



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL



Audit of American Recovery and Reinvestment Act-Funded Cooperative Agreement 2S-96099601 Awarded to the Idaho Department of Environmental Quality

Report No. 13-R-0206

March 28, 2013



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Abbreviations

ARRA	American Recovery and Reinvestment Act of 2009
CA	Cooperative Agreement
CFR	Code of Federal Regulations
CIPD	Certification of Independent Price Determination
EPA	U.S. Environmental Protection Agency
IDEQ	Idaho Department of Environmental Quality
IPA	Independent Public Accounting
RFQ	Request for Quotes

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Washington, DC 20460



At a Glance

Why We Did This Review

The U.S. Environmental Protection Agency awarded American Recovery and Reinvestment Act Cooperative Agreement 2S-96099601 to the Idaho Department of Environmental Quality. The Office of Inspector General wanted to determine whether IDEQ's procurements and use of force account under the cooperative agreement complied with Code of Federal Regulations requirements under 40 CFR Part 35 Subpart O, and whether the objectives of the cooperative agreement were met. To do so, the OIG contracted with Ollie Green & Company, an Independent Public Accounting firm, to audit the agreement.

This report addressed the following EPA Goals and Cross-Cutting Strategies:

- *Cleaning up communities and advancing sustainable development.*

For further information, contact our Office of Congressional and Public Affairs at (202) 566-2391.

The full report is at:
www.epa.gov/oig/reports/2013/20130328-13-R-0206.pdf

Audit of American Recovery and Reinvestment Act-Funded Cooperative Agreement 2S-96099601 Awarded to the Idaho Department of Environmental Quality

What the IPA Auditors Found

Ollie Green & Company, the IPA firm hired by the OIG to conduct the audit, found that IDEQ complied with Idaho's state procurement policies and procedures, as required by 40 CFR §35.6550(a), which referenced 40 CFR §31.36(a). The IPA contractor also found substantial compliance with 40 CFR Part 35 Subpart O. However, the IPA contractor found that IDEQ did not require its contractors to include Certification of Independent Price Determination language in its bid proposals as required by 40 CFR §35.6550(b)(3). The IPA contractor also found that IDEQ did not require its contractors to have accident and catastrophic loss insurance coverage as required by 40 CFR §35.6590(b). Finally, the IPA contractor found that IDEQ did not require its contractors to retain its records for 10 years after submitting its final federal financial status report as required by 40 CFR §35.6705.

The IPA contractor is responsible for the content of the audit report. The OIG performed the procedures necessary to obtain reasonable assurance about the IPA's independence, objectivity, qualifications, technical approach and audit results.

Recommendations and Corrective Actions

The IPA contractor's report recommends that the Region 10 regional administrator require IDEQ to review and gain an understanding of the requirements of 40 CFR §35.6550(b)(3) and ensure that all current and future bid proposals contain CIPD language. The report also recommends that the regional administrator require IDEQ to ensure that all contracts issued under this cooperative agreement include a 10-year record retention period as required by 40 CFR §35.6705. The report also recommends that the regional administrator require IDEQ to ensure that current and future contractors are covered by accident and catastrophic loss insurance as required by 40 CFR §35.6590(b). In addition, the report recommends that the regional administrator require IDEQ to update its policies and procedures to ensure that they address CIPD, 10-year record retention, and accident and catastrophic loss insurance requirements.

IDEQ agreed with three of the four findings but did not directly address the recommendations in its draft report response. IDEQ has updated its procurement manual to address the CIPD and record retention requirements. Region 10 had no objections to the findings and agrees that IDEQ needs to address the recommendations.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

THE INSPECTOR GENERAL

March 28, 2013

MEMORANDUM

SUBJECT: Audit of American Recovery and Reinvestment Act-Funded
Cooperative Agreement 2S-96099601 Awarded to the
Idaho Department of Environmental Quality
Report No. 13-R-0206

FROM: Arthur A. Elkins Jr.

A handwritten signature in black ink, appearing to read "Arthur A. Elkins Jr.", is written over the printed name.

TO: Dennis McLerran, Regional Administrator
Region 10

This memorandum transmits the final report for the audit of American Recovery and Reinvestment Act cooperative agreement 2S-96099601 awarded to the Idaho Department of Environmental Quality.

The independent public accounting firm Ollie Green & Company conducted this audit on behalf of the Office of Inspector General. The audit was required to be conducted in accordance with *Government Auditing Standards*, issued by the comptroller general of the United States. The IPA firm is responsible for the audit report and the conclusions expressed in that report. The OIG performed the procedures necessary to obtain a reasonable assurance about the IPA's independence, objectivity, qualifications, technical approach and audit results in order to accept the conclusions and recommendations.

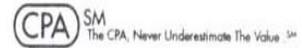
A status of recommendations table is also provided at the end of this report that summarizes the findings which the IPA firm has identified and the corrective actions it recommends. The recommendations represent the opinion of the IPA and the OIG and do not necessarily represent the final position of the U.S. Environmental Protection Agency. EPA managers, in accordance with established audit resolution procedures, will make final determination on matters in this report.

Action Required

In accordance with EPA Manual 2750, you are required to provide your final management decision to us within 180 days, or by September 24, 2013. To expedite the resolution process, please also email an electronic version of your management decision to adachi.robert@epa.gov.

Your response will be posted on the OIG's public website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal. We have no objection to the further release of this report to the public. This report will be available at <http://www.epa.gov/oig>.

If you or your staff have any questions regarding this report, please contact Melissa Heist, assistant inspector general for audit, at (202) 566-0899 or heist.melissa@epa.gov; or Robert Adachi, product line director, at (415) 947-4537 or adachi.robert@epa.gov.



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**Audit of American Recovery and
Reinvestment Act Funded Cooperative
Agreement No. 2S-96099601 Awarded to the Idaho
Department of Environmental Quality**

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Susan Savitch, CPA
Andrea Morris, CPA
Sharon Adams, CPA, CIA

October 29, 2012

**Mr. Robert Adachi, Director of Forensic Audits
U.S. Environmental Protection Agency
Office of Inspector General
San Francisco, CA 94105**

Mr. Adachi:

Please find attached a copy of the final audit report of our Recovery Act audit of Cooperative Agreement No. 2S-9609960 awarded to Idaho Department of Environmental Quality (IDEQ) on July 2, 2009. Our audit was conducted in accordance with the terms and conditions of Contract No. EP-G12H-00376 dated April 2, 2012 and 2011 Revised Government Auditing Standards.

We appreciate the opportunity to have worked with the U.S Environmental Protection Agency, Office of Inspector General. Please contact me with any questions you may have.

Sincerely,



**Ollie Green, MBA, CPA
Managing Partner**

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Introduction

Purpose

The purpose of our audit was to determine whether the Idaho Department of Environmental Quality (IDEQ) procurements and the use of force account under Cooperative Agreement (CA) 2S-96099601 complied with Title 40 Code of Federal Regulations (CFR) Part 35, Subpart O, requirements. The purpose also included determining whether the objectives of the CA were met.

Background

IDEQ was awarded CA No. 2S-96099601 for \$15 million by U.S. Environmental Protection Agency (EPA) on July 2, 2009, to remediate 450-500 lead-contaminated properties at the Bunker Hill Superfund site. The CA was later amended (Amendment No. 3) on December 10, 2009, to increase the amount to \$16,800,000. This project was funded at 100 percent by the ARRA with no state match requirement. The period of performance was from July 2, 2009, through June 30, 2012. Funding for this CA was part of the \$600 million Superfund hazardous site cleanup funded by ARRA.

Scope and Methodology

Our ARRA performance audit covered the period from July 2, 2009, through June 30, 2012. We conducted our fieldwork at IDEQ in Boise, Idaho from May 14 to May 18, 2012, and from June 18 to June 20, 2012. The scope of our audit was limited to determining whether:

- IDEQ's procurements under the CA were conducted in accordance with Title 40 CFR Part 35, Subpart O;
- IDEQ's force account complied with Title 40 CFR Part 35, Subpart O; and
- The objectives of the CA were met.

Our scope included the review of IDEQ's procurement processes and controls related to ARRA CA transactions. Our work included reviewing IDEQ's solicitation, evaluation, tabulation and award processes related to CA 2S-96099601 procurements. Because IDEQ utilized two contractors already under contract (awarded in July 2006) to conduct ARRA CA remediation work, we extended our audit scope to include Year 2006 procurement of the two contractors. IDEQ provided all Year 2006 procurement information requested except detailed tabulation support documentation. IDEQ provided a summary tabulation sheet and indicated that the detailed documentation supporting the tabulations had been destroyed. Our scope for the extended period was limited accordingly.

Our audit methodology included conducting structured interviews and discussions with officials at IDEQ and OIG to gain an understanding about the internal controls, processes, systems and procedures used to capture measure and report IDEQ's procurements and force account activity and how IDEQ met the objectives of the CA.

We requested, received and reviewed documentation from IDEQ to assess IDEQ's procurement processes, force account activity and internal controls over procurements. This documentation included the State's procurement policies and procedures and a written description of the internal controls that were in place during the audit period designed to detect and/or prevent potential errors related to the procurement process. We also requested, received and reviewed property files and other documentation required to verify that the program objectives were met. We used a judgmental sampling approach to select 10 properties to verify that all remediation work was completed in accordance with the requirements of the CA.

A performance audit includes gaining an understanding of internal controls considered significant to the audit objectives, testing controls, and testing compliance with significant laws, regulations and other requirements. For this engagement, we obtained an understanding of IDEQ's procurement processes and internal controls. The testing of internal controls over this process was not determined to be significant to our audit objectives.

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

Results of the Audit

Procurement

Generally we found that IDEQ complied with Idaho’s State procurement policies and procedures as required by Title 40 CFR 31.36 (a). We also found substantial compliance with 40 CFR Part 35 Subpart O. However, we found that IDEQ did not require its contractors to include Certification of Independent Price Determination (CPID) language in their bid proposals as required by Title 40 CFR 35.6550 (b) (3). Our audit also found that IDEQ did not require its contractors to have accident and catastrophic loss insurance coverage as required by Title 40 CFR 35.6590 (b). Finally, we found that IDEQ did not require its contractors to retain its records for 10 years after submitting its final Federal Financial Status report as required by Title 40 CFR 35.6705. See Table 1 below.

Table 1: IDEQ’s Compliance With Title 40 CFR Part 35, Subpart O

CFR Number	CFR Title	Number of Findings
40 CFR 31.36 (a)	State Procurement Policies	
40 CFR 31.36 (j)	Payments to Consultants	
40 CFR 35.6500	Use of Force Account	
40 CFR 35.6550 (a)(5)	Selection Procedures	
40 CFR 35.6550 (a) (9)	Intergovernmental Agreements	
40 CFR 35.6550 (b)	Contractor Standards	1
40 CFR 35.6555 (c)	Written Specifications	
40 CFR 35.6565 (b)-(d)	Procurement Methods	
40 CFR 35.6570	Use of Same Engineer	
40 CFR 35.6575	Restrictions on Contract Types	
40 CFR 35.6590(b)	Accident/Catastrophic Insurance	1
40 CFR 35.6600	Contractor Claims	
40 CFR 35.6705	Records Retention	1
Total		3

As illustrated in Table 1 above, we found three findings related to IDEQ’s compliance with 40 CFR Part 35 Subpart O. Our findings are summarized below.

IDEQ Did Not Require Contractors to Include Certification of Independent Price Determination Language in Their Bid Proposals

IDEQ did not require its contractors to include CIPD language in their bid proposals. Our audit found that IDEQ's two prime contractors utilized to conduct ARRA remediation work did not have CIPD language in their bid proposals as required by 40 CFR 35.6550(b) (3). Title 40 CFR 35.6550(b) (3) states that the recipient must require that each contractor include in its bid or proposal a certification of independent price determination. This document certifies that no collusion, as defined by Federal and State antitrust laws, occurred during bid preparation.

In conducting our work, we found that IDEQ contracted with United Mine Services, Inc and Ferguson Contracting, Inc. to conduct the ARRA CA remediation work. We found that these two contractors had held contracts with IDEQ since June 2006 and July 2006 respectively and their contracts were due to expire in November 2009 and December 2009 respectively. The initial ARRA CA remediation work was conducted by these two contractors from July 2, 2009 (CA award date) through December 31, 2009.

On February 1, 2010, IDEQ solicited bid proposals from qualified contractors to continue the ARRA remediation work required by CA 2S-96099601. Six bid proposals were received and the two incumbent contractors were awarded new contracts to continue the ARRA remediation work. The effective date of their new contracts was April 19, 2010. Our review of the six bid proposals found that none included the CIPD language required by 40 CFR 35.6550(b) (3).

Our review of IDEQ's Purchasing Policies and Procedures Manual issued July 1, 2000, and revised on January 18, 2012 found no requirement for IDEQ to comply with Title 40 CFR 35.6550(b) (3). The IDEQ financial officer indicated that IDEQ erred in not requiring CIPD language in the bid proposals. He also indicated that IDEQ has developed approved CIPD language and will add this language to all future bid proposal requirements.

As a result of this departure from 40 CFR 35.6550(b) (3), IDEQ had no assurances that bid prices submitted by the contractors were independently determined.

IDEQ Contracts Did Not Require A 10 Year Records Retention Period

IDEQ did not specify a 10-year records retention period in its contracts as required by Title 40 CFR 35.6705. Our audit found that IDEQ's contracts

specified a 3 year records retention period. Title 40 CFR 35.6705 requires contractors to retain records for 10 years after submitting its final Federal Financial Status report unless otherwise directed by the EPA award official. Our work included requesting copies of the two contracts awarded to the contractors conducting the ARRA lead contamination remediation work required by CA No. 2S-96099601 at the Bunker Hill Superfund site. Upon conducting our review of these contracts, we found that both contracts specified only a 3 year records retention period.

Our review of IDEQ's Purchasing Policies and Procedures Manual issued July 1, 2000, and revised on January 18, 2012 found no requirement for IDEQ to comply with Title 40 CFR 35.6705. IDEQ indicated that the Department's records retention period is 33 years. However, due to an oversight, this information was not conveyed to the contractors. IDEQ indicated that it will establish language in future contracts stating these retention periods and will require contractors to retain records for the prescribed periods.

As a result of the 3 year records retention period specified in IDEQ's contracts, IDEQ's contractors are currently required to retain records related to the CA for only 3 years.

IDEQ Did Not Require Its Contractors to Have Accident and Catastrophic Loss Insurance Coverage

Our audit found that IDEQ did not require its contractors to have accident and catastrophic loss insurance coverage as required by Title 40 CFR 35.6590 (b). To conduct our work, we requested and received the insurance requirements and coverage amounts for IDEQ contractors conducting the lead contamination remediation work at the Bunker Hill Superfund site.

Our review of IDEQ's Purchasing Policies and Procedures Manual issued July 1, 2000, and revised on January 18, 2012 found no requirement for IDEQ to comply with Title 40 CFR 35.6590 (b). We found that IDEQ required its contractors to have the following insurance coverage:

- Idaho Worker's Compensation Insurance (minimum \$100,000);
- Comprehensive General Liability (minimum \$1,000,000 per occurrence);
- Automobile Liability Insurance (no less than \$1,000,000).

IDEQ's financial officer indicated that the Department feels that it has met the requirements of Title 40 CFR 35.6590 (b). He indicated that if the Department has not met the requirement, it would have been an oversight and misinterpretation of the regulation. Finally, he indicated that all future contracts will have that requirement added if determined necessary. Title 40 CFR 35.6590 (b) states that the recipient must require the contractor to provide insurance

against accidents and catastrophic loss to manage any risk inherent in completing the project.

This departure from Title 40 CFR 35.6590 (b) put IDEQ at risk that the contract work may not be completed by the contractor due to accident or catastrophic loss.

Force Account Activity

Title 40 CFR 35.6500 (a) defines Force Account work as the use of the recipient's own employees or equipment for construction, construction-related activities (including architecture and engineering services), or repair or improvement to a facility. Our audit found that IDEQ had no Force Account activity related to the CA.

Cooperative Agreement Objectives

The EPA awarded CA No. 2S-96099601 to IDEQ on 2 July 2009. The purpose of the CA was to provide federal assistance in the amount of \$16,800,000 for remediation of 450-500 lead-contaminated properties at the Bunker Hill Superfund site. Our audit found that IDEQ completed the remediation of 480 lead contaminated properties in accordance with requirements of the CA.

Recommendations:

We recommend that the Regional Administrator, Region 10:

1. Require IDEQ to review and gain an understanding of the requirements of 40 CFR 35.6550(b) (3) and ensure that all current and future bid proposals contain CIPD language.
2. Require IDEQ to ensure that all contracts issued under this CA include the 10 year record retention period as required by Title 40 CFR 35.6705.
3. Require IDEQ to ensure that current and future contractors are covered by accident and catastrophic loss insurance as required by Title 40 CFR 35.6590 (b).
4. Require IDEQ to update its policies and procedures to ensure that they address:
 - a. Bid proposal certification of independent price determination language as required by 40 CFR 35.6550(b) (3).
 - b. 10 year record retention period as required by Title 40 CFR 35.6705.
 - c. Accident and catastrophic loss insurance as required by Title 40 CFR 35.6590 (b).

Agency and Recipient Comments

Ollie Green & Company issued a draft report on August 23, 2012 and provided copies to IDEQ, Region 10 and OIG. In response to the draft report, we received written comments from IDEQ on September 17, 2012. IDEQ agreed with 3 of the 4 findings cited but did not address the recommendations in its response. Region 10 provided its written response to the draft report on September 11, 2012 stating that it had no objections to the findings, and agrees that IDEQ needs to address the recommendations presented in the draft report. We conducted the final exit conference on September 19, 2012 via teleconference with IDEQ, Region 10 and OIG to obtain verbal comments to the draft report.

IDEQ agreed with finding 1 (***IDEQ Did Not Require Contractors to Include Certification of Independent Price Determination Language in Their Bid Proposals***) in its written response and specified the language proposed for its Request for Proposals (RFP), Contracts and Contracts Manual. IDEQ agreed with finding 2 (***IDEQ Contracts Did Not Require A 10 Year Records Retention Period***) and said that it had incorporated the required 10 year retention language in its standard RFQ, Contracts and Contracts Manual. IDEQ also agreed with finding 3 (***IDEQ Did Not Require Its Contractors to Have Accident and Catastrophic Loss Insurance Coverage***) and said that it would require contractors to have the Accident and Catastrophic Insurance Coverage required by Title 40 CFR 35.6590b. IDEQ said that its insurance carrier was not able to identify the type of insurance required by Title 40 CFR 35.6590b and requested additional clarification about the type of insurance required. Region 10 officials indicated that the required coverage may be contained within the contractor's General Liability Package but would research further and provide an answer as soon as possible. IDEQ, Region 10 and OIG agreed with the recommendations made for findings 1, 2, and 3.

IDEQ disagreed with finding number 4 (***IDEQ Did Not Sign-Off on Three Pavement Projects Invoiced by Contractors***). IDEQ agreed that the asphalt work was not included on the internal checklist used during the audit, but said that there were other checks and balances in place to ensure that the asphalt work had been done and properly inspected before payment was made. IDEQ also indicated that the checklist used to ensure work had been inspected and signed off on had been revised to include asphalt work. Based on IDEQ's written and verbal response, OIG recommended that finding 4 be taken out of the report. Ollie Green and Company concurred with this recommendation and removed finding 4 from the draft report.

Ollie Green & Company Response

IDEQ's written and verbal responses to findings 1, 3, 4, show that IDEQ has taken the appropriate actions to address the recommendations. The response provided for finding 1 show that IDEQ's proposed language for RFPs, Contracts and Contract Manual satisfies the Independent Price Determination Language requirement. Therefore recommendation 1 is closed. The response provided for finding 2 shows that IDEQ has revised its RFQs, Contracts and Contracts Manual to incorporate the 10 year retention requirement. However, this recommendation remains open as IDEQ did not modify the current contracts to include the required 10 year retention period. The response provided for finding 3 shows that IDEQ is

making an effort to identify the Accident and Catastrophic Insurance Coverage required by Title 40 CFR 35.6590b. Region 10 has agreed to research this matter further and to provide guidance to IDEQ. Therefore, recommendation 3 remains open. IDEQ disagreed with finding 4 and provided other evidence that indicated that the work had been done properly and that other checks and balances were in place to ensure that asphalt work had been inspected and signed off on. Based on this information and OIG's recommendation, finding 4 was taken out of the report. Therefore recommendation 4 is closed. IDEQ has agreed to update its RFQs, Contracts and Contracts Manual to include language to ensure that the requirements of recommendations 5a and 5b were included. However, IDEQ did not address the requirements of recommendation 5c in its response. Therefore recommendations 5a and 5b are closed and 5c remains open. We agree with IDEQ's initial corrective actions to address the requirements of recommendations 1, 3, 4, 5a and 5b cited in the draft report. IDEQ will need to include its proposed corrective action plan in its response to the final report.

Appendix – A - IDEQ Response to Draft Report

September 17, 2012

Ollie Green, MBA CPA, Managing Partner
Ollie Green & Company, CPA's
1300 South Fourth St, STE 100
Louisville, KY 40208

Re: Recovery Act audit of EPA Cooperative Agreement No. 26-96099601

Dear Mr. Green:

The Idaho Department of Environmental Quality (DEQ) accepts the “Draft” audit report sent to us on August 23, 2012, and offers the following responses to the findings identified within the report.

Finding – IDEQ Did Not Require Contractors to Include Certification of Independent Price Determination Language in Their Bid Proposals

DEQ agrees with the finding and has incorporated the following language into its standard RFP, Contracts and Contracts Manual:

The offeror certifies that:

1. *The prices in this offer have been arrived at independently, without, for the purpose of restricting competition, any consultation, communication, or agreement with any other offeror or competitor relating to:*
 - i. *Those prices,*
 - ii. *The intention to submit an offer, and*
 - iii. *The methods or factors used to calculate the prices offered.*
2. *The prices in this offer have not been and will not be knowingly disclosed by the offeror, directly or indirectly, to any other offeror or competitor before bid opening (in the case of a sealed bid solicitation) or contract award (in the case of a negotiated solicitation) unless otherwise required by law; and,*
3. *No attempt has been made or will be made by the offeror to induce any other concern to submit or not to submit an offer for the purpose of restricting competition.*

Finding – IDEQ Contracts Did Not Require A 10 Year Records Retention Period

DEQ agrees with the finding and has incorporated the following language into its standard RFP, Contracts and Contracts Manual:

The CONTRACTOR shall maintain books, records, documents and other evidence directly pertinent to performance of EPA funded work under this CONTRACT in accordance with generally accepted accounting principles and practices consistently applied, and in accordance with 40 CFR 31.36(i)(10) and (11), in effect on the date this CONTRACT is signed by both parties. Records shall be retained for a period of ten (10) years after final payment is made and all other pending matters are closed. If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the ten-year period, the records must be retained until completion of the actions and resolution of all issues which arise from it, or until the end of the regular ten-year period, whichever is later.

Finding – IDEQ Did Not Require Its Contractors to Have Accident and Catastrophic Loss Insurance Coverage

DEQ agrees with the finding and will require Accident and Catastrophic Insurance Coverage, as and when required by Title 40 CFR 35.6590 (b).

Finding – IDEQ Did Not Sign-Off On Three Pavement (Asphalt) Projects Invoiced by Contractors

DEQ disagrees with the finding. While initially the asphalt work was not included on the DEQ's internal checklist, the work was reviewed and approved prior to payment. In addition, DEQ does confirm completion of all asphalt work in the final record drawing that is completed for each property. While Title 40 CFR Part 31.36 (a) (2) requires grantees and sub-grantees to maintain a contract administration system which ensures that contractors perform in accordance with terms, conditions and specifications of their contracts or purchase orders, it does not define specifically how that is to be done. DEQ feels that in this situation, the level of oversight and approval process more than adequately meets the requirement. Finally, DEQ has revised the property file check list to include a line item for asphalt which is the form of pavement used at the site.

If you or your staff has any further questions, please contact Dave Sande, CPA, Financial Officer.

Sincerely,

Curt A. Fransen
Director

c: Dave Sande, DEQ-Fiscal Office

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
1	6	Require IDEQ to review and gain an understanding of the requirements of 40 CFR 35.6550(b) (3) and ensure that all current and future bid proposals contain CIPD language.	C	Regional Administrator, Region 10			
2	6	Require IDEQ to ensure that all contracts issued under this CA include the 10 year record retention period as required by Title 40 CFR 35.6705.	O	Regional Administrator, Region 10			
3	6	Require IDEQ to ensure that current and future contractors are covered by accident and catastrophic loss insurance as required by Title 40 CFR 35.6590 (b).	O	Regional Administrator, Region 10			
4	6	Require IDEQ to update its policies and procedures to ensure that they address: <ul style="list-style-type: none"> a. Bid proposal certification of independent price determination language as required by 40 CFR 35.6550(b) (3). b. 10 year record retention period as required by Title 40 CFR 35.6705. c. Accident and catastrophic loss insurance as required by Title 40 CFR 35.6590 (b). 	O	Regional Administrator, Region 10			

¹ O = recommendation is open with agreed-to corrective actions pending
C = recommendation is closed with all agreed-to actions completed
U = recommendation is unresolved with resolution efforts in progress

Distribution

Regional Administrator, Region 10
Agency Follow-Up Official (the CFO)
Agency Follow-Up Coordinator
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Director, Idaho Department of Environmental Quality