

**Lower Silver Creek Flood Protection Project Performance Audit**  
**Santa Clara Valley Water District Management Response**

| <b>Audit Recommendations<sup>1</sup></b>  | <b>Owner</b>        | <b>Management Response</b>   | <b>Auditor Response to Management Response</b>                      |
|---|---------------------|--|---|
| <p><b>Recommendation R1</b></p> <p>COI policy should be included in the District employee handbook issued to and signed by each employee certifying they took the course, understand and agree not to violate the Act, and will report any potential COI's or violations to the District's Ethics &amp; Equal Opportunity Program.</p> <p>Final Draft Report Page 17.</p>                 | <p>Anna Noriega</p> | <p><u>Management Response:</u><br/> Management concurs with this recommendation.</p> <p><u>District Action:</u><br/> After revising Ethics Policy, EEOP staff will distribute it to all current employees with certificate of acknowledgement to sign. Currently, EEOP staff provides training on the District's Ethics Policy to all new hires during a monthly orientation. Each new hire signs an acknowledgment of receiving the Ethics Policy and ethics training. We will look at training options that educate all employees.</p> | <p>Agree. District should provide an estimated completion date.</p> |
| <p><b>Recommendation R2</b></p> <p>The COI should reference relevant District policies and procedures. The COI policies should concisely reference applicable laws, employees Duty to Act in the Public Interest, acceptance of gifts, and include sections that define a COI, terminology/definitions, confidentiality statement, and procedures.</p> <p>Final Draft Report Page 17.</p> | <p>Anna Noriega</p> | <p><u>Management Response:</u><br/> Management concurs with this recommendation. The current Ethics Policy includes reference to applicable laws, employees' duty to act in the public interest, acceptance of gifts, a section that defines terminology/definitions, and procedures.</p> <p><u>District Action:</u><br/> The Ethics Policy is currently under revision. When revised, the Ethics Policy will incorporate much more detail on the above referenced items and adds new sections, including confidentiality.</p>           | <p>Agree. District should provide an estimated completion date.</p> |

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| <p><b>Recommendation R3</b></p> <p>The COI policy should provide guidance as to whether an employee can have a secondary job, the reporting requirements if allowed and the limitations.</p> <p>Final Draft Report Page 17.</p>  | <p>Anna Noriega</p> | <p><u>Management Response:</u><br/> Management acknowledges this recommendation. However, the District's Outside Employment Policy provides guidelines on secondary jobs and is referenced within the Ethics Policy.</p> <p>EEOP staff reviews all outside employment forms submitted by employees to ensure that there is no conflict of interest with the work being performed between the district and the secondary job. In incidents where there is a conflict of interest, EEOP staff will discuss with the employee and their manager(s) to identify any mitigating methods to ensure there is no conflict of interest.</p> | <p>We recommend that, within the COI policy, the District refer to the specific applicable COI provisions contained in the Outside Employment Policy. This document was not provided to PMA as part of the audit; if provided, PMA will review pursuant to its recommendation.</p> |
| <p><b>Recommendation R4</b></p> <p>District should develop COI procedures that include re-occurring training and documentation to allow for effective implementation, annual auditing, annual review for improvements and reporting protocol to the District's Ethics &amp; Equal Opportunity Program regarding potential violations.</p> <p>Final Draft Report Page 17.</p> | <p>Anna Noriega</p> | <p><u>Management Response:</u><br/> Management concurs with this recommendation. EEOP staff currently conducts AB 1234 Ethics training as required every other year. All Form 700 filers at the District are required to take the FPPC online or in-house 2-hour training and sign an acknowledgement certificate.</p> <p><u>District Action:</u><br/> EEOP staff will develop procedures to audit EEOP processes. Additionally, EEOP staff will develop materials that highlight the Ethics Policy for all employee distribution. Estimated completion date is by June 2019.</p>  | <p>Agree.</p>  |

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| <p><b>Recommendation R5</b></p> <p>The District should leverage the District's work (counsel memos) to develop a procedure (vs internal memos) that includes guidance on notification, evaluation, testing and formulation firewall measures specific to the situation.</p> <p>Final Draft Report Page 17.</p>   | <p>Anna Noriega</p> | <p><u>Management Response:</u><br/> Management concurs with this recommendation.</p> <p><u>District Action:</u><br/> EEOP staff will revise the Ethics Policy and create a work instruction in collaboration with District Counsel's Office for when firewall measures are needed and what should be done to avoid conflicts.</p>  | <p>Agree with the proposed District Action.</p> <p>District should provide an estimated completion date.</p>   |
| <p><b>Recommendation R6</b></p> <p>It should state a procedure for reviewing Board member, committee members, employee and consultants Form 700's and direct all that may obtain positions that a COI may occur, to immediately update their Form 700 and notify the District's Ethics &amp; Equal Opportunity Program.</p> <p>Final Draft Report Page 17.</p> | <p>Anna Noriega</p> | <p><u>Management Response:</u><br/> Management concurs with this recommendation. EEOP staff currently reviews Board member, employee and consultant Form 700s during the annual filing process and sends all managers their employees' Form 700s. As noted in the Conflict of Interest/Statement of Economic Interests (Form 700) Work Instruction, employees promoted into a designated filer job category, that employee is required to file an Assuming Office Form 700.</p> <p><u>District Action:</u><br/> In instances of a promotion of an employee who already files a Form 700, EEOP staff will forward employee's most recent Form 700 to the new supervisor for review. EEOP staff will establish communications to remind employees of their on-going obligation to report potential or actual COI through-out the year.</p> | <p>The focus of the performance review was on 2009-2012 documentation, to coincide with contractual requirements. Please provide <i>current</i> 'Conflict of Interest/Statement of Economic Interests (Form 700) Work Instruction'</p> <p>District should document the work-flow as described in the "District Action" into a formal Policy and provide an estimated completion date for the Policy.</p> |

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| <p><b>Recommendation R7</b></p> <p>The District should develop procedures to provide a framework for evaluating potential COI's prior to placing an existing or prospective employee in a position that would create a conflict.</p> <p>Final Draft Report Page 18.</p> | <p>Anna Noriega</p> | <p><u>Management Response:</u><br/> Management concurs with this recommendation.</p> <p><u>District Action:</u><br/> Staff will explore the feasibility of developing a procedure to evaluate potential conflicts of interests by June 2019.</p>   | <p>District Action is vague, and should be reworded</p>   |
| <p><b>Recommendation R8</b></p> <p>District should provide annual on-line training, which should be conducted prior to having employees update their Form 700.</p> <p>Final Draft Report Page 18.</p>   | <p>Anna Noriega</p> | <p><u>Management Response:</u><br/> Management acknowledges this recommendation. However, EEOP staff provides Form 700 filers with FPPC training videos and guides when they file an Assuming Office, Annual or Leaving Office Form 700. Video of District's AB 1234 ethics training is also available on the District's internal webpage.</p> | <p>Agree with District response. However, the referenced video was not provided to PMA as part of the audit; if provided, PMA will review pursuant to its recommendation.</p> |

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| <p><b>Recommendation R9</b></p> <p>Updated Form 700 forms should be submitted when employees are promoted or re-assigned to new positions.</p> <p>Final Draft Report Page 18.</p> | <p>Anna Noriega</p>   | <p><u>Management Response:</u><br/> Management acknowledges this recommendation. However, in instances of a promotion or reassignment of an employee who already files, EEOP staff forwards the employee's most recent Form 700 to the new supervisor for review. In instances of a promotion of an employee who transitions to a designated filer job category, that employee is required to file an Assuming Office Form 700 and EEOP staff forwards that employee's Form 700 to their new supervisor for review.</p> <p><u>District Action:</u><br/> EEOP staff is continually seeking ways to improve the existing process whereby employees are notified of their obligation to file.</p> | <p>This document was not provided to PMA as part of the audit; if <i>current</i> 'Conflict of Interest/Statement of Economic Interests (Form 700) Work Instruction' is provided, PMA will review pursuant to its recommendation.</p> <p>District should memorialize the work-flow described in their "Management Response" as a formal policy.</p> |
| <p><b>Recommendation R10</b></p> <p>The District should develop general guidelines for consistent invoice review.</p> <p>Final Draft Report Page 20.</p>                          | <p>Katherine Oven</p> | <p><u>Management Response:</u><br/> Management concurs with this recommendation.</p> <p><u>District Action:</u><br/> A general invoice review procedure for project managers will be developed.</p>  | <p>Agree with the proposed District Action.</p> <p>District should provide an estimated completion date.</p>   |

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| <p><b>Recommendation R11</b></p> <p>The District should implement a guideline for Delegation of Authority.</p> <p>Final Draft Report Page 20.</p>  | Tina Yoke    | <p><u>Management Response:</u><br/> Management concurs with this recommendation. However, the recommendation is broad as the term "delegation of authority" is granted to various units and divisions, not just contracts (example: payment of rent of District owned property, settlement of claims, etc.). The scope of Management's response is limited to consultant and service agreements.</p> <p><u>District Action:</u><br/> There are a number of separate policies and work instructions that provide roles and responsibilities, including authority levels. A new guideline that pulls all this information together and provides clarity on delegation of authority, would benefit all District personnel. This guideline should also align with the ERP project processes.</p> | <p>Agree with the proposed District Action. Please provide an estimated completion date.</p> |
| <p><b>Recommendation R12</b></p> <p>The District should update the master list of employees and labor rates within the contract as this serves as a control against unsupported labor rates and inclusion of costs on a fixed price contract.</p> <p>Final Draft Report Page 20.</p> | Thomas Esch  | <p><u>Management Response:</u><br/> Management concurs with this recommendation. Consultant contracts typically are not fixed-price contracts, and time-and-material contracts and contracts with labor rates are not fixed-price contracts. For those non-fixed-price contracts, the Project Manager is responsible for ensuring those positions and rates listed in the contract remain constant or must implement Form FC1165 Agreement Status Change Request to receive approval for modification of hourly rates or make changes to key personnel. Attached to the FC1165 in both cases is an updated table of rates or key personnel.</p>  | <p>Agree with the proposed District Action. Provide an estimated completion date.</p>        |

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|  |                    | <p>However, it should be noted that both the contract and the change request forms may benefit from a standard "Compensation Table" that identifies position titles, rates, subcontractors, and other planned expenses. This table can consistently be used and familiar to all Project Managers versus the variety of forms received from consultants.</p> <p><u>District Action:</u><br/> A single "Compensation Table" form will be used and then updated based on approved changes per the contract.</p>   |  |
| <p><b>Recommendation R13</b></p> <p>If substitute or additional employees are allowable, then the contract should provide a generic employee title which will tie to the amount being invoiced.</p> <p>Final Draft Report Page 20.</p> | <p>Thomas Esch</p> | <p><u>Management Response:</u><br/> Management acknowledges this recommendation. However, contractor employee titles must be common to the industry for the work being performed, especially to understand the working level of the position and pay rates for comparison. Furthermore, the form FC1165 Agreement Status Change Request is used to provide any changes to key personnel and rates. It is the responsibility of the Project Manager to keep a master list of positions and rates and the name of individuals filling those positions and use that information when verifying rates provided in consultant invoices.</p> | <p>District should document the responsibilities as described in their "Management Response" into a formal Policy and provide an estimated completion date for the Policy. The Policy should also include a Quality Control requirement to ensure that the Project Manager's performance complies with Policy.</p> |

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| <b>Recommendation R14</b><br><br>If rates are expected to change over the life of the contract, the contract should either specify the rate changes, or provide for an escalation clause.<br><br>Final Draft Report Page 20. | Thomas Esch    | <u>Management Response:</u><br>Management acknowledges this recommendation. However, the current Contract (Terms and Conditions) template includes a Fees and Payments schedule that explains the process for rate changes. Specifically, consultants may request a rate change every 12 months, based on an approved percentage increase or based on the Employment Cost Index (ECI) for the Bay area, whichever is less. | District response does not explain how they document and approve these changes. Suggest they develop a policy (or reference an updated policy) and include an estimated completion date. |
| <b>Recommendation R15</b><br><br>The District's invoice review process should include a component of correlating invoice rates to contractual rates.<br><br>Final Draft Report Page 21.                                      | Katherine Oven | <u>Management Response:</u><br>Management concurs with this recommendation.<br><br><u>District Action:</u><br>A general invoice review procedure for project managers will be developed. This component will be included in the procedure.   | Agree with the proposed District Action. Provide an estimated completion date.   |

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| <p><b>Recommendation R16</b></p> <p>The District should require support documentation for all labor and materials charges, unless otherwise noted by contract.</p> <p>Final Draft Report Page 21.</p>                | <p>Thomas Esch</p>    | <p><u>Management Response:</u><br/> Management concurs with this recommendation. Requests for receipts to the extent reasonably necessary to confirm the payment of costs that are subject to Cost Substantiation, copies of timesheets, invoices, canceled checks, expense reports, receipts and other documents, as appropriate, can be included in the contract. In addition, the contract currently requires invoices to include a summary of labor expenditures, direct costs, and billed Subconsultant charges. Furthermore, the contract terms does state the District has the right to obtain and review all records pertaining to the performance of the agreement, though understood for audit purposes.</p> <p><u>District Action:</u><br/> Items described in the Management Response will be incorporated into the District's standard consultant agreements language.</p> | <p>Agree with the proposed District Action. Provide an estimated completion date.</p> |
| <p><b>Recommendation R17</b></p> <p>The District should ensure task level billings from subcontractors agree with that of the consolidated invoice from the prime contractor.</p> <p>Final Draft Report Page 21.</p> | <p>Katherine Oven</p> | <p><u>Management Response:</u><br/> Management concurs with this recommendation.</p> <p><u>District Action:</u><br/> A general invoice review procedure for project managers will be developed. This component will be included in the procedure.</p>   | <p>Agree with the proposed District Action. Provide an estimated completion date.</p> |

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| <p><b>Recommendation R18</b></p> <p>Accurate task level reporting should be a component of consistent invoice review.</p> <p>Final Draft Report Page 21.</p>   | <p>Katherine Oven</p>                            | <p><u>Management Response:</u><br/>           Current consultant agreements for capital projects require the consultant to submit a monthly progress report with each monthly invoice.</p> <p><u>District Action:</u><br/>           A general invoice review procedure for project managers will be developed. This component will be included in the procedure.</p>  | <p>Agree with the proposed District Action. Provide an estimated completion date.</p> |
| <p><b>Recommendation R19</b></p> <p>Specifying date ranges on invoices should be added to invoicing requirements, and should be a component of consistent invoice review.</p> <p>Final Draft Report Page 21.</p> | <p>Thomas Esch<br/>           Katherine Oven</p> | <p><u>Management Response:</u><br/>           Management acknowledges this recommendation. However, the contract currently requires the consultant to provide beginning and end date for billing period that services were provided. The Project Manager has the responsibility to verify services were completed and only then agree to payment via the invoice.</p> <p><u>District Action:</u><br/>           A general invoice review procedure for project managers will be developed. This component will be included in the procedure.</p> | <p>Agree with the proposed District Action. Provide an estimated completion date.</p> |

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| <p><b>Recommendation R20</b></p> <p>Ensure project management training in place, allowing for process intent to be better understood.</p> <p>Final Draft Report Page 29.</p> | <p>Katherine Oven</p> | <p><u>Management Response:</u><br/> Project management training is in place in the Capital Program divisions.</p> <ol style="list-style-type: none"> <li>1. The most valuable and effective training occurs on the job, with direct guidance and mentoring provided by a unit manager or experienced project manager.</li> <li>2. The Capital Program's Quality Environmental Management System (QEMS) framework, that follows the International Organization for Standardization (ISO), provides step-by-step directions and instructions for review and preparation of key project deliverables and quality records that document project changes in scope, schedule, or cost. The supervising engineer or unit manager is responsible for his or her unit staff's performance in working within the QEMS framework.</li> <li>3. Project management classes are made available through the District's Workforce Development Program. Training on all QEMS capital project delivery procedures is provided to all staff in the Capital Program divisions every two years.</li> </ol> <p><u>District Action:</u><br/> QEMS training classes were held in August and September, 2017, in accordance with the 2-year cycle for QEMS training. Each Unit Manager is to ensure that trainings are effective by ongoing review of capital project work and deliverables prepared by his/her unit staff.</p> | <p>During the course of the performance review, the Auditors interviewed a number of employees and inquired about their respective opinions related to policy intent. Responses included varying perspectives on policy intent, signifying that then-current training was likely not effective.</p> <p>It is the Auditor's opinion that intent of documentation was not always well grasped and that a more formal training plan would be beneficial.</p> <p>Implementing follow-up audit ("as you go") at key project intervals (mobilization, 30% design, pre-construction, etc) would provide an on-going basis to gauge employee understanding, and policy conformance.</p> |

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|  |                | A review of the training classes will be conducted prior to the next training cycle to improve staff's understanding of the procedures, work instructions, and forms.  |  |
| <b>Recommendation R21</b><br><br>Modify existing project document control practice (and/or implementation of practice) to be less autonomous, in line with industry standard.<br><br>Final Draft Report Page 29. | Katherine Oven | <u>Management Response:</u><br>The existing District File Instructions for Capital Projects is a QEMS document that provides guidelines and instructions to establish a standard file management system for the Capital Program project files (hardcopy and electronic), including a naming convention and organizational structure for the creation, maintenance and retention of project files, and ensuring that files are created, maintained and archived in a consistent manner in accordance with the District Records Retention Schedule.<br><br><u>District Action:</u><br>Capital Program staff will review this procedure and agree on updates to align it with industry standards. The District File Instructions for Capital Projects (QEMS Document W42302, Revision F, Effective Date: February 14, 2013) was reviewed and revised in October 2018. | Agree. Once again, a policy and procedure audit at key project stages would help to ensure employee understanding and compliance with District QEMS. |

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| <p><b>Recommendation R22</b></p> <p>There is currently no explicit process or direction for interface of project document control systems between consultant and the District. Recommend implementing a detailed practice for project document control interface between District and Consultant. Though the Project Work Plan could serve as a platform for a description of this interaction, a framework for its use should be provided.</p> <p>Final Draft Report Page 29.</p> | <p>Katherine Oven</p> | <p><u>Management Response:</u><br/> When originally prepared, the File Instructions for Capital Projects (W42302) procedure required a document administrator (DA) staff person to manage the document filing system for each project. Over the past 5 years, as the Capital Program has grown significantly, staff dedicated to this effort have been reassigned to higher-priority work, and new staff positions have not been approved to support this effort.</p> <p><u>District Action:</u><br/> As part of the District Action Item for Recommendation R21, capital staff will be convened to review this procedure and determine how it should be improved, and what staff resources would be required to assure consistent document control interface between the District and its consultants. The District File Instructions for Capital Projects (QEMS Document W42302, Revision G, Effective Date: October 2018) will be reviewed and revised by March 2019.</p> | <p>Agree</p>                                   |

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| <p><b>Recommendation R23</b></p> <p>There is no current practice for project management (and key personnel) turnover. QEMS discusses transition between phases, but does not require transition reporting between key personnel i.e. there is no formal practice for project management turnover. The project management position was transitioned in October 2013, near the end of the RMC contract; there is no evidence of a formal project management transition plan, or documentation of a transition meeting. Though lack of transition is a risk in and of itself, a lack of attention to project document control and change management practice exacerbates this risk, as the history of the project is not well documented. Recommend implementing a project management and key personnel transition / turnover practice including tools and templates, and roles and responsibilities.</p> <p>Final Draft Report Page 29.</p> | <p>Katherine Oven</p> | <p><u>Management Response:</u><br/>The lack of a focused transition of the Lower Silver Creek Project due to the unexpected retirement of key personnel, was a detriment to the continuity of project leadership.</p> <p><u>District Action:</u><br/>The Deputy Officers of the Capital divisions have discussed this issue among themselves and with their unit managers. The DOOs will hold the UMs accountable for proper transition of projects due to key personnel retirements.</p> | <p>Recommend use of a turnover practice including tools (perhaps a checklist) to help ensure smooth transition. A standard District policy/procedure audit checklist (in line with R24) is developed to support performance auditing, it could be used as a basis for turnover. This should be documented in a Policy and an estimated completion date provided.</p> |

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| <p><b>Recommendation R24</b></p> <p>There is no current practice for project performance or compliance audit. Performance evaluation is not currently a requirement of QEMS and there are no systems or processes in place to support implementation of performance or compliance evaluation. The impact of the lack of performance evaluation increases the risk of District and consultant noncompliance and poor performance. Recommend developing and implementing process compliance audit requirements at key stages of project execution including processes, tools, and roles and responsibilities. Of note and predicated on industry best practice, audit should be implemented during project mobilization (early in the project) to allow for course correction if necessary.</p> <p>Final Draft Report Page 30.</p> | <p>Tina Yoke</p> | <p><u>Management Response:</u><br/> Management acknowledges this recommendation. District staff is exploring the parameters, benefits and risk related to a formalized performance evaluation. District staff has also reached out to other regional agencies to benchmark best practices and gain insight from established programs utilizing performance evaluations.</p> <p><u>District Action:</u><br/> Staff to continue exploring the parameters, benefits and risk related to a formalized performance evaluation.</p> | <p>Highly recommend implementing compliance auditing requirements. It can help to ensure projects are setup in accordance with District QEMS, helps to ensure employee understanding of policies and procedures, helps to identify areas that need improvement, and in general can serve as a roadmap for project managers and staff to ensure they're implementing and maintaining key project management knowledge areas, as deemed important by the District.</p> <p>District response does not provide a firm commitment to addressing the recommendation and implementing a change. Suggest they develop a Policy and include an estimated completion date. Said policy can be revised as part of the District's</p> |

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|   |                |   | commitment to continuous improvement.   |
| <p><b>Recommendation R25</b></p> <p>Risk Management is not a requirement of QEMS practices; rather it is included as an optional section within the Project Work Plan practice. Project Risk Management is a well-accepted core project management knowledge area, and industry best practice. The impact of not identifying and documenting risks greatly increases the likelihood of project budget and schedule overruns. Recommend implementing a risk management procedure.</p> <p>Final Draft Report Page 30.</p> | Katherine Oven | <p><u>Management Response:</u><br/> The current QEMS planning and design procedures do not contain instructions for including risk management in each capital project. Risk management is performed on large and complex projects, most often by the design phase consultant.</p> <p><u>District Action:</u><br/> A currently active program management consultant agreement for the District's Expedited Purified Water Program includes tasks for the development of District staff, and several risk management training sessions have been held for interested staff. This consultant was tasked with developing a project risk management practice for the QEMS framework that aligns with industry standards. The new work instruction was completed and published in March 2018.</p> | This document was not provided to PMA as part of the audit; if provided, PMA will review pursuant to its recommendation.  |
| <p><b>Recommendation R26</b></p> <p>Per the Executed Agreement, providing progress status reports is a requirement of invoice submittal. However, the demonstration of progress basis (either in a Project Work Plan or through the invoicing</p>   | Katherine Oven | <p><u>Management Response:</u><br/> Current consultant agreements for capital projects require the consultant to submit a monthly progress report with each monthly invoice. This can be further strengthened by requiring a measure of task completion (as a percentage) for each task that's being invoiced.</p> <p><u>District Action:</u></p>   | Highly recommend implementing an Earned Value Management (EVM) requirement that relies on physical progress (rather than % spent, or % of schedule used) for large capital construction projects. |

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| Audit Recommendations <sup>1</sup>  | Owner                 | Management Response  | Auditor Response to Management Response   |
|---|-----------------------|--|---|
| <p>process) is not required. The impact of not requiring a demonstration of progress basis could in some cases lead to over-invoicing and ensuing over-payment. Recommend implementing a defined procedure for earned value / progress measurement.</p> <p>Final Draft Report Page 30.</p>  |                       | <p>Capital staff will evaluate the costs/benefits of developing and implementing an earned value approach to project invoicing for consultant agreements. A recommendation of whether or not to proceed with such an effort, and the associated necessary short- and long-term financial and staff resources, will be solicited from the CEO/Chiefs by March 2019.</p>   | <p>It is typical for this requirement to be implemented by the GC, and/or CM. The District would review for compliance, and benefit from the additional cost and schedule assurances provided by EVM.</p> |
| <p><b>Recommendation R27</b></p> <p>Though some objectives are formalized in the Project Work Plan, some other objectives articulated in interviews (securing federal funding and optimizing use of federal funding) were not formally recorded either directly as objectives, or as project constraints or assumptions. Further, there is no current process for recording or documented District expectations, or satisfaction with consultant performance and methodologies. The impact of not formally recording expectations and satisfaction reduces the ability to continually improve, both from the standpoint of District procurement</p> | <p>Katherine Oven</p> | <p><u>Management Response:</u><br/>Management concurs with the recommendation and currently evaluates consultant performance for compliance with agreement requirements in terms of scope, schedule, and budget. The District's expectations for consultant performance are stated in agreements using a task and correlating deliverable format, including specific deadlines and financial limits per task. An assessment regarding the quality of consultant performance can best be determined at certain increments after the finished work is implemented and tested to operational standards and the passage of time.</p> <p><u>District Action:</u><br/>Capital Program staff will continue the current satisfaction survey/lessons learned practices.</p> | <p>The referenced surveys and practices were not provided to PMA as part of the audit; if provided, PMA will review pursuant to its recommendation.</p>   |

<sup>1</sup> See audit report for audit background, approach, conclusions, and findings.

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| and consultant performance.<br>Recommend reviewing the need for an expectation and satisfaction procedure. Practice should address objectives, requirements, process, and reporting as well as roles and responsibilities, tools, and templates.<br><br>Final Draft Report Page 30. |              |                            |  |

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