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CROSS-CONNECTION CONTROL PERFORMANCE AUDIT

OCTOBER 2015

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AUDIT SERVICES DEPARTMENT

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To: Audit Services Oversight Committee
From: Germaine F. Brewington, Director
Audit Services Department
Date: October 26, 2015
Re: Cross-Connection Control
Performance Audit (October 2015)

The Department of Audit Services completed the report on the Cross-Connection Control Performance Audit dated October 26, 2015. The purpose of the audit was to determine if adequate controls exist over the processes administered by the Cross-Connection Control staff at the City of Durham's Department of Water Management.

This report presents the observations and results of the Cross-Connection Control Performance Audit dated October 26, 2015. City management concurs with the recommendations made. Management's response to the recommendations is included with the attached report.

The Department of Audit Services appreciates the contribution of time and other resources from employees of the Department of Water Management's Cross-Connection Control staff and the Department of Technology Solutions staff in the completion of this audit.

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BACKGROUND INFORMATION

A cross-connection is a link between a potable (drinking) water system and a non-potable water system. Contamination can occur when a water supply line to a customer is connected to equipment containing a substance not fit for drinking, creating back-flow (reversal of normal flow of a liquid solid or gas). Installation and maintenance of appropriate backflow prevention assemblies or devices prevents contamination of supply lines from cross-connections.

The Cross-Connection Control (CCC) Program at the City of Durham, administered by the Department of Water Management, is required by the state and federal government to protect water systems from potential contamination or pollution. Staff in the CCC Program implement the City's Ordinance Chapter 70, "Utilities", Article VII, "Cross-Connection Control" which requires all industrial, commercial and irrigation customers to obtain a backflow permit and install backflow prevention assemblies.

In complying with the Ordinance, CCC staff perform the following steps:

- 1) Review building plans for residential and nonresidential buildings that show the locations of plumbing connections, and/or cross-connections and sign off on the certificate of occupancy;
- 2) Issue Backflow Preventer Permits;
- 3) Perform inspections for Backflow Preventer Permits issued; and
- 4) Administer the annual testing requirement. Per Ordinance a user or permit holder shall have all permitted backflow preventers inspected and tested annually. The test shall be conducted by a certified tester.

The CCC Group uses the Land Development Office (LDO) System to issue Backflow Preventer Permits, assign inspections and approve building plans that are assigned for their review by the Department of City/County Inspections staff. Based on the information obtained from the LDO System, the following applications were processed for FY 2014 and FY 2015:

BACKGROUND INFORMATION

	<u>FY 2014</u>	<u>FY 2015</u>
Total backflow inspections	774	768
Total review of building plans	646	679
Total permits issued	874	923

In addition to using the LDO System, the CCC Group also utilizes an Access database to capture all backflows that are required to comply with the annual testing requirement.

CCC staff also administer the Tester Certification Program. Proper training of individuals performing installation and testing of backflow prevention assemblies is crucial to the success of the Cross-Connection Control Program. CCC staff offer both an initial certification course as well as a recertification course. A forty-hour, five-day course is offered to persons seeking certification as a backflow preventer assembly tester. To attain certification, students must pass the written exam and the practical exam. Testers must renew certification every two years. To accommodate this recertification requirement, a sixteen-hour, two-day recertification course is conducted to enable certified testers to keep their skills and regulatory knowledge current.



EXECUTIVE SUMMARY

Purpose

The Audit Services Department staff performed this audit to determine if adequate controls existed over the processes administered by the Cross-Connection Control staff at the City of Durham's Department of Water Management.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Results in Brief

The Cross-Connection Control (CCC) Group is efficient at performing backflow inspections, issuing backflow preventer permits and approving building plans that need reviews as a result of cross-connections. Controls can be strengthened as it pertains to monitoring compliance with the annual testing requirement for backflows. The CCC staff does not enforce non-compliance by commercial customers with the annual testing requirements as allowed by the Ordinance. Also, CCC staff are not mandatorily opting in non-compliant residential customers into the Opt-In Program. Adequate controls also do not exist to ensure that annual testing is performed for residential customers voluntarily participating in the Opt-In Program.

The CCC Group had draft written procedures; however, they were not adequate and did not address all the activities carried out by the CCC Group. Standard Operating Procedures (SOPs) help create consistency over process performance and provide a method to communicate process changes to employees. At the time of field work, Department management was aware that the SOPs needed to be revised and updated.

OBJECTIVES, SCOPE AND METHODOLOGY

Objectives

The objectives of the audit were to determine if:

- Adequate controls existed over the Backflow Prevention Permit application and Backflow Inspection processes;
- Adequate controls existed to ensure compliance with the annual testing requirement for all permitted backflow preventers by users or permit holders;
- Adequate controls existed over the collections of Backflow Permit Fees and Tester Certification/Recertification Fees; and
- Adequate controls existed over the administering of the Tester Certification Training Program.

Scope

The scope of this engagement included all current practices as they pertained to the activities carried out by the Cross-Connection Control staff.

Methodology

To accomplish the objectives of this audit, Audit Services staff performed the following steps:

1. Interviewed the CCC staff;
2. Obtained a list of all building permits that were reviewed by the CCC staff and determined whether they were reviewed on a timely basis for FY 2015;
3. Obtained a list of Backflow Preventer Permits issued and inspections performed for FY 2014 and FY 2015 from the LDO System;
4. Determined if the Backflow Preventer Permits were issued on a timely basis for FY 2014 and FY 2015;
5. Determined if inspections for Backflow Preventer Permits were performed on a timely basis for FY 2014 and FY 2015;
6. Obtained a list of Certificate of Occupancy reviews performed by the CCC staff;
7. Selected a sample of Certificate of Occupancy reviews approved by the CCC staff and verified if inspections were performed;

OBJECTIVES, SCOPE AND METHODOLOGY

8. Selected a sample of Backflow Preventer Permit application forms and verified:
 - a) The accuracy of information entered into the LDO System; and
 - b) The proper completion of applications (all sections of the form were filled out);
9. Analyzed the workload of the CCC staff for FY 2014 and FY 2015;
10. Verified completeness of the information maintained in the Access database by:
 - Selecting a sample of inspections performed and verifying that they were entered in the Access database; and
 - Verifying the due date for annual testing in the Access database to the inspection date in the LDO System;
11. Obtained a report of all backflow devices;
12. Determined the rate of compliance with the annual testing requirement by company ID for the following:
 - a) Overall compliance percentage;
 - b) Residential compliance percentage for customers that did not participate in the Opt-In Program;
 - c) Residential compliance percentage for customers that voluntarily participated in the Opt-In Program; and
 - d) Commercial compliance percentage rate;
13. Determined the total number of backflow devices that are not in compliance with the annual testing requirement;
14. Selected a sample of accounts that were not in compliance with the annual testing requirement and verified actions taken by the CCC staff to bring them into compliance;
15. Obtained and reviewed the contracts with Brown Brothers Plumbing and Heating, Inc. and ACME Services;
16. Selected a sample of invoices paid to Brown Brothers Plumbing and Heating, Inc. and ACME Services and verified that payments were made for work performed;
17. Reconciled Backflow Permit revenues per the LDO System to revenues per the MUNIS System;

OBJECTIVES, SCOPE AND METHODOLOGY

18. Reconciled class rosters to fees collected for recertification/certification of testers in MUNIS;
19. Selected a sample of Backflow Prevention Assembly Test and Maintenance forms and verified that the tests were conducted by certified testers; and
20. Selected a sample of certified testers and verified that they attended a certification/recertification class.

During the audit, the staff also maintained awareness to the potential existence of fraud.

AUDIT RESULTS

Objective 1: To determine if adequate controls existed over the Backflow Preventer Permit application and inspections process

Effective Practices:

- CCC staff are performing backflow inspections on a timely basis (96% performed on time);
- CCC staff are issuing backflow permits on a timely basis (99% issued on time); and
- CCC staff are approving building plans that show locations of cross-connections (routed to the CCC staff by the Department of City/County Inspections) on a timely basis (100% reviewed on time).

Areas for improvement:

Draft written procedures existed but were not adequate.

The CCC Group had draft written procedures; however they were not adequate and did not address all the activities carried out by the CCC staff. Written standard operating procedures (SOPs) help reduce the possibility of human error and provide guidelines for employees to follow. SOPs help create consistency over process performance and provide a method to communicate process changes to employees. At the time of field work, the Department management was aware that the SOPs needed to be revised and updated.

Incomplete Backflow Preventer Permit applications were submitted by applicants requesting Backflow Permits.

Audit staff reviewed 32 Backflow Preventer Permit applications. Several Backflow Preventer Permit applications were submitted with missing information for processing. Eight of the 32 applications were not signed by applicants. Unsigned applications can expose the City to potential financial risk. In addition, in several instances the contractor information section was incomplete. In instances where information was missing, CCC staff either contacted the applicant or searched existing records in the LDO System to obtain the missing information.

AUDIT RESULTS

Missing information on applications increases the time it takes CCC staff to issue permits. The current SOPs do not address the process to deal with incomplete application submittals; and SOPs should provide guidance in this area. The supervisor is aware of this issue.

Objective 2: To determine if adequate controls existed over compliance with the annual testing requirements

Audit Services staff analyzed the compliance rate of the annual testing requirements in order to gauge the effectiveness of the monitoring of the annual testing requirement by the CCC staff.

The Audit Services staff analyzed the compliance rate with the annual testing requirement for commercial customers, residential customers voluntarily participating in the Opt-In Program and residential customers not participating in the Opt-In Program. Audit staff used data maintained in the Access database by CCC staff to determine compliance. As of September 10, 2015 the following were the compliance results by type of account:

- 82% of commercial customers were in compliance with the annual testing requirement;
- 71 % of residential customers participating in the Opt-In program were in compliance with the annual testing requirement; and
- 97% of the residential customers not participating in the Opt-In Program were in compliance with the annual testing requirement.

The CCC staff does not enforce non-compliance by commercial customers with the annual testing requirements as allowed by the Ordinance.

AUDIT RESULTS

CCC staff hand deliver notice of violation letters to commercial customers that are not in compliance with the annual testing requirement. Additional follow-up procedures are also performed by the CCC staff. However, remedies available to enforce compliance per the Ordinance are not applied by the CCC staff. According to the City Ordinance the following remedies can be applied for non-compliance:

- 1) The Department may discontinue water service to any structure or parcel for a violation of the Ordinance. Prior to discontinuing water service, the Director of the Department of Water Management should ensure written notice is given to the customer as shown on the review billing roll and to the owner, occupant, or other person in apparent control of the structure or parcel. The Director is not required to provide written notice prior to discontinuing irrigation water service;
- 2) The City may inspect and test any backflow preventer where an approved inspection or testing has not been performed as required under the Ordinance, written notice has been given to the user, the user has not provided the approved inspection or testing within the deadline provided in the notice. The City's fee for City inspection and testing, plus an administrative fee set by the City Council, may be added to the user's utility bill;
- 3) The City may also apply a civil penalty for non-compliance. The civil penalty for a non-willful violation shall not exceed \$250.00 per day for each day of violation, or a cumulative penalty of \$5,000. The civil penalty for a willful violation shall not exceed \$500.00 per day for each day of a violation, or a cumulative penalty of \$10,000.

The SOPs do not address how to effectively deal with non-compliance with the annual testing requirements. This lack of procedural guidance potentially places the City at risk as a result of possible contamination of supply lines from cross-connections.

AUDIT RESULTS

The mandatory Opt-In Program for non-compliance by residential customers who did not voluntarily participate in the Opt-In Program is not being administered as intended.

The compliance rate of residential customers who have not voluntarily participated in the Opt-In Program is adequate. For residential customers that do not comply, the Department management has decided to enforce mandatory participation in the Opt-In Program. The customers that are mandatorily opted in will be charged an administrative fee in addition to the testing fee. The CCC staff had not mandatorily opted in customers that were non-compliant by completion of audit field work. There was no documented evidence that the CCC staff had enforced mandatory opt-in of customers that were non-compliant. Lack of sanction enforcement places the City at risk of contamination of supply lines from cross-connections.

Adequate controls do not exist to ensure that residential customers voluntarily participating in the Opt-In Program are in compliance with the annual testing requirement.

When a residential customer voluntarily participates in the Opt-In Program, the City assumes the responsibility to ensure that their backflows are tested annually. The City has entered into contracts with Brown Brothers Plumbing and Heating, Inc. and ACME Services to perform the testing on backflows for these customers. The CCC staff did not consistently follow through with these contractors to ensure testing was done on a timely basis. A process should exist to ensure the contractors test all backflows that require testing. Non-compliance with the annual testing requirement in the Opt-In Program presents a risk to the City, such that the City will be liable if the water is contaminated as a result of not fulfilling the annual test of a customer's backflow. CCC staff stated that the contractors may not have the capacity to test all the backflows delegated to them. Audit staff did not examine the validity of this statement. However, documentation did not exist that indicated CCC staff had evaluated the contractor's ability to complete their work.

AUDIT RESULTS

Data maintained by the CCC staff in the Access database which should capture all backflows requiring annual testing did not appear to be complete.

Audit Services staff selected a sample of inspections performed from the LDO System and verified if the backflow information was entered into the Access database. The Access database is a repository of all backflows that are required to be tested annually. Once an inspection is performed by the CCC staff, they have to manually enter the backflow information into the Access database. Backflows not added to the Access database will not be tested annually as required. Audit staff could not verify backflow information in the Access database for 8 out of 35 inspections performed per the LDO System. Without a complete database of all backflows that require annual testing, CCC staff cannot effectively carry out its responsibility of ensuring that all users or permit holders have permitted backflow preventers inspected and tested annually as required by Ordinance.

The Access database is also used to monitor compliance with the annual testing requirement for all the backflows captured in the database. The CCC staff manually enter the results of the Backflow Prevention Assembly Test and Maintenance forms into the Access database. A significant amount of upkeep is required to maintain the database. Department management is in the initial stages of implementing a new system that will make the process less labor intensive. Unless this new system communicates with the LDO System, the risk of incomplete backflow data can still exist. A reconciliation process between the LDO System and the new system should be performed by CCC staff to mitigate this risk.

Objective 3: To determine if adequate controls existed over the collection of Backflow Preventer Permit Fees and Tester Certification/Recertification Fees

Controls over the collection of permit fees can be strengthened. The CCC staff receives back flow permit payments via mail. Lack of adequate controls can increase the risk of cash receipts being misappropriated without detection. A lack of segregation of duties existed.

AUDIT RESULTS

The Administrative Analyst position collected checks, processed applications in the LDO System, sent the deposit to Central Cashiering for processing and reconciled the processed Statement of Accounts to ensure all checks received were deposited. The Administrative Analyst also entered the fees received in the LDO System. Lack of segregation of duties can foster an environment that provides opportunity for fraud. Proper segregation of duties aids in mitigating the risk of fraud. In smaller operations, it may not be feasible to entirely segregate all of the cash-related duties. In these circumstances, the Department may rely on increased monitoring as a compensating control to mitigate the risk for misappropriation of cash. Management does not reconcile revenue per the LDO System to revenue reported in the general ledger to ensure all receipts collected were deposited. SOPs did not incorporate this control. Adequate management oversight did not exist to mitigate risk created as a result of this lack of segregation of duties.

Audit staff reconciled the LDO System revenues to the revenues reported in the MUNIS System. A discrepancy of approximately \$14,493 (16% of revenue reported in the LDO System) existed. Part of this discrepancy could be the result of a timing delay in reporting the revenues in the MUNIS System. Audit staff found that some of the discrepancy was related to a billing issue. Department of Technology Solutions staff are investigating the cause and magnitude of the billing issue.

Objective 4: To determine if adequate controls existed over the administration of the Tester Certification Training Program

Audit staff selected 35 Test and Maintenance forms and verified if the backflows were tested by certified testers per the City of Durham Tester Certification Program. One exception was noted. Documentation did not exist to support that the tester had received recertification training. In addition, the following supporting documentation to validate training received by testers was not maintained on a consistent basis:

- Signed class rosters to document attendance of participants; and

AUDIT RESULTS

- Test results demonstrating that the participants had successfully completed the class. A Testers Checklist form used by the Department staff to capture applicant information has a section to capture test results. However, this was not filled out consistently.

Adequate documentation should be maintained to ensure the Tester Certification Program is working and controls are functioning as intended. Audit staff identified a best practice used by the American Backflow Prevention Association as it relates to maintaining test scores. A score sheet was used to capture the written examination location, date and time, results of all attendees, and signature of the examination monitor responsible for administering all examinations. Inadequate documentation would impede the City from demonstrating that a certified tester did successfully complete the training program as required, should questions arise about a tester's performance.

Conclusion:

The Cross-Connection Control (CCC) Group is efficient at performing backflow inspections, issuing backflow preventer permits and approving building plans that need review as a result of cross connections. Controls can be strengthened as it pertains to monitoring compliance with the annual testing requirement for backflows. The CCC staff does not enforce non-compliance by commercial customers with the annual testing requirements as allowed by the Ordinance. Also, CCC staff are not mandatorily opting in non-compliant residential customers into the Opt-In Program. Adequate controls also did not exist to ensure that annual testing is performed for residential customers voluntarily participating in the Opt-In Program.

The CCC Group had draft written procedures; however, they were not adequate and did not address all the activities carried out by the CCC Group. SOPs help create consistency over process performance and provide a method to communicate process changes to employees. At the time of field work, Department management was aware that the SOPs needed to be revised and updated.

RECOMMENDATIONS

Recommendation 1

Department of Water Management staff should either establish or revise their written standard operating procedures. The procedures should:

- Outline procedures for all processes administered by the CCC staff;
- Establish a specific plan to address non-compliance with the annual testing requirement. The plan should contain steps beyond the notice of violation letters, to ensure all reasonable efforts are utilized to ensure compliance with the testing requirement. Department management should determine whether or not to apply the various remedies available per Ordinance for non-compliance and document their decision;
- Clearly define documentation (signed class roster and test results) that should be retained for the Certified Testing Program; and
- Clearly outline the responsibilities of all CCC staff.

Recommendation 2

Department of Water Management staff should reconcile Backflow Preventer Permit revenues per the MUNIS System to revenues per the LDO System at least annually.

Recommendation 3

Department of Water Management staff should strengthen monitoring of the residential Opt-In Program. A follow-up procedure should be established to ensure that all backflows submitted to the contractor are tested within a reasonable time period. In addition, staff should monitor accounts that are not in compliance, and ensure that they follow-up with the contractors regarding those accounts. The performance of the contractors should be evaluated on an annual basis to ensure they have the capacity to perform the work assigned to them.

RECOMMENDATIONS

Recommendation 4

Department of Water Management staff should continue their efforts to implement a new system that can facilitate the process of managing the annual testing requirement for backflows. A reconciliation process should be established to ensure all inspections performed are captured into the new system.

Recommendation 5

Department of Water Management staff should ensure adequate record keeping is maintained as it relates to the Certified Training Program. At a minimum, signed roster sheets and a score sheet that captures the written examination location, date and time, results of all attendees and signature of the examination monitor responsible for administering all examinations should be maintained.

MANAGEMENT'S RESPONSE



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MEMO

Date: October 20, 2015
To: Dr. Germaine F. Brewington, Director of Audit Services
From: Donald F. Greeley, Director Department of Water Management
Subject: Management's Response - Cross Connection Control Performance Audit (October 2015)

The following is the management's response to the Cross Connection Control Performance Audit dated October 2015.

Recommendation 1:

Department of Water Management staff should either establish or revise their written standard operating procedures. The procedures should:

- Outline procedures for all processes administered by the CCC staff;
- Establish a specific plan to address non-compliance with the annual testing requirement. The plan should contain steps beyond the notice of violation letters, to ensure all reasonable efforts are utilized to ensure compliance with the testing requirement. Department management should determine whether or not to apply the various remedies available per Ordinance for non-compliance and document their decision;
- Clearly define documentation (signed class roster and test results) that should be retained for the Certified Testing Program; and
- Clearly outline the responsibilities of all CCC staff.

Management's Response:

We concur. Management is in full agreement with the recommendation. The Cross Connection Control (CCC) Supervisor and Utility Engineering (UE) Supervisor will develop the SOPs mentioned below.

Implementation Dates:

Issuance of Cross Connection Control Permits – draft submitted to director October 8, 2015.

First Notices and Notices of Violation (Residential and Commercial) – draft by December 31, 2015; finalize to include Proposed Actions for Non-Compliance by July 1, 2016.



Cross-Connection Control
Performance Audit
October 2015

Plan Review – by April 1, 2015

Inspections and Recordkeeping – Start after NexGen Asset Management software implementation anticipated May 2016. Complete by September 2016.

Certified Testing Class Recordkeeping – Interim SOP for Class Roster and Test Results by next certification class November 2015; then incorporate this SOP into a larger SOP for other Class processes by July 1, 2016.

Process workflows are being developed for individual job positions, and the implementation of NexGen software will also change current workflow. As workflow efficiencies become apparent, they will be incorporated into the following Performance Standards by July 1, 2016:

- CCC Inspectors
- Administrative Staff
- CCC Supervisor

Recommendation 2:

Department of Water Management staff should reconcile Backflow Preventer Permit revenues per the MUNIS System to revenues per the LDO System at least annually.

Management’s Response:

We concur. Management is in full agreement with the recommendation.

Effective November 2015, CCC Supervisor will receive monthly reports from Cashiering and confirm with Munis-reported revenue for each month. This has been coordinated with Finance Department (General Billing & Collections) and DWM’s Finance Manager.

Implementation date:

November 2015.

Recommendation 3:

Department of Water Management staff should strengthen monitoring of the residential Opt-In Program. A follow-up procedure should be established to ensure that all backflows submitted to the contractor are tested within a reasonable time period. In addition, staff should monitor accounts that are not in compliance, and ensure that they follow-up with the contractors regarding those accounts. The performance of the contractors should be evaluated on an annual basis to ensure they have the capacity to perform the work assigned to them.

Management’s Response:

We partially concur. Management is in agreement with a portion of the recommendation.

A Residential Opt-In Program SOP will be developed by the CCC and UE Supervisors. The SOP will include, but not be limited to, a template spreadsheet of customer information that CCC Admin submits to Opt-In contractors, and a procedure for cross-checking contractor invoices to said spreadsheet on a monthly basis.



Regarding evaluating contractor performance on an annual basis; due to the 60-day deadlines needed for contractor submittals and customer notifications, as well as near-monthly billings, contractor performance is evaluated as frequently as every 60 days during the irrigation season.

Implementation date:

By the next irrigation cycle starting March 2016

Recommendation 4:

Department of Water Management staff should continue their efforts to implement a new system that can facilitate the process of managing the annual testing requirement for backflows. A reconciliation process should be established to ensure all inspections performed are captured into the new system.

Management's Response:

We concur. Management is in full agreement with the recommendation.

The vendor contract is currently in the OnBase system and upon approval by City Council; the department anticipates issuing the Notice to Proceed (NTP) in November 2015. The vendor estimates that conversion of data will be completed in the first quarter of 2016, and full implementation by May 2016.

Implementation date:

May 2016.

Recommendation 5:

Department of Water Management staff should ensure adequate record keeping is maintained as it relates to the Certified Training Program. At a minimum, signed roster sheets and a score sheet that captures the written examination location, date and time, results of all attendees and signature of the examination monitor responsible for administering all examinations should be maintained.

Management's Response:

We concur. Management is in full agreement with the recommendation.

The above recommendation will be fully implemented with the next scheduled Certified Tester Training school. Additionally, staff will develop an SOP titled Certified Testing Class Recordkeeping, mentioned in Recommendation 1.

Implementation date:

November 2015. SOP for all Certified Tester Class processes by July 1, 2016.

