



An Audit Report on

Selected Contracts at the Commission on Environmental Quality

March 2017
Report No. 17-029



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Overall Conclusion

The Commission on Environmental Quality (Commission) monitored contractor performance and enforced contract terms for the contracts audited (see text box for information about those contracts). The Commission also performed required contract planning activities to identify the contract objectives for the contracts audited.

While the Commission procured the contracts audited as required, it did not ensure that all personnel involved in contract evaluation and procurement signed conflict of interest and non-disclosure statements within the required time frames. The Commission also should improve its contracting processes by developing procedures to assess fraud, waste, or abuse and, if applicable, to report liquidated damages.

Auditors communicated other, less significant issues to the Commission separately in writing.

Table 1 on the next page presents a summary of the findings in this report and the related issue rating. (See Appendix 2 for more information about the issue rating classifications and descriptions.)

Contracts Audited

- The Commission issued one solicitation to assess, investigate, and provide remediation services for state Superfund sites from September 1, 2013, through August 31, 2017. The Commission awarded Superfund contracts to seven contractors. Auditors reviewed the **Commission's planning and** selection of the seven contractors. Auditors selected the Superfund contract with URS Corporation totaling \$15.0 million to review the **Commission's processes to** procure, form, and monitor the contract. AECOM Technical Services, Inc. acquired URS Corporation in 2014, and the Commission amended its contract to reflect the change in ownership.
- The selected waste removal contract with Philotechnics Ltd. was for the clean-up of waste from a former uranium mine in Three Rivers, Texas totaling \$2.3 million effective April 27, 2016, through November 30, 2016. The waste removal contract is subject to legislation passed during the 84th Legislature, Regular Session, which provided additional requirements for state contracting effective September 1, 2015.

Sources: The Commission and the Legislative Budget Board Contracts Database.

Table 1

Summary of Chapters and Related Issue Ratings		
Chapter	Title	Issue Rating ^a
1	The Commission Effectively Monitored and Enforced the Terms of the Audited Contracts	Low
2	While the Commission Appropriately Planned and Formed Both Contracts Audited, It Should Improve Its Processes Related to Conflicts of Interest and Non-disclosure Forms	Medium

^a A chapter is rated Priority if the issues identified present risks or effects that if not addressed could critically affect the audited entity's ability to effectively administer the program(s)/function(s) audited. Immediate action is required to address the noted concern and reduce risks to the audited entity.

A chapter is rated High if the issues identified present risks or effects that if not addressed could substantially affect the audited entity's ability to effectively administer the program(s)/function(s) audited. Prompt action is essential to address the noted concern and reduce risks to the audited entity.

A chapter is rated Medium if the issues identified present risks or effects that if not addressed could moderately affect the audited entity's ability to effectively administer program(s)/function(s) audited. Action is needed to address the noted concern and reduce risks to a more desirable level.

A chapter is rated Low if the audit identified strengths that support the audited entity's ability to administer the program(s)/function(s) audited or the issues identified do not present significant risks or effects that would negatively affect the audited entity's ability to effectively administer the program(s)/function(s) audited.

Summary of Management's Response

At the end of one chapter in this report, auditors made recommendations to address the issues identified during this audit. The Commission agreed with the findings and recommendations in this report.

Audit Objective and Scope

The objective of this audit was to determine whether the Commission has administered certain contract management functions for selected contracts in accordance with applicable requirements.

The scope of this audit covered the Commission's contracting process—contract planning, contract procurement, contract formation, and contract oversight—related to the following contracts:

- The contract for Superfund-related services with URS Corporation/AECOM Technical Services, Inc., which was effective September 2013.
- The contract for waste removal services with Philotechnics Ltd., which was effective April 2016.

In addition, auditors reviewed the Commission's contract planning and the selection of the contractors for the other six contracts that resulted from the solicitation for Superfund-related services.

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The Commission Effectively Monitored and Enforced the Terms of the Audited Contracts

Chapter 1
Rating:
Low ¹

The Commission on Environmental Quality (Commission) effectively monitored the selected Superfund contract with URS Corporation/AECOM Technical Services, Inc.² and the waste removal contract with Philotechnics, Ltd. to help ensure that the contractors were performing the work required by the contracts and work orders (see text box for information on work orders for the Superfund contract). The Commission also ensured that it paid for the item amounts and quantities approved and authorized by the contracts and work orders.

Superfund Contract Work Orders

A Superfund site includes facilities that may constitute an imminent and substantial endangerment to public health and safety or the environment due to a release or threatened release of hazardous substances. A Superfund contract can cover multiple Superfund sites. The Commission coordinates with Superfund contractors to develop work orders that outline the scope of work and deliverables for each site. The work orders are part of the contract. The Commission pays invoices for each work order once the contractor completes the deliverables or as scheduled.

To test the selected Superfund contract, auditors selected a sample of work orders based on dollar amounts and the types of work (for example, remedial investigation, removal action, operation and maintenance, feasibility study, and remedial design). Auditors tested each invoice for the selected work orders.

Source: The Commission.

For the contracts audited, the Commission required contractors to submit a preauthorization form before they submitted invoices (see Appendix 3 for examples of the preauthorization forms for each contract). Reviewing the documentation that contractors submit with the pre-authorization form allowed Commission staff to verify that the contractors completed the required tasks.

The Commission had an adequate payment review process, which included appropriate segregation of duties to approve invoice payments and monitor subcontractor payments. The Commission made payments to contractors in a timely manner, and it ensured that total payments did not exceed the contract or work order amounts. As of August 31, 2016, the Commission had expended \$7,456,348 for the selected Superfund contract with URS Corporation/AECOM Technical Services, Inc., and as of October 31, 2016, it had expended \$1,401,453 for the waste removal contract.

Superfund Contract Payments

For the selected Superfund contract with URS Corporation/AECOM Technical Services, Inc., auditors reviewed 11 of 71 work orders, which included 51 invoices that totaled \$4,133,058. Those 11 work orders represented 55

¹ The risk related to the issues discussed in Chapter 1 is rated as Low because the audit identified strengths that support the audited entity's ability to administer the program(s)/function(s) audited or the issues identified do not present significant risks or effects that would negatively affect the audited entity's ability to effectively administer the program(s)/function(s) audited.

² The Commission issued one solicitation for Superfund-related services and awarded contracts to seven contractors. Auditors reviewed the planning and selection of contractors for those seven contracts (see Chapter 2 for more information on the Commission's planning and selection of contractors for the Superfund-related contracts). Auditors selected the Commission's contract with URS Corporation/AECOM Technical Services, Inc. for additional testing of the Commission's procurement, formation, and monitoring processes.

percent of the total amount the Commission had paid for the selected Superfund contract as of August 31, 2016. The supporting documentation for those 11 work orders showed that the Commission actively monitored the contractor's performance during the contract. That documentation included reports with detailed lab analysis, pictures of remediation efforts on selected Superfund sites, and waste disposal manifests that certified the contractor disposed of hazardous materials appropriately.

Waste Removal Contract Payments

For the waste removal contract, auditors reviewed both payments the Commission had made as of October 31, 2016, which totaled \$1,401,453. The Commission conducted three site visits to monitor the removal process, including sending a subject matter expert into the field. The Commission also reviewed weekly progress reports from the contractor that showed the percentage of work completed, percentage of budget remaining, percentage of time remaining, and the contractor's plans to address any issues it identified related to removing waste from the site. (See Appendix 3 for an example of the document the Commission used to document its site visits.)

While the Commission Appropriately Planned and Formed Both Contracts Audited, It Should Improve Its Processes Related to Conflicts of Interest and Non-Disclosure Forms

Chapter 2
Rating:
Medium ³

The Commission generally planned and formed the waste removal contract and the Superfund-related contracts in accordance with applicable statutes, rules, and its policies and procedures. However, the Commission should improve its process related to conflicts of interest and non-disclosure forms and develop procedures for assessing fraud, waste, or abuse and for reporting liquidated damages assessed or collected, when applicable.

For the waste removal contract and the Superfund-related contracts, the Commission documented the planning process, including a cost estimate and risk assessment; it also selected the appropriate procurement method.

The Commission also evaluated the responses to the solicitations for the contracts audited, as required. Specifically, the Commission ensured that the final evaluation criteria it used to score the proposals were consistent with the criteria identified in the solicitations. In addition, the Commission scored all proposal evaluations correctly, and the Commission selected the appropriate contractors based on its evaluation criteria for the waste removal contract and the seven Superfund-related contracts.⁴

In addition, the Commission received a completed and notarized certificate of interested parties form from the waste removal contractor, and it filed the form with the Texas Ethics Commission within 30 days, as required by Texas Government Code, Section 2252.908, and Title 1, Texas Administrative Code, Chapter 46.⁵

The Commission did not document procedures to assess the risk of fraud, waste, or abuse or to report liquidated damages.

The Commission developed an internal *Contract Management Handbook*, which contained most items required by statute; however, the Commission should improve its *Contract Management Handbook* by developing and implementing procedures to assess the risk of fraud, waste, or abuse in its contract process, as required by the Texas Government Code, Section

³ The risks related to the issues discussed in Chapter 2 are rated as Medium because they present risks or results that if not addressed could moderately affect the audited entity's ability to effectively administer program(s)/function(s) audited.

⁴ The Commission issued one solicitation for Superfund-related services and awarded contracts to seven contractors. Auditors reviewed the planning and the selection of contractors for those seven contracts. Auditors selected the Commission's contract with URS Corporation/AECOM Technical Services, Inc. for additional testing of the Commission's procurement, formation, and monitoring processes.

⁵ This requirement was effective for contracts entered into after December 31, 2015. The selected Superfund contract is not subject to this requirement because it was executed prior to December 31, 2015.

Conflicts of Interest
and Non-disclosure Forms

The *State of Texas Contract Management Guide* outlines two forms that state entity management and employees involved in a contract procurement should complete:

- Conflict of Interest - Texas Government Code, Section 2262.004, requires purchasing personnel to disclose and identify any personal or financial relationships with any party associated with a contract award prior to the award of that contract. The form is titled *Disclosure Statement for Purchasing Personnel* in the *State of Texas Contract Management Guide*.
- Non-disclosure - A statement intended for an individual to certify that there are no conflicts of interest that may impair or influence his or her judgment. In addition, the individual agrees to maintain the confidentiality of the information related to the procurement process. The statement should be completed by individuals who participate in the development and/or award of a request for proposals prior to accessing bid proposals. The form is titled *Non-Disclosure Statement* in the *State of Texas Contract Management Guide*.

Sources: *State of Texas Contract Management Guide*, versions 1.9 and 1.13.

2261.256. In addition, the Commission did not include procedures to report liquidated damages assessed or collected in its waste removal contract, as required by Texas Government Code, Section 2261.254 (for contracts that exceed \$1 million).

Developing and implementing procedures to assess the risk of fraud, waste, or abuse in its contract process and to report liquidated damages that it assesses or collects could help the Commission to improve controls over its contractor selection process and monitoring processes.

The Commission did not ensure that all employees involved in the procurement and evaluation process for the contracts audited completed conflict of interest or non-disclosure forms within the required time frames.

Auditors reviewed contractors' key personnel for the waste removal contract and the Superfund contract with URS Corporation/AECOM Technical Services, Inc. and did not identify conflicts of interests between the contractors and the Commission. However, not all of the employees completed the conflict of interest and non-disclosure forms within the time frames required by the Texas Government Code, Section 2262.004, and the *State of Texas Contract Management Guide* (see text box for more information about conflicts of interest and non-disclosure forms).

For the selected Superfund contract with URS Corporation/AECOM Technical Services, Inc., 21 (81 percent) of 26 employees involved in the procurement and evaluation process did not sign the Commission's non-disclosure form until after the bid evaluation date. In addition, 1 (4 percent) of 26 employees did not complete the required conflict of interest form. That employee transferred to a different division during the procurement phase of the contract; however, the Commission was responsible for ensuring that each employee involved in procuring the contract completed the required forms.

For the waste removal contract audited, 9 (90 percent) of 10 employees involved in the procurement and evaluation process signed the Commission's non-disclosure form within the required time frame. However, one employee did not complete the form until after Commission employees began evaluating the contract proposals. In addition, 7 (70 percent) of the 10 employees did not sign conflict of interest forms until after the contract award date.

The conflict of interest and non-disclosure forms protect state entities by identifying and disclosing possible conflicts related to contracted goods and services and helping to ensure that staff involved in contract procurement do not disclose pertinent procurement information to outside entities.

The Commission generally included all essential contract terms in the contracts audited.

The Commission included all clauses that the *State of Texas Contract Management Guide* lists as an essential contract term in its waste removal contract. However, the Commission did not include an antitrust clause—which the *State of Texas Contract Management Guide* lists as an essential contract term—in the selected Superfund contract with URS Corporation/AECOM Technical Services, Inc. The antitrust clause language was included in the solicitation for the Superfund contract; however, the Commission did not formally incorporate the solicitation into the contract. The Commission included the antitrust clause language as part of the affirmation clause in the solicitation for the waste removal contract, and it incorporated that solicitation into its contract.

The Commission should ensure that appropriate management sign contracts that exceed \$1 million.

The Commission ensured that the appropriate personnel approved and signed the selected Superfund contract. For the waste removal contract, the Commission's executive director delegated his authority to sign the contract to the deputy executive director.

Texas Water Code, Section 5.222, permits the executive director to delegate his or her authority and duties to staff, unless the statute allowing the delegation specifies otherwise. Texas Government Code, Section 2261.254, states that contracts that exceed \$1 million must be approved by an agency's governing body, which can delegate that authority to the executive director. In accordance with its processes, the members of the Texas Commission on Environmental Quality delegated the authority to sign the contract to the Commission's executive director, who then delegated the authority to sign the contract to the deputy executive director.

Recommendations

The Commission should:

- Develop and implement a procedure to assess the risk of fraud, waste, or abuse in its contract processes.

- Include in contracts that exceed \$1 million procedures to report liquidated damages assessed or collected.
- Develop and implement a procedure that ensures that all employees involved in the procurement and evaluation of the contract complete conflict of interest and non-disclosure forms within the required time frames.
- Ensure that all essential contract terms are included in its contracts.
- Ensure that appropriate management sign contracts that exceed \$1 million.

Management's Response

Develop and implement a procedure to assess the risk of fraud, waste, or abuse in its contract processes.

The Commission agrees with this recommendation. The Procurements and Contracts Section is currently revising the Risk Assessment Questionnaire and will begin revising TCEQ's Contract Management Handbook to more directly address the risks of fraud, waste, and abuse in our contracting process.

Responsible Party: Procurements and Contracts Section Manager

Target Date: August 31, 2017

Include in contracts greater than \$1 million procedures to report liquidated damages assessed or collected.

The Commission agrees with this recommendation. Although the Commission had established practices of reporting significant contracts to Executive Management, staff did not maintain a finalized written procedure. The Procurements and Contracts Section has updated the Enhanced Contract Monitoring Standard Operating Procedure (SOP) to document the current business practices and to fully address the reporting requirements of Texas Government Code Section 2261.254.

Responsible Party: Procurements and Contracts Section Manager

Target Date: Implemented

Develop and implement a procedure that ensures that all employees involved in the procurement and evaluation of the contract complete conflicts of interest and non-disclosure forms within the required time frames.

The Commission agrees with this recommendation. The TCEQ has updated our internal procedures to fully document and ensure that all employees involved in a procurement are briefed on the evaluation procedures and timely execute the non-disclosure form and the conflict of interest form as required.

Responsible Party: *Procurements and Contracts Section Manager*

Target Date: *Implemented*

Ensure that all essential contract terms are included in its contracts.

The Commission agrees with this recommendation. The Commission included the antitrust clause as part of the responder's certifications within the solicitation document, as required in Texas Government Code Section 2155.005. The TCEQ's normal business practice is to incorporate into the contract documents the awarded response. This was an oversight in one of the audited contracts. The TCEQ has updated procedures to ensure proper incorporation of all contract documents at award and included an additional antitrust provision to the general terms and conditions.

Responsible Party: *Procurements and Contracts Section Manager and Legal Staff*

Target Date: *Implemented*

Ensure that appropriate management sign contracts greater than \$1 million.

The Commission agrees with this recommendation and will continue to ensure that appropriate management approve and sign contracts greater than \$1 million.

Responsible Party: *Procurements and Contracts Section Manager*

Target Date: *Implemented*

Appendices

Appendix 1

Objective, Scope, and Methodology

Objective

The objective of this audit was to determine whether the Commission on Environmental Quality (Commission) has administered certain contract management functions for selected contracts in accordance with applicable requirements.

Scope

The scope of this audit covered the Commission's contracting process—contract planning, contract procurement, contract formation, and contract oversight—related to the following contracts:

- The contract for Superfund-related services with URS Corporation/AECOM Technical Services, Inc., which was effective September 2013.
- The contract for waste removal services with Philotechnics Ltd., which was effective April 2016.

In addition, auditors reviewed the Commission's planning and the selection of the contractors for the other six contracts that resulted from the solicitation for Superfund-related services.

Methodology

The audit methodology included collecting and reviewing procurement documentation; conducting interviews with Commission staff; reviewing statutes, rules, Office of the Comptroller of Public Accounts' (Comptroller's Office) requirements, and Commission policies and procedures; and performing selected tests and other procedures.

Data Reliability and Completeness

Auditors used expenditure information in the Commission's Budget, Accounting, and Monitoring System (BAMS) and compared that information to contract payments from the Uniform Statewide Accounting System (USAS). Auditors determined that BAMS payment data for both contracts audited was reliable for the purposes of this audit.

Sampling Methodology

To test contract work orders for the Superfund contract with URS Corporation/AECOM Technical Services, Inc., auditors stratified the expenditure population by work order and used professional judgement to select a non-statistical sample. The sample was not generally representative of the population and, therefore, it would not be appropriate to project those test results to the population.

Information collected and reviewed included the following:

- Commission solicitations and vendors' responses to those solicitations.
- Contract for Superfund-related services with URS Corporation/AECOM Technical Services, Inc.
- Contract for waste removal with Philotechnics Ltd.
- The Commission's planning and procurement files for the waste removal contract with Philotechnics Ltd., the Superfund-related services contract with URS Corporation/AECOM Technical Services, Inc., and the other six contracts that resulted from the solicitation for Superfund-related services.
- Commission proposal evaluation documentation, evaluation criteria, and scoring sheets.
- Commission policies and procedures.
- Commission personnel training and certification records.
- Commission conflict of interest forms and non-disclosure forms.
- Commission contract expenditure data from USAS and the Commission's internal accounting system, BAMS.
- Commission documentation related to payments to contractors, including invoices and Commission invoice approval documentation.
- Commission support for monitoring contractor performance, such as progress reports, site visit documentation, work orders, and other reports.

Procedures and tests conducted included the following:

- Interviewed Commission employees.
- Tested conflict of interest forms and non-disclosure forms.

- Reviewed contracts to determine whether the Commission included essential terms required and recommended by the *State of Texas Contract Management Guide*.
- Tested the Commission’s evaluation and scoring of contractor proposals.
- Tested oversight documentation for the waste removal contract, including site visit checklists, progress reports, and invoices.
- Tested a sample of work orders, various required reports and invoices for the Superfund contract with URS Corporation/AECOM Technical Services, Inc.

Criteria used included the following:

- Texas Government Code, Chapters 322, 2155, 2156, 2261, 2252, and 2262.
- Texas Water Code, Sections 5.222 and 5.229.
- Title 1, Administrative Code, Chapter 46.
- *State of Texas Contract Management Guide*, versions 1.9, 1.10, 1.12, 1.13, and 1.15.
- Commission policies and procedures.

Project Information

Audit fieldwork was conducted from September 2016 through February 2017. 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, 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.

The following members of the State Auditor’s staff performed the audit:

- Arby Gonzales, CPA, CFE (Project Manager)
- Kristyn Scoggins, CGAP (Assistant Project Manager)
- John Felchak
- Jennifer Fries, MS

- Jennifer Grant, MPA
- Armando S. Sanchez, MBA
- Michelle Ann Duncan Feller, CPA, CIA (Quality Control Reviewer)
- Audrey O’Neill, CIA, CFE, CGAP (Audit Manager)

Issue Rating Classifications and Descriptions

Auditors used professional judgement and rated the audit findings identified in this report. Those issue ratings are summarized in the report chapters/sub-chapters. The issue ratings were determined based on the degree of risk or effect of the findings in relation to the audit objective(s).

In determining the ratings of audit findings, auditors considered factors such as financial impact; potential failure to meet program/function objectives; noncompliance with state statute(s), rules, regulations, and other requirements or criteria; and the inadequacy of the design and/or operating effectiveness of internal controls. In addition, evidence of potential fraud, waste, or abuse; significant control environment issues; and little to no corrective action for issues previously identified could increase the ratings for audit findings. Auditors also identified and considered other factors when appropriate.

Table 2 provides a description of the issue ratings presented in this report.

Table 2

Summary of Issue Ratings	
Issue Rating	Description of Rating
Low	The audit identified strengths that support the audited entity's ability to administer the program(s)/functions(s) audited <u>or</u> the issues identified do not present significant risks or effects that would negatively affect the audited entity's ability to effectively administer the program(s)/function(s) audited.
Medium	Issues identified present risks or effects that if not addressed could <u>moderately affect</u> the audited entity's ability to effectively administer program(s)/function(s) audited. Action is needed to address the noted concern(s) and reduce risks to a more desirable level.
High	Issues identified present risks or effects that if not addressed could <u>substantially affect</u> the audited entity's ability to effectively administer the program(s)/function(s) audited. Prompt action is essential to address the noted concern(s) and reduce risks to the audited entity.
Priority	Issues identified present risks or effects that if not addressed could <u>critically affect</u> the audited entity's ability to effectively administer the program(s)/function(s) audited. Immediate action is required to address the noted concern(s) and reduce risks to the audited entity.

Examples of the Commission's Performance Monitoring Tools

Figure 1 shows an example of the pre-authorization form that the Commission on Environmental Quality (Commission) used for its Superfund-related contract with URS Corporation/AECOM Technical Services, Inc.

Figure 1

Example of Pre-authorization Form for the Superfund Contract

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Assessment, Investigation & Remediation Services
URS Corporation

Contract 552-14-40668
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EXHIBIT I

TCEQ PROJECT MANAGER INVOICE PRE-AUTHORIZATION FORM

Site: _____ Contractor/Contract #: _____

Invoice Period: month/day/year to month/day/year Work Order No: _____

Work Summary: _____

The approval of payment for the following pay items associated with the completed tasks as authorized in the Work Order are requested:

Task	Description	Project Numbers	Pay Item	Unit/Quantity Authorized in Work Order	Invoice Quantity
Task					

Additional Clarification: _____

Contractor Project Manager Approval: I certify that pay items requested are accurate and work associated with the pay items are completed. _____

TCEQ Project Manager Approval: _____

TCEQ Comments: Receipts to support the request for direct reimbursable items and time sheets for the requested labor hours must be submitted with the actual invoice. _____

Source: The Commission's contract with URS Corporation (Contract 582-14-40668).

Figure 2 shows an example of the pre-authorization form the Commission used for its waste removal contract with Philotechnics Ltd.

Figure 2

Example of Pre-authorization Form for the Waste Disposal Contract

TCEQ Contract 582-15-51296 Lamprecht/Zamzow Projects

Attachment A-1
TCEQ PROJECT MANAGER INVOICE PRE-AUTHORIZATION FORM

Site: _____ Contractor/Contract #: _____

Invoice Period: mm/dd/yy to mm/dd/yy Project Name: _____

Work Summary:

Task (If applicable)	Description of Work Completed	Name of Project	Name of Subcontractors and Description of the Work Performed Which is Being Invoiced	Unit/Quantity/Milestone/Percentage of Work Completed	Invoice Quantity

The approval of payment for the following pay items associated with the completed tasks as authorized in the Contract are requested:

Additional Clarification:

Contractor Project Manager Approval: I certified that the work or percentage of completed work which payment is requested is accurate and work associated with the requested payment is completed.

TCEQ Project Manager Approval:

TCEQ Comments: Receipts to support the request for direct reimbursable items and time sheets for the requested labor hours must be submitted with the actual invoice.

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Source: The Commission's contract with Philotechnics Ltd. (Contract 582-15-51296).

Figure 3 shows the site visit checklist template that the Commission used to help monitor its waste removal contract.

Figure 3

Site Visit Checklist Template for the Waste Disposal Contract																																							
<p>IEC Site Contract Monitoring Checklist Rev. 0</p> <p style="text-align: center;">IEC Site Contract Monitoring Site Visit Checklist</p> <p>TCEQ Personnel: _____ Date of Inspection: _____ _____ _____</p> <p>1. Check to make sure they have all the proper documents in hand</p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr style="background-color: #cccccc;"> <th style="padding: 5px;">Documents</th> <th style="padding: 5px;">Verified</th> </tr> </thead> <tbody> <tr><td style="padding: 5px;">Work Plan</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;">HASP</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;">QAPP</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;">Health Physics Procedures</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;">RWP</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;">Reciprocity</td><td style="padding: 5px;"></td></tr> </tbody> </table> <p style="margin-left: 40px;"><i>Comments:</i></p> <p>2. Get an account of site management present at each visit.</p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr style="background-color: #cccccc;"> <th style="padding: 5px;">Personnel</th> <th style="padding: 5px;">Title</th> <th style="padding: 5px;">Present</th> </tr> </thead> <tbody> <tr><td style="padding: 5px;"></td><td style="padding: 5px;">Program Manager</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;"></td><td style="padding: 5px;">Project Manager</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;"></td><td style="padding: 5px;">Site Supervisor/HP</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;"></td><td style="padding: 5px;">Shipping / HP</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;"></td><td style="padding: 5px;">Project Controls</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;"></td><td style="padding: 5px;">Operations/HP</td><td style="padding: 5px;"></td></tr> <tr><td style="padding: 5px;"></td><td style="padding: 5px;">Operations/HP</td><td style="padding: 5px;"></td></tr> </tbody> </table> <p style="margin-left: 40px;"><i>Comments:</i></p>		Documents	Verified	Work Plan		HASP		QAPP		Health Physics Procedures		RWP		Reciprocity		Personnel	Title	Present		Program Manager			Project Manager			Site Supervisor/HP			Shipping / HP			Project Controls			Operations/HP			Operations/HP	
Documents	Verified																																						
Work Plan																																							
HASP																																							
QAPP																																							
Health Physics Procedures																																							
RWP																																							
Reciprocity																																							
Personnel	Title	Present																																					
	Program Manager																																						
	Project Manager																																						
	Site Supervisor/HP																																						
	Shipping / HP																																						
	Project Controls																																						
	Operations/HP																																						
	Operations/HP																																						

3. Site Control

Feature	
Radiation Monitoring is utilized	
Dust Control	
Verify Site Access is restricted	
Respiratory Control Masks	
Hard Hats	
Steel Toe Boots	

Comments:

4. Observe pile excavation. Note the equipment used and steps taken. Verify procedure minimizes the spread of contamination.

Comments:

5. Current Progress

Piles Excavated	
Current Piles being excavated	
Piles Removed	
Volume of Waste Remaining	
Volume of Wasted Disposed	
Number of Shipments	

Comments: (Note the location of the stockpiles or previous stockpile locations)

IEC Site Contract Monitoring Checklist
Rev. 0

6. Observe waste packaging (equipment used, weighing process, volume determination)

Comments:

7. Verify site cleanliness (at the end of the contract work before final payment).

Comments:

8. “As Left” Conditions (Verify the same detector setup used for “As Found”.)

Comments:

9. Review waste manifest and make an account of waste disposed.

Comments:

10. "As Found" Conditions

"As found" surveys performed by:

Pile	Instrument/Probe	Serial Number	Calibration Date

IEC Site Contract Monitoring Checklist
Rev. 0

For our own internal report:

Check waste pile readings

Pile	Instrument/Probe	Cal. Date	Readings

Photograph:

- “as found” conditions
- “as left” conditions
- waste loading and shipments
- excavation in progress
- their surveying method and set-up
- Note any contract violations

Project Manager

Date

Source: The Commission.

Related State Auditor's Office Work

Related State Auditor's Office Work		
Number	Product Name	Release Date
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13-028	A Report on Analysis of Quality Assurance Team Projects	March 2013

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