparency, compliance, diverse community representation, and performance, we recommend that the Planning Department develop a proposal for City Council to consider revisions to Council Policy 600-24 and the Administrative Guidelines to Council Policy 600-24 to include, but not be limited to:

- a) Requiring annual training for all CPG members, not just new members;
- b) Expanding the components for the annual report to include a member summary (number of members, turnover, elections), overall summary of project review with voting results, the number of times the applicant presented to the group per project and any major modifications to the project proposed by the group (also see Finding 2);
- c) Including election results in the record retention requirements;
- d) Defining CPG representation to include a distinct category for renters and consider setting a minimum number of seats for that category;
- e) Making Membership Applications mandatory and subject to record retention requirements;
- f) Identifying deadlines for CPGs to provide the Planning Department with rosters, minutes, and annual reports, so that the Planning Department can post them online to ensure this information is available to the public in a centralized location; and
- g) Ensuring that the CPG rosters, annual reports, and meeting minutes contain all the required elements as described in Council Policy 600-24 through proactive monitoring of those documents.

In Process

This recommendation remains in process.

In addition to OCA's report, Circulate San Diego and the San Diego County Grand Jury issued reports identifying issues with Community Planning Groups (CPGs) and recommending changes to CPGs and their role with the City. At the April 10, 2019 Land Use & Housing Committee, Council District 7 brought forward and the Committee recommended to Council the creation of a Taskforce on Community Planning Groups to review the recommendations from the three reports as well as suggest any of its own. Council District 7 brought forward and the Land Use & Housing Committee heard these recommendations and recommended 31 revisions to Council on December 5, 2019. At the direction of the Land Use & Housing Committee, the City Attorney provided a legal analysis of CPGs and a draft Council Policy. According to the City Attorney's Office, this draft policy addressed the legal issues identified in the legal analysis and was done as a courtesy. As of March 18, 2021, Council District 1 has stated that they are involved in the policy update and are working with both the City Attorney's Office and the Planning Department to bring a policy revision to Council.

The Planning Department has received input from the Land Use & Housing Committee, including recommended revisions to the Council Policy consolidated through the Taskforce on Community Planning Groups and recommended by the Land Use & Housing Committee subject to legal review. The City Attorney's Office provided a review of the revisions recommended by the Land Use & Housing Committee and a draft Council Policy. The Planning Department has developed a matrix of options and reported that it met with the City Attorney's Office and former Councilmember Sherman's office. However, it has not yet provided to us or proposed to City Council a revised Council Policy—either of its own design or based on the City Attorney's Office's draft—based on the Land Use & Housing Committee and City Attorney input.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	December 13, 2018	December 2019	December 2019
			December 2020
			Unknown

#2

To help ensure Community Planning Group (CPG) transparency, compliance, and performance, we recommend that the Planning Department develop a proposal for City Council to consider revisions to Council Policy 600-24 and the Administrative Guidelines to Council Policy 600-24 to include, but not be limited to:

- Developing a formal mechanism for recording and posting CPG project review recommendations, either using a revised annual report that

includes all project recommendations or using the Bulletin 620 Distribution Form revised to include the number of times the applicant presented to the group per project and any major modifications to the project proposed by the group.

- Establishing a due date for receipt of CPG recommendations by Development Services Department Project Managers.

In Process No change in status since the last reporting period. Following the December 2019 LU&H vote to recommend that the CPG recommendations from the Taskforce for Community Planning Group reform be presented to the City Council, and considering delays caused by the COVID-19 pandemic, Councilmember Sherman's office is planning on bringing the item forward to the City Council. A City Council date has not been set. The item will present the City Council with options on how to move forward with Council Policy 600-24 revisions at a subsequent City Council hearing. Once City Council provides input on how to move forward, the Planning Department will formulate the specifics needed in order to implement the revisions. The Planning Department will then present the final proposal to City Council by December 2020 for final adoption.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	December 13, 2018	December 2019	December 2019 December 2020 Unknown

Public Utilities Department

19-003 PERFORMANCE AUDIT OF THE PUBLIC UTILITIES DEPARTMENT'S WATER BILLING OPERATION

(SG) (JP)

#2 The Public Utilities Department (PUD) should periodically assess the strength and effectiveness of their billing control environment. Specifically, to determine the effectiveness of current controls at a macro level, PUD should at least twice a year evaluate the number of implausible readings created and changed, in addition to the number of customers rebilled and the number of customer complaints. PUD could then assess if these numbers are high, identify causes, and adjust controls to address root causes, such as poor meter reader performance. Additionally, PUD should:

- a) Post these metrics and the results of its assessment on its public website

as soon as they become available, along with any actions taken to improve the control environment;

- b) Add key performance indicators relating to billing accuracy to its annual budget; and
- c) Report the results of this assessment and billing accuracy performance in its annual budget and to relevant committees and oversight bodies.

In Process

PUD reported that implausible readings continue to be monitored daily, and the department continues to work with the Department of IT on the implementation of enhancements identified to improve billing accuracy. In order to evaluate the efficacy of each enhancement, these are being done one at a time. As noted in the last update, this will require more time. Since PUD is also dependent on the Department of IT on these, this isn't entirely within the department's control. Timing is at least two years for the full implementation and testing of all enhancements. This will help PUD accomplish a portion of the OCA recommendation to the extent that documentation will be available for the OCA to validate.

The department also previously reported that several elements of this recommendation were complete as of June 30, 2020. PUD hired and on-boarded the final two positions of the Customer Support Division structural reorganization, both of which are critical to the implementation of this recommendation: the Workforce Resources and Development Program Manager and the Data and Analytics Program Coordinator. Under their leadership and in close collaboration with the Department of IT, the following steps have occurred:

- a. An SAP consultant was engaged to review PUD's current SAP billing module for potential system modifications to reduce implausibles; this review is complete;
- b. Department of IT extracted significant data from SAP related to billing challenges potentially impacting accounts; PUD then completed a complex data validation process;
- c. From both the SAP consultant review and PUD's review of data, nine key factors were identified as contributing to implausible bills, and prioritized based on the number of accounts they impact, and recommended system and operational improvements were developed to address all nine factors;
- d. PUD completed follow up meetings with its Water Construction and Maintenance Division and Department of IT's Enterprise Resources Program (ERP), as both play roles in the implementation of the system and operational improvements; and
- e. Together with the Department of IT, PUD is now developing timelines for

completion of the improvements, which will then be followed by testing for efficacy and ongoing monitoring.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	July 26, 2018	April 2019	April 2019 June 2019 April 2020 July 2020 January 2023

#3

The Public Utilities Department (PUD) should develop, track, and analyze employee performance metrics to increase the effectiveness of the meter reading program and reduce potential billing errors before they impact customers. Specifically, PUD should annually:

- a) Develop performance metrics based on the time taken to complete each route and the average number of errors and estimations for that route;
- b) Identify methods to reduce the number of errors and skipped readings per route;
- c) Track specific meter reader performance against route averages and incorporate this into annual performance evaluations;
- d) Define acceptable boundaries of performance for each route and adjust them as necessary;
- e) Track metrics for each route over time, such as route difficulty, ease of meter access, which routes take longer, why they take longer, etc. and adjust as necessary for maximum efficiency.

In Process

This recommendation is in process. The Public Utilities Department has developed and finalized, with labor union approval, its Standard Operating Procedure to track and analyze employee performance to increase the effectiveness of the meter reading program and reduce potential billing errors before impacting customers. Identified performance metrics include:

- *Meter Reading Accuracy Percentage* which quantifies the number of misreads;
- *Percentage of Assigned Routes Completed* which compares the number of routes assigned to a meter reader at the start of a shift to the number of routes fully completed at the end of the day;
- *Completion of Route (within an established timeframe)* which measures route completion in comparison to average route times; and

- *Percentage of Skip Codes Entered with the Proper Trouble Code* which measures the total number of skip codes entered into the handheld device with the properly assigned trouble code.

Staff have received training on this SOP, most recently in February 2021. PUD has indicated that quarterly tracking of staff will begin after the policy's implementation date, effective April 1, 2021. This recommendation will remain in process until PUD demonstrates that it is tracking and analyzing these performance measures on a quarterly basis.

Priority 2	Issue Date: July 26, 2018	Original Target Date: January 2019	Current Target Date: January 2019 July 2019 July 2021
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#7 The Public Utilities Department should facilitate stronger coordination between the Customer Support Division and the Meter Shop to prioritize repairs and reduce the backlog of unrepaired meters that impact accurate and timely customer billing. Additionally, the Customer Support Division should communicate high priority trouble code entries to the Meter Shop to expedite critical maintenance.

In Process The Public Utilities Department (PUD) has developed a Standard Operating Procedure that establishes standards for enhanced communications between the Customer Support Division (CSD) and the Water Construction Management (WCM) Division. Management has demonstrated, via its communication tracker tool and supporting evidence, that regular communication takes place to discuss emergency and routine work, meter repair and replacement backlog, and review and oversight of progress made from these communications.

However, PUD management indicated that more work remains to be done for CSD to communicate high priority trouble code entries to WCM's Meter Shop to expedite critical maintenance. This work includes documenting high priority trouble codes, standardizing descriptors, and flow charting of the billing and consumption analytics process to identify meter issues even before a meter reader would notice a problem in the field. This recommendation will remain in process until PUD demonstrates that the aforementioned steps have been completed. These additional steps will improve the department's processes in order to meet the intent of the recommendation to prioritize repairs and reduce the backlog of unrepaired meters that impact accurate and timely customer billing.

Priority	Issue Date:	July	Original Target Date:	Current Target Date:
2	26, 2018		August 2018	August 2018 June 2019 January 2020 January 2023

- #10 To improve customer satisfaction, the Public Utilities Department should communicate with customers in advance of anticipated bill-impacting activities. Specifically, PUD should:
- a) Notify a customer when their meter reading is under review for a prolonged period that may impact their billing schedule or result in receiving multiple bills at the same time.
 - b) Inform customers of forthcoming changes or bill-impacting activities, such as rate increases or prolonged billing periods, with sufficient notice to prepare for the additional expenses.

In Process The department reported that an updated Process Narrative related to customer contact when accounts are under review is nearing completion. The department also previously reported that several elements of this recommendation were complete as of June 30, 2020. As previously reported, PUD successfully implemented and followed a standard operating procedure (SOP) to inform customers of forthcoming rate changes or other bill-impacting activities. The SOP was followed for the rate change that went into effect in 2019 and subsequently updated for greater internal efficiency. As noted in the update for Recommendation 2, PUD hired and onboarded the final two positions of the Customer Support Division structural reorganization, both of which are critical to addressing the complex improvements recommended for the billing system software and operational changes. Significant progress has been made identifying needed improvements in this report period. As PUD projected in its December 31, 2019 update, a revised completion date is now required.

The updated target implementation date of July 31, 2020 will be revised in consultation with the City Auditor in the next report period.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	July 26, 2018	September 2018	September 2018 June 2019 January 2020 July 2020 June 2021

**19-005 PERFORMANCE AUDIT OF THE PUBLIC UTILITIES DEPARTMENT'S WATER
METER COVER REPLACEMENT PROGRAM**

(AH) (LB)

#11 To ensure the Box and Lid Group has the necessary staffing capacity to meet service demand and performance targets, PUD should reevaluate the size of the Box and Lid Group. This assessment should include a consideration of time that employees spend on activities other than regular work duties, such as vacation, industrial leave, restricted duty assignments, training, and any other activities that take employees away from work. When conducting this assessment, PUD should also re-evaluate the Box and Lid Group's current six-month performance goal, given the potential for public liability and the City's emphasis on customer service. Lastly, PUD should also evaluate alternate means of completing box/lid replacement work, which may include outsourcing these activities to an outside contractor.

In Process This recommendation was reported as implemented by PUD; however, additional information was requested but not received in time for the publishing of this report. According to PUD, during December 2019 through June 2020 they completed investigations of 25,687 locations to determine the backlog of both boxes and lids. This review closed out 666 duplicate work orders and identified 9,979 work order complete in EAM, leaving 15,642 to be investigated. Of the 15,642 investigations, 9,387 were complete upon arrival or no action was needed. All missing or damaged Lids were replaced, leaving a backlog of 6,255 boxes. This review showed ~25% of the SWIM data set evaluated was accurate. PUD is evaluating alternate means of completing box/lid replacement work, which may include outsourcing these activities to an outside contractor.

PUD determined with a high level of confidence that the average number of boxes 1 crew can replace in a day is currently 3.06 and there are currently 30 positions in the Box and Lids Section. With the absence rate identified in the audit of 26%, the remaining number needed to determine the appropriate number of staff for box and lids repair is the incoming number of boxes and lids needing repair.

Due to the low repair reporting accuracy identified in the backlog above, the next step is to improve field data accuracy to have more confidence in the average number of incoming box and lid repair requests. Once we have this number, we use the other statistics noted above, and determine the correct number of positions needed to complete the incoming work. This improved process will include FS&I supervisors reviewing photographs submitted by Field Representatives as they visit each box and lid in the field. Once validated,

accepted photos of boxes and lids needing replacement will result in an EAM notification for the box and lid team to complete. Not only will this improved process provide a reliable number of incoming work orders for box and lid repair, it will also results in fewer wasted trips and greater production.

The current standard is a 6-month performance goal until repair reporting accuracy is confirmed.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	August 31, 2018	April 2019	April 2019 June 2020 June 2021

19-019 PERFORMANCE AUDIT OF THE PUBLIC UTILITIES DEPARTMENT CUSTOMER SUPPORT DIVISION CUSTOMER SERVICE OFFICE (CALL CENTER)

(MJ)

- #1 To maximize its call system investment and provide enhanced customer service, the Public Utilities Department's (PUD) Customer Support Division (CSD), should assess its Call Center data and system needs and, within its chosen call center system, develop a plan that includes, but is not limited to:
- Acquisition of a dedicated subject matter expert (SME) to provide technical and operational support for the call system; and
 - Determination of data necessary for management and Supervisors to assess customer service goals.

In Process For the call center, the department reported that it started on the latest contact center software solution process with Department of IT. They anticipate having the initial features live in August 2021. Completion requires full implementation of the call center software.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	June 4, 2019	January 2020	January 2020 June 2020 June 2021 August 2021

#2 To facilitate knowledge transfer for future users of the call management system, the Public Utilities Department's (PUD) Customer Support Division (CSD) should develop policies and procedures on how to use the system, including the system's reporting capabilities. CSD should also develop a training plan to educate staff, at least annually, on the use of the Call Center system's features.

In Process This recommendation is still in process. During the reporting period, PUD noted that the timeline for the implementation of the call center system has been extended and the development of training materials will follow the implementation.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	June 4, 2019	January 2020	January 2020 January 2021 July 2021

#3 To improve internal operations and provide best-in-class customer service, the Public Utilities Department's (PUD) Customer Support Division (CSD) should develop key performance indicators to establish baseline performance and compare them with industry best practice. To that end, if metrics include the use of customer satisfaction surveys, the surveys should be automated and offered in appropriate languages. Additionally, CSD should continually reassess these key performance indicators based on the

Customer Service Office (Call Center) capacity (e.g., staffing, etc.) and desired goals. Lastly, CSD should establish and communicate individual and overall Call Center expectations to staff.

In Process This recommendation is still in process. During the reporting period, PUD noted that it is working with the Performance and Analytics Department to establish baseline and performance goals for its key performance metrics.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	June 4, 2019	December 2019	December 2019 July 2020 January 2021

#5 To enhance training and improve internal communication, the Public Utilities Department's (PUD) Customer Support Division (CSD) should develop a training program or provide staff access to trainings specific to the technical and soft skill needs of the Call Center staff, including training on properly entering system codes. PUD should develop written guidance on how long it should take for each transaction type to be approved, entered in Customer Care Services/SAP system,

and communicated to CSD staff and customers. This guidance should also include the level of detail for system notes regarding the status of customer transactions.

In Process PUD completed the training of 17 Customer Success team members and SAP authorization was modified as a result. This is greater than the expectation of having five team members trained initially. While the training of additional team members was delayed by the move to a remote workforce in Spring 2020, training is continuing and PUD is on target to fully address the recommendation as scheduled, including the development of an online training module.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	June 4, 2019	December 2019	December 2019 July 2022

#6 To ensure that Customer Service Representatives (CSRs) have the proper authority to efficiently respond to customer inquiries, the Public Utilities Department's Customer Support Division (CSD) should review authorization levels for its Customer Services Office's (Call Center) CSRs and determine which additional authorizations/customer requests CSRs should be able to process/approve without the intervention of a Call Center Senior CSR or a Supervisor.

In Process Technical skills and soft skills training programs have been developed and implemented. The vast majority of individuals working in the contact center have successfully completed both curricula. A few of them missed individual days or individual training sessions, so that is preventing us from considering this complete. Make up sessions were planned for this spring, which were derailed when in-person trainings were restricted due to the global pandemic. There are make-up training sessions that still need to occur.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	June 4, 2019	January 2020	January 2020 December 2020 July 2021

20-002 PERFORMANCE AUDIT OF PUD'S ADVANCED METERING INFRASTRUCTURE IMPLEMENTATION

(LB) (JP)

#3 The Executive Steering Committee, in conjunction with the project manager, should develop a deployment plan for the Citywide AMI implementation project, which includes specific and detailed tasks, responsibilities, budgets, and a timeline for completion. Budgets and timelines for completion should be supported by detailed analysis based on realistic assumptions.

In Process PUD had previously developed a deployment plan internally, but it has been determined that to ensure success for future citywide deployment, an outside consultant is needed to provide a truly comprehensive implementation plan. As such, PUD is currently developing a request for proposal (RFP) for a consultant to prepare a project implementation plan to include how many meters per year are replaced, overall schedule, public outreach, and use of internal/external resources.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 11, 2019	January 2020	January 2020 July 2021 January 2022

#4 The Executive Steering Committee should meet regularly to review performance against project goals and timelines and adjust the deployment plan as needed.

In Process The department reported that the previously established Executive Steering Committee has been suspended and will be re-assessed (timing, attendees) once a full project implementation plan has been developed.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 11, 2019	January 2020	January 2020 July 2021 January 2022

#6 The Public Utilities Department (PUD) should develop a staffing management plan for meter replacements to enable the department to complete the Citywide AMI implementation on a schedule, as determined by PUD. As part of this plan, PUD should consider: A dedicated work group with experienced and stable staff to complete meter replacements; and Augmenting City forces with a third-party meter installation provider.

In Process

PUD indicated that the forthcoming revised implementation plan will address use of internal and/or external resources to effectively deploy future meter replacements. □□As previously noted in prior updates, if external resources are identified, PUD will need to Meet and Confer with the affected recognized employee organizations.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 11, 2019	January 2020	January 2020 July 2021 January 2022

#7

The Public Utilities Department (PUD) should evaluate the impacts and causes of turnover and vacancies in the meter replacement group, working with the Personnel Department (Personnel) to address any identified causes, as needed. This should include, but not be limited to, evaluating the impact of job classification requirements and pay competitiveness on employee recruitment and retention. If PUD determines pay competitiveness is a significant driver of turnover and vacancies, PUD management should submit a Special Salary Adjustment to Personnel for Water Systems Technician, Laborer, and any other affected classifications.

Similarly, if PUD determines current job classifications are preventing PUD from hiring and retaining employees, PUD should work with Personnel to modify or create new classifications that are better suited to the tasks associated with the AMI implementation and other PUD business needs.

In Process

PUD indicated that the forthcoming revised implementation plan will address use of internal and/or external resources to effectively deployment future meter replacements. □□As previously noted in prior updates, if external resources are identified, PUD will need to Meet and Confer with the affected recognized employee organizations.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	July 11, 2019	July 2020	July 2020 January 2021 January 2022

#8

The Public Utilities Department (PUD) should develop a staffing management plan for endpoint installation and programming to enable the department to complete the Citywide AMI implementation on a schedule, as determined by PUD. As part of this plan, PUD should consider: A dedicated work group with experienced and stable staff to complete endpoint installation and programming; and Augmenting City forces with a third-party endpoint

installation and programming provider.

In Process

Public Utilities has submitted for a dedicated workgroup to perform meter and endpoint installation field work as part of the Fiscal Year 2022 budget approval/adoption process. The proposed full-time equivalent positions consist of one (1) Water Utility Supervisor and five (5) Laborers. Upon approval and adoption of the FY 2022 budget submittal, this dedicated workgroup will be established.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 11, 2019	July 2020	July 2020 January 2021 January 2022

#9

To capture labor costs more accurately, Public Utilities management should provide timekeeping instructions to all employees working on the AMI project that specify how and when to charge their working time to the project. These instructions should be provided to employees in all business units working on the project, including (but not limited to) field crews that complete meter and endpoint installation, programming, and troubleshooting and office staff performing related administrative duties. These timekeeping instructions should also include guidance on supervisory responsibilities for those employees who approve others' time entries and guidance on which WBS sub-element(s) is (are) appropriate to use.

In Process

PUD reported that as the full implementation plan is developed, the focus will be on ensuring existing systems and processes, including EAM, are functioning as intended. PUD and Department of IT are evaluating the use of additional outside resources to support PUD's needs for EAM improvements.

PUD also previously reported that it has provided employees instructions on how to charge their time to the AMI project. Public Utilities Management is actively engaged in assessing the effectiveness of timekeeping instructions, policies and procedures which specify how and when City Forces charge working time to the AMI Project. Continued monitoring activities are in process to ensure compliance.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	July 11, 2019	January 2020	January 2020 July 2020 January 2022

#10 The AMI project manager or an appropriate designee should be assigned to continuously monitor time entries and/or labor charges to the project for reasonableness; if issues are identified as part of this review, the project manager should coordinate appropriate corrective actions across the organization as necessary.

In Process This item remains In Process. The AMI project manager continues to monitor AMI City Forces CIP labor charges/time entries and is actively working with WCM Division management to initiate appropriate corrective actions.

PUD previously reported that several elements of this recommendation were substantially complete as of June 30, 2020. For example, PUD Water Construction and Maintenance Division/Section designees have been appointed to actively monitor AMI CIP time entries and/or labor charges for reasonableness as well as to coordinate appropriate corrective actions, as needed. EAM functionality provided via the Work Order Completeness Reports and Labor Detail Summary Reports are generated and reviewed on a monthly basis to monitor time entries and labor charged to the AMI CIP budget.

Per stakeholder meetings with the Department of Finance, Department of IT's Enterprise Resources Program (ERP), and PUD staff, as all play roles in the implementation of the system and operational improvement, it was determined an SAP system enhancement is needed. The new enhancement would address EAM system functionality used to schedule AMI CIP versus corrective maintenance work. As such, PUD is moving forward to address gaps and incorporate SAP system enhancements.

EAM Work Manager system enhancements required to address the EAM timekeeping functionality was placed on hold effective June 2020 due to the expiration of the Department of IT, SAP Technical Consultants contract. As of December 2020, the new SAP vendor RFP contract was not available for use. As such, PUD is moving forward to address gaps and incorporate SAP system enhancements as soon as possible.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	July 11, 2019	January 2020	January 2020 July 2020 January 2022

#11 The Public Utilities Department (PUD) and the Department of Information Technology (DoIT) should work together to evaluate the EAM Work Manager control environment and ensure the new Work Manager development meets PUD's needs for complete, accurate, and timely data entry for meter

replacements. Specifically, these should include controls at the device level that prevent incomplete and inaccurate data from entering the meter replacement workflow. Additionally, this evaluation should include maintaining an awareness of business processes and associated activities, and comprehensive testing of EAM Work Manager for the meter replacement process.

In Process

No change in status since the last reporting period. According to PUD, this recommendation is a component of the implementation plan.

The target implementation date is dependent on the outcome from the meet and confer process. This discussion and resolution timeline is currently unclear and might be revised in consultation with the City Auditor in the next reporting period.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	July 11, 2019	February 2020	February 2020 January 2021 Unknown

#12

The Public Utilities Department (PUD) and Department of Information Technology (DoIT) should work together to evaluate the control environment of any application to be used for endpoint installations—such as EAM—and ensure that it meets PUD's needs for complete, accurate, and timely data entry for endpoint installations. Specifically, these should include controls at the device level that prevent incomplete and inaccurate data from entering the meter replacement workflow. Additionally, this evaluation should include maintaining an awareness of business processes and associated activities, and comprehensive testing of any application to be used for endpoint installation—such as EAM—for the endpoint installation process.

In Process

According to PUD, this recommendation is a component of the implementation plan. PUD reported that as the full implementation plan is developed, the focus will be on ensuring existing systems and processes, including EAM, are functioning as intended. PUD and Department of IT are evaluating the use of additional outside resources to support PUD's needs for EAM improvements.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	July 11, 2019	June 2020	June 2020 July 2021 January 2022

#13 The Public Utilities Department should track the causes, resolution, and duration of all exceptions cases resulting from AMI meter replacements, including but not limited to EMMA and the SAP Workflow Inbox, and review the data to perform trending and root cause analyses.

In Process According to PUD, this recommendation is a component of the implementation plan. PUD reported that as the full implementation plan is developed, the focus will be on ensuring existing systems and processes, including EAM, are functioning as intended. PUD and Department of IT are evaluating the use of additional outside resources to support PUD's needs for EAM improvements.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	July 11, 2019	July 2020	July 2020 July 2022

21-001 FOLLOW-UP PERFORMANCE AUDIT OF THE PUBLIC UTILITIES DEPARTMENT'S INDUSTRIAL WASTEWATER CONTROL PROGRAM

(LB) (SM)

#1 The Public Utilities Department should establish policies and procedures to track all billable IWCP related costs so that fee levels and appropriate cost recovery rates can be determined effectively.

In Process PUD has developed and is in process of issuing a Department Instruction to track IWCP-related costs and ensure fee levels are reviewed. IWCP costs are appropriately accounted for in the City's financial system (SAP).

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 15, 2020	December 2020	December 2020 July 2021

#2 The Public Utilities Department should establish policies and procedures to periodically review fee levels and present fee proposals to the City Council. These reviews and fee studies should include calculation of the rate of cost recovery achieved by current fees. Reviews should be conducted on an annual basis, and detailed fee studies should be conducted not less than every three years, in accordance with Council Policy 100-05 and Administrative Regulation 95.25, and proposed fees and cost recovery levels should comply with Proposition 218.

In Process In addition to the updates provided for Recommendations 1 and 3, PUD will abide by Council Policy 100-05 on User Fees and ensure that updated fee schedules are considered by Council at least every three years.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 15, 2020	December 2020	December 2020 July 2021

#4 Upon completion of the fee study, the Public Utilities Department should work with the Office of the City Attorney and the Participating Agencies to review and revise, as appropriate, Interjurisdictional Agreements to include fees for service that achieve appropriate cost recovery under the guidelines of Council Policy 100-05 and Administrative Regulation 95.25, as well as Proposition 218. The revised agreements should include mechanisms to adjust fees in response to changes in the cost of service.

In Process PUD is beginning the process of renegotiating its amended and restated agreement with the PAs. The current version of the Agreement precludes charging PAs general IWCP costs, but notes that all parties will revisit that section in good faith. Additionally, individual conveyance agreements with each PA may need to be revisited. Initial conversations have been held with the PAs and PA representatives. While negotiations have begun, it will take some time for them to be complete and for agreements to be updated, revised, and adopted by all parties. Dec 2020 update: Amended agreement completed Jan 2021. IWCP issues are not required to be negotiated within a years time. Negotiations starting in Feb 2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 15, 2020	November 2020	November 2020 July 2021

#7 The Public Utilities Department should work with the Office of the City Attorney to seek recovery, to the greatest extent possible allowed by law, of all unbilled costs related to Industrial Wastewater Control Program application review, permitting, inspection, and monitoring.

In Process The department reported the recommendation as implemented. Some documentation was provided, but additional documentation is required to consider this recommendation as implemented. OCA will continue to follow up on this recommendation during the next reporting cycle.

Priority 1	Issue Date:	Original Target Date:	Current Target Date:
	July 15, 2020	December 2020	December 2020

Purchasing and Contracting

15-012 THE CITY NEEDS TO ADDRESS THE LACK OF CONTRACT ADMINISTRATION AND MONITORING ON CITYWIDE GOODS AND SERVICES CONTRACTS

(SG)

#1 The Purchasing & Contracting Director should take immediate action to ensure contract administration responsibilities are assigned to appropriate personnel for all Citywide contracts and provide those individuals with the tools to properly monitor each contract. This should include but is not limited to providing a copy of contract with all terms and conditions listed, pricing agreements, and the responsibilities involved with contract administration.

In Process The Purchasing and Contracting Department informed us they have implemented recommendation 2 from the Performance Audit of Citywide Contract Management. Specifically, they have implemented a “not to exceed” amount contract control in Ariba. The recommendation requires that the department institute a detective control to identify any contracts that may find a way to circumvent the “not to exceed” control as occurred with the previous system. We requested evidence for both controls, however, the department has not provided evidence that the preventative and detective controls are implemented to address the recommendation. As a result, the recommendation is still in progress.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	January 16, 2015	April 2015	November 2016 July 2017 June 2022 April 2019 December 2020 Unknown

#2 The Purchasing & Contracting Director should take immediate action to ensure the Target Value control is enforced on contractual purchases. Specifically, the Director should implement the following detective controls:

- Ensure that the report in development will clearly identify orders made without references to the appropriate contract and his staff is trained to utilize the report.
- Create a policy defining the intervals of review and actions taken to correct the control weakness.

Additionally, the Director should review the potential for preventative controls to minimize the circumvention of the Target Value control.

In Process

Purchasing & Contracting (P&C) reported this recommendation as implemented. P&C indicated when a contract is entered into Ariba, the entry includes a "not-to-exceed" amount for the contract. This amount is authorized either by the language within the executed contract or via Resolution/Ordinance if the contract went to Council. P&C staff enter contracts into Ariba and P&C management approve the data entered including the not-to-exceed amount. When POs are entered into Ariba that are tied to a contract, the amount of the PO automatically accumulates against the contract amount. If the dollar amount of POs are more than the contract allows for, the system places a hard stop on the Purchase Requisition and it will not be approved.

OCA is working with P&C to obtain supporting documentation to verify implementation.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	January 16, 2015	N/A	January 2017 June 2017 June 2022 April 2019 December 2020

15-016

PERFORMANCE AUDIT OF CITYWIDE CONTRACT OVERSIGHT

(SG) (MJ)

#1

To ensure accurate contractual information and supporting documentation are available to Citywide contract administrators and users, the Chief Operating Officer should establish policies and procedures to require:

- a) All City contracts utilize an SAP Outline Agreement to centralize contract information and utilize centralized controls, access and reporting in the Citywide financial system;
- b) The City should track total contract awards in SAP in accordance with the full value of the awarded contract to facilitate accurate controls and reporting;

The configuration of contract terms is standardized in SAP, in accordance to contractual terms, to facilitate better control and reporting across all contract, including the Target Value, Total Award
- c) Value, and Contract Validity Dates; and
- d) Supporting contracting documentation is centralized and stored electronically in SAP, i.e. attaching all contracts and related

documentation to an SAP Outline Agreement.

Additionally, the Chief Operating Officer should establish responsibility for training contracting staff in Purchasing & Contracting and Public Works Contracting Group to ensure that information is tracked uniformly in SAP according to the developed policies and procedures.

In Process

No change in status since the last reporting period. Purchasing & Contracting (P&C) reported this recommendation implemented during the last reporting period, indicating that P&C has entered all contracts into Ariba and therefore contracts are held to expiration dates and not-to-exceed amounts (expiration dates and not-to-exceed amounts are considered hard stops.) All contract documentation also stored in Ariba.

OCA requested supporting documentation and did not receive any as of the publishing of this report. OCA is working with P&C to obtain supporting documentation to verify implementation.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 25, 2015	TBD January 2017	January 2017 June 2017 June 2022 December 2020 Unknown

#3

The Chief Operating Officer should design policies and procedures detailing a standardized citywide contract administration process to mitigate the City's contractual risks and ensure compliance with contractual terms and receipt of contracted construction, reconstruction, repairs, goods, and services. At a minimum the contract administration requirements should include:

- a) Preparation of a Quality Assurance Surveillance Plan for each contract awarded to be attached and maintained with supporting documentation to the SAP Outline Agreement;
- b) Mandatory training for contract administrators in contract monitoring and ethics; and
- c) An annual review of the City's contract administration oversight process to ensure it is working as intended and effective; additionally, the policies and procedures should be updated as necessary resulting from this review.

In Process

No change in status since the last reporting period. According to Purchasing & Contracting (P&C), the contract compliance training and resources for department contract administrators are currently being updated. They anticipated having all updates ready and rolled out by the end of calendar year

2020.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 25, 2015	November 2015	November 2016 June 2017 December 2020 Unknown

#7

The Chief Operating Officer (COO) should require the completion of a standardized performance evaluation upon contract completion for both CIP and non-CIP contracts. Specifically, the COO should develop policies and procedures for vendor performance evaluations that:

- a) Are defined at a high enough level for both the Purchasing and Public Works departments to use and add more detailed information as appropriate;
- b) Define specified periods in a contract lifespan;
- c) Ensure that all evaluations are centrally attached to vendor record, such as the SAP Vendor Master files Attachment;
- d) Ensure that past Vendor Performance is taken into account prior to issuing or renewing contracts with that vendor;
- e) Design a formalized vendor dispute and arbitration process to ensure evaluations are performed equitably; and
- f) Ensure that the process is robust enough to pursue vendor debarment when appropriate.

Additionally, the COO should establish responsibility for training contracting staff in Purchasing & Contracting and Public Works Contracting Group to ensure that information is tracked in SAP in a uniform manner according to the developed policies and procedures.

In Process

No change in status since the last reporting period. According to Purchasing & Contracting (P&C), the contract compliance training and resources for department contract administrators are currently being updated. They anticipated having all updates ready and rolled out by the end of calendar year 2020.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 25, 2015	N/A November 2016	November 2016 June 2017 January 2019 December 2020 Unknown

#8

The Chief Operating Officer should design policies and procedures detailing a vendor debarment process to mitigate the City's contractual risks. At a minimum the vendor debarment process should include:

- a) Defined submission steps and requirement.
- b) Assignment of accountability for the process.
- c) Establishment of a monitoring process.
- d) Designation of a location for and maintenance of the debarred vendor list.
- e) An annual review of the City's debarment process to ensure it is working as intended and effective; additionally, the policies and procedures should be updated as necessary resulting from this review.

Additionally, the Chief Operating Officer should establish responsibility for and provide debarment training for contract administrators and managers. At a minimum the training should identify how, when and to whom they should submit a vendor for consideration of debarment or suspension.

In Process

No change in status since the last reporting period. According to Purchasing & Contracting (P&C), training was provided to PCOs in February 2020. As part of P&C's annual review of contract compliance processes, it will also review the City's debarment process. P&C is finalizing updates to its compliance manual and will consider this recommendation closed when they are completed.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 25, 2015	N/A January 2017	January 2017 June 2017 April 2018 May 2018 April 2019 January 2020 February 2020 November 2020 Unknown

(DK)

#1

Purchasing & Contracting (P&C) should ensure that its new purchase requisition procedures and the forthcoming digital procurement manual include a requirement for review by senior procurement specialist to try to reduce errors in purchase requisitions and purchase orders. An emphasis on ensuring that existing contracts are identified when appropriate should be included in the procedures.

Additionally, P&C should develop a monitoring program that periodically reviews, or spot checks, new purchase orders that have been created and were not tied to contracts. This monitoring process should review all purchasing information and vendor assignment to ensure that there was not a contract available for the goods or services. If errors are identified during the monitoring, staff at the client department and P&C should be further trained to help eliminate such errors.

In Process

P&C has finalized and published the digital procurement manual. P&C states that the Ariba system has automated features to ensure that purchase requisitions are properly created and linked to contracts.

P&C also reported that any purchase requisitions that are created outside of Ariba and that are not linked to a contract, a review by a Procurement Contracting Officers is required.

P&C also reported that it was working on an internal handbook for PCOs to refer to that lays out the process for reviewing Purchase Requisitions that are not tied to contracts. This internal handbook was anticipated to be finalized by the end of September 2020.

However, City Management has not provided sufficient evidence of a monitoring program or the internal handbook.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	April 21, 2016	November 2016	January 2017
			June 2017
			September 2020
			Unknown

#2

Purchasing & Contracting (P&C) should continue its efforts to obtain and expedite implementation of the catalog software to, among other things, address lapses in contract pricing review of when invoices are processed. P&C should develop a clearly defined and documented plan for training P&C and client department staff as part of the implementation process.

In Process

No change in status since the last reporting period. Purchasing & Contracting (P&C) reported this recommendation as implemented. P&C indicated that it has input all contracts into Ariba. Pre-existing vendor catalogues have been implemented and in addition P&C staff have worked with departments to assist them in creating catalogues for their contracts, where appropriate. P&C staff from both the procurement and systems teams routinely reach out to departments about contracts that would be good candidates for catalogue creation including during training efforts (for example, Department of Finance's Finance Academy) and Ariba "check-ins" where P&C Systems staff will meet with departments to discuss how Ariba is working with them.

OCA is working with P&C to obtain supporting documentation to verify implementation.

Priority
3

Issue Date:
April 21, 2016

Original Target Date:
November 2016

Current Target Date:
~~January 2017~~
~~June 2017~~
~~June 2022~~
~~December 2020~~
Unknown

Real Estate Assets

13-009

PERFORMANCE AUDIT OF THE REAL ESTATE ASSETS DEPARTMENT

(CN)

#4

The Real Estate Assets Department (READ) should work with the City Administration and the City Council to draft a policy on rent subsidies to nonprofit organizations that establishes eligibility criteria for recipients, recovers the City's facilities maintenance and upkeep costs for the subsidized space, and fee to recover the costs of preparing, processing, and monitoring leases.

In Process

READ reported that it is working with the new administration on READ's Council Policy 700-10 with the intent to docket the item in the Summer of 2021.

Priority 3	Issue Date: December 20, 2012	Original Target Date: June 2013	Current Target Date: March 2017 April 2017 June 2018 December 2018 June 2019 December 2019 March 2020 September 2020 July 2021
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14-019 PERFORMANCE AUDIT OF REAL ESTATE ASSETS DEPARTMENT

(CN)

#1 The Mayor's Office should work with the Park and Recreation Department and the Real Estate Assets Department to develop a comprehensive plan, including a timeline and funding appropriation, to remove residential use from Sunset Cliffs Natural Park, ensure compliance with the 2005 Master Plan, and to resolve the apparent conflict between the private tenancies at Sunset Cliffs and the restriction on dedicated parks for public park use in Charter Section 55.

In Process READ indicated that based on information from Parks and Recreation, the project is still on track for the next phase of construction.

Priority 2	Issue Date: May 7, 2014	Original Target Date: June 2017	Current Target Date: Fiscal Year 2018 June 2018 July 2020 July 2021
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19-002 PERFORMANCE AUDIT OF THE REAL ESTATE ASSETS DEPARTMENT'S PORTFOLIO MANAGEMENT PRACTICES

(CN)

#2 READ should consult with the Mayor and City Council to determine whether to work with land-managing departments to conduct an analysis of City property that ensures a good match between the property and its function. This analysis should focus on key information such as whether the property is:

- A good match between the property and function, unlikely to change;

- To be considered for relocation of the function to anchor another property with a better match, good fit with upcoming events, or held for future use; and
- Surplus, or property unused by City functions.

These designations should then be included with property information in REPortfolio. To ensure a review of the most valuable properties, and not the entire real estate portfolio, READ should determine how to prioritize properties for analysis (e.g., minimum acreage threshold, high profile, etc.).

In Process READ reported that a draft document has been developed; however READ was in the process of recruiting a new Director and is likely to undergo enhancements of policies and procedures including the PMP.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	July 23, 2018	June 2019	June 2019 December 2019 March 2020 September 2020 December 2021

#4 Throughout the process of updating Council Policy 700-10, READ, in consultation with the City Attorney's Office and City Council, should determine the most appropriate channel of presenting the Portfolio Management Plan, and clarify expectations and language, to ensure consistent expectations and guidelines.

In Process READ reported that a draft document has been developed; however READ was in the process of recruiting a new Director and is likely to undergo enhancements of policies and procedures including the PMP.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	July 23, 2018	January 2019	January 2019 June 2019 November 2019 March 2020 September 2020 December 2021

Risk Management Department

20-015

PERFORMANCE AUDIT OF THE CITY'S PUBLIC LIABILITY MANAGEMENT

(AH) (GT)

#5

The Risk Management Department should coordinate with public liability claims-incurring City departments to identify and record data related to the identification and completion of corrective measures, such as cause(s) of claim-incurring incidents and date of corrective action completion, for claims with settlement amounts of \$25,000 and above for the City's top ten public liability claims resulting in the highest annual aggregated settlement amounts. This information should be recorded and tracked in a manner that is accessible to City departments and personnel.

In Process

This recommendation is in process. Risk Management provided the following documents:

- CY2020 Corrective Measures 25-50K - This spreadsheet contains corrective measure information for claims with payments/settlements between \$25-\$50K. The spreadsheet includes claimant name, claim number, incident date, incident description, City department responsible for claim, loss code (i.e. type of claim), and description of corrective measure.
- Remedial Measures Memo - This document includes detailed procedures for remedial measures related to claims against the City that require Council authority (i.e. claim payments/settlements above \$50K). Specifically, the document directs Directors to send a memo to their respective DCOO/CFO, with a copy to the ACOO, indicating remedial measures have occurred, are in process, or are to be completed. The office of the ACOO will independently track and monitor implementation of Mayoral Department-recommended remedial measures.

Additionally, according to Risk Management, the department has modified its claims system, iVos, to record corrective measures for settlements between \$25K and \$50K as per Management's response to this audit recommendation. iVos now provides a drop-down corrective measures option in "Notepad" to allow the adjusters to record the reported corrective measure as provided by the department. iVos now includes functionality to extract these recorded corrective measures via a spreadsheet. The spreadsheet can be sorted and shared with departments and personnel.

We have not received evidence that corrective measures for claims with settlement values above \$50K are being tracked in a transparent and accessible

manner. Upon receiving evidence that corrective measure information is being tracked for public liability claims with settlement values above \$50k, we will consider this recommendation fully implemented. The Administration indicated that this recommendation will be fully implemented by the end of the next recommendation follow-up cycle.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	June 11, 2020	December 2020	December 2020

Transportation and Storm Water Department

18-023 PERFORMANCE AUDIT OF THE STORM WATER DIVISION

(AH) (MJ) (DN)

#1

To more quickly and efficiently replace the City's aging corrugated metal pipes, the Transportation and Storm Water Department Storm Water Division (SWD) should continue with its plans to determine the optimal size of its in-house pipe repair crew (crew) and equipment needs, and continue to request funding for the additional staff, as needed. Specifically, SWD should conduct the following analysis to justify the funding request:

- Review all projects on its Capital Improvement Program Needs List and determine which projects the crew can complete; and
- Project future repair and replacement needs based on the City's aging storm water pipes and condition assessment data to help determine the optimal size of the crew.

If SWD is not granted funding for additional FTEs to optimize the size of the crew (based on the results of the analysis above), SWD should develop and implement an annual process to analyze its funding and determine whether funds can be reallocated to fund additional repairs by the crew.

In Process

The Storm Water Division (SWD) has partially implemented this recommendation. As of January 30, 2019, a consultant completed a review of 32.2 miles of corrugated metal pipe (CMP) and assessed the repair options for individual pipe segments. The consultant recommended a phased doubling of in-house staff over FY20 and FY21. In keeping with the recommended phased increase of in-house staff, SWD requested funding for an additional 12 FTEs in its FY20 budget request. The request was prioritized against other requests and subsequently not funded. The full pipe repair crew was included in the Fiscal Year 2021-2025 Five-Year Financial Outlook and was included in the FY21 budget request. The request was not approved for FY21. The full pipe repair crew will be included in the FY22 budget request.

OCA will continue to follow-up on this recommendation until either the additional in-house crew positions are funded, or SWD develops and implements an annual process to analyze its funding and determine whether funds can be reallocated to fund additional repairs by the crew.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	June 14, 2018	January 2019	January 2019 June 2020 January 2021 June 2021

#9 The Transportation and Storm Water Department Storm Water Division should establish a re-inspection fee, and develop, document, and implement policies and procedures for when reinspection fees should be issued, consistent with the City of San Diego's Municipal Code.

In Process As a part of the scoping of the workflow and processes that would be needed to implement a cost-recovery program for storm water re-inspections, the Stormwater Division identified the need for additional resources to administer the program. A budget request was submitted by the Transportation & Stormwater Department (Department) as part of the FY21 budget request. However, the request was prioritized against other budgetary needs and was not selected for funding. The additional resources were included in the Fiscal Year 2022-2026 Five-Year Financial Outlook and will be included in the FY22 budget request.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	June 14, 2018	January 2020	January 2020 July 2021

December 2020

ATTACHMENT D

**Recommendations Deemed As In Process
And Original Target Dates Are Not Due**

Sorted by Department

This schedule includes all recommendations with original target dates that are not due as of December 31, 2020 that are **In Process** of implementation based on the status information provided.

ATTACHMENT D
RECOMMENDATIONS DEEMED AS IN PROCESS – NOT DUE

Chief Compliance Officer

20-015 PERFORMANCE AUDIT OF THE CITY’S PUBLIC LIABILITY MANAGEMENT

(AH) (GT)

#2

The City's enterprise risk management (ERM) manager and Risk Oversight Committee should provide City departments incurring trip and fall liabilities with sufficient information and resources to identify and mitigate public liability risks based on a proactive approach to risk mitigation.

- a. The City's ERM manager and Risk Oversight Committee should ensure the Transportation and Storm Water Department (TSW) and other operational departments are appropriately prioritizing damaged sidewalk mitigation efforts in high pedestrian usage areas given the much higher potential liability each damaged location presents in these areas. Specifically, this should include all departments that incur significant trip and fall liabilities documenting and implementing a procedure to prioritize sidewalk repairs in high pedestrian usage areas.
- b. TSW should expand on our analysis using at least five years of data to determine whether larger sidewalk uplifts do increase the risk and cost of trip and fall liabilities relative to smaller uplifts. TSW's sidewalk maintenance prioritization procedure should include prioritizing maintenance of larger sidewalk uplifts if this analysis shows that such prioritization would more effectively address trip and fall risks.

In Process

According to the department, a draft SOP that reflects current prioritization is under review. As the results of the analysis performed in Part B of this recommendation suggest that the size of defects do not significantly affect public liability risk, the size of a defect will not be included as a factor in location prioritization. Size of a defect will continue to be evaluated to determine if concrete replacement or a less expensive measure is appropriate. Additionally, maps for upcoming projects that demonstrate the use of the various factors, including estimated pedestrian intensity, will be provided for Risk Oversight Committee and City Auditor review.

Implementation Target Date: December 30, 2021

Rec. 2.b. TSW analyzed available claim settlement data for 159 claims closed in Fiscal Years 2016-2020. The size of a sidewalk damage does not appear to be significantly correlated with the risk of a trip-and-fall claim liability. Approximately 60% of damages noted in the 2015-2016 Sidewalk Assessment & Inventory had displacement sizes of 1.5 inches or less, while 53% of the claims resulting in a financial liability had similar displacement sizes. Given that the cost of slicing sidewalks to repair smaller defects is far less expensive than replacement of concrete, the most cost-effective reduction of public liability related to tripping continues to be to prioritize locations that can be mitigated by repair instead of replacement.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	June 11, 2020	December 2021	December 2021

Chief Operating Officer

20-013 IT PERFORMANCE AUDIT OF CITYWIDE DATA CLASSIFICATION AND SENSITIVE DATA ENCRYPTION

(SG) (WM)

#4 The Chief Operating Officer should ensure appropriate resources are allocated to the City Clerk, Chief Information Officer, and Chief Data Officer to coordinate and execute the data management strategy based on that governance model.

In Process The three departments are leveraging existing resources to complete the audit recommendations amid a challenging budget situation and will continue to evaluate resource needs throughout the project. This recommendation is on target for the 7/1/2021 implementation date.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	May 29, 2020	July 2021	July 2021

City Clerk

20-013 IT PERFORMANCE AUDIT OF CITYWIDE DATA CLASSIFICATION AND SENSITIVE DATA ENCRYPTION

(SG) (WM)

#5 The City Clerk, Chief Information Officer, and Chief Data Officer should create an Administrative Regulation defining a citywide data governance model and the roles and responsibility of each of the City's data management entities.

In Process This recommendation is in progress and is on track for the 7/1/2023 implementation date.

Priority
1

Issue Date:
May 29, 2020

Original Target Date:
July 2023

Current Target Date:
July 2023

Department of Finance

20-011 PERFORMANCE AUDIT OF STRATEGIC HUMAN CAPITAL MANAGEMENT

(NO) (GT)

#2 Upon completion of the City's Total Compensation Strategy outlined in Recommendation #1, the Department of Finance should ensure that fiscal outlooks should incorporate and align with the Total Compensation Strategy

In Process No change since the last reporting period. On September 15, 2020, the Human Resources (HR) Department presented to Council several of the efforts they have initiated to address the SHCM issued raised by the audit. OCA will work with HR and Department of Finance to gather more information about tangible evidence of progress.

Priority
1

Issue Date:
April 23, 2020

Original Target Date:
June 2022

Current Target Date:
June 2022

Department of Information Technology

21-007 IT PERFORMANCE AUDIT OF LEGACY APPLICATIONS

(SG) (WM)

#1	The Department of Information Technology (DoIT) should develop and document a standard definition for a legacy system that incorporates the critical factors necessary to identify systems that no longer efficiently and effectively meet operational needs of the department.			
In Process	This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.			
	Priority 2	Issue Date: December 23, 2020	Original Target Date: March 2021	Current Target Date: March 2021
#2	In coordination with other City departments, the Department of Information Technology (DoIT) should create a policy and procedure to document when each legacy system was put into production where possible, and document the current life expectancy of each system. Further, DoIT should track and update the life expectancies as systems are updated and work with the department to prioritize their replacement as the systems near the end of their life expectancy.			
In Process	This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.			
	Priority 2	Issue Date: December 23, 2020	Original Target Date: June 2021	Current Target Date: June 2021
#3	The Department of Information Technology (DoIT) should create a centralized process to track legacy systems, listing their detailed deficiencies, and update this information on an annual basis for discussion with the department during the annual Strategic Technology Advisory Committee meeting.			
In Process	This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.			
	Priority 2	Issue Date: December 23, 2020	Original Target Date: June 2021	Current Target Date: June 2021
#4	The Chief Information Officer should create and implement a policy and procedures that ensure risk assessments and risk assessment reports are completed and/or reviewed annually and updated according for all legacy systems.			
In Process	This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.			

	Priority 2	Issue Date: December 23, 2020	Original Target Date: June 2021	Current Target Date: June 2021
#5	The Chief Information Officer should include the results of the risks assessment for legacy systems as a significant discussion item on the agenda in the annual Strategic Technology Advisory Committee meeting with mayoral department directors to help determine which systems should be prioritized for replacement among departments.			
In Process	This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.			
	Priority 2	Issue Date: December 23, 2020	Original Target Date: September 2021	Current Target Date: September 2021
#6	The Chief Operating Officer should work with the Department of Information Technology (DoIT) and City departments to create a policy and procedure for centrally tracking all actual IT costs associated with legacy applications to facilitate replacement prioritization based on cost. DoIT should ensure that this information is updated annually.			
In Process	This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.			
	Priority 2	Issue Date: December 23, 2020	Original Target Date: September 2021	Current Target Date: September 2021
#7	The Chief Operating Officer should ensure coordination between all City departments and the Department of Information Technology (DoIT) to develop, document, and implement a policy to require all City departments to annually report all information systems under their purview to DoIT as well as the total operation and maintenance costs managed outside of DoIT for each system.			
In Process	This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.			
	Priority 2	Issue Date: December 23, 2020	Original Target Date: June 2021	Current Target Date: June 2021
#8	The Department of Information Technology should develop a metric for identifying high cost legacy systems and work with departments to prioritize and phase out these systems.			

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	December 23, 2020	June 2021	June 2021

#9 The Chief Operating Officer should work with the Chief Information Officer to develop a policy and corresponding procedures to require that each legacy application has a current calculation weighing the costs and benefits of each alternative and is documented for, and reviewed during the annual Strategic Technology Advisory Committee process.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	December 23, 2020	September 2021	September 2021

#10 The Chief Information Officer should develop and implement an operational analysis policy, and coordinate with each City department to conduct and document an operational analysis for IT investments currently in production in accordance with this policy.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	December 23, 2020	June 2021	June 2021

#11 The Chief Operating Officer, working with the Chief Information Officer, should provide a confidential report annually to the City Council containing high risk legacy applications that should be prioritized for replacement. This report should include the risks impacting information technology operations, business operations, return on investment calculation available, and security considerations in appropriate detail for the City Council to make a decision whether to prioritize funding for application replacement.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	December 23, 2020	November 2021	November 2021

Homeless Strategies Division

20-009 PERFORMANCE AUDIT OF THE CITY'S EFFORTS TO ADDRESS HOMELESSNESS

(DN) (LB)

#2

To ensure that the City has the funding necessary to implement the new City of San Diego Community Action Plan on Homelessness (Strategic Plan on Homelessness), the Homelessness Strategies Division (HSD) should develop long-term funding options, such as: continued or increased reliance on the General Fund, State or Federal funding, bonds, tax measures, and any other options that may significantly contribute to closing a funding gap.

Once outcomes of the 2020 ballot measures have been determined, HSD should immediately initiate the development of a long-term funding strategy to meet its present and future homelessness needs identified in the Strategic Plan on Homelessness. The funding strategy should identify permanent and sustainable funding sources and should be finalized, publicly documented, and presented to the City Council upon completion.

When developing its funding strategy, HSD should solicit public input. Specific strategies HSD should consider include, but are not limited to:

- Focus groups;
- Interviews;
- Comment (or point-of-service) cards;
- Public meetings, such as hearings, "town hall" meetings, and community vision sessions;
- Interactive priority setting tools;
- Creating public or neighborhood advisory groups, committees, or task forces; or
- Hire a consultant to conduct surveys.

The funding strategy should include a plan to pursue the desired funding mechanism(s) based on consideration of information obtained from stakeholders, expert knowledge, and objective data.

In Process

No change since the last reporting period. The City, during the FY21 budget process, developed a funding proposal that significantly utilized State of California grant funding in order to ensure continuity of services provided during a very tight budget cycle. Moving forward, the City will continue to

address funding needs. The City intends to satisfy this recommendation by implementation of the Community Action Plan, under which:

- Strategy 1 is to: "Implement a systems-level approach to homeless planning"
- Priority 2 under that strategy is to: "Develop and maintain a funding strategy for housing and crisis response needs identified in the Action Plan" and its components include:
 - Prepare and maintain a master record of all dedicated funding contributing to ending homelessness in the City.
 - Develop a City-wide funding plan for homeless services.
 - Conduct joint budget planning and use of common language in budget process (use 2-year projections).
 - Execute the funding plan and monitor goals versus actuals on a quarterly basis.
 - Work with foundations and other private funders to align their investments.
 - Work closely with the County, and other funders to anticipate shifts in funding and ensure partner agencies are prepared for those changes.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	February 12, 2020	December 2021	December 2021

#10

The Homelessness Strategies Division should, in consultation with the City Attorney's Office, implement an outreach and encampment protocol to better align encampment abatement procedures with the City's goal to increase opportunities for unsheltered individuals to access short-term shelter and long-term housing, and other services designed to provide stability, while continuing to fulfill the City's responsibility to protect public health and safety. The City should direct departments to comply with the protocol, and develop and formally document new encampment abatement policies and procedures accordingly. Specifically, the protocol should ensure that when addressing encampments:

- Whenever possible, non-law enforcement outreach workers are given adequate time to provide the persistent outreach necessary to build relationships, assess individual needs, and connect the encampment residents to shelter and services prior to their forced dispersal;
- Outreach is person-centered rather than provider-centered. Specifically, all City-funded outreach workers should be able to provide connection

(i.e., a “warm hand-off”) to all available shelters and services, not just to one particular service provider; and

- Outreach is primarily conducted by non-law enforcement outreach workers, with assistance provided by law enforcement as needed or requested.

When developing this protocol, the City should consider an evaluation of the feasibility of making non-law enforcement outreach the first point of contact for complaints regarding homeless encampments when an immediate health and safety hazard is not reported.

In Process

No change since the last reporting period. Currently, the City follows strict protocols that relate to the treatment of belongings that may belong to homeless individuals, including advance notification of abatement of items in the right-of-way and storage of such items for retrieval. Currently, the City uses an ad hoc approach to direct service provider outreach workers to encampments and areas with high concentrations of homeless individuals in advance of a known abatement. For example, abatements occur on a periodic basis in City parks. When an abatement is scheduled in advance, Park & Recreation staff inform Homelessness Strategies staff, who request that service provider outreach visit the area frequently in the time leading up to the abatement. The time available for outreach between notification and abatement depends in part on operational resources and largely on the health and safety risks present. In response to the requests for advance outreach, service providers exercise discretion, balancing their other responsibilities, about whether and how frequently to visit the area to comply with the request. Homelessness Strategies staff, similarly, reaches out to the Homeless Outreach Team to perform advance outreach. The Homeless Outreach Team, which operates within City control, reliably complies with the request. In the future, one of the functions of the Outreach Coordinator may be to formalize this process in order to provide a more consistent approach.

Further, the City has participated in the development of regional outreach protocols, which have been adopted by the Regional Task Force on the Homeless, and is in the process of participating in development of standards that will apply to outreach work. Once adopted, the City will evaluate how to incorporate relevant standards into departmental operations.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	February 12, 2020	December 2021	December 2021

Human Resources Department

19-015 PERFORMANCE AUDIT OF PAY EQUITY

(NO)

#2

Human Resources, working collaboratively with Personnel, and the City Attorney's office, should develop and execute an action plan for things the City may be able to do to mitigate its unadjusted earnings gaps if/as appropriate. Strategies may include:

- a) Considering how to increase part-time arrangements for a larger number of City positions;
- b) Expanding other flexible work policies such as position-sharing or telecommuting as appropriate;
- c) Building on past work and exploring additional policies such as expanded parental leave, onsite child care, and flexible work arrangements where appropriate;
- d) Ensuring leadership opportunities such as Citywide Supervisors Academy, OpEx Academy, and other departmental efforts are being offered to a diverse audience;
- e) Reducing reliance on overtime to meet staffing requirements, especially within Fire-Rescue; and
- f) A particular focus on these or other operationally-appropriate efforts within public-safety departments.

In Process

No change since the last reporting period. Per a memo issued by the COO to the City Council on August 8, 2019, it states:

In response to further recommendations in the audit, the City's Human Resources (HR) Department is creating an action plan to mitigate unadjusted earnings gaps. Pending any implementation requirements - such as meet and confer with recognized employee organizations - required by the Meyers-Milias-Brown Act and Council Policy 300- 06, the action plan will be finalized and executed after the conclusion of the citywide pay equity study. Additionally, on August 1, 2019, HR requested the City's six recognized employee organizations provide ideas and suggestions on how to address earning gaps, by Friday, August 16, 2019.

No additional updates have been provided since the issuance of the memo.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 8, 2019	December 2021	December 2021

(NO) (GT)

#1

The Human Resources Department (HR), working collaboratively with the Department of Finance and the City's Executive Management, should document and articulate a Total Compensation Strategy, including but not limited to compensation and benefits components, levels, and market competitiveness to guide labor negotiations and set employee expectations with respect to compensation.

- a) Informed by HR's assessment efforts (see Recommendations 4 and 5), the strategy should include what role "non-economic" incentives can play – and how such incentives can help the City achieve its total compensation strategy.
- b) The City's strategy should include fiscal consideration and appropriate long-term forecasting for how the City can financially achieve its total compensation goals.

In Process

No change since the last reporting period. On September 15, 2020, the Human Resources (HR) Department presented to Council several of the efforts they have initiated to address the SHCM issued raised by the audit. OCA will work with HR and Department of Finance to gather more information about tangible evidence of progress.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	April 23, 2020	June 2021	June 2021

#4

The Human Resources Department should document and implement a more data-driven methodology—such as a periodic survey like the Employee Satisfaction Survey—for assessing:

- a) How satisfied employees are with their level of compensation and benefits;
- b) Which forms of compensation or benefits are or would be most valued by employees; and
- c) A comparison of these results to some sort of benchmarking criteria, such as results from the federal Employee Viewpoint Survey, the Society for Human Resource Management's annual Employee Benefits report, etc.
 - I. Such an assessment should place particular emphasis on which non-economic incentives are most valued by employees and best align with the City's Total Compensation Strategy (from Recommendation 1).

In Process

Human Resources has made progress on the first two parts of the recommendation, now the City needs to compare the City's results to a benchmark organization.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 23, 2020	December 2022	December 2022

#5

The Human Resources Department should build on its work related to flex work arrangements, specifically by:

- a) Identifying how the City can minimize its risk and liability while offering flex work options;
- b) Articulating updated guidance for employees and supervisors regarding flex work arrangements;
- c) Encouraging expansion of flex work opportunities where appropriate; and
- d) Developing a monitoring and reporting capability for flex work's effects.

In Process

No change since the last reporting period. On September 15, 2020, the Human Resources (HR) Department presented to Council that they are making progress on this recommendation, such as flex work which has expanded considerably with the onset of COVID. Although the recommendation also addresses issues related to updated guidance and related items. OCA will work with HR to gather more information about tangible evidence of progress.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	April 23, 2020	June 2021	June 2021

#6

The Human Resources Department (HR) should outline and formally document its own plan, including goals, responsibilities, and the organizational efforts it is undertaking internally to strengthen its emphasis on Strategic Human Capital Management efforts. City Executive Management should also consider the feasibility of maintaining support for—if not expanding—professional development opportunities that HR provides for departments across the City.

In Process

No change since the last reporting period. On September 15, 2020, the Human Resources (HR) Department presented to Council that they are making progress on this recommendation and outlining several ways they are increasing their focus on SHCM and development opportunities Citywide. OCA will work with HR to gather more information about tangible evidence of progress.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 23, 2020	June 2021	June 2021

#7

HR and Personnel should jointly present an annual, publicly available Workforce Report to the City Council and Mayoral administration, updating City leadership by identifying key City positions facing challenges related to recruitment, retention, employee satisfaction and other metrics.

- a) The Workforce Report should include fundamental Human Capital Management (HCM) metrics on turnover rates, quits rates, vacancy rates, employee satisfaction, and others and should include benchmarking/comparative information, such as data from the U.S. Bureau of Labor Statistics, other large cities, the Society for Human Resource Management, etc.
- b) Among other content, the Workforce Report should identify:
 - a. A reasonable number—e.g. 10—of the job types for full-time employees, regardless of classification status, with:
 - i. The highest rates of turnover and/or voluntary separations;
 - ii. The highest rates of vacancies; and
 - iii. A metric assessing employee recruitment—for example, the number of “qualified” vs. “highly qualified” applicants. If they are not included among the job types above, the Workforce Report should also include the results for Police officers and Firefighters as well.
 - iv. ii. An assessment of the differences, if any, between employees with Defined Contribution retirement plans and the rest of the City workforce, with respect to recruitment and retention patterns and/or other metrics (e.g. satisfaction or engagement).
- c) The Workforce Report should identify key elements of concern within the workforce, such as recruitment, development, satisfaction/engagement, and retention problems, an action plan to address these issues, and a timeline for completion.
- d) The Workforce Report should be required by a strong mechanism, such as a Council Policy or Municipal Code amendment.

In Process

No change since the last reporting period. On September 15, 2020, the Human Resources (HR) and Personnel Departments presented to Council that they are making progress on this recommendation, including developing a turnover dashboard. OCA will work with HR and Personnel to gather more information about tangible evidence of progress.

Priority	Issue Date:	Original Target Date:	Current Target Date:
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#8

In order to aid in the production of the workforce report—as well as ongoing monitoring during the intervening periods—the Human Resources, Personnel, Information Technology, Finance, and Performance and Analytics Departments should strengthen an interactive dashboard with monitoring and reporting capabilities for core Strategic Human Capital Management metrics. Specifically:

- a) Convene a working group to solicit concerns about reliability of the workforce data within the dashboard and issue a resulting action plan to address concerns raised.
- b) Expand the dashboard's historically available data to the maximum extent possible, not less than a period of five years.
- c) Display additional key workforce metrics, such as those listed in Exhibit 22. A metric on employee retention, including but not limited to turnover and quits rates, should be a top priority.
- d) Ensure the dashboard is widely accessible to stakeholders, such as analysts within each of their own departments, the Office of the City Auditor, the Office of the Independent Budget Analyst, and interested individual operational departments that request access and have a reasonable business purpose.
- e) The dashboard should have “break-out” and export capabilities for at least the following dimensions:
 - a. By department;
 - b. By job classification;
 - c. By labor group; and
 - d. By retirement plan type

In Process

No change since the last reporting period. On September 15, 2020, the Human Resources (HR) and Personnel Departments presented to Council that they are making progress on this recommendation, including developing a turnover dashboard. OCA will work with HR and Personnel to gather more information about tangible evidence of progress.

Priority

Issue Date:

Original Target Date:

Current Target Date:

1

April 23, 2020

December 2021

December 2021

#9

The Human Resources and Personnel Departments should develop and monitor target goals or metrics for key aspects of the City's workforce, such as target turnover rates, quits rates, vacancy rates, etc. These should be formally documented, for example, by incorporation into the City's Total Compensation Strategy (from Recommendation 1) and annual Workforce Report (from Recommendation 7).

In Process

No change since the last reporting period. On September 15, 2020, the Human Resources (HR) and Personnel Departments presented to Council several of the efforts they have underway to address SHCM issues raised by this audit. The presentation did not go into detail on this recommendation, but OCA will work with HR and Personnel to gather more information about tangible evidence of progress.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	April 23, 2020	December 2021	December 2021

21-006

**PERFORMANCE AUDIT OF STRATEGIC HUMAN CAPITAL
MANAGEMENT II: EMPLOYEE PERFORMANCE MANAGEMENT**

#3

The Human Resources Department, working collaboratively with the Finance Department, should consider replacing or supplementing the existing cap of 24 discretionary leave (D/L) hours per entry with a maximum cap on annual awards per employee, and should revise Administrative Regulation 95.91 accordingly.

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	November 25, 2020	July 2021	July 2021

#4

The Human Resources Department, working collaboratively with the Finance Department, should conduct an annual review of the Rewards & Recognition Program for conformance with the cash and discretionary leave (D/L) caps within Administrative Regulation 95.91 and the extent of program participation.

This review should be formalized in the form of a process narrative, and included within Administrative Regulation 95.91, or some other way to ensure that it will be performed each year.

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	November 25, 2020	July 2021	July 2021

#5

The Human Resources Department should develop and implement a plan to increase awareness of Rewards & Recognition Program tools and to

encourage additional program participation in the lowest-utilizing departments in particular—for example, via targeted or required trainings of supervisors and managers in those departments.

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 25, 2020	December 2021	December 2021

#6

The Human Resources Department (HR), working as necessary with the Personnel Department, should strengthen its abilities to more strategically monitor aggregate discipline trends and issues within the City workforce—for example, trends over time or patterns across departments or other aspects of the City's workforce. Specifically, HR should develop and implement a process to provide this information periodically, or preferably on-demand, to the City Executive Team, the Risk Oversight Committee, the Civil Service Commission, and City departments' management to better identify and mitigate performance and misconduct-related risks.

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 25, 2020	December 2021	December 2021

#7

The Human Resources Department should incorporate strengthening its tracking and dissemination of performance and discipline-related information into its ongoing effort to outline and document its goals, responsibilities, and the organizational efforts it is undertaking internally to strengthen its emphasis on Strategic Human Capital Management (SHCM) efforts, agreed to as part of our first SHCM audit. See Recommendation #6 from our Performance Audit of the City's Strategic Human Capital Management. This should include analysis to determine if additional staffing resources are needed to successfully execute this plan to strengthen its SHCM capabilities

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 25, 2020	July 2021	July 2021

#8

The Human Resources Department, working collaboratively with the Personnel Department, should develop and execute a plan for actions the

City can take to better utilize mechanisms, such as probationary periods and Supplemental Employee Performance Reviews (EPRs), if/as appropriate. Strategies considered should include: a. Reexamining or reaffirming the City's philosophical approach to discipline issues; b. Trainings for supervisors identifying the tools of probationary periods and Supplemental EPRs and their importance; c. Ensuring quarterly EPRs are completed, especially for probationary employees; and d. A particular focus on these or other operationally appropriate efforts among departments that show lower EPR completion rates, especially for probationary employees.

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 25, 2020	July 2022	July 2022

#9

The Human Resources Department (HR) should continue its efforts to expand more general training opportunities pertaining to discipline processes, for example by creating or expanding virtual attendance options. a. Priority for registration should be given to supervising employees who have not taken City courses on supervision or discipline. b. HR should develop a mechanism to monitor and report compliance with the existing requirement for supervisors to take these courses, such as by requiring departmental appointing authorities to annually report all new supervisors and whether or not they completed such trainings.

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 25, 2020	December 2021	December 2021

#11

The Human Resources Department, working collaboratively with the Personnel Department, should seek to improve guidance to supervisors for common discipline issues; for example, by including potential corrective options that may be appropriate for various types of performance and misconduct offenses in the Dimensions of Discipline training and manual

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 25, 2020	December 2021	December 2021

Performance & Analytics Department

20-013 IT PERFORMANCE AUDIT OF CITYWIDE DATA CLASSIFICATION AND SENSITIVE DATA ENCRYPTION

(SG) (WM)

#1 The three city data management authorities—the Chief Data Officer (CDO), Chief Information Officer (CIO), and City Clerk—should work collaboratively to create a centralized data management strategy based on a centralized data governance model. All three authorities should sign off on the policy and the City Attorney should conduct a legal review to ensure compliance with applicable laws and regulations. Further, this strategy should incorporate the different roles of the CDO, CIO, and City Clerk to clarify their data management objectives and potential areas of collaboration.

In Process The department reported that this recommendation is in progress and is on track for the 7/1/2022 implementation date.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	May 29, 2020	July 2022	July 2022

#2 The Chief Data Officer and Chief Information Officer should work with the City Clerk to create a citywide data classification of the various data types that leverage information gathered to create the Department Record File Plans, which outlines and classifies records and their retention requirements. This data classification should contain attributes required and usable by all involved parties in addition to incorporating the current classifications.

In Process The department reported that this recommendation is in progress and is on track for the 7/1/2023 implementation date.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	May 29, 2020	July 2023	July 2023

#3 The Chief Data Officer (CDO) and Chief Information Officer (CIO) should work with the City Clerk to ensure departments coordinate efforts to create a data inventory containing the data/records, its location, owner, classification, and attributes. This effort can leverage the City Clerk's Department Record File Plans to improve the efficiency of the effort. Each department should define the person and position responsible in their department for data management that may mirror the records management representative to coordinate data management for the department in accordance with the City's data strategy.

In Process

The CDO, CIO, and City Clerk are collaborating to define departmental data coordinators and record coordinators for a data inventory. This recommendation is on target for the 7/1/2021 implementation date.

Priority
1

Issue Date:
May 29, 2020

Original Target Date:
July 2021

Current Target Date:
July 2021

Personnel Department

20-011**PERFORMANCE AUDIT OF STRATEGIC HUMAN CAPITAL MANAGEMENT**

(NO) (GT)

#14

The Personnel Department, collaborating with the Human Resources Department, should proactively facilitate the Special Salary Adjustment (SSA) application process by identifying yearly which classifications have the highest recruitment and retention difficulties; communicating with affected department directors; and working with them to submit SSA applications as appropriate.

- a) This effort could be included as part of the annual Workforce Report from Recommendation 7.

In Process

The Personnel Department is working with the Department of IT to evaluate the feasibility of developing a report that can produce the recommended data.

Priority
1

Issue Date:
April 23, 2020

Original Target Date:
December 2021

Current Target Date:
December 2021

21-006**PERFORMANCE AUDIT OF STRATEGIC HUMAN CAPITAL MANAGEMENT II: EMPLOYEE PERFORMANCE MANAGEMENT**

(NO) (GT)

#1

The Personnel Department (Personnel) and Human Resources Department (HR) should work collaboratively to report Employee Performance Review (EPR) completion rates for all eligible employees Citywide in the City's Annual Workforce Report.

- a. The report should include some sort of breakout capability, such as results by department, type of EPR (e.g., annual, quarterly, etc.), and classified or unclassified status.
- b. Personnel and HR should encourage the lowest-utilizing departments in

particular—for example, via additional reminders or targeted trainings of supervisors and managers in those departments.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority 2	Issue Date:	Original Target Date:	Current Target Date:
	November 25, 2020	December 2021	December 2021

#2 The Personnel Department and Human Resources Department should continue collaborative efforts to implement an online Employee Performance Review (EPR) management solution to more efficiently facilitate their EPR reminder and completion monitoring capabilities for classified employees—for example, breakout capabilities discussed in Recommendation 1 a.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority 2	Issue Date:	Original Target Date:	Current Target Date:
	November 25, 2020	July 2021	July 2021

#10 The Personnel Department (Personnel) should continue its efforts to expand its Employee Performance Review (EPR) Program training as well as more general training opportunities pertaining to discipline processes, for example by creating or expanding virtual attendance options.

a. Priority for registration should be given to supervising employees who have not taken City courses on supervision or discipline.

b. The Chief Operating Officer should implement a requirement that departmental appointing authorities require all new supervisors take the EPR Program course within one year of becoming a supervisor.

Personnel should develop a mechanism to monitor and report compliance with this requirement such as by requiring departmental appointing authorities to annually report all new supervisors and whether or not they completed such trainings

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 25, 2020	December 2021	December 2021

Public Utilities Department

21-001 FOLLOW-UP PERFORMANCE AUDIT OF THE PUBLIC UTILITIES DEPARTMENT'S INDUSTRIAL WASTEWATER CONTROL PROGRAM

(LB) (SM)

#5 Upon completion of the fee study, the Public Utilities Department, in consultation with the City Attorney's Office, should develop a proposal for consideration by the City Council to update fees for Industrial Users within the City of San Diego. This proposal should include fees that achieve appropriate cost recovery under the guidelines of Council Policy 100-05 and Administrative Regulation 95.25, as well as Proposition 218. The revised fee schedules should include mechanisms to adjust fees in response to changes in the cost of service.

In Process PUD has received a draft IWCP Fee Study from Raftelis and is currently reviewing and vetting it. It will be used as the basis for a recommendation to the City Council to update IWCP fees. Dec 2020 Update: report is completed and expected to be discussed at Environmental Committee in Feb 2021.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 15, 2020	January 2021	January 2021

#6 The Public Utilities Department should move the Industrial Wastewater Control Program's budget from the Municipal Wastewater Fund to the Metropolitan Wastewater Fund.

In Process Once current negotiations are completed with PA's, PUD will start negotiations on moving IWCP budget from Muni to Sewer Fund.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 15, 2020	July 2022	July 2022

#8 The Public Utilities Department should establish a centralized billing process and standardized billing policies and procedures for all IWCP fees and charges. These policies and procedures should be documented in a process narrative and should:

- a. Establish responsibilities and timelines for generating and sending invoices for all IWCP fees and charges;
- b. Establish responsibilities and timelines for performing a periodic reconciliation of all IWCP revenue accounts;

- c. Establish guidelines and procedures for recording labor time, if necessary to determine invoice amounts;
- d. Establish guidelines and procedures for calculating invoice amounts; and
- e. Ensure that appropriate Separation of Duties controls are enforced.

In Process PUD will develop an SOP to document the billing process, procedures and timelines, including incorporating verification of timely and accurate revenue collection. Dec 2020: update. SOP is completed and awaiting final review and approval.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 15, 2020	January 2021	January 2021

#9 The Public Utilities Department should perform a comprehensive review of all PIMS settings and invoice calculating features to ensure that invoices are automatically generated by PIMS and sent in a timely manner.

In Process PUD is evaluating the RFP for PIMs replacement, which will have correct settings and invoice calculating features, and will automatically generate invoices, verification will be provided over the next six months. Dec 2020 update: RFP proposal did not provide responsive bidders. IWCP is evaluating custom built PIMS system.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	July 15, 2020	June 2021	June 2021 June 2022

Purchasing and Contracting

21-002 AGREED-UPON PROCEDURES RELATED TO THE CENTRAL STORES PHYSICAL INVENTORY - FISCAL YEAR 2020

(DK)

#1 Macias Gini & O'Connell recommends that the Purchasing and Contracting Department consider procuring handheld devices that are compatible with the SAP inventory record module. These devices can be used to scan the barcodes that already exist on each stock item tag and will allow storekeepers to update inventory records in real-time for their inventory cycle counts and will provide more accurate and timely information regarding inventory record maintenance.

In Process This is a new recommendation that was issued within the last three months of

the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	September 14, 2020	April 2021	April 2021

- #2 Macias Gini & O'Connell recommends that the Purchasing and Contracting Department develop policies and procedures for obtaining and documenting explanations and related support for any adjustments made to the inventory stock records.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	September 14, 2020	June 2021	June 2021

21-005 PERFORMANCE AUDIT OF THE PURCHASING AND CONTRACTING DEPARTMENT'S SMALL LOCAL BUSINESS ENTERPRISE PROGRAM

- #1 To increase transparency into the distribution of funds among SLBEs, we recommend Equal Opportunity Contracting list each Small Local Business Enterprise (SLBE) program-certified contractor by the number of prime contracts the City awarded the SLBE, the number of subcontracts the City awarded the SLBE, and the total dollar amount the City awarded the SLBE across those contracts in that year. The list should be included as an addendum to the annual report and made publicly available on the program's website. This recommendation would allow the City and SLBE participants to monitor where the economic benefits of the program are centered and if the funds could be distributed among a broader array of SLBEs.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	March 2021	March 2021

- #2 We recommend that once the disparity study is complete, the Purchasing and Contracting Department should provide full copies of the study to City Council. With the results of the disparity study, if disparities in contracting exist, San Diego City Council and the Mayor's Office should consider changes to the Small Local Business Enterprise program to include narrowly tailored race- and gender-conscious contracting preferences to alleviate those disparities.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	March 2021	March 2021

#3 We recommend that Equal Opportunity Contracting (EOC) compare the amount awarded in each contract type for each race/gender group to the race/gender makeup of contractors available in the region. Once the disparity study is complete, EOC could use the disparity study's analysis of the makeup of business owners in the region to estimate the anticipated percentage of contract funding that could possibly be awarded to each group in each contract type (construction, architectural and engineering services, and goods and services). If the disparity study is not complete or does not provide sufficient information, EOC management should use countywide race/ethnicity and gender data (either workforce or population data) to make this estimation. EOC should include this comparison in its annual reports. This recommendation does not recommend any preference in contracting based on race or gender, nor does it create or imply a required goal or quota of race or gender in contracts with the City.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	December 2021	December 2021

#4 We recommend the Mayor's Office reposition oversight of the Small Local Business Enterprise (SLBE) program outside the management of the program. Oversight should include necessary expertise on decreasing barriers for businesses owned by women and people of color and should not solely rely upon City contracting expertise or fall to an advisory commission that cannot compel management to action. Oversight should, at minimum, include: a. Reviewing and approving the SLBE program's performance measures, including the goods and services participation rate in Recommendation #7. b. Ensuring the performance measures and goals of the program align with the program's objectives. c. Reviewing the program's progress at meeting performance measures and goals, and increasing the goals at a steady rate to ensure program progress. d. Reviewing and approving the goal setting methodology for construction contracts. e. Reviewing and approving the template for the annual report to City Council, as referenced in Recommendation #11, to ensure the information is presented in a manner that is clear and details the program's performance. f. Reviewing, approving, and seeking regular updates on the progress of the outreach plan in Recommendation #5.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	December 2021	December 2021

#5 We recommend that Equal Opportunity Contracting develop a written, evidence-based plan consistent with the results of the disparity study for increasing outreach and participation in the Small Local Business Enterprise (SLBE) program for small, local businesses and those owned by women and people of color to the extent allowable under the law. □ The plan should include outcome-based performance measures for each program objective. Measures to be considered should include: o registration by businesses owned by women and people of color o the number of businesses that grow out of the emerging local business enterprise category each year o the number of businesses that grow out of the small, local business enterprise category each year o the number of employees the organization has when applying initially, when renewing their application, and when growing out of the program □ The plan should be presented to the Citizens Equal Opportunity Commission for input and should include a public hearing with invited speakers from the pool of current registered SLBEs, SLBEs that successfully grew out of the program, and affiliated stakeholder groups, including industry associations and chambers of commerce. □ The plan should create goals and performance measures related to other tools designed to reduce barriers and increase competition in contracting included in the program, such as the mentor-protégé program and the bonds/insurance assistance program. This recommendation does not recommend any preference in contracting based on race or gender, nor does create or imply a required goal or quota of race or gender in contracts with the City.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	December 2021	December 2021

#6 We recommend that Equal Opportunity Contracting (EOC), along with other departments inputting staff time including Engineering and Capital Projects Department and Purchasing and Contracting Department, track staffing and any additional design-bid-build contract costs of the Small Local Business Enterprise (SLBE) program. EOC should report these data, and the method the program used to calculate and track the data, to the City Council in the SLBE program annual report, as required in council policy and municipal code. Based on this information, San Diego City Council could determine if additional resources are

necessary for success of the program.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	January 2022	January 2022

#7 We recommend the Small Local Business Enterprises (SLBE) program management work with the Purchasing and Contracting Department to create annual performance goals for the percent of goods and services contract dollars awarded to SLBEs. The evaluation of appropriate goods and services SLBE contracting goals should include reviewing the portion of goods and services contracts that are for services that could likely be provided by local businesses.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	January 2022	January 2022

#8 We recommend the Purchasing and Contracting Department collect more information from goods and service contract bidders, including asking if the bidding contractor (prime contractor) is certified by the Small Local Business Enterprise (SLBE) program or if the business thinks they may qualify to be certified by the SLBE program.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	June 2021	June 2021

#9 We recommend Small Local Business Enterprise (SLBE) program management, in consultation with the appropriate oversight bodies, evaluate the caps on SLBE subcontracting requirements for construction projects annually. Program management should then include the caps in the annual report, with a detailed description of the methodology used to justify the cap, and should include the previous cap amounts over time. This recommendation, however, should not conflict with City policies that require the prime contractor to perform at least 50 percent of the contract.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	January 2022	January 2022

#10 We recommend the Equal Opportunity Contracting (EOC) track and present Small Local Business Enterprise (SLBE) program specific data over time in its annual report, to highlight trends in program performance. Items tracked and reported over at least a five-year time span should include, but are not limited to: □ Participation rate (defined as the percent of dollars awarded to SLBE program-certified contractors, regardless of other certifications, within City contracts with SLBE program goals) across all city contracts – construction, architectural and engineering services, and goods and services contracts combined. □ Participation rate (as defined above) within construction contracts. □ Participation rate (as defined above) within architectural and engineering service contracts. □ Participation rate (as defined above) within goods and services contracts. □ Percent of funds awarded to SLBE-certified firms that the City awarded to women-owned SLBEs over all contract types and broken out into each category of contracting (construction, architectural and engineering services, and goods and services). □ Percent of funds awarded to SLBE-certified firms that the City awarded to African American-owned SLBEs, Hispanic-owned SLBEs, Asian-owned SLBEs, Native American-owned SLBEs, and Caucasian owned SLBEs, within each category of contracting and overall. Additionally, the report should identify proposed changes to the program's design that would help the program better achieve its objectives.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	January 2022	January 2022

#11 We recommend Equal Opportunity Contracting create a template for the Small Local Business Enterprise program's annual report that is clear and easy to understand, with sufficient information presented to clearly highlight the program's performance relative to the program's objectives and the goals set.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	January 2022	January 2022

#12 We recommend Equal Opportunity Contracting draft written policies for data tracking. Methodologies should be consistent year over year, with any changes documented, and the report should have a written quality control reviewing

process to minimize errors and ensure the methodologies for the data used in the report do not distort the conclusions drawn from the data.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	November 24, 2020	December 2021	December 2021

San Diego Police Department

21-004 PERFORMANCE AUDIT OF SAN DIEGO POLICE DEPARTMENT'S DATA ANALYSIS

(SG) (JP) (ZA)

#2 The San Diego Police Department (SDPD) should update crime report procedures and training materials to improve reporting consistency and to ensure SDPD can switch their reporting to the National Incident-Based Reporting System (NIBRS) as planned— and ahead of other California agencies. This should include requiring officers to report all known offenses in reportable fields.

As procedures are updated, SDPD should provide training and continuous feedback through supervisory review on the updated procedures.

Finally, SDPD should ensure consistency across Divisions in training and supervisory review of crime report data entry.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	September 28, 2020	June 2022	June 2022

#4 In order to maximize the effectiveness of limited resources, the San Diego Police Department (SDPD) should formally document a requirement for Commanders to include data analysis in planning and evaluation of Division operations, such as analysis of response times, call outcomes, and community-oriented policing efforts. As part of these procedures, SDPD should determine if the analysis is appropriate for public release, document that determination, and publish the analysis if appropriate. SDPD should also provide additional training in evidence-based policing for Commanders.

In Process This is a new recommendation that was issued within the last three months of

the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	September 28, 2020	June 2022	June 2022

- #5 San Diego Police Department's Crime Analysis Unit should document a process to conduct outreach with Patrol and Neighborhood Policing Commanders to determine data analysis needed to evaluate operations. This should include designing reports in a way that allows Commanders to access the same or similar analysis on a regular basis, such as designing new reports in the Mapping Dashboard that can be accessed by Commanders as needed. The Crime Analysis Unit should inform relevant officers of the report availability. The Crime Analysis Unit should keep a catalog of available reports for officers to request.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	September 28, 2020	June 2022	June 2022

- #6 San Diego Police Department's Crime Analysis Unit should establish procedures to survey officers and Commanders annually for information needed to effectively evaluate and manage their operations. The Crime Analysis Unit should design crime analysis reports and new standard reports in available systems, such as the Mapping Dashboard, based on that feedback to be provided periodically and targeted to the relevant officers and Commanders.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	September 28, 2020	June 2022	June 2022

- #7 The San Diego Police Department should formally establish appropriate reporting review access to the Community Review Board on Police Practices (CRB) to review all formal and documented informal complaints for classification and be able to investigate all calls that come in as inquiries or complaints to ensure they were investigated according to policy, including those resolved by Sergeants without filing a formal complaint. In the case where an independent commission for police oversight assumes the CRB's role, the new commission must also have this access.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	September 28, 2020	N/A	N/A

#8 In order for the San Diego Police Department (SDPD) to ensure those filing complaints are aware of alternative complaint methods, SDPD should develop procedures for officers to inform a complainant of alternative methods of making complaints such as the Community Review Board on Police Practices (CRB) website, City website, or CRB hotline to file complaints. Complaint forms should be kept in all police vehicles to provide to the public. The procedures should include informing a complainant of the ability to file anonymously.

SDPD should include these updated procedures in its periodic training to ensure the leadership's directives regarding complaints are as easy to follow as possible.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	September 28, 2020	July 2021	July 2021

#9 The San Diego Police Department (SDPD) should work with all organizations that accept complaints, such as the Community Review Board on Police Practices (CRB), to ensure that the complaint forms available on City websites and other public information, clarify the requirements for filing a complaint and note that SDPD will investigate all complaints even if they are made anonymously and there is insufficient information to contact the complainant.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	September 28, 2020	July 2021	July 2021

Transportation & Storm Water

18-023

PERFORMANCE AUDIT OF THE STORM WATER DIVISION

(AH) (MJ) (DN)

#6

If the selected funding mechanism(s) requires voter approval, then the Transportation and Storm Water Department Storm Water Division (SWD) should ensure that it hires a consultant to conduct an unbiased, statistically reliable survey of potential voters to estimate voter support for a variety of funding options deemed viable by the long-term funding strategy recommended above. When conducting the survey, the consultant should educate stakeholders on specific storm water issues, including: flood prevention, the storm water funding gap, the deferred capital backlog, ongoing operational costs, and water quality regulations. The consultant should then solicit voter opinions and include analysis regarding:

- Importance of water quality and flood reduction to residents and businesses;
- Whether, and how much residents or property owners are willing to pay for water quality measures, storm water infrastructure, and other SWD activities;
- Funding mechanism structure options, such as tiered fee rates, fee rates that adjust annually by inflation, a sales tax measure, general obligation bonds, etc.;
- Identify objections and strategies to overcome them; and
- Whether the funding mechanism can be obtained by a simple majority or a two-thirds supermajority

Based on the survey results, SWD should modify the plan to pursue the selected funding mechanism(s) as needed, and execute the plan.

In Process

The Stormwater long term funding strategy was developed as part of Recommendation Number 5. City Council approved the funding strategy report and directed Stormwater Division (SWD) to continue identifying potential funding mechanisms and to conduct public surveys on 2/9/2021. The Stormwater Division will hire a consultant to conduct an unbiased, statistically-reliable survey of potential voters to estimate voter support for a variety of funding options deemed viable by the long-term funding strategy. Stakeholder engagement will be an important component to this phase along with the

development of a funding measure expenditure plan for a voter-approved measure.

Priority	Issue Date:	Original Target Date:	Current Target Date:
1	June 14, 2018	January 2022	January 2022

**21-003 PERFORMANCE AUDIT OF THE TRANSPORTATION AND STORMWATER
DEPARTMENT'S STREET SWEEPING SECTION**

(CK) (MJ) (DK)

#1 The Transportation and Stormwater Department Stormwater Division (SWD) should develop a periodic report, generated no less than annually (via a BusinessObjects report from EAM), to capture data necessary to analyze operations. SWD should work with the Department of Information Technology to create reports in EAM to extract sweeping information, such as tonnage or volume of debris and other meaningful measuring points or data which can be reported from EAM.

In Process This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

The department reported that the item is on track and updates will be provided at the next reporting period.

Priority	Issue Date:	Original Target Date:	Current Target Date:
2	September 22, 2020	September 2021	September 2021

#2 The Transportation and Stormwater Department Stormwater Division (SWD) should develop and document a process to review route frequencies to determine if any route sweeping priorities need adjusting based on management analysis of debris collection data and motor sweeper operator input of results.

- a. The review process should include an annual assessment of operational adjustments to determine if any near-term modifications are needed for items such as missed or incomplete routes, newly implemented cycle tracks, new development or seasonal variability.
- b. In FY22, SWD should analyze data from FY19-FY21 for a comprehensive reassessment of all route frequencies, priorities, posting designations, staffing for shifts, sweeper types, and debris removal to ensure that these elements correlate with one another and that they account for debris levels and watershed areas. Reallocation of resources/staff should be

based on this trend analysis and incorporated into the MS4 Permit cycle to focus on sweeping areas with high debris and that are in watershed areas with high priority pollutants.

- c. A trend analysis should be conducted at a minimum with each subsequent permit cycle or as frequently as possible. When changes are made outside of the permit cycle and Jurisdictional Runoff Management Plan (JRMP) renewal period, the changes should be communicated to the California Regional Water Quality Control Board, San Diego Region, via the annual JRMP report.

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

The department reported that the item is on track and updates will be provided at the next reporting period.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	September 22, 2020	December 2021	December 2021

#3

After completing the FY19-FY21 program assessment in Recommendation 2, the Transportation and Stormwater Department Stormwater Division should request budget approval to selectively add posted routes and make any other improvements identified to optimize watershed areas with high priority pollutants and/or high debris.

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

The department reported that this recommendation is on track and updates will be provided at the next reporting period.

Priority	Issue Date:	Original Target Date:	Current Target Date:
3	September 22, 2020	June 2022	June 2022

#4

The Transportation and Stormwater Department Stormwater Division (SWD) should incorporate the following adjustments to their performance measures:

- a. Create a target for planned annual miles swept that excludes special sweeps and anticipated typical operational limitations (such as winter or seasonal restrictions); and add this as a performance measure to track total mileage and percent of miles completed, and;
- b. Add an annual key performance indicator for annual debris volume collected using the same unit of measurement as the annual Jurisdictional Runoff Management Plan report.

In Process

This is a new recommendation that was issued within the last three months of the current reporting period and it not expected to be implemented.

Priority
3

Issue Date:
September 22, 2020

Original Target Date:
June 2021

Current Target Date:
June 2021