SANDAG

OIPA | Office of the Independent Performance Auditor

Audit and Investigation Recommendation and Corrective Action Plan

Annual Status Report – FY 2025-26

As of July 30, 2026

Courtney Ruby, CPA, CFE
Independent Performance Auditor

Published August 28, 2026

Message from the Independent Performance Auditor

I am pleased to present the annual Audit and Investigation Recommendation and Corrective Action Plan Status Report, prepared by the Office of the Independent Performance Auditor (OIPA).

Background

Board Policy No. 039: Audit Policy Advisory Committee and Audit Activities, section 3.1.9 states the responsibilities of the Audit Committee include:

> *"Monitor the implementation of corrective action identified in audit and investigative reports and inform the Board when corrective action is insufficient or untimely."*

This report provides the status of OIPA's audit and investigation recommendations from July 19, 2025 through July 30, 2026.

OIPA reviews all information provided by SANDAG departments regarding their progress for each corrective action by reviewing documentation and/or conducting testing to independently verify Management's progress and determine the status of each recommendation.

Report Results

During FY 2025-26, there were 152 new and open recommendations. Of those, SANDAG implemented 40 recommendations (26%) during the year. These results reflect continued progress in addressing OIPA's recommendations; however, sustained management attention remains important to ensure past-due and open recommendations are implemented timely.

OIPA would like to thank SANDAG Management and departmental staff for their assistance in tracking, implementing, and facilitating testing on the audit and investigation recommendations included in this year's report.

Sincerely,

Courtney Ruby, CPA, CFE
Independent Performance Auditor

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Audits in this Report

Contracts and Procurement Operational and System Control Audit Report (Part I)
Released 10/14/2022

The objective of this engagement was to audit SANDAG's management of contracts and procurement. Specific objectives were to review policies and procedures, evaluate the effectiveness of internal controls, and test contracts and procurement transactions for appropriateness, allowability, and proper documentation. Part I was extensive and involved testing and reviewing operational processes and system controls within the organization.

Contracts and Procurement Operational and System Control Audit Report (Part II)
Released 5/12/2023

The objective of this audit was to review SANDAG's management of contracts and procurement. Specific objectives included testing and evaluating whether policies, procedures, and internal controls over processes existed, were being followed, and functioning effectively. The final objective included testing contracts and procurement transactions to determine whether they were appropriate, allowable, and supported by adequate documentation. Part II focused on the contractor's adherence to the contract, proper submittal of documentation when invoicing, work product and results, timelines, and commitments.

Continuous Auditing Operations Process and System Control Review – Purchase Cards
Released 10/13/2023

The objectives of this audit were to ensure that staff adheres to SANDAG's purchase card policy, including policies which took effect on July 1, 2022, and to apply tests and perform procedures to verify that controls are sufficient and consist of supporting documentation and other relevant data to assess SANDAG's ability to properly and sufficiently track, obtain sufficient documentation, and keep adequate records of processes and controls that support adherence to purchase card policies and procedures.

Operational Process and System Control Audit for Board Member and Employee Travel and Other Business-Related Reimbursements
Released 12/8/2023

The objectives of this audit were to examine SANDAG's operational processes and system controls related to Board member and employee travel and other business-related reimbursements to ensure policies and controls existed and were followed.

Performance Audit of SANDAG's Contract Invoicing and Payment Process
Released 7/3/2024

This audit was initiated in response to the significant audit findings in OIPA's *Operational Process and System Control Review - Contracts and Procurements Audit Parts I & II*. The objective of this audit was to determine the effectiveness of SANDAG's review and approval controls over contract invoicing and payment processes.

Performance Audit of SANDAG's Sole Source Procurement Process
Released 5/19/2025

This audit aimed to assess SANDAG's use of sole source contracts, evaluating whether they are properly justified, documented, and aligned with procurement policies. The review focused on the adequacy of internal controls, the consistency of decision-making, and the transparency of the sole source procurement process.

Performance Audit of SANDAG's Contract and Project Management over HNTB
Released 9/29/2025

The objective of this audit was to determine if there was sufficient oversight of the contractor HNTB. Specific objectives were to review active projects awarded to HNTB and determine whether the contracts and task orders were awarded competitively, included clearly defined scopes of work, were subject to proper contract and project management oversight, and whether the projects were delivered on time and within budget.

Accounting and Finance Independent Assessment
Released 12/1/2025

This assessment was initiated in response to the significant audit findings in OIPA's *Investigation Report on SANDAG's State Route 125 (SR 125) Toll Operations*. The objectives were to perform comprehensive assessment of SANDAG's Finance and Accounting Department's current state to evaluate operating effectiveness, identify deficiencies, strengthen safeguards over assets, and assess coordination for effective reporting and communication to stakeholders.

OIPA Annual Work Plan and Risk Assessment, FY 2026-27
Released 6/5/2026

The Annual Work Plan emphasized the need for SANDAG Management to prioritize implementing recommendations from OIPA's Accounting and Finance Independent Assessment and to engage a qualified CPA firm to assist SANDAG in preparing for the Annual Comprehensive Financial Report (ACFR) Audit and related reporting obligations.

Investigations in this Report

Office of the Independent Performance Auditor's Investigation Report on SANDAG's State Route 125 Toll Operations
Released 3/25/2024

The objectives of the investigation were to determine if SANDAG's SR 125 financial accounting can be relied upon, if SANDAG rectified the publicly reported errors with customer accounts shared with the Board of Directors in December 2023, and if there were other significant matters noted during the investigation.

Office of the Independent Performance Auditor's Whistleblower Investigation Report on SANDAG's New Tolling Back-Office System Implementation
Released 10/7/2024

The objectives of the investigation were to determine if SANDAG's financial reporting needs were taken into consideration during the selection of Deloitte and A-to-Be as vendors for the new BOS to replace ETAN's BOS, and if A-to-Be's Move Beyond back-office system could provide requisite financial reporting.

Implementation Status Definitions

Throughout fiscal year 2026, OIPA gathered information and obtained updates on all outstanding OIPA audit recommendations from SANDAG departments. Based upon the information received and testing performed, each recommendation's status was determined to be one of the following:

Pending – Implementation has not begun or has not been provided to OIPA for validation.

Partly Implemented – Some elements of the recommendation have been satisfied, but additional work remains.

Implemented – OIPA has verified the satisfactory implementation of the recommendation.

Closed – The recommendation is no longer relevant and implementation is not feasible.

Implementation Date Definitions

Planned Implementation Date – Original date for implementation provided by Management when audit/investigation issued.

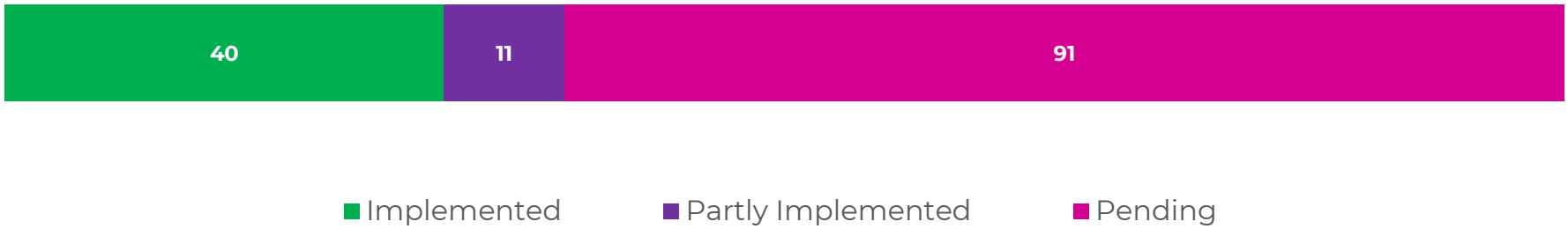
Revised Date of Implementation Date – Management revised the original date for implementation.

Implementation dates listed in blue represent revised dates provided by SANDAG Management. The original planned implementation dates are noted below the revised dates with a strikethrough (example ~~12/31/2024~~).

Implementation dates listed in red represent dates that are past due.

Summary of Audit Recommendations

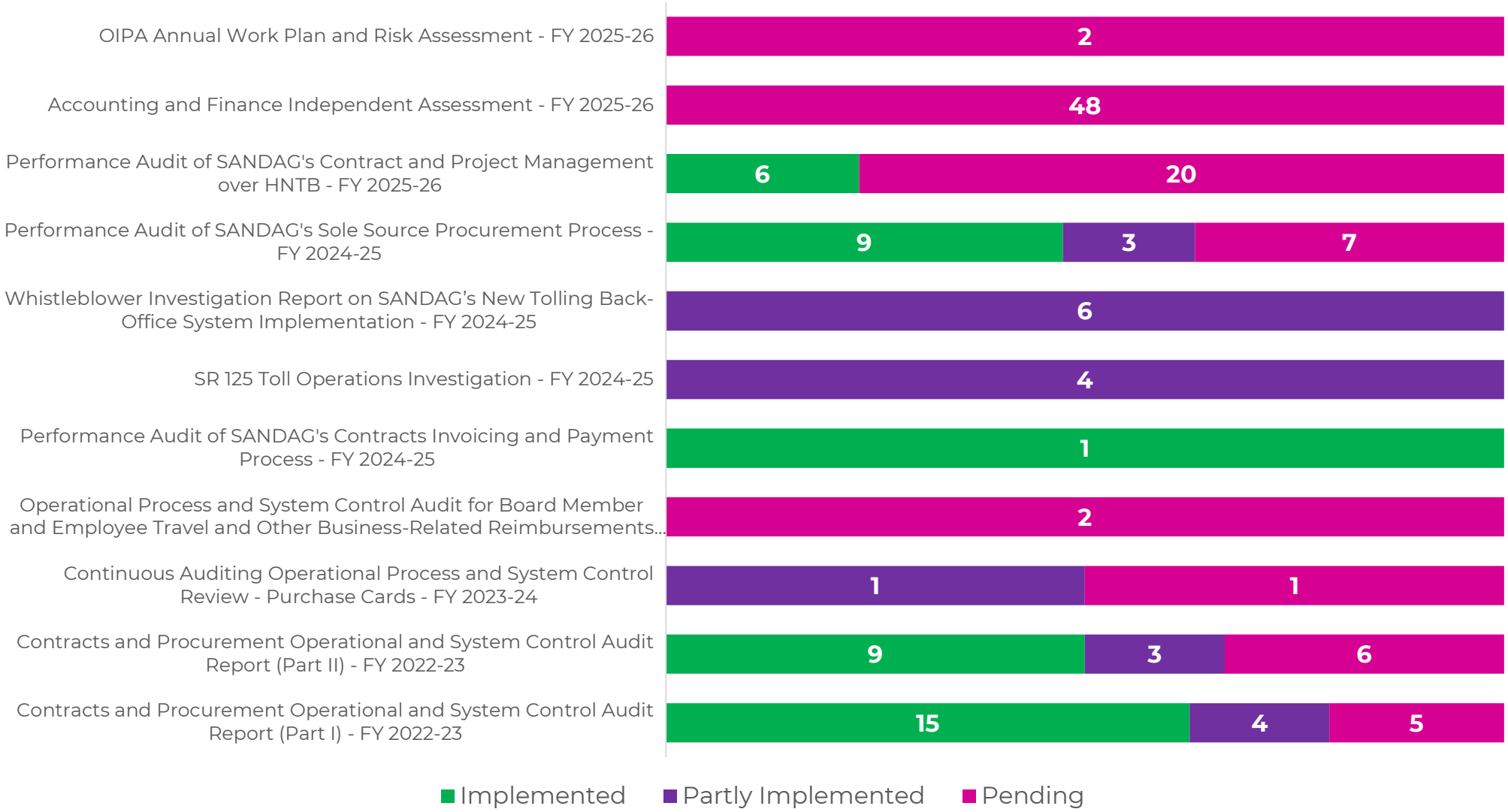
There are nine audits containing **142 open recommendations**. At year end, **40 were implemented, 11 are partly implemented**, and **91 are pending**.



Summary of Investigation Recommendations

There are two investigations containing **10 open recommendations.** At year end, **10 are partly implemented.**

Corrective Action Implementation Status by Audit/Investigation



Results of Recommendations Completed by Year

Since FY 2022-23, OIPA has issued **229 recommendations**. At year end, **108 were implemented, 9 were dismissed, and 112 are open**.

	Recommendations				
FY	**Total Issued**	**Open***	**Implemented**	**Dismissed****	**Percent Complete*****
2022-23	**98**	18	71	9	82%
2023-24	**23**	8	15	-	65%
2024-25	**32**	16	16	-	50%
2025-26	**76**	70	6	-	8%
Grand Total	**229**	**112**	**108**	**9**	

* Open recommendations include recommendations with the status of pending and partly implemented.
** Dismissed recommendations were deemed no longer relevant by OIPA.
*** Percent completed includes implemented and dismissed recommendations.

Results of Recommendations Completed During FY 2025-26

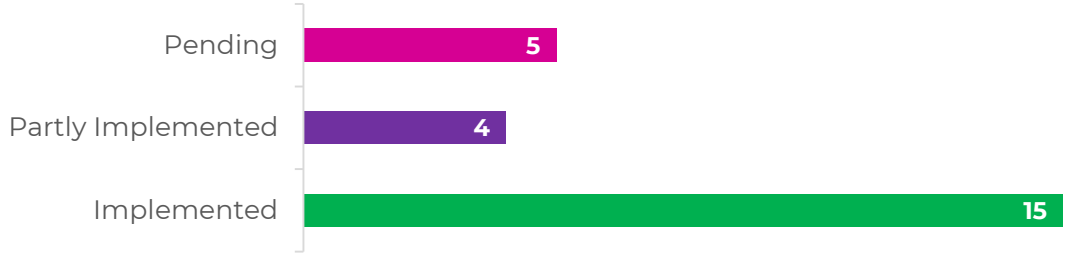
In FY 2025-26, SANDAG implemented 26% of open recommendations.

FY	Pending	Partly Implemented	Implemented	Total
2022-23	11	7	24	**42**
2023-24	3	5	-	**8**
2024-25	7	9	10	**26**
2025-26	70	-	6	**76**
Grand Total	**91**	**21**	**40**	**152**

Audit Recommendations

Contracts and Procurement Operational and System Control Audit Report (Part I)

Released 10/14/2022



Recommendation	Number	Due Date	Status	Department
Create standard operating procedures with step-by-step instructions for tasks for both contract analysts and project managers (e.g., desk procedures).	1.1	-	**Implemented**	Contracts and Procurement
Provide formal and regular training to contract analysts and project managers on their assigned roles, responsibilities, and procedures.	1.2	-	**Implemented**	Contracts and Procurement
Create standard operating procedures for contract analyst and project manager specific tasks.	2.1	-	**Implemented**	Contracts and Procurement
Provide consistent training for contract analysts provided by contracts subject matter experts and/or Management.	2.3	-	**Implemented**	Contracts and Procurement
Provide annual and/or continuous training on the Procurement Manual and standard operating procedures for both contract analysts and project managers.	2.4	-	**Implemented**	Contracts and Procurement

Recommendation	Number	Due Date	Status	Department
Provide training and step-by-step standard operating procedures to staff for replacement CMS and submitting all types of procurement requests.	4.2	6/30/2026 ~~10/30/2025~~ ~~9/30/2025~~ ~~12/31/2024~~	Partly Implemented	Contracts and Procurement
Ensure staff can query to identify the contractor and subcontractor efficiently and easily within the replacement CMS without going to various other platforms or documents.	4.3	4/30/2026 ~~10/30/2025~~ ~~9/30/2025~~ ~~9/30/2023~~	Pending	Contracts and Procurement
Ensure contracts and contract-related records and documents are stored in one easily accessible location.	4.4	4/30/2026 ~~10/30/2025~~ ~~9/30/2025~~ ~~12/31/2024~~	Partly Implemented	Contracts and Procurement
Ensure the replacement CMS is updated with correct and complete information and data to correct the inaccuracies and blanks from the current CMS records	4.5	6/30/2026 ~~3/31/2026~~ ~~9/30/2023~~	Pending	Contracts and Procurement
Require that the listed project manager for a contract is the actual project manager in the replacement CMS.	4.6	6/30/2026 ~~3/31/2026~~	Pending	Contracts and Procurement
Identify required fields in the replacement CMS and require all mandatory fields to be completed.	4.7	-	**Implemented**	Contracts and Procurement
Provide staff certain access to the replacement CMS, based on their job duties.	4.8	4/30/2026 ~~10/30/2025~~ ~~9/30/2025~~ ~~9/30/2023~~	Pending	Contracts and Procurement
Ensure the replacement CMS can provide an audit trail for review.	4.9	-	**Implemented**	Contracts and Procurement

Recommendation	Number	Due Date	Status	Department
Ensure that more than one employee, but preferably more than three, have an in-depth knowledge, training, and skill in the replacement CMS and should be able to provide reports to auditors and/or other authorized recipients.	4.10	-	**Implemented**	Contracts and Procurement
Create formal standard operating procedures and provide training on completing a record of negotiations to both project managers and contract analysts.	5.1	-	**Implemented**	Contracts and Procurement
Provide negotiation training and/or guidelines to project managers and contract analysts to include reasons/intent of negotiations, best practices, and risks of not negotiating and/or not following best practices.	5.2	-	**Implemented**	Contracts and Procurement
Provide training to staff on sole source laws, rules, regulations, and processes.	6.1	-	**Implemented**	Contracts and Procurement
Reorganize contract and sole source records in one centralized location.	6.4	4/30/2026 ~~10/30/2025~~ ~~9/30/2025~~	Partly Implemented	Contracts and Procurement
Update CMS to have accurate information.	6.5	6/30/2026 ~~3/31/2026~~ ~~1/2/2024~~	Pending	Contracts and Procurement
Ensure required documents are saved as separate files and labeled accordingly, such as saving a sole source justification form as such.	6.6	4/30/2026 ~~10/30/2026~~ ~~9/30/2025~~	Partly Implemented	Contracts and Procurement
Provide training on procurement planning to include the steps and timeline needed to prepare for various sized and timed projects to contract analysts, project managers and any approving staff.	7.2	-	**Implemented**	Contracts and Procurement

Recommendation	Number	Due Date	Status	Department
Review the sole source policies, processes, and procedures to ensure a clear understanding of allowed sole sources, limitations around sole sources, and the review and approval requirements of sole sources.	7.4	-	**Implemented**	Contracts and Procurement
Create and provide training related to sole sources to include examples of allowable/approvable situations when a sole source is or can be justified and an explanation and examples of when poor planning does not suffice in requesting a sole source procurement.	7.6	-	**Implemented**	Contracts and Procurement
Ensure that on-call procurements are appropriately advertised to reach sufficient, qualified, and various contractors and subcontractors, including outreach efforts using public platforms and attendance of outreach events to attract new and disadvantaged contractors and subcontractors.	7.7	-	**Implemented**	Contracts and Procurement

Contracts and Procurement Operational and System Control Audit Report (Part II)

Released 5/12/2023

Recommendation	Number	Due Date	Status	Department
Create a standard operating procedure and update Procurement Solicitation Forms to include notification to Evaluation Panel participants of their responsibility to complete score sheets and provide justification of their scores.	1.1-1	3/31/2026 ~~12/31/2025~~ ~~6/30/2025~~	Pending	Contracts and Procurement
Create a standard operating procedure and provide training to contract analysts for the solicitation processes.	1.1-2	6/30/2026 ~~3/31/2026~~ ~~6/30/2025~~	Pending	Contracts and Procurement
Create standard operating procedures for contracts staff that clearly explains their role in reviewing amendments and procurement history to ensure bid splitting and avoidance of competition is not repeatedly occurring.	1.3-4	4/30/2026 ~~12/31/2025~~ ~~12/31/2024~~	Partly Implemented	Contracts and Procurement
Create a tracking system/method for expiring contracts/task orders to ensure customer department awareness of planning needs for current and future procurements.	1.4-2	-	**Implemented**	Contracts and Procurement
Create standard operating procedures for both departments and contracts staff to explain the roles, responsibilities, requirements, forms, approvals needed, and processing of retroactive procurement requests.	1.4-4	-	**Implemented**	Contracts and Procurement

Recommendation	Number	Due Date	Status	Department
Provide training on appropriate planning efforts and expectations for project managers and customer departments including tracking of contracts, monitoring of expiration dates, and procurement timelines for any next steps or changes to projects.	1.4-5	-	**Implemented**	Contracts and Procurement
Update the Board Policy No. 017, the Employee Handbook and Procurement Manual to create more internal controls around approval and signature of procurement transactions by including the OGC in all transactions to ensure risks are mitigated.	1.6-1	8/31/2026 ~~12/31/2025~~	Pending	Executive Office
Create standard operating procedures and provide training for contracts staff to address proper document storing and recording procurement transactions.	1.8-1	5/15/2026 ~~12/31/2025~~ ~~12/31/2024~~	Pending	Contracts and Procurement
Create standard operating procedures for QA/QC efforts to ensure document storing and procurement transactions are properly recorded.	1.8-2	5/15/2026 ~~12/31/2025~~ ~~12/31/2024~~	Pending	Contracts and Procurement
Create policies and standard operating procedures to ensure sole sources are limited and are thoroughly being reviewed and analyzed to ensure potential risks are mitigated.	2.2	-	**Implemented**	Contracts and Procurement
Update the Delegation of Authority by Executive Director Policy to align with the recommended changes to Board Policy No. 017 and current Board Policy No. 041 by creating more internal controls to include clearly limited parameters around contract amendments and task orders by including the OGC and/or Finance department(s) in all transactions to ensure risks are mitigated.	5.3	5/31/2026 ~~12/31/2025~~	Pending	Executive Office
Create a tracking system/method for expiring contracts/task orders to ensure awareness of planning needs for current and future procurements.	6.2	-	**Implemented**	Contracts and Procurement

Recommendation	Number	Due Date	Status	Department
Create standard operating procedures for staff to explain the roles, responsibilities, requirements, forms, and approvals needed for all procurement transactions including retroactive procurement requests.	6.4	-	**Implemented**	Contracts and Procurement
Provide training on procurement planning to include appropriate efforts and expectations for project managers to include tracking of contracts, monitoring of expiration dates, and procurement timelines to follow for any next steps or changes to projects.	6.5	-	**Implemented**	Contracts and Procurement
Provide training to departments and project managers to ensure understanding of on-call contracts and processes to award task orders.	6.6	-	**Implemented**	Contracts and Procurement
Create standard operating procedures for project management roles that clearly explain responsibilities to ensure projects are being completed on time and in an efficient manner. This should include assessing and documenting the consultant's completion of deliverables, milestones, and whether they meet the contract requirements and agency needs or not.	7.2	-	**Implemented**	Contracts and Procurement
Create policies and standard operating procedures that clearly explain allowed justification for amendments. These procedures should include examples of both allowable and non-allowable justifications.	7.3	3/31/2026 ~~12/31/2025~~ ~~12/31/2024~~	Partly Implemented	Contracts and Procurement
Create standard operating procedures for contract analysts that clearly explains how to review amendment requests and procurement history to ensure amendments are justified, to identify excessive amendments, to identify potential bid splitting, avoidance of competition, non-performing consultants, and conflicts of interest.	7.5	3/31/2026 ~~12/31/2025~~ ~~12/31/2024~~	Partly Implemented	Contracts and Procurement

Continuous Auditing Operations Process and System Control Review – Purchase Cards

Released *10/13/2023*

Recommendation	Number	Due Date	Status	Department
Review all professional memberships and monthly/annual subscription fees paid for by purchase cards to ensure none are set to automatically renew.	1.2	4/30/2026 ~~11/30/2025~~ ~~12/31/2023~~	Partly Implemented	Human Resources/ Accounting and Finance
Provide training to cardholders, project managers, finance staff, and any other relevant staff on the Hospitality and Events Policy.	2.2	6/30/2026 ~~10/30/2025~~ ~~9/30/2025~~ ~~11/30/2024~~	Pending	Human Resources/ Accounting and Finance

Operational Process and System Control Audit for Board Member and Employee Travel and Other Business-Related Reimbursements

Released *12/8/2023*

Recommendation	Number	Due Date	Status	Department
Create two separate documents to replace the current SANDAG travel form. The Travel Request to approve travel should be documented separately from the Travel Expenses Report to reimburse travel.	1.1	5/31/2026 ~~10/30/2025~~ ~~9/30/2025~~ ~~12/31/2024~~	Pending	Human Resources
Provide training to executive assistants and other staff who process or submit Travel Requests and/or Travel Expenses Reports to ensure they are familiar with the requirements for approval and/or the requirements for reimbursement and supporting documentation.	1.2	6/30/2026 ~~10/30/2025~~ ~~9/30/2025~~ ~~12/31/2024~~	Pending	Human Resources

Performance Audit of SANDAG's Contracts Invoicing and Payment Process

Released *7/3/2024*

Recommendation	Number	Due Date	Status	Department
Create procedures to manage, track and store rate and fee schedule approvals and changes in one file location to ensure accurate verification of invoiced amounts.	2.1	-	**Implemented**	Contracts and Procurement

Performance Audit of SANDAG's Sole Source Procurement Process

Released *5/19/2025*

Recommendation	Number	Due Date	Status	Department
For the nine (9) missing contracts, document their absence in the contract file and do not allow future sole source follow-on work for the project.	1.1	4/15/2026 ~~10/30/2025~~ ~~8/31/2025~~	Pending	Contracts and Procurement
Revise the process to document how each contract is awarded (contract history) and ensure contract documentation is clear, comprehensive, complete and readily accessible.	1.2	-	**Implemented**	Contracts and Procurement
Develop a procedure to identify and document the contract award method for past projects to ensure follow-on work is adequately validated.	1.3	-	**Implemented**	Contracts and Procurement
Create criteria for evaluating if the sole source economy and efficiency justification is reasonable, including but not limited to: • Steps to identify if a prior contract was multi-phase. • Steps to identify if the new contract's scope of work was included in the original, competitively awarded contract.	1.4	-	**Implemented**	Contracts and Procurement

Recommendation	Number	Due Date	Status	Department
Establish a protocol for policy exceptions for unforeseen circumstances. Such a policy should be comprehensive and include, but not be limited to: • Define exception and authority for such an exception. • Define any limitations related to the exception: Can it be applied to multiple contracts in the form of a blanket approval? Or only to a single contract? Can it include future contract actions, such as amendments for time, costs, scope? • Include documentation and analysis requirements to justify appropriate application.	1.5	6/15/2026 ~~12/31/2025~~	Pending	Contracts and Procurement/ Internal Controls
Evaluate if the Agency's approval and review process provides an appropriate level of control. For example, the DDCPS is the senior management contracting and procurement expert and is responsible for contracting and procurement oversight. Additionally, the CEO is responsible for the Agency's overall operations. The Agency should consider approval levels based on criteria such as dollar volume and project risk level.	2.1	7/31/2026 ~~12/31/2025~~	Pending	Internal Controls/ Office of General Counsel

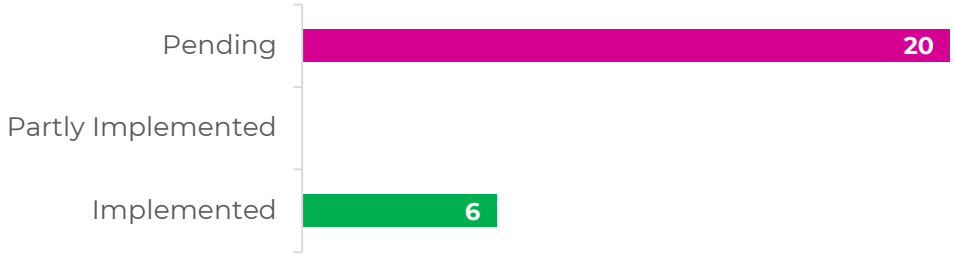
Recommendation	Number	Due Date	Status	Department
Review and update policies and procedures to: • Define process for obtaining and documenting required grantor permissions to sole source contracts. • Define staff and management responsibilities (including OGC) and when they are engaged in the sole source process. • Define the scope and substance and document each level of review performed and required documentation from each review. • Define the sequence of reviews and approvals to ensure strategic, compliance, and legal reviews occur before approval, and eliminate the possibility of approving a sole source before all appropriate reviews are completed. • Evaluate and assign the appropriate level of Agency approval based upon dollar amount and project risk. • Implement steps and/or controls where gaps in the process were identified.	2.2	-	**Implemented**	Contracts and Procurement/ Internal Controls
Once policies and procedures have been updated, provide training to staff to ensure they understand their roles and responsibilities within the sole source procurement process. Periodically provide refreshers and evaluate staff's retention.	2.3	-	**Implemented**	Contracts and Procurement/ Program Project Management
Annual performance reviews for contracting staff and Project Managers should include expectations to demonstrate their knowledge and execution of their contract responsibilities with adequate professional care to ensure accuracy, completeness, and compliance.	2.4	8/31/2026 ~~12/31/2025~~	Pending	Contracts and Procurement/ Program Project Management

Recommendation	Number	Due Date	Status	Department
Establish and document key controls for ensuring effective monitoring and continuous improvement of the sole source process, including but not limited to: • Target limit for sole source contracts. • Key performance indicators, reporting procedures, and periodic quality assurance review process to increase compliance and operational efficiency over the sole source process. • Periodic evaluations of staff assignments and procurement methods to ensure that sole source procurements are appropriately utilized. • Reporting sole source contract metrics to the Board of Directors and executive leadership.	3.1	7/31/2026 ~~3/31/2026~~	Pending	Contracts and Procurement/ Internal Controls
Identify data needed to track sole source volume and dollar amounts in SANDAG's system(s) responsible for tracking contract data, and ensure system(s) are configured to require necessary data, including but not limited to: • Amendment Effective Date • Contract type • Dollar value of amendments and where they are stored • Procurement method	3.2	10/30/2025 ~~9/30/2025~~	Partly Implemented	Contracts and Procurement
Update the Procurement Manual to include and define all possible contract types that are awarded.	3.3	-	**Implemented**	Contracts and Procurement
Reconcile the contract types in CMS with those defined in the Procurement Manual and configure CMS to allow only the contract types defined in the manual.	3.4	4/30/2026 ~~10/30/2026~~ ~~9/30/2025~~	Partly Implemented	Contracts and Procurement

Recommendation	Number	Due Date	Status	Department
The Board of Directors and the Audit Committee approve the following for inclusion in OIPA's Fiscal Year 2025-2026 Audit Plan: 1. Assess planned capital project outcomes for fiscal year 2025-2026. 2. In December 2025, initiate a six-month review of sole source justifications to evaluate progress.	3.5	-	**Implemented**	Office of the Independent Performance Auditor
Update policy to require contract staff evaluate and document the need to sole source contract amendments.	4.1	4/30/2026 ~~10/30/2026~~ ~~9/30/2025~~	Partly Implemented	Contracts and Procurement
Develop a process to periodically review non-sole sourced contract amendments for compliance with sole source thresholds.	4.2	8/31/2026 ~~3/31/2026~~	Pending	Internal Controls/ Program Project Management
Evaluate and revise policy to strengthen requirements for when amendments should be awarded by sole source, considering materiality and the original contract value.	4.3	-	**Implemented**	Contracts and Procurement/ Office of General Counsel
Update procurement policy to require that contracts include the maximum dollar value, as required.	4.4	-	**Implemented**	Contracts and Procurement
Work with the Board to develop a specific dollar threshold for requesting Board consent prior to awarding contracts by sole source.	5.1	8/31/2026 ~~12/31/2025~~	Pending	Contracts and Procurement/ Office of General Counsel

Performance Audit of SANDAG's Contract and Project Management Over HNTB

Released *9/29/2025*



Recommendation	Number	Due Date	Status	Department
Establish a review process to ensure ICEs are current, complete, and approved by a principal/manager before task order execution. Supervisory review must be clearly documented.	1.1	3/31/2026	Pending	Contracts and Procurement
Establish a review process to ensure ICEs are current, complete, and approved by a principal/manager before task order execution. Supervisory review must be clearly documented.	1.2	3/31/2026	Pending	Contracts and Procurement
For ongoing and new HNTB contracts and projects, ensure task order solicitations, evidence of who received invites to bid on task orders, and justifications of vendor selection are added to the appropriate task order record in CMS or clearly identified as missing/not found. Require supervisory reviews to ensure compliance.	1.3	3/31/2026	Pending	Contracts and Procurement
Update contract templates (such as the On-Call Firm Recommendation Forms) to clearly indicate whether work is standalone or part of a multi-phase project.	1.4	-	**Implemented**	Contracts and Procurement

Recommendation	Number	Due Date	Status	Department
Develop and document a control to verify Project Managers properly document rationale for awarding task orders to on-call vendors, including why competitive bidding was not used if the task order was awarded via sole source.	1.5	3/31/2026	Pending	Capital and Delivery
Establish policies and procedures for when to use a new task order or amend an existing task order, ensuring a clear audit trail can be followed for each phase of a multiphase project.	1.6	3/31/2026	Pending	Contracts and Procurement
Update contract templates to ensure spending limits are accurately documented as required and approvers' names, in addition to signature, are present.	1.7	3/31/2026	Pending	Contracts and Procurement
Develop a control to ensure Project Managers prepare and retain complete, detailed Independent Cost Estimates (ICEs) for all task orders, in accordance with the Procurement Manual.	2.1	4/30/2026	Pending	Contracts and Procurement
Standardize Project Management task order templates to require a clearly defined list of deliverables, responsible parties, and due dates.	2.2	4/30/2026	Pending	Contracts and Procurement/ Capital and Delivery
Require Project Managers to document the date vendors complete the final deliverable for task orders and retain evidence in the contract file. Require supervisory reviews to ensure compliance.	2.3	3/31/2026	Pending	Capital and Delivery
Establish a formal Project Management process for monitoring project schedules, including periodic updates and milestone tracking.	2.4	-	**Implemented**	Program Project Management

Recommendation	Number	Due Date	Status	Department
Require all amendments include a revised project schedule when extending the timeline or modifying deliverables.	2.5	-	**Implemented**	Contracts and Procurement
Require written justification for all schedule extensions. Do not allow undocumented schedule changes.	2.6	-	**Implemented**	Contracts and Procurement
Train Project Managers on contract monitoring responsibilities, including cost estimation, deliverable tracking, and schedule management.	2.7	6/30/2026	Pending	Capital and Delivery
Establish a quality control process to audit a sample of task orders quarterly to ensure proper documentation is maintained, policies and procedures were followed, and exceptions were properly documented. Establish a compliance baseline, then track improvements over time. When management's established goals for agencywide compliance occur, reduce reviews to no less than annually.	2.8	9/30/2026	Pending	Internal Controls
Incorporate adherence to policies and procedures into Project Manager's annual performance evaluations and require supervisors to sample Project Manager's work and document compliance during annual evaluations.	2.9	4/30/2026	Pending	Capital and Delivery
Update SANDAG Project Management contract templates to require all tasks have corresponding deliverables that are clearly defined, measurable, and time-bound, and ensure all deliverables are linked to specific contract tasks and include acceptance criteria.	3.1	4/30/2026	Pending	Contracts and Procurement/ Capital and Delivery

Recommendation	Number	Due Date	Status	Department
Update procurement guidance to require that roles and responsibilities in multi-vendor projects (e.g., oversight of contractors like ETAN) are clearly defined in both prime and support contracts and SANDAG's oversight over such multi-vendor projects is clearly defined.	3.2	3/31/2026	Pending	Contracts and Procurement/ Office of General Counsel
Establish a checklist-based review process for all contract amendments to ensure changes in scope, deliverables, cost, or schedule are fully documented and justified. Require supervisory review to ensure compliance.	3.3	-	**Implemented**	Contracts and Procurement
Establish a centralized, secure, and auditable repository for storing vendor deliverables during the life of each project and require Project Managers to upload and maintain all submitted deliverables in this repository as they are received. Require supervisory review to ensure compliance.	3.4	5/31/2026	Pending	Capital and Delivery/ Data Science and IT
Review and update all ongoing and new HNTB contract and task order documents in CMS to ensure the final versions are complete, correctly labeled, and properly loaded. Require supervisory reviews to ensure accuracy and completeness.	4.1	4/30/2026	Pending	Contracts and Procurement
Review and update CMS data fields for HNTB contract and task order records to ensure key data (e.g., dates, status, competition type) is complete and accurate.	4.2	4/30/2026	Pending	Contracts and Procurement
Create and apply a consistent methodology for assigning competition types to contract, task orders and amendments in CMS.	4.3	-	**Implemented**	Contracts and Procurement

Recommendation	Number	Due Date	Status	Department
Establish and enforce a standard naming convention that includes the project name or identifier for contracts, task orders, and amendments.	4.4	4/30/2026	Pending	Contracts and Procurement
Evaluate the allocation of necessary resources, including budget, time, and tools to improve documentation efforts through the creation of a formal records management system.	4.5	4/30/2026	Pending	Data Science and IT/ Administration and Public Affairs
Assign Director-level ownership to ensure accountability of the records management system.	4.6	4/30/2026	Pending	Data Science and IT/ Office of General Counsel/ Administration and Public Affairs

Accounting and Finance Independent Assessment

Released *12/1/2025*

Recommendation	Number	Due Date	Status	Department
SANDAG should establish and maintain a comprehensive framework to consistently assess and monitor key internal controls. The framework should integrate governance, risk management, and compliance across all accounting and finance processes, including groups of key controls for the following areas, at a minimum: 1. Accounts Payable 2. Accounts Receivable 3. Asset Management 4. Project Accounting 5. General Ledger 6. Revenue and Expense Recognition 7. Toll Operations Accounting 8. Quarter and Year End Closing 9. Training	A.1	7/31/2026	Pending	Internal Controls

Recommendation	Number	Due Date	Status	Department
SANDAG should encourage and, where appropriate, require pursuit of relevant professional certifications (e.g., CPA, CGFM, CMA) for leadership and technical roles. Update job descriptions to clearly define preferred or required credentials, or specific accounting coursework that satisfies requirements, and prioritize credentialed leadership to strengthen technical proficiency and promote a culture of continuous learning.	A.2	8/31/2026	Pending	Human Resources
SANDAG should implement a centralized point of receipt for all vendor invoices, preferably through activation and full use of the ERP Vendor Module, to ensure Accounting has immediate visibility over incoming invoices. This will reduce reliance on Project Managers, enable consistent tracking, and improve accountability and timeliness of invoice processing.	A.3	6/30/2026	Pending	Accounting and Finance
SANDAG should revise the Accounts Payable Standard Operating Procedure to: 1. Include dollar-based or risk-based approval thresholds. Routine, low-dollar invoices could follow streamlined approval workflows, while higher-value or high-risk invoices should receive elevated review, improving efficiency and allowing management to focus oversight where it is most needed. 2. Include timeframe requirements to pay invoices. Specifically, within 30 calendar days after receipt of an undisputed and properly submitted payment request from a contractor as defined by the California Public Contract Code - PCC § 20104.50.	A.4	5/29/2026	Pending	Administration and Public Affairs/ Accounting and Finance
SANDAG should require capture of both the invoice receipt date and payment due date within the ERP system to ensure that the ERP system can accurately track and escalate any issues with the timeliness of payment to vendors. To support this, the Standardized Invoice Review Checklist and ERP data entry protocols should be revised to ensure this information is consistently recorded and monitored in alignment with California Public Contract Code §20104.50 and to uphold strong vendor relationships.	A.5	5/29/2026	Pending	Accounting and Finance

Recommendation	Number	Due Date	Status	Department
SANDAG should fully develop and implement a documented policy outlining overall reconciliation requirements, including frequency, preparer/reviewer responsibilities, documentation standards, escalation procedures, version control, and closure timelines. This policy should clearly define accountability and provide management with oversight mechanisms to ensure timely and accurate completion.	A.6	8/31/2026	Pending	Accounting and Finance
SANDAG should fully implement and consistently use the Reconciliation Tracking Schedule, or another centralized system-based tool, to document and monitor all required reconciliations. The tool should include standardized fields to record the preparer, reviewer, review and approval dates, reasons for delays or issues, and defined frequencies for completion and review. Management should review the tracker monthly to confirm the accuracy of accounts and ensure reconciliations are completed as required. Additionally, the tool should be version-controlled and periodically archived by management to prevent manual edits or deletion of historical data.	A.7	8/31/2026	Pending	Accounting and Finance
SANDAG should require quarterly management reviews of reconciliation completion, accuracy, and timeliness metrics, with results reported to executive leadership. SANDAG should also consider periodic independent reviews to assess adherence to policy and effectiveness of the reconciliation process.	A.8	1/29/2027	Pending	Accounting and Finance/ Internal Controls
SANDAG should establish and implement interim reporting checklists or similar procedures / tools to document and define all required steps to ensure account balances are accurate, including reconciliations, validations, and reviews of key accounts, enabling accurate and reliable financial data for decision-making, interim reporting (e.g., to the Board), and audit readiness. This should include any report modifications required for clarity of purpose and use.	A.9	8/31/2026	Pending	Accounting and Finance/ Internal Controls

Recommendation	Number	Due Date	Status	Department
SANDAG should develop or adopt a centralized mechanism or tool to consolidate billing information across all funding sources (local, state, federal, and TransNet), ensuring a system is in place to provide real-time visibility into billing progress, key financial metrics, and compliance deadlines to improve accuracy and timeliness. Management should review the centralized billing tool (on a monthly or quarterly basis) to identify missed or delayed billings.	A.10	3/31/2026	Pending	Accounting and Finance
SANDAG should document and define the expectation for accounting staff to perform either monthly or quarterly reconciliations of cumulative billings to budgeted revenues and funding agreements. Management should review and approve these reconciliations to identify missed billings, discrepancies, or noncompliance in a timely manner.	A.11	8/31/2026	Pending	Accounting and Finance
SANDAG should establish formal reconciliation procedures and documentation requirements to ensure consistency, enable secondary review, and reduce reliance on a single individual for toll revenue tracking between FASTLANE and the ERP system.	A.12	8/31/2026	Pending	Accounting and Finance
SANDAG should evaluate and implement system integration or automation solutions, including compatibility assessments for future and planned upgrades, such as the Deloitte back-end system, to eliminate manual workarounds and improve accuracy, timeliness, and oversight of toll revenue reporting.	A.13	10/30/2026	Pending	Data Science and IT

Recommendation	Number	Due Date	Status	Department
SANDAG should integrate the Capital Asset Module with Tyler Content Manager (TCM) or implement an alternative centralized tracking system to automatically link supporting documentation (e.g., invoices, contracts, sale records) to corresponding asset records, reducing manual effort and improving accuracy and traceability.	A.14	10/30/2026	Pending	Accounting and Finance
SANDAG should require quarterly or semi-annual reconciliations between the Capital Asset Module and supporting project or financial records to confirm completeness and accuracy of asset data and responsible owners. Reviews should include verification of asset existence and the timely recording of economic events such as sales or retirements.	A.15	8/31/2026	Pending	Accounting and Finance
SANDAG should develop a centralized training and certification/credential tracking mechanism that includes role-specific development plans, recurring training schedules, and monitoring of credential status to ensure consistent skill growth tailored to individuals and regulatory compliance.	A.16	8/31/2026	Pending	Human Resources
SANDAG should implement and maintain a single, agency-wide reference document (e.g., a RACI matrix) that defines who is Responsible, Accountable, Consulted, and Informed for each step of the budgeting process across capital and non-capital projects, including budget changes made between draft and final stages.	B.1	6/30/2026	Pending	Financial Planning, Budgets, & Grants
SANDAG should implement a mandatory, role-specific budget training program aligned with ERP system requirements to ensure consistent understanding of budgeting processes and expense classifications. Additionally, the agency should promote relevant certifications, such as PMP, to strengthen budgeting expertise and enhance financial oversight.	B.2	8/31/2026	Pending	Financial Planning, Budgets, & Grants
SANDAG should revise the Grant Distribution Program Guide to include a clear 30-day payment timeline expectation in alignment with CFR § 200.305 and establish internal procedures to monitor and report compliance with this standard.	B.3	9/30/2026	Pending	Regional Planning

Recommendation	Number	Due Date	Status	Department
SANDAG should implement a standardized tracking process across all grant programs to capture key data points, such as actual invoice receipt dates, payment status, and reasons for delays, to improve accountability, timeliness, and oversight of reimbursement processing.	B.4	9/30/2026	Pending	Regional Planning
SANDAG should consider developing program-specific invoice review checklists tailored to grant's unique requirements, ensuring Program Managers consistently evaluate expenses against all applicable federal, state, and program guidelines.	B.5	6/30/2026	Pending	Regional Planning
SANDAG should develop and implement a policy that clearly defines the frequency, scope, and responsibilities for budget-to-actual monitoring across all projects and departments. The policy should specify who is accountable for preparing, reviewing, and approving budget performance reports and establish clear escalation procedures for significant variances.	B.6	6/30/2026	Pending	Financial Planning, Budgets, & Grants/ Capital Delivery/ Regional Planning
SANDAG should require monthly or quarterly budget-to-actual reporting and performance monitoring for all active projects, not only major CIP or grant-funded projects, and require Project Managers to review results, document explanations for variances, and outline corrective actions, with oversight from Directors or other leadership personnel as applicable to ensure timely follow-up.	B.7	6/30/2026	Pending	Financial Planning, Budgets, & Grants
SANDAG should perform a current user needs assessment to identify reporting challenges across departments and use the results to prioritize and develop ERP or other business intelligence reports that support operational, project management, and executive decision-making, including standardized budget-to-actual reporting.	B.8	8/31/2026	Pending	Data Science and IT

Recommendation	Number	Due Date	Status	Department
SANDAG should implement a mandatory mid-cycle budget review process for all projects between September and April, with clear accountability assigned in the recommended RACI matrix for initiating, confirming, and approving any budget changes, as outlined in the Budgets, Grants, and Financial Planning Recommendation 1.	B.9	6/30/2026	Pending	Financial Planning, Budgets, & Grants
SANDAG should create a centralized IT governance structure led by a designated executive with a CIO-equivalent role. This position should oversee IT strategy, decision-making, issue escalation, and alignment between IT and business objectives across departments, with clearly documented oversight procedures and accountability mechanisms in alignment with leading practices, such as those outlined by ISACA for IT governance.	C.1	4/30/2026	Pending	Data Science and IT
SANDAG should document task-level responsibilities for all stakeholders involved in systems implementation and major updates or upgrades, including workflow approvals, testing, and issue resolution. SANDAG should also ensure expectations are communicated consistently across departments to support accountability and reduce confusion.	C.2	9/30/2026	Pending	Data Science and IT
SANDAG should develop specific, outcome-based goals for stages of systems implementations and major updates or upgrades (e.g., system uptime, user adoption rates, ROI, automation targets). These should be tracked through KPIs and used to monitor progress, evaluate success, and guide decision-making throughout the project lifecycle.	C.3	4/30/2026	Pending	Data Science and IT
For future phases, SANDAG should develop a standard methodology to rate implementation milestones by risk and criticality (e.g., high, medium, low). Use this framework to highlight critical-path activities, such as data migration and financial close testing, enabling leadership to allocate resources, escalate delays, and proactively mitigate risks.	C.4	4/30/2026	Pending	Data Science and IT

Recommendation	Number	Due Date	Status	Department
For future phases, SANDAG should develop a unified, organization-wide systems implementation project schedule accessible to all stakeholders, consolidating milestone tracking across departments and project managers, ensuring real-time access for all stakeholders to improve visibility and coordination across departments.	C.5	9/30/2026	Pending	Data Science and IT
For future phases, SANDAG should establish a centralized digital repository for systems implementation and major updates or upgrade documentation, including milestone status, testing logs, configuration settings, and training materials. This will support continuity, especially during staff transitions, and preserve institutional knowledge.	C.6	4/30/2026	Pending	Data Science and IT
For future phases, SANDAG should require formal validation of system configurations, such as budget roll-forward settings, prior to go-live for each stage of systems implementation or major module update and upgrade. SANDAG should also consider incorporating milestone-specific testing checklists and sign-off procedures to ensure readiness and prevent post-launch errors that could impact multiple users.	C.7	9/30/2026	Pending	Data Science and IT
SANDAG should develop, or clearly assign responsibility for developing, training materials tailored to a new system or module's customizations and specific user roles, with defined internal approval workflows and designated ownership for reviewing, updating, and distributing content to ensure consistency and accountability. Training should include hands-on exercises, role-based scenarios, and system walkthroughs to prepare users to operate the system effectively.	C.8	8/31/2026	Pending	Data Science and IT
For future phases, SANDAG should establish a structured post-go-live support framework, including a documented support plan that defines roles, responsibilities, escalation paths, and expected response times for user issues. This framework should also include mechanisms to collect user feedback systematically and analyze recurring issues to identify root causes, allowing SANDAG to use insights from trend analysis to refine training, update documentation, and improve system configurations proactively.	C.9	9/30/2026	Pending	Data Science and IT

Recommendation	Number	Due Date	Status	Department
For future phases, establish a documented process for reviewing, validating, and approving all functional, technical, management, and system requirements prior to vendor release. Require sign-off from relevant stakeholders and maintain version-controlled records to ensure traceability and alignment.	C.10	9/30/2026	Pending	Data Science and IT
For future implementations or major upgrades and updates, ensure that critical system requirements, especially functional expectations, are explicitly referenced in vendor contracts and amendments. Include provisions for customized modules (e.g., Contract Management) to hold vendors accountable for delivering agreed-upon capabilities.	C.11	9/30/2026	Pending	Data Science and IT
Perform a formal assessment for selection of new systems and new modules against defined requirements to identify gaps, overlaps, and customization needs, and retain evidence of this analysis to support future implementation decisions.	C.12	10/30/2026	Pending	Data Science and IT
For future systems implementations and major updates or upgrades, create a comprehensive Risk Register that documents potential project risks, their impact, triggers, and mitigation strategies. Update the register throughout the project lifecycle and assign ownership for monitoring and escalation to ensure proactive risk management.	C.13	9/30/2026	Pending	Data Science and IT
For future systems implementation or major module updates and upgrades, develop a formal process to map all test plans, data validation, end-to-end, and user acceptance, to documented functional requirements. This ensures comprehensive coverage of expected system functions and supports traceability from requirement to test outcome.	D.1	4/30/2026	Pending	Data Science and IT
For future systems implementation or major module updates and upgrades, clearly define testing roles across departments in project planning materials, including responsibilities for validating both numerical and non-numerical data. Require formal review and approval of test plans to confirm they meet organizational needs.	D.2	4/30/2026	Pending	Data Science and IT

Recommendation	Number	Due Date	Status	Department
For future systems implementation or major module updates and upgrades, ensure end-to-end testing covers all critical business processes, not just a subset. If certain workflows are excluded, document the rationale and assess potential downstream impacts to system performance and integration.	D.3	4/30/2026	Pending	Data Science and IT
For future systems implementation or major module updates and upgrades, SANDAG should increase the number and variety of test cases related to reporting capabilities to validate that the system can generate accurate, timely, and relevant outputs across departments.	D.4	4/30/2026	Pending	Data Science and IT
SANDAG should create a comprehensive inventory of Information Technology General Controls (ITGCs) applicable to the Tyler ERP system. This should include access controls, change management procedures, system monitoring protocols, and recovery mechanisms, aligned with organizational risk appetite and strategic objectives.	D.5	7/31/2026	Pending	Internal Controls/ Data Science and IT
SANDAG should perform a detailed review of Tyler's SOC 1 and SOC 2 reports to identify relevant Complementary User Entity Controls (CUECs). Document and implement these controls to support the integrity and security of financial reporting and system operations.	D.6	7/31/2026	Pending	Internal Controls/ Data Science and IT
SANDAG should implement a formal user access review process prior to system go-live to ensure access rights are appropriate for each user's role. Revoke or adjust elevated access granted during development or testing to prevent unauthorized use in production.	D.7	4/30/2026	Pending	Data Science and IT
For future systems implementation or major module updates and upgrades, SANDAG should establish a formal process to align each Go-Live checklist item with documented functional requirements, ensuring readiness tasks directly support expected system capabilities and business needs.	D.8	9/30/2026	Pending	Data Science and IT

Recommendation	Number	Due Date	Status	Department
For future systems implementation or major module updates and upgrades, require written rationale for any checklist items marked “not applicable” or “in progress.” Include impact assessments and approval from relevant stakeholders to ensure exclusions are appropriate and do not compromise system functionality.	D.9	9/30/2026	Pending	Data Science and IT
For incomplete functions at Go-Live of systems implementation or major module updates and upgrades, create detailed workaround plans that include testing protocols, integration steps, and validation of outputs. Document these plans and confirm they are reviewed and approved before deployment.	D.10	9/30/2026	Pending	Data Science and IT

FY 2026-27 OIPA Annual Work Plan and Risk Assessment

Released *6/5/2026*

Recommendation	Number	Due Date	Status	Department
Prioritize implementation of the accounting and finance recommendations in OIPA's Accounting and Finance Independent Assessment.	1	Response pending	Pending	Accounting and Finance
Take immediate action to engage a qualified CPA firm to assist SANDAG's Accounting and Finance team in preparing for the Annual Comprehensive Financial Report audit and related reporting obligations.	2	Response pending	Pending	Accounting and Finance

Investigation Recommendations

Investigation Report on SANDAG's State Route 125 Toll Operations

Publish Date: March 2024

Recommendation	Number	Due Date	Status	Department
Reconcile the data from the KAPSCH system to ETAN's BOS daily to ensure accurate transmission and posting of customer account data to ETAN's Fastlane.	3.2	6/30/2026 ~~11/30/2025~~ ~~8/31/2025~~ ~~12/31/2024~~	Partly Implemented	Accounting and Finance/ Toll Operations
Immediately implement daily monitoring to ensure all systems are operating and communicating with each other correctly.	5.7	6/30/2026 ~~11/30/2025~~ ~~10/31/2024~~	Partly Implemented	Accounting and Finance/ Toll Operations
SANDAG evaluates with Deloitte and A-to-Be if the DMV Hold Functionality can be implemented sooner.	6.8	6/30/2026 ~~11/30/2025~~ ~~4/8/2024~~	Partly Implemented	Accounting and Finance/ Toll Operations
Implement a daily reconciliation process between the KAPSCH roadway system and the ETAN Fastlane system be put in place immediately to verify the accuracy of customer charges going forward.	7.9	6/30/2026 ~~11/30/2025~~ ~~8/31/2025~~ ~~4/8/2024~~	Partly Implemented	Accounting and Finance/ Toll Operations

Whistleblower Investigation Report on SANDAG's New Tolling Back-Office System Implementation

Publish Date: March 2024

Recommendation	Number	Due Date	Status	Department
Clearly define senior management roles, responsibilities and expectations. Special project assignments must also have clearly defined roles, responsibilities and expectations.	1	8/31/2026 ~~11/30/2025~~	Partly Implemented	Internal Controls
Require key senior leadership positions have the requisite project management skills to effectively manage large-scale internal projects. The process should align with best practices, include proper certifications, and result in a thorough analysis of internal and external capacity including technical expertise, documented risk assessments, and demonstrated alignment with SANDAG's core responsibilities.	2	8/31/2026 ~~11/30/2025~~	Partly Implemented	Internal Controls
Revise sole source policies and procedures for IT to preclude sole source awards except for demonstrated proprietary, compatibility or unique functionality issues only. An IT system implementation would not qualify.	3	6/30/2026 ~~10/30/2025~~ ~~9/30/2025~~	Partly Implemented	Internal Controls

Recommendation	Number	Due Date	Status	Department
Require system requirements be developed for IT system solutions and all stakeholders are formally included in the process. Project planning must include the requisite time to accomplish this.	4	6/30/2026 ~~11/30/2025~~	Partly Implemented	Internal Controls
Perform pre-award analysis of multi-million-dollar contract awards to demonstrate a vendor has been formally evaluated against SANDAG's project requirements. SANDAG's project requirements must be fully defined before award is determined.	5	6/30/2026	Partly Implemented	Internal Controls
Conduct and document formal post-evaluations of all multimillion-dollar projects, lessons learned, and corrective action plans for future projects prepared and presented to the CEO.	6	6/30/2026	Partly Implemented	Internal Controls