



FCPS Audit Report: 25-1004 – Construction and Renovation Contracting Process

June 2025

Prepared by
Office of Auditor General

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Report Highlights

<u>Background:</u> <p>The construction and renovation contracting process is a joint responsibility of the Office of Administrative Services (OAS), managed by the Chief Operating Officer (COO), and the Office of Design and Construction Services (D&C), managed under the Chief of Facilities Services and Capital Programs.</p>	<u>Key Audit Objectives:</u> <ul style="list-style-type: none"> • Obtain understanding of FCPS construction and renovation contract administration and management • Evaluate the design of key processes and controls • Benchmark industry standards <u>Audit Scope:</u> <ul style="list-style-type: none"> • July 1, 2023, to December 31, 2024
<u>Financial Indicators (from FCPS Fiscal Year (FY) 2025 Program Budget):</u> <p>In FY 2024, the Chief of Facilities Services and Capital Programs coordinated and managed 18 bond-funded projects within the FY 2024 funding cap of \$205 million.</p>	

Risk rating: High = red; Moderate = yellow; Low = green

#	Findings	Key Recommendations
1	OAG identified instances of non-compliance with project contract terms and D&C Manual.	<ul style="list-style-type: none"> • D&C should implement a monitoring process to increase accountability and ensure compliance with construction and renovation contracting guidelines. At a minimum, this process should oversee the following elements: daily reports, punch lists, submittal timelines, and the documentation and timing related to PCOs. • D&C should consider including change orders threshold guidelines in their Operating Procedures Manual (Manual).
2	OAG identified several areas where improvements could be made to FCPS construction monitoring practices.	<ul style="list-style-type: none"> • D&C should establish formal guidelines mandating a documented cost analysis for all approved PCOs and Architect Evaluations. • D&C should implement a monitoring process for punch list including establishing clear roles and responsibilities for managing, reviewing, and approving. • D&C should establish and enforce a formal process for submission, review, and approval of updated construction project schedules.
3	OAG identified that policies and guidelines require updating.	<ul style="list-style-type: none"> • D&C should finalize its update of the Manual.
4	OAG noted that Key Performance Indicators (KPI) and construction benchmarking were not established.	<ul style="list-style-type: none"> • OAS and D&C should establish and document internal and external benchmarking practices and implement measurable KPIs for assessing program effectiveness.

Management concurred with all recommendations. For more information and context, please refer to the report in its entirety.

Table of Contents

Executive Summary	4
Background, Scope and Objectives, and Methodology	6
Background	6
Scope and Objectives	11
Methodology	12
Sampling Plan	12
Benchmarking	14
Audit Findings, Recommendations, and Management's Responses	16
Finding 1 – Compliance with Construction and Renovation Contracting Requirements	17
Finding 2 – Construction and Renovation Monitoring	22
Finding 3 – Update to FCPS Policies and Guidelines	26
Finding 4 – Key Performance Indicators and Construction Benchmarking	28
Observation – Contractor Performance Monitoring	30
Appendix – Sample Attribute Testing	31

Executive Summary

The Office of Auditor General (OAG) conducted a performance audit of the Fairfax County Public Schools (FCPS) construction and renovation contracting process in accordance with the Fiscal Year (FY) 2025 audit plan approved by the Fairfax County School Board. Construction contracts are administered by the Office of Administrative Services (OAS), under the Chief Operating Officer (COO). The Office of Design and Construction Services (D&C), under the Office of Chief of Facilities Services and Capital Programs, is responsible for administering and monitoring design and construction service contracts for FCPS Capital Improvement Program (CIP) projects. CIP projects include new school facilities, capacity enhancements (additions or installation of modular buildings), and renovations of existing school facilities. CIP projects funded for construction in the 2019, 2021, and 2023 bond referendums were included in the scope of this audit.

The objectives of the audit were to perform the following:

1. Obtain understanding of FCPS construction and renovation contract administration and management processes through walkthroughs with the Office of Administrative Services and the Office of Design and Construction Services (D&C), review of D&C procedures, and analysis of current and recently completed Capital Improvement Program (CIP) projects.
2. Evaluate the design of key processes and controls related to procurement, contract monitoring, change orders, contract invoicing, and contract closeout on a sampling basis.
3. Benchmark industry standards, including the Virginia Public Procurement Act (VPPA), to assess FCPS construction and renovation contracting process compliance.

As a result of this audit, OAG identified one high risk finding, three moderate risk findings, and one observation, summarized below:

Finding 1 – Compliance with Construction and Renovation Contracting Requirements (High risk)

OAG examined six construction and renovation projects and identified several instances of non-compliance with project contract terms and Office of Design and Construction Manual. These include incomplete daily reports, a significant backlog of outstanding punch list items¹, unclear change order threshold approval guidelines, delays in submittal reviews resulting in an additional \$68,022 in incurred costs, and an approved \$233,328 proposed change orders (PCO) with insufficient documentation.

Key Recommendations:

- D&C should implement a monitoring process to increase accountability and ensure compliance with construction and renovation contracting guidelines. At a minimum, this process should oversee the following elements: daily reports, punch lists, submittal timelines, and the documentation and timing related to PCOs.
- D&C should consider including change orders threshold guidelines in their Operating Procedures Manual.

¹ For each construction phase, a punch list is completed to document any tasks needed to be performed or corrected prior to phase completion.

Finding 2 – Construction and Renovation Monitoring (Moderate risk)

OAG identified several areas where improvements could be made to FCPS construction monitoring practices. Specifically, FCPS does not document its cost analysis of approved PCOs proposed by the General Contractor. Additionally, while punch lists identify tasks and their initial dates, they lack assigned due dates for the contractor or prioritization of critical items. Also, while FCPS reviews initial project schedules, there is no documented review of updated schedules. Finally, three of the six sampled projects missed key contractual milestones without documented time extensions.

Key Recommendations:

- D&C should establish formal guidelines mandating both a documented cost analysis for all approved PCOs and a formal Architect Evaluations.
- D&C should implement a monitoring process for the punch list process including establishing clear roles and responsibilities for managing, reviewing, and approving punch list items.
- D&C should establish and enforce a formal process for the submission, review, and approval of updated construction project schedules.

Finding 3 – Update to FCPS Policies and Guidelines (Moderate risk)

Last updates to FCPS Policy 8240 were made in 2014, and the draft Operating Procedures Manual for Design and Construction requires updates to reflect current procedures.

Key Recommendations:

- D&C should finalize its update of the Operating Procedures Manual.

Finding 4 - Key Performance Indicators and Construction Benchmarking (Moderate risk)

Office of Administrative Services and Office of Design and Construction Services do not have established Key Performance Indicators (KPIs) to evaluate the effectiveness of their construction and renovation programs, nor do they document internal or external benchmarking efforts.

Key Recommendations:

- Office of Administrative Services and D&C should establish and document both internal and external benchmarking practices, coupled with the implementation of measurable KPIs for assessing program effectiveness.
- Office of Administrative Services and D&C should actively explore solutions for creating dynamic dashboards to visualize this critical information.

Management concurred with all recommendations. OAG appreciates the cooperation and courtesies extended to our staff by the Office of Design and Construction Services (D&C) and the Office of Administrative Services.

Background, Scope and Objectives, and Methodology

Background

The construction and renovation contracting process is a joint responsibility of the Office of Administrative Services, managed by the Chief Operating Officer (COO), and the Office of Design and Construction Services (D&C), managed under the Chief of Facilities.

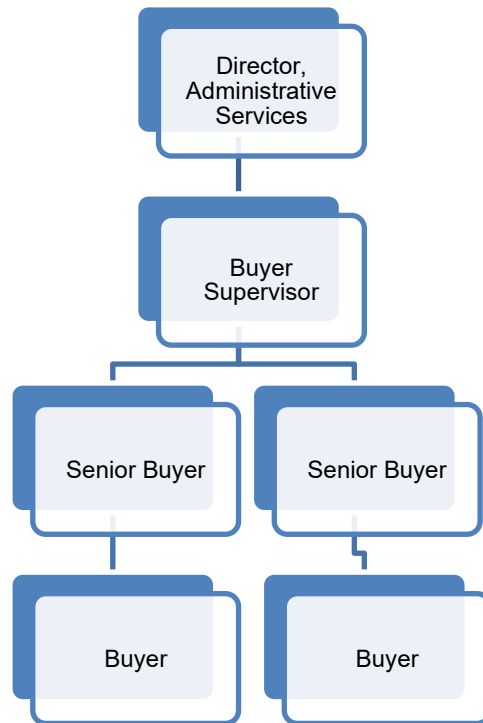
Organization and Responsibilities

1. Office of Administrative Services

The COO includes the Office of Administrative Services, which provides administrative and logistical support by overseeing the community use of FCPS facilities, supports departmental technology requirements, and coordinates departmental financial, budgeting, and contract management. This includes providing procurement support to the Office of Design and Construction Services in the Department of the Chief of Facilities Services and Capital Programs.

Organization

The diagram below shows the organizational structure for the Office of Administrative Services:



2. Office of Design and Construction Services

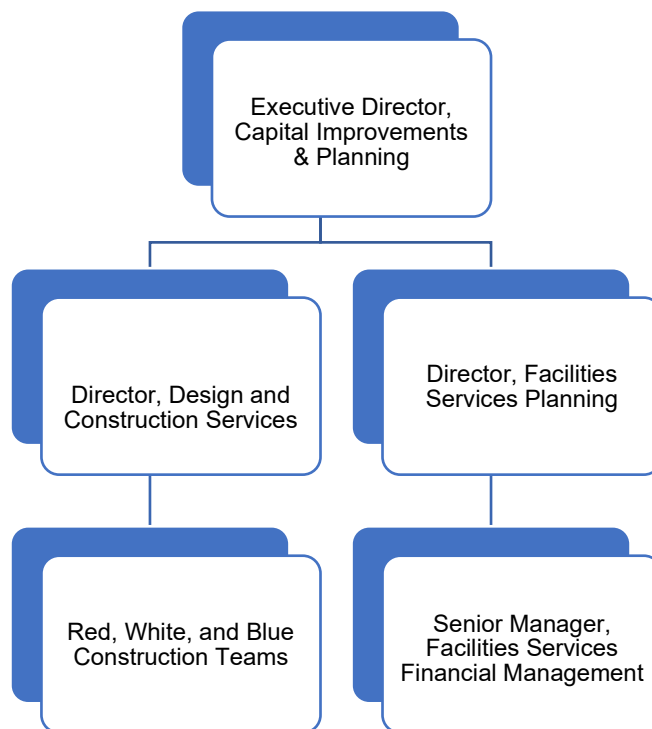
Effective August 1, 2023, as part of the division-wide reorganization of the COO, the services and functions of the Office of Design and Construction, Office of Facilities Management, and the

Office of Facilities Planning Services were realigned to the Office of Chief of Facilities Services and Capital Programs.

According to FCPS FY 2025 Budget Program, the Office of Design and Construction Services (D&C) under the Chief of Facilities Services and Capital Programs, prioritizes equity by promoting and providing community and school input from the design phase to the completion of a project, ensuring all voices are considered. This office partners with Fairfax County and is responsible for design and construction services for all capital projects, including new school facilities, additions to existing schools, renewals (renovations) of existing school facilities, and the purchase, installation, and relocation of temporary classroom facilities. This office is also responsible for financial management, budget development and administration, School Construction Fund administration, vendor payment processing, and distribution of proffer funds.

Organization

The diagram below shows the organizational structure for the Office of D&C:



Contract Administration

During the audit scope period, FCPS utilized a "Design-Bid-Build" project methodology for capital improvement program (CIP) projects. OAG noted that currently FCPS is exploring additional mechanisms related to construction projects. A discussion was held on May 6, 2025, during a School Board work session to propose new construction strategies. The new strategies address increasing construction costs. The considered alternative project delivery methods include "Construction Manager at Risk" and "Design-Build," which aim to improve budget predictability and accelerate project timelines compared to the current approach.

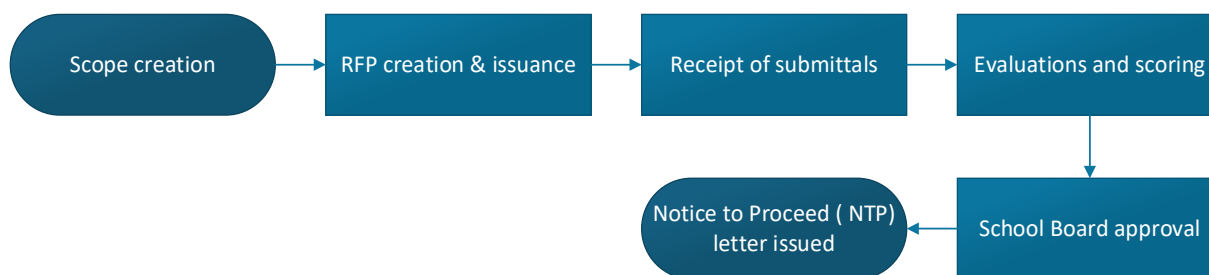
1. Design

The design phase begins with the solicitation of vendors to provide architectural and engineering (A&E) services for a project. FCPS Policy 8220 *Architectural and Engineering Services* requires that a Request for Proposal (RFP) be issued to procure these contracts for projects with compensation expected to exceed \$50,000.

Specifically, for the Office of Administrative Services, RFP is used to procure design contracts from A&E firms for projects over \$50,000, third-party construction testing contracts (e.g., concrete, steel), and temporary classroom relocation and electrical service contracts. Proposals are evaluated based on specific criteria and negotiation with one or more vendors. The award is made to the offeror deemed most qualified based on the evaluation factors set forth in the RFP or may be awarded to multiple offerors if necessary.

RFPs for design contracts are solicited every two years, when a new bond referendum² is issued. Funding for design is generally in one bond, with funding for construction approved in the subsequent bond two years later (based on a review of approved bonds, there were instances in which there is a four-year gap, or two bond referendums, between design and construction funding).

The RFP for design process is illustrated by the following diagram:



Office of Administrative Services is responsible for verifying the completeness of the application submitted by the applicant to pre-qualify the contractor with an approved project value range. The application is sent for review by D&C senior managers who give their recommendation of approval or denial based upon their review of the application and in accordance with the requirements of Section 2.2-4317(C) of the VPPA. Office of Administrative Services then compiles the reviews and send it to the Director of D&C for their ultimate approval/denial.

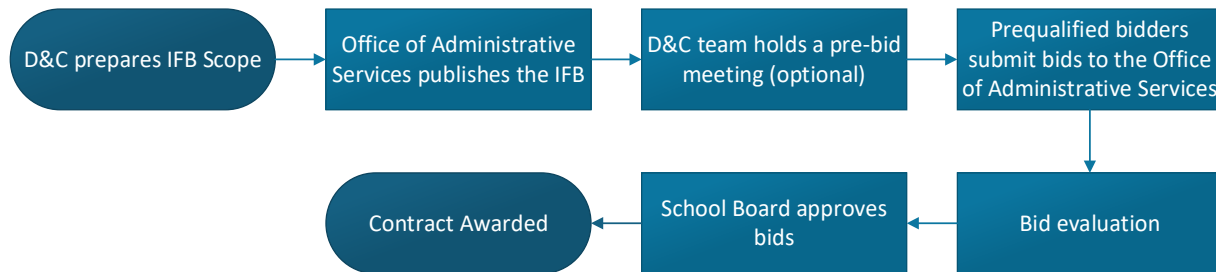
2. Bid

Once the project design has been finalized and construction costs estimated, D&C prepares a solicitation to obtain the services of a general contractor to perform the construction. FCPS Policy 8240 *Construction, Maintenance Services, Bids, Contracts, Bonds* requires that an Invitation for Bid (IFB) be issued to procure construction contracts that exceed \$100,000. Public notice of the IFB is given at least ten days prior to the date set for the receipt of bids.

² The primary source of funding for school construction projects is the sale of bonds authorized by voters in the bond referendum.

Bid documents are only provided to bidders who are pre-qualified in accordance with FCPS pre-qualification process, which helps to ensure that prospective bidders are qualified, reputable, and financially capable of performing the project. Bid prices submitted by general contractors include the cost of subcontractors who perform significant portions of the project. The construction contract is awarded to the lowest responsive and responsible bidder.

The IFB process for construction contracts is illustrated by the following diagram:



3. **Build**

Once a contract is executed and a Notice to Proceed (NTP) letter is issued, the general contractor, along with the various subcontractors, break ground on the project. During construction, the Architect acts on behalf of FCPS to oversee and administer the construction process. Architects are involved in the processes of reviewing general contractor payment requisitions, which are based on a percentage completion of a defined schedule of values, as well as reviewing and coordinating change orders. Approved change orders are signed by the Architect, contractor, and FCPS project coordinator. Other contractual oversight responsibilities the Architect has relate to documenting minutes of biweekly progress meetings.

Contract Management

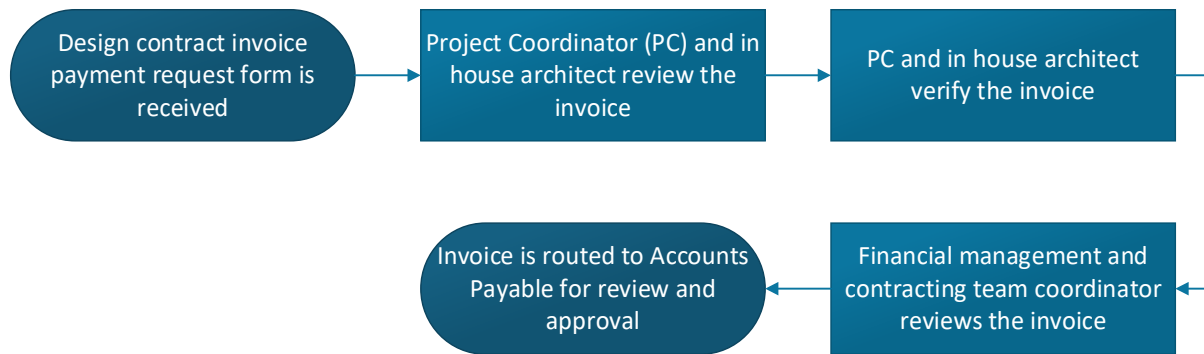
After the award decision has been made by the School Board and the contract has been signed, D&C staff prepares a Superintendent's Cost Data Sheet to inform the Superintendent of the total cost of the project. The Cost Data Sheet includes the referendum budget vs. the actual construction amount. The Routing Slip is signed off by the Executive Director of Facilities Services & Capital Programs, Chief of Facilities Services & Capital Programs, and Superintendent.

1. **Vendor Payment**

➤ Design Contract Payment Process

When a design contract invoice (in the form of a payment request form) is received, it is sent to the Project Coordinator to review with the in-house Architect. Both need to review the invoice details and certify the payment request. Afterwards, the invoice is submitted to the Financial Management and Contracting Team Coordinator for review and approval. Finally, the invoice is routed to Accounts Payable for review and processing.

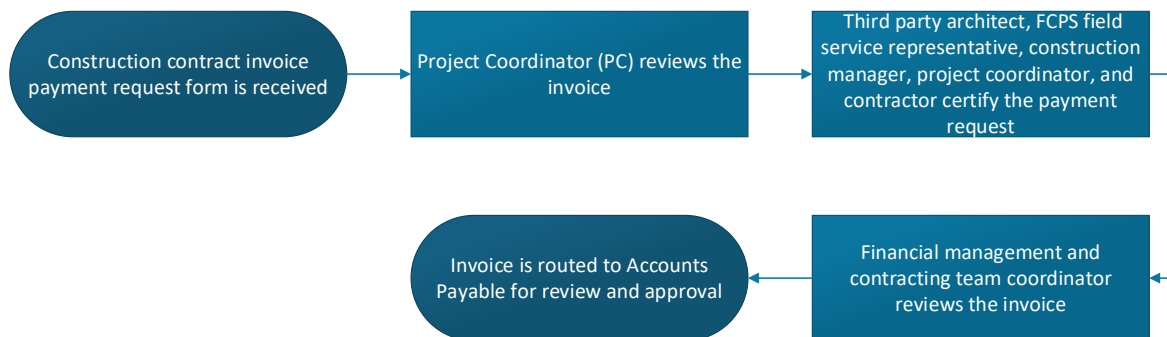
The design contract payment process is illustrated by the following diagram:



➤ Construction Contract Payment Process

As construction begins, monthly invoices are received from the General Contractor (GC). When a construction contract invoice (in the form of a payment request) is received, it is sent to the Project Coordinator to review. The contractor, third-party Architect, FCPS Field Service Representative, Construction Manager, and Project Coordinator review the invoice detail and certify the payment request. The invoice is then routed to Financial Management and Contracting Team staff, who calculates the retainage amount to be withheld from progress payments based on the contract's terms and conditions (typically 5% of the contract value). The Project Construction Manager verifies the percentage of completion prior to authorizing the payment invoice. After that, the Financial Management and Contracting Team Coordinator will review and approve the invoice and submit it to Accounts Payable for review and processing.

The construction contract payment process is illustrated by the following diagram:



2. Change Orders

A proposed change order (PCO) is submitted by the GC along with supporting detail, including the costs associated with the change.

After the PCO is reviewed and costs are agreed on, the Architect of the project generates the change order with the approved amounts. The approved change order is signed by the Architect, contractor, and Project Senior Manager.

3. Contract Monitoring

➤ Superintendent's Cost Data Sheet

This covers the overall school project, i.e., including both design and construction contracts of the school.

After the School Board makes the award decision and the contract is signed, D&C staff prepares a Superintendent's Cost Data Sheet to inform the Superintendent of the total cost of the project. The Cost Data Sheet includes the referendum budget compared to the actual construction amount. The sheet is approved by the Director of D&C, the COO, and the Superintendent.

➤ Daily Log

The field service representative fills out a daily report in Microsoft Access (Access) to document the project's progress and issues (e.g., safety issues, general comments on the site, building, mechanical, electrical, and manpower).

➤ Progress Meetings

During the biweekly progress meetings, including contractor and school staff meetings, the project team reviews project issues, outstanding punch lists, and draft payment invoice documents. The Architect documents the minutes of each meeting as part of their contract oversight responsibilities.

➤ Punch List

A punch list is completed for each construction phase to document any tasks that need to be performed/corrected before phase completion.

4. Contract Close Out

Projects are considered substantially complete when the owner can occupy the building for its designated use. After substantial completion, the design firm and GC continue to be retained to oversee and perform work such as correcting deficiencies and completing smaller tasks. A notice of final completion is provided by the design firm once it is determined that the work has been satisfactorily completed and the contract documents have been fully performed. Both substantial completion and final completion are dates established in the construction contract.

Scope and Objectives

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings, observations and conclusions based on our audit objectives.

The objectives of the audit were to perform the following:

1. Obtain understanding of FCPS construction and renovation contract administration and management processes through walkthroughs with the Office of Administrative Services and the Office of Design and Construction Services (D&C), review of D&C procedures,

and analysis of current and recently completed Capital Improvement Program (CIP) projects.

2. Evaluate the design of key processes and controls related to procurement, contract monitoring, change orders, contract invoicing, and contract closeout on a sampling basis.
3. Benchmark industry standards, including the Virginia Public Procurement Act (VPPA), to assess FCPS construction and renovation contracting process compliance.

The scope of work includes contract administration and management processes and vendor compliance with contractual terms and conditions for CIP projects funded for construction in the 2019, 2021, and 2023 bond referendums.

As required by GAGAS, OAG assessed whether internal control was significant to the audit objectives. OAG's assessment included the use of the Committee of Sponsoring Organizations of the Treadway Commission internal control framework. The framework includes five components: Control Environment; Risk Assessment; Control Activities; Information and Communication; and Monitoring; along with 17 related principles.

Methodology

To satisfy our audit objectives, the audit team performed the following:

- Reviewed applicable federal and state legislation and FCPS Policy and Regulation.
- Reviewed D&C standard operating procedures.
- Obtained an understanding and evaluated the design of key processes and controls related to procurement, contract monitoring, change orders, contract invoicing, and contract close out on a sampling basis.
- Benchmarked industry standards including VPPA to assess FCPS construction and renovation contracting process compliance.

Sampling Plan

1. Project Sample

OAG compiled the 2019, 2021 and 2023 Bond Referendum (refer to **Table 1- Bond Referendums Projects**). The total approved bond referendum totaled \$360,000,000 in 2019, \$360,000,000 for 2021 and \$435,000,000 for 2023.

Table 1- Bond Referendums Projects

Project	2019 Amount	2019 Number	2021 Amount	2021 Number	2023 Amount	2023 Number
New Construction	\$37,337,990	2	\$0	0	\$0	0
Capital Enhancements	\$58,437,515	4	\$0	0	\$0	0
Renovation ES	\$158,595,219	10	\$202,000,000	12	\$402,500,000	15
Renovation MS	\$103,129,276	2	\$0	0	\$8,000,000	1

Renovation HS	\$0	0	\$142,000,000	2	\$0	0
Modular Relocations	\$0	0	\$0	0	\$9,000,000	3
Site Acquisition	\$0	0	\$13,500,000	1	\$0	0
Inflation Adjustment	\$0	0	\$0	0	\$10,000,000	N/A
Security Vestibules	\$0	0	\$0	0	\$2,500,000	1
Project Subtotal	\$357,500,000	18	\$357,500,000	15	\$432,000,000	20 ³
Bond Cost	\$2,500,000	N/A	\$2,500,000	N/A	\$3,000,000	N/A
Referendum Total	\$360,000,000	N/A	\$360,000,000	N/A	\$435,000,000	N/A

Sampled projects include one new school, one capacity enhancement, and four renovations. Three of the six projects have been substantially completed⁴ and will be used to test closeout procedure (refer to **Table 2 - Projects Sample**). Key considerations when judgmentally selecting the sample included oversight team, general contractor, project type, school type (ES, MS, HS), and approved construction bond dollars. Please see **Appendix - Sample Attribute Testing**.

Table 2 - Projects Sample

Project (Type)	Substantial Completion (as of 12/31/2024)	Construction Bond Referendum Approval Year	Approved Construction Bond Referendum Dollars
Site 1	No	2019	\$35,330,490
Site 2	Yes	2019	\$22,298,143
Site 3	Yes	2019	\$53,468,723
Site 4	Yes	2021	\$37,000,000
Site 5	No	2021	\$130,000,000
Site 6	No	2023	\$50,800,000

2. GC and Architect Payments

OAG obtained FOCUS payments for each project and selected a sample of GC and Architect payments. From a population of 126 payments during our scope period of July 1, 2023, to December 31, 2024, OAG selected 45 payments for testing, including 30 Architect and 15 GC payments (refer to **Table 3 – Payments Sample**). OAG used the binomial sampling model based on a 90% confidence level, 5% tolerance rate, and 0% expected population exception rate. The sample size of payment requests selected was proportionate to the total population. OAG verified the following:

³ Per management, only two of the 20 projects are active as of testing date.

⁴ Substantial completion signifies the point at which the project is sufficiently complete and usable for its intended purpose, even though minor finishing touches or punch list items may remain.

- Verified supporting documentation was included in the payment application, including Requisition Form, Stored Materials Log, Change Order Log, and Certificate of Payment.
- Verified if payment is in accordance with contract requirements
- Verified payment documentation was approved by the contractor, FCPS Inspector, Architect, and FCPS Capital Project Coordinator.

Table 3 – Payments Sample

Project	Architect Payments Population	Architect Payments Sample	GC Payments Population	GC Payments Sample
Site 1	\$ 864,660.71	\$ 625,933.20	Out of scope period.	N/A
Site 2	\$ 3,453.40	\$ 3,330.00	\$313,302.69	\$313,302.69
Site 3	\$ 4,396,946.00	\$ 1,464,083.00	\$ 4,396,946.00	\$ 1,464,083.00
Site 4	\$ 538,260.75	\$ 208,772.75	\$ 13,966,462.55	\$ 7,238,448.63
Site 5	\$ 1,110,856.11	\$ 650,994.69	\$ 48,519,334.23	\$ 24,905,546.32
Site 6	\$ 284,967.03	\$ 179,745.35	Out of scope period.	N/A

3. Change Orders

For a sampled projects, using the change order log, OAG selected all change orders within our scope period and tested the following:

- Verified that each change order that increases contract value was accompanied by a budget transfer authorization.
- Verified that change orders are accompanied by PCOs with supporting documentation.
- Verified that each change order was signed by the general contractor, the Architect, and FCPS.

Table 4 – Change Orders Sample

Project	Change Order (CO) Sample Amount
Site 2	\$ 279,211.00
Site 3	\$ 249,433.00
Site 4	\$ 1,015,442.00
Site 5	\$ 5,008,571.61

Benchmarking

OAG reached out to nine neighboring entities to learn about their construction mechanism.

Five out of the nine schools responded including, City of Alexandria Government, Fairfax County Government, City of Virginia Beach Government, Arlington County Government and Virginia Beach Public Schools.

While Virginia Beach Public Schools and Arlington County Government have construction mechanism similar to FCPS's Design-Bid-Build method, Fairfax County Government and City of Virginia Beach Government utilize Design-Build method, and City of Alexandria implements diverse construction project approaches.

OAG Organization

OAG is free from organizational impairments to independence in our reporting as defined by government auditing standards. OAG reports directly to the Fairfax County School Board through the Audit Committee. We report the results of our audits to the Audit Committee and the reports are made available to the public via the FCPS website.

Audit Findings, Recommendations, and Management's Responses

The findings within this report have been attributed a risk rating in accordance with established risk criteria as defined in Table 1.

Table 1 – Risk Criteria

Type	Description
High	<p>One or more of the following exists:</p> <ul style="list-style-type: none"> • Controls are not in place or are inadequate. • Compliance with legislation and regulations or contractual obligations is inadequate. • Important issues are identified that could negatively impact the achievement of FCPS program/operational objectives.
Moderate	<p>One or more of the following exists:</p> <ul style="list-style-type: none"> • Controls are in place but are not sufficiently complied with. • Compliance with subject government regulations or FCPS policies and established procedures is inadequate, or FCPS policies and established procedures are inadequate. • Issues are identified that could negatively impact the efficiency and effectiveness of FCPS operations.
Low	<p>One or more of the following exists:</p> <ul style="list-style-type: none"> • Controls are in place but the level of compliance varies. • Compliance with government regulations or FCPS policies and established procedures varies. • Issues identified are less significant but opportunities exist that could enhance FCPS operations.

OAG identified one high risk finding, three moderate risk findings, and one observation.

Finding 1 – Compliance with Construction and Renovation Contracting Requirements

Risk Rating: High – *Compliance with legislation and regulations or contractual obligations is inadequate.*

Condition:

OAG reviewed a sample of six projects to determine if projects comply with (a) Virginia Public Procurement Act (VPPA) requirements, (b) FCPS Policy 8240 *Construction, Maintenance Services, Bids, Contracts, Bonds, and Conflict of Interests*, (c) contract terms, and (d) Office of Design and Construction (D&C) Operating Procedures Manual.

During the audit, OAG tested the respective aspects of the construction and renovation contracting process including contract administration (procurement) and contract management. OAG found the following:

1. **Construction Project Daily Reports:** From a total of 19 General Contractor (GC) payment requisitions for Site 5, OAG identified four requisition periods where daily reports were not submitted for more than five days in the period.

Requisition #	Requisition Period	Number of Reporting Days in Period (Excluding weekends and holidays) (A)	Count of Daily Reports Submitted (B)	Total Daily Logs Missing (A)-(B)= (C)	Current Work Performed
15	July 2023	20	14	6	\$6,497,632
17	September 2023	23	13	10	\$3,576,562
18	October 2023	22	14	8	\$3,643,002
19	November 2023	20	12	8	\$1,614,710

2. **Punch Lists:** OAG reviewed final punch lists across four projects and identified a backlog of 2,056 items lacking completion documentation as of testing date. Specifically, 1,683 of these items dated 2022 and 2023 pertained to one completed project, 125 items dated 2022, 2023 and 2024 pertained to two projects that had achieved substantial completion by the time of review, and the remaining 248 dated 2023 and 2024 were for a project that is still active. Additionally, 2,537 punch list items documented as completed were received after testing date; however, the correction dates cannot be verified.
3. **Submittals Review:** The contract for Site 5 stipulates that finish material submittals are due within 45 days of the Notice to Proceed. This deadline encompassed both the GC's submission and FCPS' subsequent review. The GC submitted two material submittals in June and July 2022. However, FCPS did not review and return them until January 2023 and November 2022, respectively. The quotes for the materials provided by the GC reached their expiration date before the submittals were reviewed and returned to GC. Subsequently, two PCOs in the amount of \$68,022 were approved to cover the difference between the re-procurement rate and the procurement rate in the original

submittal. This untimely approval resulted in FCPS incurring \$68,022 in escalation costs. Management indicated that the escalation of cost of July submittal (\$60,671 out of the \$68,022) was a result of the Architect not reviewing the submittal in a timely manner.

4. **PCO Supporting Documents and Timelines of Review:** For Site 2, an approved \$230,524 PCO from the GC to extend general conditions was approved without explaining why the project's scope change caused a delay requiring this extension. Therefore, we could not confirm if the resulting delay and costs were reasonable according to the contract. Additionally, the supporting documents for the \$230,524 includes an aggregate labor total of \$13,504 per week with no detailed breakdown of labor costs.

In addition, for Site 3, OAG found that two approved PCOs totaling \$2,804 did not have supporting documents.

Furthermore, OAG noted that change orders for four projects⁵ were not approved within the 90 days of PCOs issuance date. Please refer to the table below for details⁶:

Project	Change Order Number (A)	Number of PCOs Tested (B)	Number Approved within 90 Days (C)	Number Approved after 90 Days (D)	Exception Rate D/B= (E)
Site 5	CO 18	56	33	23	41%
Site 4	CO 6	29	15	14	48%
Site 3	CO 12	16	8	8	50%
Site 2	CO 14	10	4	6	60%

5. **Change Order Threshold Approval:** OAG reviewed a sample of 24 change orders; however, we could not verify if change orders dollar amount threshold approval was appropriate. While management cited the Code of Virginia Requirement for School Board approval of change orders exceeding \$50,000 or 25% of the contract, whichever is greater, FCPS Policy 8240 states the following:

- Change orders with aggregate value of \$250,000 or less

The Superintendent is authorized to execute on behalf of the School Board any change order that, when aggregated with the base contract and all prior change orders for such contract, results in an adjusted contract amount that does not exceed \$250,000. School Board approval shall not be required prior to the execution of any such change order.

- Change orders with aggregate value in excess of \$250,000

⁵ OAG audit project sample count is six projects, only four projects had change orders during our scope period.

⁶ OAG selected one change order from each project to assess the timing relationship between PCOs and change orders

Unless otherwise expressly authorized by the School Board, any change order that, when aggregated with the base contract and all prior change orders for such contract, results in an adjusted contract amount that exceeds \$250,000 shall be approved by the School Board.

We observed that the wording of FCPS Policy 8240 could lead to uncertainty in its interpretation. Specifically, it could mean (a) staff must receive School Board approval in every instance of a change order that causes the total contract amount to exceed \$250,000, (b) staff must receive School Board approval for change orders that exceeded a total of \$250,000 or (c) staff must receive School Board approval for any change order that exceeds \$250,000.

Criteria:

1. According to FCPS Regulation 8253 *Construction Records and Reports*, "The following list of records and reports shall be provided as required by contract requirements and shall be maintained for information and records:
 - A. Inspector's Daily Report
 1. Manpower
 2. Weather
 3. Construction Activities"
2. According to Contract *Master Specifications*, Section 00700, General Conditions, Part 12.04 Substantial Completion:
 - B. Punch List
 - 1) The contractor shall have a maximum of sixty (60) days after the date of issuance of any punch list to complete all of the Work items contained thereon. Where the Project consists of discrete construction phases, the contractor shall have a maximum of fourteen (14) days after the date of each punch list for each phase to complete the Work contained on the list. If the Work is not completed within the designated period, the sum of \$50.00 per day per punch list item will be deducted from the Contract Sum until the Date of Final Completion.
3. According to Contract *Master Specifications*, Section 01340, Shop Drawings, Product Data and Samples, Part 1.09 Submission Requirements:
 - A. Schedule submissions for receipt by the Architect from the date of Notice to Proceed (NTP) as follows:
 - 2) Finish materials and packaged or prefabricated equipment: Maximum of 45 calendar days from NTP.
4. According to Contract *Master Specifications*, Section 01153, Change Order Procedures, Part 1.05 Preliminary Procedures:
 - A. Owner or Architect/Engineer may initiate changes by submitting Proposed Modification to contractor. Request will include:
 - 1) Detailed description of the Change, Products, and location of the change

in the Project.

- 2) A specific period of time during which the requested price will be considered valid, which shall be 90 calendar days, unless otherwise stated.
- 3) The contractor's proposal shall be itemized and segregated by labor, equipment, and materials for the various components of the Change in the Work (no aggregate labor total will be acceptable) and shall be accompanied by signed proposals of any Subcontractors who shall perform any portion of the Change in the Work and of any entities who shall furnish materials or equipment for incorporation therein.

5. FCPS Policy 8240 states the following:

- Change orders with aggregate value of \$250,000 or less
The Superintendent is authorized to execute on behalf of the School Board any change order that, when aggregated with the base contract and all prior change orders for such contract, results in an adjusted contract amount that does not exceed \$250,000. School Board approval shall not be required prior to the execution of any such change order.
- Change orders with aggregate value in excess of \$250,000
Unless otherwise expressly authorized by the School Board, any change order that, when aggregated with the base contract and all prior change orders for such contract, results in an adjusted contract amount that exceeds \$250,000 shall be approved by the School Board.

Cause:

- Currently there is no formal monitoring process to ensure that daily reports are completed as required.
- Based on discussion with management, unresolved punch list items primarily concerning non-safety related matters are not completed. This is due to FCPS seeking to avoid delaying the transition to the next phase of construction or meeting the fall school start.
- Additional costs were incurred for projects as the finished material submittals were not approved by FCPS within 45 days from Notice to Proceed (NTP).
- There is no process in place to ensure that change orders are approved within 90 days of PCO submission.
- Unclear guidance of change order approval process within FCPS Policy 8240. This policy is currently pending approval with updates to change order thresholds.

Effect:

- Without the completion of the daily reports, FCPS does not have contractually required listing of number and type of work force and work in progress for all days during the construction period.
- Unresolved punch lists increase the risk of delayed project closeout as projects cannot be officially closed out until all punch list items are resolved, leading to administrative burdens and potential disputes.
- Delays in approving submittals can lead to project delays, cost overruns (due to potential escalation of material prices or labor rates).
- Unauthorized change orders bypass proper cost estimation and approval processes. Additionally, not approving PCO in a timely manner could lead to cost escalation.

- Unclear guidance for change orders results in inconsistent application of requirements. This may lead to unauthorized change orders based on FCPS requirements.

Recommendation:

1. D&C should implement a monitoring process to increase accountability and ensure compliance with construction and renovation contracting guidelines. At a minimum, this process should oversee the following elements: daily reports, punch lists, submittal timelines, and the documentation and timing related to PCOs.
2. D&C should consider including change orders threshold guidelines in their Operating Procedures Manual.

Management Responses (Actions and Due Date):

D&C concurs with the findings and recommendations.

D&C will:

- Develop a training session for Field Construction Representatives (FCRs) on expectations and formatting for daily reports. D&C will also develop a process for construction supervisors to oversee completion of daily reports to verify completion and accuracy. The tentative completion date is November 2025.
- Review the current Manual, develop guidelines for project team members to continually update and monitor punch list progress, and review specification Section 0700 to ensure requirements are in alignment with industry standards. The tentative completion date is December 2025.
- Develop a process for reminders for any submittals not returned within the 10-day period review time to be sent to all project team members for resolution. The tentative completion date is September 2025.
- Standardize and enforce all time extension criteria as outlined in project specifications across all projects. This includes conducting a mandatory training session for D&C staff and Architects to ensure a thorough understanding of these criteria. Furthermore, D&C will require that all time extensions for reviews are clearly documented with a stated reason. The tentative completion date is December 2025.
- Review the Manual and develop procedures for monitoring the documentation and timing of PCOs. The tentative completion date is December 2025.
- Review the Manual and establish clear procedures for change orders threshold guidelines. The tentative completion date is August 2025.

Finding 2 – Construction and Renovation Monitoring

Risk Rating: Moderate – *Issues are identified that could negatively impact the efficiency and effectiveness of FCPS operations.*

Condition:

While FCPS has implemented controls within the construction and renovation contracting process, OAG identified several areas for further improvements, specifically over monitoring:

1. **Change Orders Justification:** A PCO is submitted by the GC along with supporting detail, including the costs associated with the change. OAG reviewed a sample of 24 change orders totaling \$6,552,657 within four projects and noted that while change orders were signed by the Architect, FCPS and GC, there was no documented evidence of FCPS conducting its own cost analysis of the GC's proposed prices. The cost justification appeared to be entirely based on the GC's proposal. Similarly, the Architect's evaluation of the submitted PCOs was not formally documented.
2. **Aging Punch List:** For each construction phase, a punch list is completed to document any tasks needed to be performed or corrected prior to phase completion. As identified in [Finding 1](#), a significant portion of the punch list items has been outstanding for an extended period. The Excel-based punch lists used by FCPS, while noting tasks and their identification dates, do not assign due dates for GC responsibility or prioritize critical tasks, potentially hindering timely resolution. Furthermore, OAG found no evidence to indicate that these punch lists were reviewed.
3. **Project Schedules and Progress Monitoring:** FCPS requires the GC to provide and regularly update a detailed construction project schedule. While OAG was able to verify the review of the initial construction progress schedule for all five⁷ projects, OAG could not verify that FCPS reviewed any of the subsequent updated schedules.

Insufficient documentation verifying the review of updated schedules can hinder effective progress tracking, which then ties into our observation of project milestones documentation, where we noted three of the six sampled projects missed key contractual milestones without justifying late performance. Specifically: Site 2 substantial completion was delayed from August 2022 to April 2023; Site 3 final completion target of September 2023 has not been completed as of OAG review date (February 2025); and Site 4 final completion date of November 2024 has not been completed as of OAG review date.

Currently, contract terms stipulate a 30-day period between substantial and final completion dates. However, none of the reviewed projects met this requirement. Management indicated that the 30-day period may not be sufficient.

⁷ OAG audit sample comprises six projects, including one that is currently in the design phase and has not yet entered construction.

4. **Bi-Weekly Progress Meetings:** OAG found that bi-weekly progress meetings, required by D&C with both contractors and school staff, were not documented for Site 2 after its substantial completion in April 2023, through to project completion in November 2024. Notably, the GC received payment of \$313,302.69 for work performed in October 2024, falling within the period for which meeting documentation is missing.

While D&C management stated these meetings are unnecessary post-substantial completion, OAG could not verify this guideline as D&C's draft Manual does not provide guidance on post-completion meetings and omits procedures for school staff meetings entirely.

Criteria:

- The National Contract Management Association (NCMA), through its Contract Management Body of Knowledge (CMBOK) and various guidance documents, emphasizes the importance of thorough cost and price analysis in contract management, particularly when dealing with contract changes. The principles outlined by NCMA support the best practice of obtaining independent cost estimates for significant change orders to ensure fair and reasonable pricing and ethical conduct in contractual agreements.
- According to Contract *Master Specifications*, Section 00700, General Conditions, Part 12.04 Substantial Completion:
 - A. Punch List
 - 1) The contractor shall have a maximum of sixty (60) days after the date of issuance of any punch list to complete all of the Work items contained thereon. Where the Project consists of discrete construction phases, the contractor shall have a maximum of fourteen (14) days after the date of each punch list for each phase to complete the Work contained on the list. If the Work is not completed within the designated period, the sum of \$50.00 per day per punch list item will be deducted from the Contract Sum until the Date of Final Completion.
- According to Contract *Master Specifications*, Section 01310 Construction Progress Schedules, Part 1.2 Schedule Responsibilities:
 - A. The Construction Schedule shall be developed by means of a critical path method of scheduling and shall be used to monitor job progress. The contractor shall be responsible for providing all information concerning the sequencing, logic and duration of all activities as well as providing the initial critical path method ("CPM") logic network diagram (in electronic and paper form) and tabular report data. Once the initial logic network diagram is accepted by the Architect and the Owner, the contractor shall be responsible for providing monthly update information on logic, percentage completion, actual start and finish dates, and duration changes as requested by the Owner.
- According to Contract *Master Specifications*, Section 00700, General Conditions, Part 11.02 Extension of Time:

- A. Extension of Time. The parties to this Contract wish to provide a framework for resolving issues in connection with any delays that may occur on this Project. No extension beyond the date of completion fixed by the terms of the Contract will be effective unless granted in writing and signed by the Owner's representative.
- According to Contract *Master Specifications*, Section 01200, Project Meeting, Part 1.05 Progress Meetings:
 - A. Schedule progress meetings every second week unless it is determined by Architect and Owner that additional meetings are necessary.

Cause:

- No guidelines or requirements in place for assessing pricing reasonableness for items in the PCO(s).
- FCPS does not have a well-defined, documented, and consistently applied process for managing punch lists including clear assignment of responsibility for monitoring and resolving punch list items. Additionally, although the contract stipulates that the contractor is liable for overdue punch list items, FCPS is not enforcing these provisions.
- FCPS may not have established a clear, documented process for the review and approval of updated schedules, nor is there a process in place to document projects delay reasons or contractor late performance.
- D&C's draft Manual does not address the requirement for progress meetings after substantial completion.

Effect:

- Paying inflated prices for change order work.
- Delayed project closeout: projects cannot be officially closed out until all punch list items are resolved, leading to administrative burdens and potential disputes.
- Without regular review of updated schedules, FCPS may not be aware of potential delays in a timely manner. This can hinder their ability to take corrective action and mitigate the impact of delays, potentially leading to extended project completion dates and disruption of school operations.
- While major construction is done, there are still critical closeout activities (outstanding punch lists, final payments and warranty submittals) that require continued communication and oversight. Additionally, without the bi-weekly progress meetings, updates related to project issues are not disseminated to school-based staff which can lead to misunderstandings and conflicts.

Recommendation:

3. D&C should establish formal guidelines mandating both a documented cost analysis for all approved PCOs and a formal Architect Evaluation.
4. D&C should implement a monitoring process for the punch list process, including establishing clear roles and responsibilities for managing, reviewing, and approving punch list items.
5. D&C should establish and enforce a formal process for the submission, review, and approval of updated construction project schedules. D&C should also implement a formal and consistently applied process for documenting and approving time extensions for all capital projects and strengthen its review and oversight of project schedules and any proposed changes, including time extensions.

6. D&C should consider reevaluating the 30-day period, stipulated in the contract, between substantial and final completion dates, with the objective of aligning it with current project realities and improving overall project flow.
7. D&C should revise and finalize its draft Manual to establish clear guidelines for the frequency of progress meetings throughout the entire project lifecycle, specifically addressing the period between substantial and final completion. This updated guidance should include guidance for progress meetings with school staff.

Management Responses (Actions and Due Date):

D&C concurs with the findings and recommendations.

- D&C is currently in the process of establishing comprehensive justification procedures and expectations with the consulting Architects to review and analyze contractor PCOs and certify, request revisions, or reject, in writing, contractor requests and recommend payment or otherwise. Written review is to certify that A) the reason for request is justified and in accordance with the contract documents, and B) the submitted cost is determined to be within industry norms, or otherwise. The tentative completion date is December 2025.
- D&C will review the current Manual, develop guidelines for project team members to continually update and monitor punch list progress, and review specification Section 0700 to ensure requirements are in alignment with industry standards. The tentative completion date is December 2025.
- D&C will review current project schedule process and identify any gaps in the process. While current specifications call for monthly updates, it also states "as requested by the Owner". D&C will coordinate and update specifications and Owner/Contractor Agreements for projects moving forward with consideration to require as part of payment requisition package. The tentative completion date is December 2025.
- D&C will review current master specifications and Owner/Contractor Agreements to confirm project time durations are aligned with industry standard practices. D&C will also develop a standardized operating procedure for documenting schedule changes. The tentative completion date is December 2025.
- D&C will review current contractual communication requirements and make any adjustments to clarify and determine requirements in the specifications and Manual. Once substantial completion of a project is achieved, potentially replacing bi-weekly progress meeting with a bi-weekly or monthly closeout meeting. The tentative completion date is September 2025.

Finding 3 – Update to FCPS Policies and Guidelines

Risk Rating: Moderate – *Issues are identified that could negatively impact the efficiency and effectiveness of FCPS operations.*

Condition:

1. FCPS Policy 8240 *Construction, Maintenance Services, Bids, Contracts, Bonds, and Conflict of Interest* was not updated in a timely manner; the last update was on July 24, 2014. It appears that management has proposed updates that are awaiting review and approval by the School Board Governance Committee.
2. Procedures for D&C are captured in the Operating Procedures Manual (Manual). Management did communicate at the start of the audit that there are sections of the Manual that are currently a work in progress. OAG identified procedures in the Manual that could be enhanced to reflect current processes and provide additional guidance to employees. Below are examples of these procedures:
 - General Contractor Pay Requisition - The procedure is used to review pay applications for accuracy and timeliness of payment. The procedure is adequate but could be enhanced by incorporating the process of the site walkthroughs conducted by the Field Construction Representative (FCR) to verify the percentage of completed work reported by the General Contractor. The Pay Application process could also be enhanced through the implementation of a Pay Application review checklist that could include FCR walkthrough, Construction Manager review, Senior Manager review and Finance mathematical accuracy verification.
 - Architect Invoice Review: The review process for design contract invoices is not clearly documented in the draft Manual. The Manual indicates that "Architect services invoices are approved by the appropriate Coordinator". However, according to initial discussions with management, this process involves the Project Coordinator reviewing the payment request form with the in-house Architect, both certifying the invoice details. Based on our testing of Architect invoices, it appears that the invoices were reviewed *only* by Construction Senior Managers, and not by the in-house Architect. A subsequent follow-up discussion with management indicated that only the Construction Senior Managers review these invoices. Consequently, OAG could not verify the proper approval flow of Architect invoices.
 - Organizational Change: The draft Manual should be revised to align with the new organizational structure. Specifically, it identifies the Department of Facilities and Transportation as the process owner.
 - Bi-Weekly Progress Meetings: Office of Design and Construction Services is required to conduct two bi-weekly progress meetings: one with the contractor and a separate meeting with school-based staff. The draft Manual provides guidance for the contractor meetings but does not address the school staff meetings.

- Contractor Evaluation Form: The draft Manual should include the process of evaluating the contractor including contractor signatures on evaluation forms and the frequency of evaluations. OAG noted that for Site 2, the December 2022 evaluation was not signed by the contractor, and there was no documentation of a 2023 evaluation. Similarly, the October 2024 Site 4 evaluation also was missing the contractor's signature.

Criteria:

- FCPS Regulation 1102 *Procedures for Maintenance of Directives* states, "By state mandate, policies must be reviewed by appropriate staff members at least every five years and updated as necessary. Regulations are reviewed and updated every five years or sooner. Notices with short-term effective dates (less than one year) are reviewed and reissued as necessary. The School Board Office will monitor review dates for directives and notify appropriate staff." Additionally, the office within the department of primary responsibility indicated on the directive will "Review and update directives as needed and in a timely manner."
- The *Standards for Internal Control in the Federal Government*⁸ (Green Book) states the following in reference to addressing Periodic Review of Control Activities:
 - 12.05 Management periodically reviews policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks. If there is a significant change in an entity's process, management reviews this process in a timely manner after the change to determine that the control activities are designed and implemented appropriately.

Cause:

- Proposed changes to Policy 8240 are currently pending School Board approval.
- Procedure updates have not been completed. D&C is currently working on these updates; however, the procedures are still in draft form.

Effect:

Guidance on key processes might not be available or properly reflect current practices which could lead employees to miss key documents or executing steps.

Recommendation:

8. D&C should finalize its update of the Operating Procedures Manual. The updated procedures should encompass all process key controls, including FCR walkthroughs, Pay Application review checklists, Architect invoice review responsibilities and contractor evaluation process.

Management Responses (Actions and Due Date):

D&C concurs with the findings and recommendations.

- D&C is in progress of updating and finalizing the manual. The tentative completion date is December 2025.

⁸ Standards set forth by [US Government Accountability Office](#) provides the overall framework for establishing and maintaining an effective internal control system. The Green Book may be adopted by state, local, and quasigovernmental entities, as well as not-for-profit organizations, as a framework for an internal control system.

Finding 4 – Key Performance Indicators and Construction Benchmarking

Risk Rating: Moderate – *Issues are identified that could negatively impact the efficiency and effectiveness of FCPS operations.*

Condition:

Office of Administrative Services and D&C have not developed Key Performance Indicators (KPIs) to measure program effectiveness of the construction and renovation contracting process, or regularly document its effort on internal or external construction benchmarking. Modern KPI practices involve utilizing real-time dashboards for data visualization, offering an immediate and clear view of construction progress (e.g., phase completion rates, punch list resolution) which would reduce the need for time-consuming manual data extraction from Microsoft SharePoint or Outlook.

Criteria:

The Green Book states the following in reference to measuring performance:

6.07 – “Management determines whether performance measures for the defined objectives⁹ are appropriate for evaluating the entity’s performance in achieving those objectives. For quantitative objectives, performance measures may be a targeted percentage or numerical value. For qualitative objectives, management may need to design performance measures that indicate a level or degree of performance, such as milestones.”

10.03 – “Management establishes activities to monitor performance measures and indicators. These may include comparisons and assessments relating different sets of data to one another so that analyses of the relationships can be made and appropriate actions taken. Management designs controls aimed at validating the propriety and integrity of both entity and individual performance measures and indicators.”

Cause:

The primary system for construction data and reports, Microsoft SharePoint, lacks integrated functionality or add-ons for KPIs and internal benchmarking. While a monthly Excel-based report is distributed via Outlook, it requires users to manually organize and retain emails for a point-in-time understanding of construction performance. There is no dedicated software or enhancement to existing systems for internal benchmarking or KPIs.

Effect:

Lack of proper benchmarking documentation and readily available, measurable KPIs prevents FCPS from accurately assessing the success of its construction operations. Management cannot easily access key project data, such as time to completion or the currently assigned construction team (i.e. red, white, or blue).

Recommendation:

9. Office of Administrative Services and D&C should establish and document both internal and external benchmarking practices, coupled with the implementation of measurable KPIs for assessing program effectiveness.

⁹ An entity's objectives can be classified as operations objectives (effectiveness and efficiency of operations), reporting objectives (reliability of reporting for internal and external use), and compliance objectives (compliance with applicable laws and regulations).

10. Office of Administrative Services and D&C should actively explore solutions for creating dynamic dashboards to visualize this critical information.

Management Responses (Actions and Due Date):

OAS and D&C concur with the findings and recommendations.

- OAS and D&C will conduct departmental and cross departmental reviews and discussions of measurable KPIs that can be standardized across the complex nature of project specific variables. Notable is that in October, all data organized and stored in Microsoft SharePoint will be migrated to the Kahua project management software platform. OAS and D&C will work with the software administrator to ascertain KPI development and tracking potential within that platform. The tentative completion date is December 2025.

Observation – Contractor Performance Monitoring

Per OAG understanding, FCPS has a process to evaluate a contractor's performance via Contractor Evaluation Forms. However, FCPS does not have a process designed to leverage contractor's performance evaluation when determining project assignment of contractors.

Contracts are awarded based on the lowest responsive bid received from a prequalified bidder. As part of prequalification process, contractors are expected to provide information regarding their experience performing projects of a similar scope. However, the prequalification criteria do not consider the internally developed performance evaluation measurements and instead rely solely on external information provided by the contractors.

We recommend D&C and Office of Administrative Services to work with Office of Division Counsel to construct a process to consider contractor performance evaluation while maintaining compliance with VPPA.

Appendix – Sample Attribute Testing

1. Request for Proposal (RFP) associated with project design.
2. RFP response from design firm awarded design contract.
3. Evaluation Report presented to School Board
4. Executed contract for design firm awarded design contract.
5. Invoices and supporting documentation for payments made to design firm.
6. List of pre-qualified contractors provided to Architect identifying contractors who were eligible to bid the project.
7. Pre-bid meeting agenda and meeting minutes.
8. Invitation for Bid (IFB) associated with construction project.
9. Bid Tab sheet associated with construction project IFB.
10. Bid documentation for general contractor awarded construction contract, including bid price and bid bond.
11. Prequalification documentation (original and any subsequent updates) for general contractor awarded construction contract.
12. Executed contract for general contractor awarded construction contract.
13. Subcontractor list for general contractor awarded construction contract.
14. School Board contract approval.
15. Evidence that set of complete final bids plans and specification was sent to VDOE
16. Project earmark document number.
17. Schedule of values.
18. Project schedule(s).
19. Proof of bond(s) and certificate(s) of insurance (project initial and most recent update, if applicable).
20. Project modification (PM) log(s).
21. Project change order logs and supporting documentation for all executed change orders.
22. Project cost report(s) (most recent as of Dec 31, 2024, or final).
23. Project superintendent cost sheet(s).
24. Internal project budget transfer(s) documentation.
25. Project start-up checklist.
26. General contractor notice to proceed.
27. Payment requisition log.
28. Application for payment, and all supporting documentation (requisition form, stored materials log, change order log, and certification form), for all payments made to general contractor from contract inception to December 31, 2024.
29. Notice of substantial completion for each project phase completed prior to Dec 31, 2024.
30. Pre-punch/punch lists for each phase.
31. Final application for payment from general contractor, if applicable.
32. Final certification for payment.
33. Project daily logs.
34. Contractor evaluation form(s).
35. Meeting minutes for all bi-weekly progress meetings.

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