

John A. Carey
Inspector General

**OFFICE OF INSPECTOR GENERAL
PALM BEACH COUNTY**



Inspector General
Accredited

“Enhancing Public Trust in Government”

Contract Oversight Notification

2016-N-0001

Palm Beach County COU 2014-N-0003 Corrective Action Review

December 17, 2015



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OFFICE OF INSPECTOR GENERAL PALM BEACH COUNTY

CONTRACT OVERSIGHT NOTIFICATION (2016-N-0001) (CA-2015-0075)

ISSUE DATE: DECEMBER 17, 2015



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Palm Beach County COU 2014-N-0003 Corrective Action Review

SUMMARY

What We Did

On February 13, 2014, the Office of the Inspector General (OIG) issued a Contract Oversight Notification 2014-N-0003 recommending the Palm Beach County Water Utilities Department (WUD) ensure that staff attending the weekly Palm Beach County (County) Contract Review Committee meetings has sufficient knowledge concerning the project/contract paperwork submitted for approval.

We reviewed the official Contract Review Committee meeting minutes for the period from February 11, 2015 to August 12, 2015 to evaluate the effectiveness of the corrective action implemented by WUD in their response to our previous notification.

What We Found

We found that the Contract Review Committee deferred eight (8) WUD items totaling **\$522,432.14** that did not meet the Local Government Prompt Payment Act requirements. We also found that the Contract Review Committee deferred three (3) WUD work authorizations resulting in potential project delays.

We found that WUD submits items to the Contract Review Committee for approval with a comparatively higher rate of

deferrals¹ when compared to the other submitting departments within the County.

What We Recommend

We recommend that WUD implement formal written guidelines to address Contract Review Committee submittal requirements and better prepare WUD staff regarding item submissions to reduce the number of deferred items.

¹ A deferral means the submitted backup paperwork for the item is either incomplete or needs corrections and should be resubmitted when ready.

BACKGROUND

Contract Oversight Notification (CON) 2014-N-0003

On February 13, 2014, the Office of Inspector General (OIG) issued a CON 2014-N-0003, which contained the following finding:

“The Water Utilities Department’s lack of preparedness for November 13, 2013, Contract Review Committee meeting resulted in a delayed \$21,019.96 vendor payment.”

The CON recommended, *“WUD should ensure that staff attending the weekly Contract Review Committee meetings has sufficient knowledge concerning the project/contract paperwork submitted for approval; thereby increasing the efficiency and effectiveness of the Contract Review Committee and avoiding unnecessary delays.”*

The management response from the WUD acknowledged the recommendation and stated, *“The Department will work diligently to ensure that future paperwork errors are kept to a minimum. ...The Department will also work to make sure that the staff most knowledgeable about an item attends the CRC meetings to answer questions. ...But in order to reduce future issues the Director of Engineering has been assigned to attend the CRC meetings when possible.”*

Contract Review Committee

The County created the Contract Review Committee per Resolution R89-663 to review and approve/reject specific additional services against annual Professional Services Agreements or contracts; and change order and construction change directive requests against construction contracts from Lead and User departments.

The purpose of the Contract Review Committee is to ensure change order and consultant service authorizations for Construction, Engineering, and Architectural Contracts are consistent with uniform application and prior Board policy, approval authority limits, and procedures. The Contract Review Committee is charged to review and approve the final acceptance and final payment of all existing construction contracts and ensure the entity complies with all the construction contract requirements as developed by the County’s Contract Development and Control Division.

The approval of routine change order and consultant services authorizations (task orders) is delegated to the County’s Contract Review Committee and Lead Department Heads within described authority limits, and applies to:

1. All Board of County Commissioners executed construction contracts.
2. Board of County Commissioners executed contracts with architects, engineers (including testing labs), land surveyors, and landscape architects, which are entered into in compliance with F. S. §287.055.

3. This Policy is intended to apply to a majority of routine contract situations; which can be efficiently handled by County staff but shall not limit the ability of the Board of County Commissioners or County Administrator to implement project specific policies for present or future major County projects.

The following Palm Beach County Lead Departments are required, per Policy and Procedure Memorandum (PPM) CW-F-050, to submit items to the Contract Review Committee for review and approval:

- Airports
- Engineering and Public Works
- Environmental Resources Management
- Facilities Development and Operations
- Water Utilities
- Parks and Recreation²

FINDINGS

FINDING (1):

The Contract Review Committee deferred the approval of eight (8) requests for final payment which did not comply with the Local Government Prompt Payment Act (F.S. §218.70).

OIG Review

The OIG regularly attends the meetings of the Contract Review Committee to observe the review of submissions by Contract Review Committee.

While attending the August 12, 2015 meeting, the OIG noted that the Contract Review Committee deferred two (2) of the six (6) items submitted for the meeting. Both of the deferred items were WUD submissions.

As result of these deferred items and as a follow-up to our previous report, the OIG decided to analyze the Contract Review Committee submissions and deferrals over the six-month period of February 11, 2015 to August 12, 2015. The purpose of this review was to evaluate the effectiveness of the Corrective Action Plan implemented by WUD in response to our previous Contract Oversight Notification and to analyze the frequency of deferred items by all the Lead Departments.

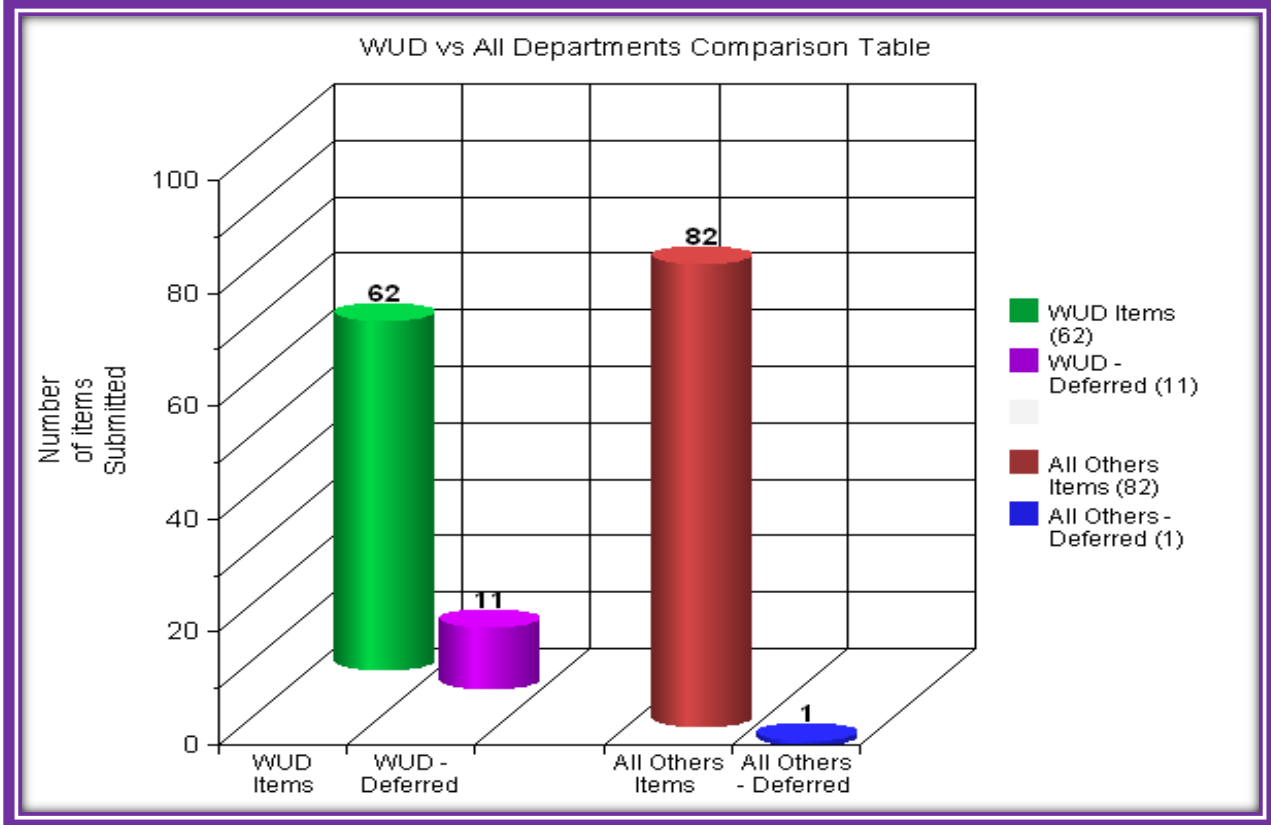
During the six-month review period the County departments submitted one hundred forty-six (146) items totaling **\$9,806,331.41** to the Contract Review Committee for review and approval (see table below). Of the total one hundred forty-six (146)

² Parks and Recreation is not considered a lead department per PPM CW-F-050; however, due to the nature and volume of their construction related projects they submit items directly to the Contract Review Committee.

submissions, eleven (11) items totaling **\$746,348.93** required corrections; two (2) of which were given conditional approvals based upon the department correcting the errors; all the items that required corrections were WUD submissions.

Of the eleven (11) deferred WUD items, eight (8) were final payment requests, and three (3) were work authorization requests, all of which will be discussed in Finding (2).

Department	Items Submitted	Items Deferred
WUD	62	11
All Others	84	1
Total	146	12



WUD submitted 62 items totaling **\$3,117,661.49** that represent 42% of the total items reviewed by the Contract Review Committee during the review period, and accounted for 92% of the items that required corrections. WUD had 18% of their submissions deferred.

The standard construction contract used by County departments includes a clause that states that the County will pay the contractor in accordance with F.S. §218.70³, which

³ Standard contract language per Director of Palm Beach County - Contract Development and Control and verified by COU in a random sample of contracts.

requires payments are received by the contractor within twenty (20) business days from the received stamp date of the contractor's invoice and provides for payment of interest for payments beyond the requirements of F.S. §218.70. The final payments deferred by the Contract Review Committee reduce the number of days to timely process a payment request.

The Department did not pay the contractors (Attachment A) for any of the eight (8) payment requests within the twenty (20) business days as required by F.S. §218.70; therefore, the total amount of the invoices was **\$522,432.14**. Approval for these payments ranged from twenty-three (23) days to two hundred one (201) days. The payment taking two hundred one (201) days was the result of a contract dispute that ended in a settlement agreement that was beyond the department's responsibility.

F.S. §218.75 provide for payment of interest at a 1% a month rate for those payments exceeding the 20-day requirement and F.S. §218.76 (2) defines the procedures and sets the deadlines as follows:

"FS 218.76 (2) (a) If a dispute arises between a vendor and a local governmental entity concerning payment of a payment request or invoice, the dispute shall be finally determined by the local governmental entity pursuant to a dispute resolution procedure established by the local governmental entity. Such procedure must provide that proceedings to resolve the dispute are commenced within 45 days after the date the payment request or proper invoice was received by the local governmental entity and concluded by final decision of the local governmental entity within 60 days after the date the payment request or proper invoice was received by the local governmental entity. Such procedures are not subject to chapter 120 and do not constitute an administrative proceeding that prohibits a court from deciding de novo any action arising out of the dispute. If the dispute is resolved in favor of the local governmental entity, interest charges begin to accrue 15 days after the local governmental entity's final decision. If the dispute is resolved in favor of the vendor, interest begins to accrue as of the original date the payment became due."

According to WUD representatives, none of the eight final payments in this review period submitted a claim for interest payment. However, WUD was at risk of having to pay additional charges for late payments.

FINDING (2):

Palm Beach County Water Utilities Department submits items such as final payments, changes orders, and work authorizations with a comparatively high rate of deferred items by the Contract Review Committee. Deferrals add time to the Committee's approval process and delay the start or completion of projects.

OIG Review

Of the eleven (11) deferred WUD items, eight (8) were final payments to contractors and three (3) were Work Authorizations. Work Authorizations are the request for a particular task under a Board of County Commissioners approved annual contract. The result of a deferred work authorization is a delay in the start of the project.

A work authorization deferred by the Contract Review Committee affects the overall project schedule by adding days to the project start date. These delays may be compounded by other factors such as weather conditions, urgent repairs and water quality fixes thereby further delaying the project.

WUD has maintained a Check List Construction Final Payment / Final Contract Summary since 1999. The OIG reviewed the current version of the checklist dated June 25, 2015, that includes such items as original contract amount, change orders amount if any, assessed liquidated damages, and Small Business Enterprise (SBE) / Minority Business Enterprise (MBE) participation. Further, in January 2015, WUD developed and implemented a payment tracking system. This system tracks steps in the payment including approved amount, date of the payment request, and payment date. While the checklist and payment tracking systems are intended to reduce the number of Contract Review Committee deferrals, no formal written guidelines exist regarding Contract Review Committee submissions.

Written documented guidelines can ensure consistency, effectiveness, and efficiency to ensure compliance with Contract Review Committee requirements, thereby minimizing the risk of deferred submissions date.

RECOMMENDATION

We recommend that WUD implement formal written guidelines to address Contract Review Committee submittal requirements.

RESPONSE FROM MANAGEMENT

On December 9, 2015, the WUD Director provided a response to the Notification (Attachment B). The response stated, in part,

“In response to the findings of the IG, WUD proposes and is implementing the following procedures as corrective actions: 1) WUD has developed a PPM to ensure that payments are made to contractors within 20 business days as required by the Local Government Prompt Payment Act. 2) In conjunction with the PPM, WUD has developed a Payment/Final Contract Summary Check List3) WUD also created Pay Request and Final Pay Request Routing Process Diagrams”

In regards to the payment that was a result of a contract dispute WUD provided the following response:

"...as it was the result of a contract dispute that ended in a settlement agreement¹ WUD strongly believes that this item should be removed from the IG findings and conclusion of the CON. "

In regards to the payment related to a grant resource WUD provided the following response:

"Due to administrative requirements, such as the application of the Davis Bacon Act, grant reconciliation can be extremely complex and make meeting final payment requirements nearly impossible. Due to these circumstances, WUD strongly believes that the IG should allow flexibility for grant reconciliation and remove this item from the IG findings and conclusions"

OFFICE OF THE INSPECTOR GENERAL RESPONSE

Finding 1 - We identified eight (8) payments which did not meet the Local Government Prompt Payment Act. The Local Government Prompt Payment Act dispute resolution process was not followed and as a result, they are included in the CON.

Finding 2 - We identified eight (8) final payments and three (3) work authorizations, which were deferred by the Contract Review Committee. Irrespective of the Local Government Prompt Payment Act timeframe provisions, these eleven (11) items were deferred for reasons such as insufficient surety bonds, lapse in insurance coverage, reconciliation of payments, clarification of bond amounts, and revised consent of surety.

ACKNOWLEDGEMENT

The Inspector General's Contract Oversight staff would like to extend our appreciation to the Palm Beach County Water Utilities Department for the cooperation and courtesies extended to us during the contract oversight process.

This report is available on the OIG website at: <http://www.pbcgov.com/OIG>. Please address inquiries regarding this report to Dennis L. Yeskey, Contract Oversight Manager, by email at inspector@pbcgov.org or by telephone at (561) 233-2350.

ATTACHMENT A - FINAL PAYMENT SUMMARY TABLE

Project	Amount (\$)	Received Stamp Date	Prompt Pay Due Date	Actual Payment Date	Total Payment Time (Days)
SRWRF Solar Energy Design-Build Services - (R2013-0187)	214,645.46	May 20, 2014	June 17, 2014	February 25, 2015	201 **
SW Belle Glade Water Main & Services Replacement (R2013-0550)	40,082.32	January 20, 2015	February 17, 2015	March 9, 2015	34
Belvedere Homes Infrastructure Improvements (R2013-0091)	208,453.79	March 9, 2015	April 6, 2015	July 8, 2015	86
Westgate/Congress Gravity Sewer Lining (R2014-0521)	15,235.00	April 10, 2015	May 8, 2015	June 2, 2015	38
SW Belle Glade Water Main & Services Replacement (R2013-0551)	11,888.18	April 30, 2015	May 28, 2015	June 23, 2015	39
Monaco Blvd./Jog Rd. Force Main Replacement (R2013-0551)	11,392.23	March 2, 2015	March 30, 2015	June 23, 2015	81
SCADA Tower Replacement (R2013-1180) *	16,568.58	June 11, 2015	July 9, 2015	July 13, 2015	23
Ben Eden Water Main Extension (R2013-0550) *	4,166.58	June 30, 2015	July 28, 2015	September 2, 2015	46
	Total Invoice Amount				
	\$522,432.14				

* Were given a conditional approval

** 201 days was the result of a settlement agreement


ATTACHMENT B – WUD RESPONSE



INTEROFFICE MEMORANDUM

DATE: December 9, 2015

TO: Dennis Yeskey, Contract Oversight Manager
Office of Inspector General

FROM: Jim Stiles, Director 
Water Utilities

RE: Palm Beach County CON 2014-N-0003 Corrective Action Review

The Water Utilities Department (WUD) appreciates the efforts that the Office of the Inspector General (IG) has put into reviewing the submittals that WUD staff has brought before the County Contract Review Committee (CRC). WUD additionally welcomes the recommendations made by IG staff in an effort to assist WUD in streamlining procedural processes and providing more efficient final payments to WUD contractors. Please find below detailed responses to the finding and recommendations contained in the Contract Oversight Notification (CON) that was provided to WUD on November 23, 2015.

The CON identified 62 items totaling \$3,117,661.49 that were submitted by WUD for review by the CRC. Those items represented 42% of the items that were reviewed by the CRC during the review period. WUD items resulted in an 18% deferral rate. In reference, during the same time period, WUD undertook 171 projects overall with a total value of \$45,924,841.64.

Of the 11 WUD items that were identified by the IG as being deferred by the CRC, eight (8) were final payment requests to contractors that were deferred, in part, because of WUD delays in providing final payment beyond the 20 business day requirement, which is established under the Local Government Prompt Payment Act, Section 218.70, Florida Statutes. Of those eight (8) items, one (1) was beyond WUD responsibility and control, as it was the result of a contract dispute that ended in a settlement agreement.¹ WUD strongly believes that this item should be removed from the IG findings and conclusions of the CON. Another item was funded through grant resources requiring additional administrative processes that resulted in delay in final payment.² Due to administrative requirements, such as the application of the Davis Bacon Act, grant reconciliation can be extremely complex and make meeting final payment requirements nearly impossible. Due to these circumstances, WUD strongly believes that the IG should allow flexibility for grant reconciliation and remove this item from the IG findings and conclusions of the CON. The remaining six (6) items encountered delays related to internal decisions that are proposed to be adjusted through the implementation of the corrective actions detailed below.

¹ SRWRF Solar Energy Design-Build Services (R2013-0187). The IG CON recognizes the contract dispute and settlement on page 5 of 8.

² Belvedere Homes Infrastructure Improvements (2013-0091).

In response to the findings of the IG, WUD proposes and is implementing the following procedures as corrective actions:

- 1) WUD has developed a PPM to ensure that payments are made to contractors within 20 business days as required by the Local Government Prompt Payment Act. The PPM designates the Fiscal Specialist within the Engineering Division as the person responsible for tracking each pay request. The Construction/Project Manager for a project will be responsible for approving the request for payment, as required by state statute. The PPM additionally establishes concrete procedures for processing Pay Requests and Final Pay Requests, including provisions detailing how to address an incomplete or incorrect request that requires correction by the contractor prior to final approval. The proposed PPM is attached as Exhibit A to this document.
- 2) In conjunction with the PPM, WUD has developed a Payment/Final Contract Summary Check List that will be completed by the Construction/Project Manager approving the request for payment. The Check List will be utilized by the Construction/Project Manager to ensure that the requirements of the PPM were followed in approving a pay request. The Checklist is identified within the PPM as the basis for approval or denial of the pay request. The Checklist is attached as Exhibit B to this document.
- 3) WUD also created Pay Request and Final Pay Request Routing Process Diagrams to provide a visual aid to Fiscal Specialists and Construction/Project Managers that are processing pay requests. The Diagrams are referenced in and attached to the PPM and ensure ease and efficiency in processing pay requests. The Diagrams are attached as Exhibits C and D to this document.

The CON additionally cited Section 218.75, Florida Statutes, which provides for the possible payment of interest at 1% per month for those payments that exceed the 20-day requirement. As noted in the CON, none of the eight (8) final payments at issue included a claim for interest. A thorough review of WUD records revealed no circumstances in which interest was demanded as a result of a late payment. However, WUD is confident that the implementation of the above noted corrective actions will significantly reduce or eliminate the instances under which payment of interest could be claimed.

The CON additionally identified three (3) Work Authorizations brought by WUD before the CRC that were ultimately deferred. The CON did not specifically list the reasons for the deferment of these work authorizations. Historically, the deferment of CRC items not associated with a final payment, were the result of the committee needing additional information that could not be supplied by WUD staff presenting the item. Since February 2015, as the result of recommendations stated in CON 2014-N-003 Corrective Action Review, WUD has been diligent in ensuring that the proper knowledgeable staff attends the CRC meeting. WUD believes these efforts have substantially reduced the number of items returned to the department that require additional information.

WUD is confident that the Corrective Actions that are being undertaken will result in a drastic reduction of the numbers of items deferred and identified for corrective action by the CRC. WUD has identified and addressed personnel and procedural weaknesses within the Department and looks forward to working with the IG to ensure quality service and prompt payment to our contractors.

Exhibit A

MEMORANDUM

TO: ALL ENGINEERING DIVISION CONSTRUCTION AND PROJECT MANAGERS

FROM: JIM STILES,
DEPARTMENT DIRECTOR

PREPARED BY: ENGINEERING ADMINISTRATION

SUBJECT: CONSTRUCTION CONTRACT PAYMENTS (DRAFT)

PPM#: WUD-xxx-xxx

ISSUE DATE	EFFECTIVE DATE
December x, 2015	December x, 2015

PURPOSE:

To document and ensure that payments made to Contractors are within 20 working days as required by the Local Government Prompt Payment Act (F.S. 218.70).

POLICY:

The Fiscal Specialist will be responsible for tracking of each pay request that is submitted to the Engineering Division. The responsibility of ensuring that the Contractor is paid as required by the State statute will be with the Construction/Project Manager that is approving the Pay Request payment. This PPM also dictates the responsibility of the Construction/Project Manager for approval of final Pay Request by the Contract Review Committee (CRC).

PROCEDURE PAY REQUEST (Refer PBCWUD Pay Request Routing Process Diagram):

1. Fiscal Specialist in Engineering Division receives Pay Request from the Contractor. Fiscal Specialist confirms the Pay Request has been date stamped, if not, then a date stamp is added.
2. Fiscal Specialist logs Pay Request received date into the Payment Tracking Spreadsheet.
3. Fiscal Specialist forwards within 1 day the Pay Request to the appropriate Construction/Project Manager.
4. The Construction/Project Manager within 5 working days of receiving the Pay Request shall either approve or not approve the Pay Request. Pay Requests not approved shall be returned to the Fiscal Specialist with a note stating the reason for not approving the Pay Request. Fiscal Specialist shall return the Pay Request to the Contractor along

with noted reason for denial. Returned date of Pay Request shall be noted by the Fiscal Specialist in the Payment Tracking Spreadsheet.

5. Pay Requests that are approved by the Construction/Project manager shall be signed and dated, thus confirming approval for payment. The approved Pay Request shall be entered into CIP for payment. Fiscal Specialist will add the approval and routing dates to the tracking spreadsheet.

PROCEDURE FINAL PAY REQUEST (Refer PBCWUD Final Pay Request Routing Process Diagram):

1. Fiscal Specialist in Engineering Division receives Pay Request from the Contractor. The Fiscal Specialist confirms that Pay Request has been date stamped, if not, then a date stamp is added.
2. Fiscal Specialist logs Pay Request received date into Payment Tracking spreadsheet.
3. Fiscal Specialist within 1 day forwards the Pay Request to the appropriate Construction/Project Manager
4. The Construction/Project manager within 5 working days of receiving the Pay Request shall either approve or not approve the Pay Request. The Checklist titled "FINAL PAYMENT/FINAL CONTRACT SUMMARY" will be used as the basis for approval or denial of the Pay Request.
5. Pay Requests not approved shall be returned to the Fiscal Specialist with a copy of the Checklist filled out and clearly indicating the reason for not approving the Pay Request.
6. Fiscal Specialist shall return the Pay Request to the Contractor along with the Checklist and reason for denial. Returned date of Pay Request shall be noted by the Fiscal Specialist in the Payment Tracking Spreadsheet.
7. Pay Requests that are approved by the Construction/Project manager shall be signed and dated thus confirming approval and then routed to CRC.
8. The Construction/Project Manager or Engineering Director is required to attend the CRC meeting in order facilitate approval. If the Construction/Project Manager is unable to attend the CRC meeting a designee shall be selected by the Construction Services Manager.
9. Upon approval of the final Pay Request by CRC, the Construction/Project Manager shall enter the payment into CIP. Fiscal Specialist will add the approval and routing dates to the Payment Tracking Spreadsheet.
10. If CRC does not approve the Pay Request the Construction/Project Manager meets with the Division Director to resolve the issue. If the issue is not resolved the Pay Request is immediately sent to the Fiscal Specialist and returned to the Contractor. Resolved issues are sent back to the CRC for approval at the next meeting.

Jim Stiles,
Department Director

Exhibit B

**CHECK LIST
CONSTRUCTION**

FINAL PAYMENT / FINAL CONTRACT SUMMARY

PROJECT NAME: _____

PROJECT #: _____ PROJECT MANAGER: _____

APPLICATION FOR PAYMENT #: _____ BUDGET ACCOUNT #: _____

DATE: _____

THIS SECTION TO BE COMPLETED BY THE PROJECT MANAGER REVIEWED BY THE CONTRACT MANAGEMENT SPECIALIST:

	<u>PROJECT MANAGER</u>			<u>CONTR MGMT</u>
	<u>YES</u>	<u>NO</u>	<u>N/A</u>	
Has four (4) signed originals been prepared?	___	___	___	___
Is the payment application number indicated and is it correct?	___	___	___	___
Is the name of the contractor indicated in the Motion and Summary?	___	___	___	___
Is the final payment amount indicated in the Motion and is it correct?	___	___	___	___
Is the WUD project number indicated?	___	___	___	___
Is the contract number indicated in the Summary and is it correct?	___	___	___	___
Is the date of contract approval by the Board of County Commissioners indicated in the Summary?	___	___	___	___
Is the Commission District Number indicated and is it correct?	___	___	___	___
Are the budget account numbers indicated and are they correct? ***Fiscal Specialist Initials _____	___	___	___	___
Do the budget account numbers in the final contract summary match the budget account numbers in the application for payment?	___	___	___	___
Is the original contract sum indicated and is it correct?	___	___	___	___
Is the amount of approved change orders indicated and is it correct?	___	___	___	___
Is the amount of previous payments indicated and is it correct? ***Fiscal Specialist Initials _____	___	___	___	___
Is the amount of liquidated damages indicated and is it correct?	___	___	___	___

	<u>PROJECT MANAGER</u>			<u>CONTR MGMT</u>
	<u>YES</u>	<u>NO</u>	<u>N/A</u>	
Is the final payment amount indicated and is it correct? ***Fiscal Specialist Initials_____	___	___	___	___
Are all of the necessary attachments included with each original?				
Project location map?	___	___	___	___
Final Warranty of Title?	___	___	___	___
Contractor's Certification of Final Completion?	___	___	___	___
Consent of Surety for Final Payment?	___	___	___	___
SBE Construction Activity Report?	___	___	___	___
M/WBE Payment Certification for each SBE subcontractor?	___	___	___	___
Previous Change Order Summary?	___	___	___	___

INTERNAL REQUIRED DOCUMENTS

List of subcontractors/suppliers that filed Notice to Owner?	___	___	___
Release or waiver of lien for all subcontractors/suppliers that filed Notice to Owner?	___	___	___
Permit Closeouts/ Letters of Release	___	___	___
Record Drawings	___	___	___
O&M Manuals	___	___	___
Collect Contractor's Security Badges	___	___	___

Exhibit C

PBCWUD Pay Request Routing Process

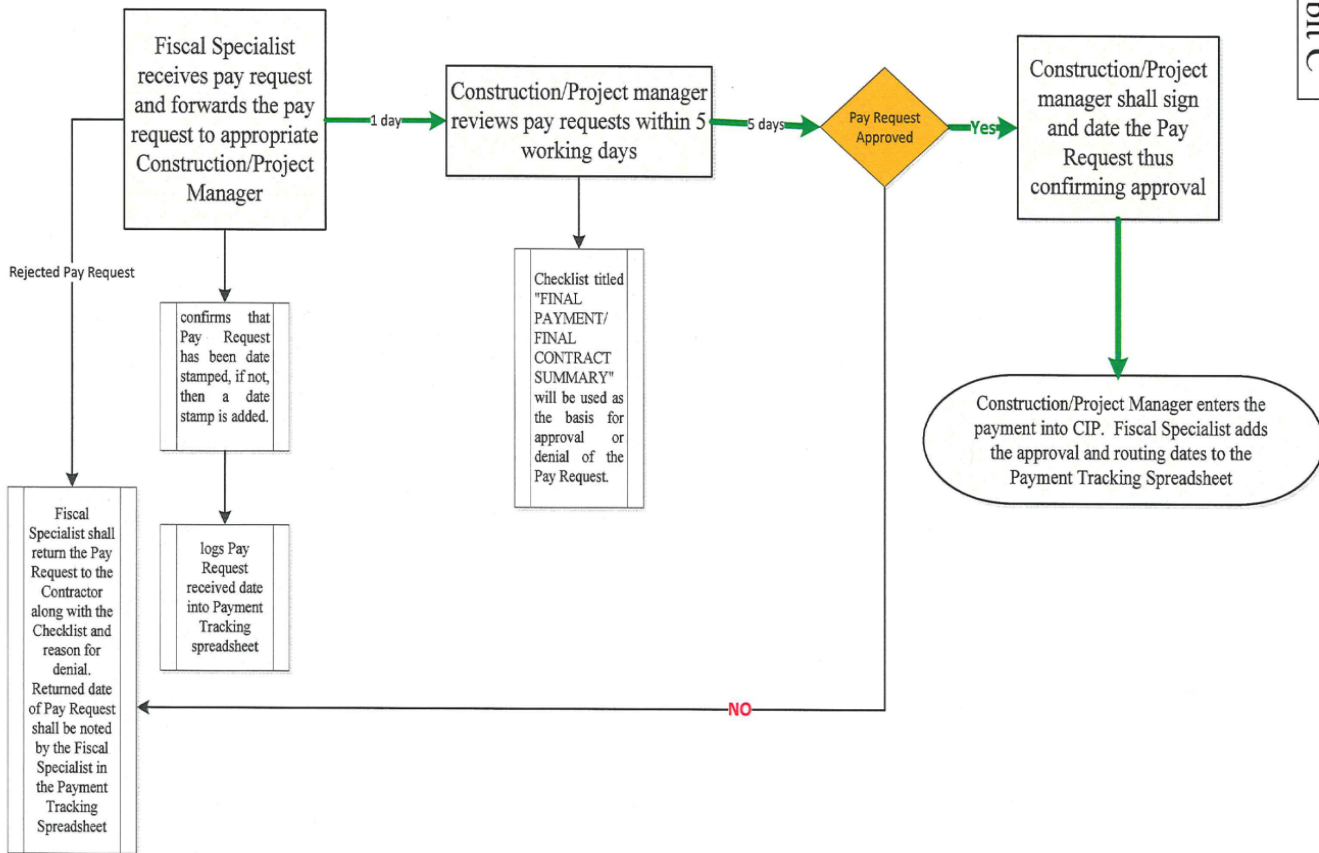


Exhibit D

PBCWUD Final Pay Request Routing Process

