



COUNTY OF LOS ANGELES DEPARTMENT OF AUDITOR-CONTROLLER

KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 525
LOS ANGELES, CALIFORNIA 90012-3873
PHONE: (213) 974-8301 FAX: (213) 626-5427

ARLENE BARRERA
AUDITOR-CONTROLLER

OSCAR VALDEZ
CHIEF DEPUTY AUDITOR-CONTROLLER

April 19, 2022

TO: Each Supervisor

FROM: Arlene Barrera, Auditor-Controller *Arlene Barrera*

SUBJECT: **SHERIFF'S DEPARTMENT – GRADING ON PROPERTY OWNED BY SOUTHERN CALIFORNIA GAS COMPANY**

NUMBER OF
RECOMMENDATIONS

PRIORITY 1

4

CORRECTIVE ACTION REQUIRED
WITHIN 90 DAYS

PRIORITY 2

1

CORRECTIVE ACTION REQUIRED
WITHIN 120 DAYS

PRIORITY 3

0

CORRECTIVE ACTION REQUIRED
WITHIN 180 DAYS

In consultation with County Counsel and the Los Angeles County Sheriff's Department (LASD), we reviewed the facts and circumstances of grading work contracted by LASD on property owned by Southern California Gas Company (SoCalGas) in the City of La Habra Heights. We initiated this review at the request of County Counsel, after they received a cease and desist letter from SoCalGas that indicated LASD trespassed on the property and graded the land without authorization. Based upon warranties received by the County and its vendor that no foreign material was brought to their property, SoCalGas agreed to remediate their property.

We noted opportunities to improve and strengthen LASD's internal controls over construction-related procurement to ensure compliance with applicable laws, regulatory requirements, and policies. For example, LASD management will establish policies, procedures, and management controls to:

- Ensure that it has obtained legally sufficient written authorization from owners of private property prior to engaging in construction on such property.
- Ensure that any applicable local government permits, approvals and/or inspections are obtained prior to commencing any construction-related work.
- Ensure that projects requiring specific regulatory approvals (e.g., operation of aircraft landing facilities) are identified during the planning process and that appropriate approvals are obtained.

These and the other improvements we have recommended will ensure the risks of penalties, code compliance issues, potential liability to the County are minimized and that the Department may continue to have access to sites they may need to depend on in emergencies.

FAST FACTS

LASD undertook the grading project after their threat assessment of the area around the Sheriff's personal residence, which is near the SoCalGas property, identified the need for an emergency evacuation site.

LASD did not obtain explicit and legally sufficient written authorization from SoCalGas to undertake the grading project.

Each Supervisor
April 19, 2022
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For details of our observations and the Department's corrective action plan, see Attachment I. The Department's response, included in Attachment II, indicates general agreement with our findings and recommendations.

We thank LASD management and staff for their cooperation and assistance during our review. If you have any questions please call me, or your staff may contact Robert Campbell at rcampbell@auditor.lacounty.gov.

AB:OV:RGC:AMS:cm

Attachments

c: Fesia A. Davenport, Chief Executive Officer
Celia Zavala, Executive Officer, Board of Supervisors
Alex Villanueva, Sheriff

LOS ANGELES COUNTY AUDITOR-CONTROLLER

Attachment I
Page 1 of 5

Oscar Valdez

CHIEF DEPUTY AUDITOR-CONTROLLER

Robert G. Campbell

DIVISION CHIEF

Office of County Investigations

Report #IOR-2021-17670

SHERIFF'S DEPARTMENT

IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED REVIEW #2021-17670

BACKGROUND

On February 5, 2021, the Southern California Gas Company (SoCalGas) sent County Counsel an "Order to Cease and Desist" letter stating that the Los Angeles County Sheriff's Department (LASD or Department) trespassed on SoCalGas property located at 2490 Las Palomas Drive (Property) in the City of La Habra Heights (La Habra Heights or City), graded land, and brought in fill dirt to create a helipad. The letter indicated that SoCalGas declined a previous informal request from the Department to install a helipad, that it was completed without their authorization, and that they learned of the construction activity when a City representative contacted them to inquire if they had obtained required permits.

According to LASD documents, in response to threats concerning the Sheriff, the LASD's Major Crimes Bureau (MCB) conducted a threat assessment at the Sheriff's residence in August 2020. MCB staff noted several vulnerabilities, including the inability to safely evacuate the Sheriff during emergencies due to the geography of the immediate area and limited vehicular access. MCB staff identified the nearby Property as a possible landing area for emergency helicopter evacuation of the Sheriff. LASD documentation indicates MCB staff met with SoCalGas representatives on more than one occasion to discuss leveling a small area of the Property to accommodate a helicopter landing site and indicates that during a site visit on January 14, 2021 a SoCalGas representative gave "verbal permission" to enter the property and level an area for an emergency landing site. LASD's Facilities Services Bureau (FSB) subsequently retained a contractor, Century Paving Inc. (Century Paving), which completed brush clearance and leveling of existing soil on the Property on February 2, 2021.

Our review found no evidence that LASD staff obtained written confirmation of SoCalGas' verbal approval to perform the work in question, and we were unable to identify anyone from SoCalGas who provided it. We also found no evidence that the site work completed at the Property involved importing fill dirt. All the records we reviewed indicate that the work consisted of regrading existing soil. We noted that neither LASD nor Century Paving obtained the required permits from La Habra Heights to perform the grading work. According to the City, the grading activity at the property was not permitted or approved and allegedly did not comply with Municipal codes related to grading permits and erosion prevention.

In addition, the Department of Public Works (DPW) Aviation Division and the California Department of Transportation (CalTrans) informed us that construction of an emergency use helipad is subject to State Heliport Permit requirements, and LASD was required to submit an application that included letters or notice of approval from the local governing body (La Habra Heights) and from the landowner (SoCalGas). Staff from both DPW and CalTrans indicated that LASD did not consult with either entity prior to commencing work at the Property and did not submit an application or letters of approval from the City or SoCalGas.

| TABLE OF FINDINGS AND RECOMMENDATIONS FOR CORRECTIVE ACTION | |
|---|--|
| ISSUE | RECOMMENDATION |
| <p>1 Written Agreements for Improvement and Use of Non-County Property; Seeking Proper County Approvals – During our limited review we noted that LASD does not have policies, procedures, or management controls in place to ensure that documented and legally sufficient approval is obtained from private property owners before the Department undertakes construction activity or site improvements on non-County owned property.</p> <p>Specifically, LASD contracted with Century Paving, a County vendor and licensed contractor, to grade and level land owned by SoCalGas for use as an emergency helicopter landing site without obtaining written approval from SoCalGas. Such approval should have expressly authorized and detailed:</p> <ol style="list-style-type: none"> 1) the terms of LASD's access to the site, 2) all improvements and/or modifications proposed by the Department, 3) the intended use of the property as an emergency helicopter landing site, and 4) the term or duration of the Department's access to and use of the property. <p>While Department management indicated that two SoCalGas representatives gave them verbal approval for site work during an in-person visit, LASD could not provide any documentation of the approval or specifically identify the individuals who purportedly gave it, and SoCalGas expressly denied authorizing LASD to use or modify their property.</p> <p>Impacts: The lack of a formal, written agreement with a private property owner prior to commencing construction work on their property is inconsistent with basic standards of due diligence and exposes the Department to liability. Additionally, in the absence of a formal agreement describing the terms of the Department's use of the improved property, LASD risks losing access to site improvements and facilities they paid for and might depend on in an emergency. Lack of a formal, written agreement also prevented the Department from seeking the proper County approvals and/or delegated authority from the Board needed to enter into such agreements.</p> | <p>Priority 1 – LASD management establish policies, procedures, and management controls to:</p> <ol style="list-style-type: none"> a) Ensure that before construction-related work involving private property is procured, performed, or paid for LASD secures a legally sufficient written agreement that expressly authorizes the Department to access the private property, make planned site improvements, proceed with any intended future use of the property, and describes the term/duration of access/use granted by the property owner. b) Ensure that such agreements are developed in consultation with and/or reviewed by County Counsel for sufficiency, that proper County approvals and/or delegated authority from the Board is sought to enter into such agreements, and that such agreements are formally executed by personnel who are expressly authorized to contract on behalf of the Department/County and enter into such agreements. <p>Department Response: Agree Implementation Date: July 5, 2022</p> |
| <p>2 Compliance with Local Laws and Ordinances – During our review we found that LASD does not have policies, procedures, or management controls in place to ensure that construction and site work undertaken by the Department complies with local building codes and permitting requirements.</p> | <p>Priority 1 – LASD management establish policies, procedures, and management controls to:</p> <ol style="list-style-type: none"> a) Identify projects which require local government permits and approvals during the planning process. |

Priority Ranking: Recommendations are ranked from Priority 1 to 3 based on the potential seriousness and likelihood of negative impact on the Agency's operations if corrective action is not taken.

| TABLE OF FINDINGS AND RECOMMENDATIONS FOR CORRECTIVE ACTION | |
|---|--|
| ISSUE | RECOMMENDATION |
| <p>We noted that La Habra Heights Municipal Code Section J103.1 requires the submission of grading plans and the issuance of a permit before grading work may commence. We confirmed with City staff that no permits were issued for the work the Department performed on the SoCalGas property. LASD's FSB indicated they did not inquire with the City or apply for a permit because they did not believe the grading of the area required a permit. Further, because the Department did not consult with La Habra Height's building department, DPW's Aviation Division and CalTrans with respect to the construction of a helipad, it did not receive the benefit of expertise and oversight from departments and agencies with the proper subject matter expertise and jurisdiction over the project who would have been able to assist on what was needed to correctly build a legally compliant helipad.</p> <p>According to the City, it alleges that the grading activity at the property was not permitted or approved and did not comply with Municipal codes related to grading permits and erosion prevention.</p> <p>Impact: The absence of a written policy/procedure to ensure applicable building permits or other entitlements are obtained from local agencies before initiating work may result in increased risk of liability for the County.</p> | <p>b) Consult appropriate departments and agencies with subject matter expertise or jurisdiction over the project.</p> <p>c) Obtain or ensure that contracted parties performing work on behalf of the Department obtain required permits before commencing any work.</p> <p>d) Retain documentation of final permits and related inspections/approvals.</p> <p>Department Response: Agree Implementation Date: July 5, 2022</p> |
| <p>3 Compliance with Regulatory Requirements – We found that LASD does not have a process or management controls in place to ensure that projects with specific regulatory requirements are identified during the planning process, and that appropriate approvals are obtained before such projects begin.</p> <p>In this case, construction and operation of an emergency helicopter landing site required a State Heliport Permit obtained in consultation with DPW's Aviation Division and CalTrans. The Heliport Permit application requires approval from the local governing body (in this case the City of La Habra Heights) and from the landowner (SoCalGas). We inquired with DPW and CalTrans, and neither had any record of LASD submitting a Heliport Permit application for the property in question. Additionally, as previously noted, neither SoCalGas nor the City approved the construction of a helicopter landing site.</p> <p>Impacts: The lack of procedures or controls to identify specialized construction projects which might have specific regulatory requirements during the planning process, or to ensure that such regulatory requirements are met before</p> | <p>Priority 1 – LASD management establish policies, procedures, and controls to ensure that projects requiring specific regulatory approvals (e.g., construction or operation of aircraft landing facilities) are identified during the planning process, and that appropriate approvals are obtained before commencing work on such projects.</p> <p>Department Response: Agree Implementation Date: July 5, 2022</p> |

| TABLE OF FINDINGS AND RECOMMENDATIONS FOR CORRECTIVE ACTION | |
|---|---|
| ISSUE | RECOMMENDATION |
| commencing work on the project, increases the risk of liability and may impair the Department's ability to use such facilities if they are non-compliant. | |
| <p>4 Contractor Monitoring and Invoice Review – We noted that LASD authorized and attempted to issue payment to Century Paving, the County contractor LASD retained to grade the Property, without confirming that the contractor's work was completed in conformance with applicable laws and regulations. According to the City, it alleges that grading activity at the SoCalGas property was not permitted or approved and therefore did not comply with Municipal Code Sections J103.1 and 4.5.20R related to grading permits and erosion prevention.</p> <p>As part of LASD's process for overseeing construction contractors and reviewing construction invoices, the Department should have verified that work requiring a permit was permitted and that permit conditions were met before authorizing payment. According to the California Contractor State Licensing Board, a contractor is in violation of Business and Professions (B&P) Code Sections 7110 and 7090 if they begin work that requires permits by a local municipality without obtaining or ensuring a permit was obtained. In this case, Century Paving is a licensed contractor and performed work requiring a permit but did not obtain one.</p> <p>Impacts: The lack of appropriate monitoring and review of contracted work requiring permits increases the risk of penalties, code compliance issues, and the cost of rework. Payment disputes, such as unpaid invoices for unpermitted work, exposes the County to liability.</p> | <p>Priority 1 – LASD management:</p> <p>a) Strengthen policies, procedures, and controls for monitoring contractors and reviewing contractor invoices to ensure that contractor work complies with legal and regulatory requirements before approving payment.</p> <p>b) Consult with County Counsel about options for resolving the unpaid invoice from Century Paving for unpermitted site work performed at the SoCalGas property in La Habra Heights.</p> <p>Department Response: Agree Implementation Date: July 5, 2022</p> |

| TABLE OF FINDINGS AND RECOMMENDATIONS FOR CORRECTIVE ACTION | |
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| ISSUE | RECOMMENDATION |
| <p>5 Staff Training – During our review, we noted that LASD personnel who contracted for and oversaw this project did not identify circumstances where permits or regulatory approvals were required and did not verify that contracted work was performed in accordance with legal requirements before authorizing payment. In addition, because LASD did not consult with La Habra Height's building department, DPW's Aviation Division and CalTrans, it did not receive the benefit of oversight and subject matter expertise from other departments and agencies who were more qualified to evaluate, handle and determine if work was properly performed in accordance with required rules and regulations.</p> <p>Impact: Inadequate contractor monitoring may not identify non-compliant work, resulting in improper payments.</p> | <p>Priority 2 – LASD management:</p> <ul style="list-style-type: none"> a) Train facilities and procurement staff on the policies and procedures developed in response to these recommendations, as applicable. b) Ensure that staff are aware of and understand their obligations concerning improvements to non-County owned property, properly consulting with appropriate County departments and agencies with oversight, jurisdiction, and subject matter expertise, effective oversight and monitoring of construction contractors, and their responsibility to ensure that contractor invoices are thoroughly reviewed before approving or paying them. c) Consider implementing a checklist or other compliance tool to assist procurement staff to ensure completion of all required steps in obtaining and documenting that applicable permits and licenses are secured before commencing work. <p>Department Response: Agree Implementation Date: July 5, 2022</p> |

For more information on our auditing process, including recommendation priority rankings, the follow-up process, and management's responsibility for internal controls, visit auditor.lacounty.gov/audit-process-information.

Priority Ranking: Recommendations are ranked from Priority 1 to 3 based on the potential seriousness and likelihood of negative impact on the Agency's operations if corrective action is not taken.



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



April 8, 2022

Chief Robert Campbell
Office of County Investigations
500 West Temple Street
Los Angeles, California 90012

Dear Chief Campbell:

**RESPONSE TO AUDITOR-CONTROLLER FINDINGS AND RECOMMENDED
CORRECTIVE ACTIONS-REPORT #IOR-2021-17670**

The Los Angeles County Sheriff's Department (Department) has reviewed the Auditor-Controller's report and agrees with the findings and recommendations. Attached is the Department's plan of corrective action.

Should you have any questions, please contact me at (213) 229-3008.

Sincerely,

ALEX VILLANUEVA, SHERIFF

TIMOTHY K. MURAKAMI
UNDERSHERIFF

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service
— Since 1850 —

Chief Campbell

-2-

April 8, 2022

AV:TM:CM:aw/dw

(Administrative Services Division/Facilities Services Bureau)

Attachments

c: Alex Villanueva, Sheriff
Conrad Meredith, Division Director, Administrative Services Division (ASD)
Glen C. Joe, Assistant Division Director, ASD
John Carillo, Director, Facilities Services Bureau (FSB)
Clint Yates, Assistant Director, FSB
Adam R. Wright, Sergeant, ASD
Kristine Corrales, Deputy, ASD

| SHERIFF'S DEPARTMENT IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED REVIEW #2021-17670 DEPARTMENT ACTION PLAN/RESPONSE | |
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| ISSUE 1: Written Agreements for Improvement and Use of Non-County Property | |
| A-C Recommendation | <p>LASD management establish policies, procedures, and management controls to:</p> <ul style="list-style-type: none"> a) Ensure that before construction-related work involving private property is procured, performed, or paid for LASD secures a legally sufficient written agreement that expressly authorizes the Department to access the private property, make planned site improvements, proceed with any intended future use of the property, and describes the term/duration of access/use granted by the property owner. b) Ensure that such agreements are developed in consultation with and/or reviewed by County Counsel for sufficiency, that proper County approvals and/or delegated authority from the Board is sought to enter into such agreements, and that such agreements are formally executed by personnel who are expressly authorized to contract on behalf of the Department/County and enter into such agreements. |
| Priority | PRIORITY 1 |
| Agree/Disagree | (Agree) |
| Department Action Plan¹ | <p>The Department's Facilities Services Bureau (FSB) will establish policies and procedures related to construction work involving private property. These established policies and procedures will be adhered to when procuring services from outside vendors or implementing services provided by the Department service provider FSB. The Department will secure a legally sufficient written agreement that expressly authorizes to access the private property, make planned site improvements, and proceed with any intended future use of the property. The document will address the term/duration of access/use granted by the property owner. The mentioned legal document will be presented to the Los Angeles County Council for their input and review prior to any agreement between the parties. Proper County approvals and/or delegated authority from the Board of Supervisors will be sought to enter into such agreements, and such agreements are formally executed by personnel who are expressly authorized to contract on behalf of the Department/County and enter into such agreements.</p> <p>A FSB Unit Order will be generated and considered a Unit Level Directive.</p> <p>All mentioned procedures will be processed through the FSB Director for general oversight.</p> |

¹ In this section the Department should only describe the efforts they plan to take to implement the recommendation. The Department should include any other information in the Additional Information section that follows.

² In this section the Department can provide any background or clarifying information they believe is necessary.

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| Planned Implementation Date | Fully Implemented by July 05, 2022 |
| Additional Information (optional)² | |

¹ In this section the Department should only describe the efforts they plan to take to implement the recommendation. The Department should include any other information in the Additional Information section that follows.

² In this section the Department can provide any background or clarifying information they believe is necessary.

| ISSUE 2: COMPLIANCE WITH LOCAL LAWS AND ORDINANCES | |
|--|--|
| A-C Recommendation | <p>LASD management establish policies, procedures, and management controls to:</p> <ul style="list-style-type: none"> a) Identify projects which require local government permits and approvals during the planning process. b) Consult appropriate departments and agencies with subject matter expertise or jurisdiction over the project. c) Obtain or ensure that contracted parties performing work on behalf of the Department obtain required permits before commencing any work. d) Retain documentation of final permits and related inspections/approvals. |
| Priority | PRIORITY 1 |
| Agree/Disagree | (Agree) |
| Department Action Plan¹ | <p>FSB will establish policies, procedures, and management controls related to construction work involving private property. Project requests which require local government permits and approvals will be identified prior to and or during the project's planning stages. The FSB Project Manager will maintain general oversight over the approval and permitting process. The Department will consult with appropriate departments and agencies with subject matter expertise or jurisdiction over the project. All contracted vendors and Department's service provider, FSB, will be required to obtain all required permits and approvals prior to commencing any work on mentioned private property.</p> <p>All copies of consultation communications, permitting, fees, and approvals will be memorialized and maintained as a historical record within the Department's electronic Service, Labor and Material Tracking System (MAXIMO) and the Department's Main-Drive Computer Server electronic files.</p> <p>The required process of obtaining all outside agency permitting and approvals will be reflected within all FSB generated Purchase Orders for services. All FSB requested outside vendor solicitations for service quotations and generated Purchase Orders will require the following statement:</p> <p>"Vendor/Contractor submitting the requested quotation for service must obtain all necessary Local, State, Federal and/or any other regulatory agency permits and approvals prior to commencing work and the provided quotation must include all fees associated to such. The Vendor/Contractor submitting the requested quotation will be required to provide all documentation to the Department prior to commencing work and at completion of provided work."</p> |

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| | <p>A FSB Unit Order will be generated and considered a Unit Level Directive.</p> <p>The FSB Director will have general oversight of all mentioned procedures.</p> |
| Planned Implementation Date | Fully Implemented by July 05, 2022. |
| Additional Information (optional)² | |

¹ In this section the Department should only describe the efforts they plan to take to implement the recommendation. The Department should include any other information in the Additional Information section that follows.

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| ISSUE 3: COMPLIANCE WITH REGULATORY REQUIREMENTS | |
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| A-C Recommendation | LASD management establish policies, procedures, and controls to ensure that projects requiring specific regulatory approvals (e.g., construction or operation of aircraft landing facilities) are identified during the planning process, and that appropriate approvals are obtained before commencing work on such projects. |
| Priority | PRIORITY 1 |
| Agree/Disagree | (Agree) |
| Department Action Plan¹ | <p>FSB will establish policies and procedures related to projects requiring specific regulatory approvals (e.g., construction or operation of aircraft landing facilities) are identified during the planning process and those appropriate approvals are obtained before commencing work on such projects. The FSB Project Manager will maintain general oversight over the mentioned process. The Department/FSB will consult with appropriate departments and agencies with subject matter expertise or jurisdiction over the project. All contracted vendors and Department's service provider, FSB, will be required to obtain all required permits and approvals prior to commencing any work.</p> <p>All copies of consultation communications, permitting, fees and approvals will be memorialized and maintained as a historical record within the Department's/FSB electronic Service, MAXIMO and the Department's Main-Drive Computer Server electronic files.</p> <p>A FSB Unit Order will be generated and considered a Unit Level Directive.</p> <p>The FSB Project Manager will have general oversight of all mentioned procedures.</p> |
| Planned Implementation Date | Fully Implemented by July 05, 2022. |
| Additional Information (optional)² | |

¹ In this section the Department should only describe the efforts they plan to take to implement the recommendation. The Department should include any other information in the Additional Information section that follows.

² In this section the Department can provide any background or clarifying information they believe is necessary.

| ISSUE 4: CONTRACTOR MONITORING AND INVOICE REVIEW | |
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| A-C Recommendation | <p>LASD management:</p> <p>a) Strengthen policies, procedures, and controls for monitoring contractors and reviewing contractor invoices to ensure that contractor work complies with legal and regulatory requirements before approving payment.</p> <p>b) Consult with County Counsel about options for resolving the unpaid invoice from Century Paving for unpermitted site work performed at the SoCalGas property in La Habra Heights.</p> |
| Priority | PRIORITY 1 |
| Agree/Disagree | (Agree) |
| Department Action Plan¹ | <p>FSB will establish policies, procedures, and internal controls related to monitoring contractor work and compliance with all Legal and Regulatory requirements. The FSB Project Manager will maintain all copies of permitting, fees, and approvals as a historical record within the Department's electronic Service, MAXIMO and the Department's Main-Drive Computer Server electronic files.</p> <p>Contractor Invoices: All invoices for service will be processed through the FSB Accounts Payable section. A complete three-way match will occur to address the approvals to pay. As to the assurance of contractor compliance with Legal and Regulatory requirements, the FSB Project Manager will participate in the approval process to ensure compliance prior to approving the final payment.</p> <p>A FSB Unit Order will be generated and considered a Unit Level Directive.</p> <p>"Consult with County Counsel about options for resolving the unpaid invoice from Century Paving for unpermitted site work performed at the SoCalGas property in La Habra Heights."</p> <p>The Department Director or his representative will reach out to County Counsel to discuss options in resolving the unpaid invoice to contract vendor Century Paving.</p> |
| Planned Implementation Date | Fully Implemented by July 05, 2022. |
| Additional Information (optional)² | |

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| ISSUE 5: STAFF TRAINING | |
|--|---|
| A-C Recommendation | <p>LASD management:</p> <ul style="list-style-type: none"> a) Train facilities and procurement staff on the policies and procedures developed in response to these recommendations, as applicable. b) Ensure that staff are aware of and understand their obligations concerning improvements to non-County owned property, properly consulting with appropriate County departments and agencies with oversight, jurisdiction, and subject matter expertise, effective oversight and monitoring of construction contractors, and their responsibility to ensure that contractor invoices are thoroughly reviewed before approving or paying them. c) Consider implementing a checklist or other compliance tool to assist procurement staff to ensure completion of all required steps in obtaining and documenting that applicable permits and licenses are secured before commencing work. |
| Priority | PRIORITY 2 |
| Agree/Disagree | (Agree) |
| Department Action Plan¹ | <p>FSB will produce a detailed, interactive training session related to the Department's policies and procedures developed in response to the Auditor-Controller's recommendations. Staff will be made aware through review and hands-on training.</p> <p>Training will ensure personnel understand their obligations concerning improvements to non-County-owned property, consulting with appropriate County departments and agencies, and monitoring construction contractors, including their responsibility to ensure that contractor invoices are thoroughly reviewed before approving or processing for payment.</p> <p>FSB will implement a user-friendly and effective tracking checklist to better comply with the FSB Unit Order directive and the Auditor-Controller's recommendations.</p> |
| Planned Implementation Date | Fully Implemented by July 05, 2022. |
| Additional Information (optional)² | |

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