



Memorandum

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To: Hon. Carlos Alvarez, Mayor, Miami-Dade County
From: Christopher Mazzella, Inspector General
Date: October 28, 2009
Subject: Final Memorandum on the OIG's Review of Complaints Regarding WASD Donation Projects - IG09-13

The following memorandum discusses complaints received by the Office of the Inspector General (OIG) regarding the Water and Sewer Department's New Business Division's (NBD) operations, in particular its handling of "donation" projects. Donation projects are Water and Sewer facilities that are installed by land developers and then conveyed to the Department by proper bill of sale immediately after the Department's acceptance of the construction of said facilities.

The complaints, in general, alleged abuse of power and circumvention of business processes. The OIG's review found that there were instances where established business processes were circumvented; however, due to the lack of an "audit trail" noting the justification for the deviation, we could not determine if the exercised power was an abuse of power. We make six recommendations at the end of the report that, we believe, will add accountability measures to the business process relating to donation projects.

The following memorandum, as a draft, was presented to WASD for its review and comment. WASD's response is attached herein as Appendix A. WASD does not refute any of the OIG's findings and acknowledges that various deficiencies exist. WASD's specific responses to the OIG's recommendations are stated after each OIG recommendation. The OIG is requesting from WASD a follow-up report in 90 days, on or before January 29, 2010, regarding its implementation of our recommendations.

cc: George M. Burgess, County Manager
John Renfrow, Director, Water and Sewer Department
Howard Piper, Special Assistant, Mgmt. & Performance Assessment
Cathy Jackson, Director, Audit and Management Services Department
Charles Anderson, Commission Auditor
Clerk of the Board (copy filed)

BACKGROUND

As you may be aware, the Office of the Inspector General (OIG) has been reviewing Water and Sewer Department's (WASD) project files relating to several complaints concerning WASD's New Business Division's (NBD) operations, in particular its handling of "donation" projects.¹ We became involved because of ongoing anonymous complaints to the OIG, including one addressed to the Mayor that arrived via the OIG's website, dating back to November 13, 2008. Complaints continued to arrive at the OIG through the spring of 2009. These complaints collectively allege that WASD was improperly installing water meters prior to their conveyance because of mismanagement, favoritism to certain developers, managerial abuses, and possible corruption. In addition, we became aware of another anonymous complaint, similar to those received by the OIG, which had been directed to the Governor's Office.

On June 28, 2008, the Governor's Office forwarded the referenced anonymous complaint about WASD's NBD operations to both the County Manager's Office and the Miami-Dade Police Department for their responses. The complaint then was forwarded to WASD management, with a request that they review and respond to the complaint's allegations. WASD's response, dated August 11, 2008, specifically addressed each of the thirteen allegations contained in the complaint. On October 14, 2008, another anonymous complaint was received by the County Manager's Office refuting the findings contained in WASD's response. At the request of the County Manager, the WASD Director had the allegations re-reviewed and, on November 21, 2008, he replied to the County Manager that WASD continued to stand by its original findings.

We also reviewed the Miami-Dade Police Department (MDPD) Public Corruption Investigations Bureau's "Contact Report." This report summarized the allegations and later discussions regarding the allegations between MDPD and WASD representatives. The report's conclusions were that the complainant did not allege any criminal violations, that the allegations did not meet the criteria for conducting additional investigations, and that the matter would be referred back to WASD. We noted, however, that the review did not examine allegations relating to any particular project; in other words, it may have been people specific but it was not project specific.

During the course of these events, we also learned that in September 2008, WASD established a task force, under the direction of the Assistant Director of Finance, to perform a comprehensive overview of the New Customer Division. The goals of the task force were to:

¹ Donation projects are Water and Sewer facilities that are installed by land developers and then conveyed to the Department by proper bill of sale immediately after the Department's acceptance of the construction of said facilities.

- Address all internal accounting control issues;
- Identify and establish policies and procedures to enhance the Department's service provision; and
- Establish policies and procedures to address deficiencies in internal record keeping.

The task force issued a draft report of its findings on February 27, 2009. Among the various findings and recommendations stated in the draft report were expressed concerns regarding the proper payment of conveyance fees and the non-reporting of assets in the form of un-conveyed infrastructure. The report states "The New Customer Division has the delegated authority for setting of meters creating the risk that service is provided without development of the asset/infrastructure or receipt of all amounts contractually due."

In its draft report, the task force also recommended several departmental unit realignments and revised policies and procedures that were designed to improve upon internal controls. Specifically, these organizational, policy, and procedural changes were intended to: ensure service agreements are not executed unless cross-validated across units; better track departmental assets by inspections prior to the expiration of financial instruments; ensure that collection activities continue to be effective and efficient; and minimize any detrimental impact to the Department's bond rating.

OIG Involvement

The OIG's first involvement began by obtaining inspection reports and service agreement files, in late 2008, shortly after we received the first complaint. Included with files that we obtained were the *Conveyance Document Project Check-Lists* generated by the WAsD DSI System, which shows the project name and location, as well as the WAsD agreement identification number and other project data. This checklist denotes the required fifteen documents needed from the developer in order to convey the facility to WAsD. These documents should be submitted to WAsD prior to meter installation.² The objective of our review was to provide an independent assessment of the complaints, NBD operations, and related WAsD policies and procedures.

The complaints identified nineteen specific donation projects: Santa Maria Court; Quantum; Pine Crest Community Center; Camaguey Plaza Apartments; Country Club Towers Phase II; Metroflex 44; Beacon Village; Home Depot Homestead; French Villas at Pinecrest; Target Miami Lakes; Buena Vista; Stritter Estates; Century

² The required fifteen documents are described in WAsD's "Agreement for Water and Sanitary Sewage Facilities Between Miami-Dade County and [Developer/Requestor Name]."

Gardens; University of Miami Clinical Research Building; AMB Codina Beacon Lakes; University Village Townhomes; Duque Residence; Miami Executive Airport (Opalocka); and 2701 Lejeune Road.

In addition to reviewing WASD/NBD files for these projects, we also reviewed:

- Two audit reports previously issued by the Audit and Management Services Department (AMS);
- The aforementioned WASD draft task force report, dated February 27, 2009 (the OIG is unaware of whether the report was ever officially finalized); and
- The final draft report forwarded to WASD, on May 5, 2009, by WASD's consultant, Rachlin, of its study on the effectiveness of the WASD IT systems.

In the course of our review, OIG staff also interviewed members of the NBD and WASD's Meter Section. During our interviews, we obtained some additional documentation, as well as a flow chart of the meter installation process. The relevancy of the OIG's interest in pursuing these complaints became more apparent as we found that the WASD internal review, the MDPD report, and the Rachlin draft study had not specifically addressed the project irregularities described in the various complaints.

RESULTS

With the information that we obtained from WASD, we found that we could only review fifteen of the nineteen projects. Files for the Santa Maria Court and Duque Residence projects were too incomplete, and files for the Miami Executive Airport and 2701 Lejeune Road projects could not be located. Our review showed that nine out of the remaining fifteen projects did not adhere to WASD's written policies and procedures for water meter installations.

On February 24, 2009, the OIG requested from WASD copies of any information and/or reports relating to the Department's special task force on NBD's operations. Shortly after receiving our request, WASD furnished the OIG with a copy of the task force's draft report, dated February 27, 2009.

On March 6, 2009, the OIG made a follow-up request for additional information on the nine problematic projects. Our request included a table listing the nine projects that summarized our preliminary observations/findings. We requested that WASD provide explanations or justifications for each irregularity noted, and a copy of the work order authorizing the installation of the water meters on the listed projects.

We compared WASD's response, dated March 20, 2009, to our second request where WASD acknowledged, with associated explanations, that it had installed meters prior to the projects being conveyed. However, WASD did not provide copies of the actual work orders, which we expected would have shown the names and approval signatures of the individuals who authorized the meter installations prior to their conveyance. We believe that the integrity of the entire conveyance process relies on this key element—the audit trail leading back to the person authorizing the meter installation—which should happen only after the project has been properly conveyed to the County (WASD). Therefore, on March 26, 2009, we again requested copies of the actual work orders for these nine projects.

WASD responded by stating that signatures were not available since authorizations from NBD are generated electronically and are retrieved from the system at various times throughout the day by the Meter Section. We interviewed the Chief of Meter Installation and Maintenance and an Administrative Officer 2 in the Meter Section who confirmed this fact, and provided us with a copy of a meter installation process flow chart. However, even though the authorization is generated electronically, the authorization itself is not necessarily entered into the system by the person with the authority to authorize the setting of meters.

The Meter Section provided us with examples of the computer screens for both the *Field Activity Form* and the *Field Order Form*. These are the forms that are generated in order to initiate a new meter installation. Both of these forms are generated in the WASD CIS System (CIS), which is a different system from the WASD DSI System used by NBD to record pertinent project information. We learned that hard copies of the forms are only kept for six months. Since the projects we were reviewing dated back more than six months, the forms for these projects were no longer available. However, even if the forms were available, they still would not have shown who authorized the meter installation.

We learned that *Field Activity Forms* are generated by a New Business Processor ("Processor"), at the request of a New Business Representative ("Representative"). However, a request can be verbal or by e-mail and may not actually come from the Representative handling the project. Again, it cannot be overstated that nowhere on this form does it indicate who actually authorized the meter installation. In some cases, we found evidence in the file that "management" authorized a meter installation, apparently without regard to whether the project had been conveyed or not. In any case, there is no requirement that the authorization for meter installation be documented in the project file.

WASD's Meter Section retrieves the electronic *Field Activity Form* and then generates its own electronic form, the *Field Order Form*, on which additional information is added, including a scheduled date for the meter installation, and direction

to the Dispatch Group to perform the work. Later, the actual date of installation is recorded on the *Field Order Form*. The NBD Representative assigned to the project should receive notification of the installation date and enter that information into the DSI system.

During our interviews, we were informed that throughout the process it would be normal for the customer (developer/owner, etc.) to keep in contact with the assigned NBD Representative. Ideally, after the customer had submitted all of the required conveyance documentation, then the customer would request that the Representative have the meter installed. The Representative would research in the DSI System to ascertain that all WASD requirements had been met and that, in-fact, the project had been conveyed to WASD. Then, the Representative would request that a Processor generate a *Field Activity Form* requesting the Meter Section to install the meter.

WASD, in its response to the OIG inquiry, acknowledged that the NBD Division Chief would at times authorize a meter setting prior to project conveyance. At issue for the OIG is that certain WASD senior staff repeatedly took actions that directly contravened WASD policies and procedures designed to ensure that the County is protected at all times against dishonest/disreputable developers that seek financial benefit for themselves, while exposing the County to financial detriment. Moreover, such actions may present an immediate threat to the life, health, and safety of County residents. This condition results when WASD installs water meters for use in projects when the developer has not completed all of the steps listed on WASD's *Conveyance Document Project Check-List*. This checklist is designed to ensure that the County has officially taken ownership of the facilities and that said facilities have been tested by various public safety agencies and found safe to use. We seldom found that exceptions and deviations from the checklist were documented. Instead, we received the explanation for the deviation or exception when we questioned it.

The three projects summarized below are indicative of the irregularities we found in nine of the fifteen projects that we sampled:

Country Club Towers Phase II - Agreement #19495

The meters were set on this project on March 7, 2008. The final inspection report could not be found in the files and the property has yet to be conveyed to the County. WASD, in its March 20, 2009 response to the OIG, stated that it had no explanation for this meter setting, other than to say that several months earlier, in October 2007, the Division Chief, by way of memorandum, set forth exacting procedures for new meter sets on donated projects and that only the Division Chief and one other person were authorized to approve exceptions to the procedure. However, in this case, no exception was noted and no approval was documented.

In its same response to the OIG, WASD included a letter to the developer, dated March 19, 2009, giving the developer 60 days to submit the outstanding documentation and recording fees that were preventing the conveyance of this project to the County. Although the letter did not specify the documents still outstanding, further research has shown at least nine documents that WASD claims it has not yet received from the developer. We were told that the developer has stated in verbal communications with WASD that he believes he has complied with all the conveyance requirements and wanted to discuss the matter further. As of the date of this report, we have been advised by WASD staff that the facility has yet to be conveyed and that the developer has yet to provide several key documents.

On August 7th WASD received an additional \$1,747.50 in connection fees from the developer, after a second inquiry on the issue by the OIG. This additional fee was the result of a second field inspection by WASD Management Services that determined five of the units rated as apartments in the project actually fit the criterion for townhouses and, therefore, would require the additional fees. The concern in this case is that the developer has been able to sell these units to individual owners but has not yet conveyed the associated water system infrastructure to WASD. Because water service to these units was started more than a year ago, WASD now has little leverage over the developer to make it comply with requirements. WASD cannot claim these assets in its inventory, until the project is officially conveyed—which, in this case, it has not been.

Home Depot Homestead – Agreement #19469

The meter was set on December 13, 2007, before the final inspection, which was performed on February 7, 2008, and before the project was conveyed to the County on April 11, 2008. WASD's March 20, 2009 response to the OIG states that the reason the Division Chief authorized the premature installation of the water meter was because Home Depot had railroad cars on a side track and containers in the parking lot full of merchandise that could not be unloaded at the new store until the water supply was available. Apparently, this was costing Home Depot storage charges. While we were provided with this explanation in response to our inquiry, the exception to the procedure and authorization for the meter setting were not documented in the file.

University of Miami Clinical Research Facility - Agreement #18221

The WASD task force found a similar occurrence on this project where meters were installed without the completion and conveyance of the required upgrade to Pump Station No. 45. This project was of particular concern because the pump station upgrade needed to be completed and certified by the Florida Department of

Environmental Protection by December 2008, or WASD would have been assessed a daily \$5,000 fine.

Summary

At this point, having researched the complaints concerning just a small number of projects, and finding irregularities and lapses in the process, we checked with WASD about the existence of other donation projects where water service is being provided without the water system being formally conveyed to the County (WASD). WASD's DSI system shows, as of August 6, 2009, there are 93 donation projects pending conveyance. Twenty-five projects have had meters installed before WASD was in possession of the final conveyance documents. Ten of these are school board projects, and the remaining 15 projects are either older projects or projects where meters were installed in response to specific internal WASD requests.

As noted, projects not conveyed are not accounted for as WASD capital assets, thus their revenue-generating capacity is not accounted for. WASD's asset base and associated revenue generating capability are regularly reviewed by WASD's bond engineer and are factors used in determining WASD's bond rating. In addition, the value of the non-conveyed assets cannot be accounted for in determining WASD's bonding capability.

There is also a liability exposure to the County should a non-conveyed system cause damages, injury, or death. Questions could arise concerning inspections and final acceptance of the system by WASD, materials and sizing of the system components, and proper construction. Since water service was provided and water bills are being paid, the owners/occupants of the buildings and/or homes would assume that WASD owned the system and was the responsible entity. However, if for whatever reason (missing documentation, lack of final inspection, final as-built drawings missing, etc.) the project was never conveyed to WASD, there would be reason to believe that the project's developer would be the party responsible for any liability. Time consuming and costly litigation would likely be necessary to resolve the issue.

In addition to being both a financial and liability risk to the County, we believe that poor internal controls and the lack of an audit trail in this area have already subjected the NBD, and ultimately WASD, to reputational risk and immense criticism of this program area. As noted above, the integrity of the entire conveyance and meter setting process relies on one key component—the documented authorization to set the meter. The validity of complaints alleging misconduct, favoritism, and even corruption in the premature installation of meters cannot be determined absent evidence of the misdeed. When the critical component of this entire work flow—identity of the individual who authorized the setting of the meter—is not captured in whatever system WASD uses (DSI or CIS) that crucial piece of evidence is missing. Simply stated,

without this documentation there is no continuous audit trail during the conveyance process.

Whether true or not, these allegations have already taken its toll on the New Business Division. Reputational risk, however, is not confined to the rumors and gossip mill within the Department. It has direct external consequences, which for this program area lies with the developer and contractor communities. Unverifiable allegations of favoritism—and worst yet, corruption—may fuel devious desires by dishonest and unscrupulous developers and contractors.

This is a program area within WASD that has not gone without previous scrutiny. It has been the subject of previous audits, and complaints like the ones received this past winter and spring will continue to surface until a high documentary threshold (or electronic audit trail) is established. Accordingly, we believe that WASD's immediate attention to this area is warranted.

WASD RESPONSE

In its response to the OIG, WASD acknowledges that there have been various audits, investigations and reviews pertaining to the business operations of its New Customer Division, and that it “established a Task Force to address internal accounting issues; identify and establish policies and procedures to enhance the Department’s service provisions; and establish policies and procedures to address deficiencies in internal record keeping.”

WASD does not refute any of the OIG's findings; it too concludes that there were various deficiencies. WASD lists these deficiencies as:

- Lack of integrated financial management and business systems
- Inadequate business system and workflow documentation
- Lack of/or inadequate policies and procedures
- Lack of sufficiently trained staff in the New Customer Division
- Inadequate and/or inefficient performance measures

WASD goes on to advise that:

Staff has been instructed to start the process of identifying the necessary system needed to allow for the integration to our financial management and business systems which will also support the workflow documentation. Currently within the NCD, policies and procedures are being written and on-going training is being provided by the Department's training staff. Staff has also been instructed to establish additional performance measures for the NCD. There have been

realignments of certain sections related to the NCD. We continue to work to strengthen the NCD wherever it is determined internal weaknesses and inefficiencies exist.

The OIG is re-assured by WASD's comments that, having acknowledged these deficiencies, it has pledged to make improvements. However, while WASD strives to improve its business processes, the OIG continues to receive complaints alleging circumvention of the business process and abuse of power. We acknowledge that some of these complaints reiterate concerns already voiced, but with the implementation of the recommendations below, we feel that that WASD management should take this opportunity to integrate ethics and integrity training with its business process re-engineering. WASD NBD staff not only need to be assured that management is taking care to fix identified deficiencies in the business process, but also that management is working to restore the reputation of the NBD and the morale of those who work there.

RECOMMENDATIONS

1. Evaluate NBD document control practices, in conjunction with the internal controls review recommended by the task force, to ensure that the distribution and retrieval of original documents is controlled and that procedures provide for the safekeeping of original NBD records.

WASD Response: The Department has placed all agreement files in locked cabinets and assigned a Records Custodian. An inventory of all Maintenance Bonds and Letters of Credit (LOC) has been completed and all documents are properly secured in a safe.

2. Review all NBD DSI files of service agreements entered into within the last 36 months to confirm that all documents have been obtained and all actions have been completed that are required to convey the subject donation projects. Any missing documents or incomplete actions should be remediated by prompt action to obtain the necessary documents and complete any outstanding tasks.

WASD Response: A comprehensive review of all executed agreements since September 1, 2006 is underway. In conjunction, we are working with property owners and the County Attorney's Office to secure the required documents for any un-conveyed project.

3. Assess each of the 25 projects where meters were prematurely installed (see page 8) to immediately obtain the necessary documents and complete any outstanding tasks.

WASD Response: This is being addressed in our response to Recommendation Number 2.

4. Immediately act on the recommendations contained in the task force report for evaluating WASD policies and procedures, especially to determine whether the current policies and procedures represent "best practices" for the described activities necessary for the setting meters on donation projects. WASD should decide whether its policies and procedures will stand as written or whether to revise them to allow for non-standard meter installations and, if so, who is authorized to approve deviations from required protocols and, just as important, how to document a deviation.

WASD Response: The Department will continue reviewing its policies and procedures governing the installation of water meters on all donation projects including government and school board projects.

5. Even for standard meter installations, establish a documented approval path in the CIS system indicating the NBD Representative responsible for authorizing a meter to be set; establishing adequate supervisory sign off or review of such actions; and ensuring that an adequate audit trail is established to review such actions in the future.

WASD Response: A New Account Form has been created to include a supervisory signature box. This form will be produced as part of the conveyance process and require[s] supervisory approval, prior to a water meter being ordered.

6. Accelerate efforts to achieve continuous tracking of donation projects by establishing unique identifying designators. Currently, WASD's DSI system tracks projects by an Agreement Number. However, WASD's CIS does not use this reference number and instead uses a project's address as a project identifier.

WASD Response: A new field has been added to our CIS system to capture the Agreement Number as a unique identifier connecting the property address in CIS to the property in DSI. A new reconciliation process has already been instituted for DSI, IS2 and CIS.

The OIG appreciates WASD's recommendation-specific responses. We look forward to reviewing the outcomes of implementing these recommendations. As such, we request that WASD provide us with a follow-up report in 90 days, on or before January 29, 2010, that addresses new forms and processes implemented, progress made in additional conveyances, improvements to the CIS system, as well as efforts to boost integrity and morale. We would also appreciate receiving a copy of WASD's internal task force report, once finalized.

**Miami-Dade County
Office of the Inspector General**

APPENDIX A

**Response from Miami-Dade County
Water and Sewer Department**

IG09-13

Memorandum

MIAMI-DADE
COUNTY

Date: September 21, 2009

To: Christopher Mazzella, Inspector General
Office of Inspector General

From: John W. Renfrow, P.E., Director
Miami-Dade Water and Sewer Department

Subject: Review of Complaints Regarding Donation Projects



The Department would like to take this opportunity to thank the Office of Inspector General (OIG) for their review of anonymous complaints regarding Donation Projects. These anonymous complaints allege that Miami-Dade Water & Sewer Department (WASD) was improperly installing water meters prior to conveyance of the related infrastructure to be donated because of mismanagement, favoritism to certain developers, managerial abuses and possible corruption.

As you are aware, there have been various audits, investigations and reviews conducted as it pertains to the way business is conducted in the New Customer Division (NCD). Additionally, the Department established a Task Force to address internal accounting control issues; identify and establish policies and procedures to enhance the Department's service provisions; and establish policies and procedures to address deficiencies in internal record keeping.

Based on the results of the various audits, reviews and investigations, it is concluded that the following summarizes the deficiencies that existed at the time reviews were performed:

- o **Lack of Integrated Financial Management and Business Systems**
- o **Inadequate Business System and Workflow Documentation**
- o **Lack of/ or inadequate Policies and Procedures**
- o **Lack of sufficiently trained staff in the New Customer Division**
- o **Inadequate and/or Inefficient Performance Measures**

Staff has been instructed to start the process of identifying the necessary system needed to allow for the integration to our financial management and business systems which will also support workflow documentation. Currently within the NCD, policies and procedures are being written and on-going training is being provided by the Department's training staff. Staff has also been instructed to establish additional performance measures for the NCD. There have been realignments of certain sections related to the NCD. We continue to work to strengthen the NCB wherever it is determined internal weaknesses and inefficiencies exist.

Summary of OIG Recommendations and Department's Responses Thereto:

The Department agrees with the recommendations presented and will continue making the necessary changes to strengthen and enhance internal and accounting controls. As stated in the OIG Report "we believe that WASD's continued attention to this area is warranted". We agree with this statement and will continue the process already underway.

1. OIG Recommendation:

Evaluate NCD document control practices, in conjunction with the internal controls review recommended by the task force, to ensure that the distribution and retrieval of original documents is controlled and that procedures provide for the safekeeping of original NCD records.

Response:

The Department has placed all agreement files in locked cabinets and assigned a Records Custodian. An inventory of all Maintenance Bonds and Letters of Credit (LOC) has been completed and all documents are properly secured in a safe.

2. OIG Recommendation:

Review all NCD DSI files of service agreements entered into within the last 36 months to confirm that all documents have been obtained and all actions have been completed that are required to convey the subject donation projects. Any missing documents or incomplete actions should be remediated by prompt action to obtain the necessary documents and complete any outstanding tasks.

Response:

A comprehensive review of all executed agreements since September 1, 2006 is underway. In conjunction, we are working with property owners and the County Attorney's Office to secure the required documents for any un-conveyed projects.

3. OIG Recommendation:

Assess each of the twenty-five (25) projects, where meters were prematurely installed (see page 7) to immediately obtain the necessary documents and complete any outstanding tasks.

Response:

This is being addressed in our response to recommendation number 2.

4. OIG Recommendation:

Immediately act on the recommendations contained in the task force report for evaluation of WASD policies and procedures, especially to determine whether the current policies and procedures represent "best practices" for the described activities necessary for the setting meters on donation projects. WASD should decide whether its policies and procedures will stand as written or whether to revise them to allow for non-

standard meter installations and, if so, who is authorized to approve deviations from required protocols and, just as important, how to document a deviation.

Response:

The Department will continue reviewing its policies and procedures governing the installation of water meters on all donation projects including government and school board projects.

5. **OIG Recommendation:**

Even for standard meter installations, establish a documented approval path in the CIS system indicating the NCD Representative responsible for authorizing a meter to be set; establishing adequate supervisory sign off or review of such actions; and ensuring that an adequate audit trail is established to review such actions in the future.

Response:

A New Account Form has been created to include a supervisory signature box. This form will be produced as part of the conveyance process and require supervisory approval, prior to a water meter being ordered.

6. **OIG Recommendation:**

Accelerate efforts to achieve continuous tracking of donation projects by establishing unique identifying designators. Currently, WASD's DSI system tracks projects through an Agreement Number. However, WASD's CIS does not use this reference number and instead uses a project's address as a project identifier.

Response:

A new field has been added to our CIS system to capture the Agreement Number as a unique identifier connecting the property address in CIS to the property in DSI. A new reconciliation process has already been instituted for DSI, IS2 and CIS.