



---

**Audit of DPW  
Operations Safety**

---

**AYCHA SAWA**  
City Comptroller

**CHARLES ROEDEL**  
Audit Manager

City of Milwaukee, Wisconsin

December 2021

## Table of Contents

<b>Transmittal Letter .....</b>	<b>1</b>
<b>Audit Report Highlights .....</b>	<b>2</b>
<b>I. Audit Scope, Objectives, and Methodology .....</b>	<b>3</b>
<b>II. Organization and Fiscal Impact .....</b>	<b>4</b>
<b>III. Audit Conclusions and Recommendations .....</b>	<b>4</b>
<b>Comptroller's Acknowledgement of Receipt.....</b>	<b>6</b>
<b>Management Response .....</b>	<b>7</b>



**Aycha Sawa, CPA, CIA**

Comptroller

**Joshua Benson**

Deputy Comptroller

**Toni Biscobing**

Special Deputy Comptroller

**Richard Bare, CPA**

Special Deputy Comptroller

November 23, 2021

Honorable Tom Barrett, Mayor  
The Members of the Common Council  
City of Milwaukee

Dear Mayor and Council Members:

The attached report summarizes the results of the Audit of DPW Operations Division Safety. The scope of the audit was the Department of Public Works (DPW) Operations Division safety practices from July 1, 2019, through June 30, 2020. The objectives of the audit were to:

1. Review and evaluate the mitigation of safety risks within the DPW Operations Division. Determine if key controls are in place to mitigate safety risks. Determine if key controls are operating effectively.
2. Review and evaluate compliance of DPW Operations Division Safety with regulatory standards and ordinances as required.

The audit concluded that safety controls in place over the Operations Division are adequately designed and are operating effectively. This report identifies recommendations in the areas of safety training and safety activity evidence retention to further enhance the control environment. Audit findings and related recommendations are discussed in the Audit Conclusions and Recommendations section of this report and are followed by management's response.

Appreciation is expressed for the cooperation extended to the auditors by the personnel of the Department of Public Works.

Sincerely,

Handwritten signature of Charles Roedel in cursive.

Charles Roedel, CPA, CIA  
Audit Manager

CRR:ny



# Audit Report Highlights

## Audit of DPW Operations Safety

### Why We Did This Audit

DPW Operations personnel perform activities that are high risk from a safety standpoint. Adequate training and other safety activities are critical to mitigate the risk.

### Objectives

The objectives of the audit were to:

- Review and evaluate the mitigation of safety risk within the DPW Operations Division. Determine if key controls are in place to mitigate safety risks. Determine if key controls are operating effectively.
- Review and evaluate compliance of the DPW Operations Division Safety with regulatory standards and ordinance as required.

### Background

The DPW Operations Division provides Sanitation, Forestry, Fleet, and Parking services to City of Milwaukee residents and visitors. Key safety activities include onboarding and annual safety training, incident investigation, compliance with driver hours of service limitations, and ensuring truck drivers are qualified to drive the trucks they are assigned.

### Overview

The audit concluded that safety controls in place over the Operations Division are adequately designed and are operating effectively. This report identifies recommendations in the areas of safety training and safety activity evidence retention to further enhance the control environment.

### Opportunities for Improvement

#### *Safety Training*

Annual safety trainings were not consistently conducted during the audit period. Onboarding and transfer safety trainings were inconsistently documented and monitored.

DPW departments should align with DPW Safety personnel on title-specific evidence to demonstrate that DPW personnel received all necessary onboarding and annual safety trainings for their roles. Then, DPW departments should confirm that all employees received the trainings necessary for their roles, DPW Safety should monitor that confirmation, and DPW Safety should sample test that employees have received the necessary trainings and evidence was retained to support the employees having received the trainings.

#### *Document Retention*

Evidence is inconsistently retained to support the execution of safety activities.

Management should identify key safety controls and develop and implement a document retention schedule for evidence supporting key safety control activities.

## **I. Audit Scope, Objectives, and Methodology**

### *Scope*

The scope of the audit encompassed the DPW safety practices from July 1, 2019 through June 30, 2020.

Audit activities consisted of walk-throughs, observations, review of policies and procedures, and testing of controls. The audit obtained documentary evidence that onboarding and annual safety trainings occurred, operators of vehicles had the correct credentials, and accidents were investigated. Additionally, Internal Audit observed the Fleet Vehicle Condition Report (VCR) vehicle maintenance process and the Federal Motor Carrier Safety Administration (FMCSA) Clearinghouse process for Commercial Driver License (CDL) drivers.

### *Objectives*

The objectives of the audit were as follows:

1. Review and evaluate the mitigation of safety risks within the DPW Operations Division. Determine if key controls are in place to mitigate safety risks. Determine if key controls are operating effectively; and
2. Review and evaluate compliance of DPW Operations Division Safety with regulatory standards and ordinances as required.

The objectives of the audit were satisfied through assessment of applicable policies and procedures, assessment of applicable regulations, and control testing.

The audit was conducted 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 the findings and conclusions based on the audit objectives. Internal Audit believes that the evidence obtained provides a reasonable basis for the audit's findings and conclusions based on the audit objectives.

### *Methodology*

Audit methodology included developing an understanding of the processes and controls over DPW Operations Division Safety. To establish appropriate evaluation criteria for this audit, controls and

procedures specific to DPW Operations Division Safety were compared to regulations and departmental policies and procedures. The audit procedures developed to evaluate the processes and controls to meet the audit objectives included process walkthroughs, inspection of relevant control documentation, and the testing of controls as follows:

- Reviewed internal policies, procedures, and guidelines;
- Observed Department of Transportation FMCSA compliance regulation as it relates to CDL Driver report card;
- Observed the VCR maintenance process for DPW trucks;
- Verified new hire and transfer training logs specific to the job; and
- Verified Annual training logs specific to the job.

## **II. Organization and Fiscal Impact**

The DPW Operations Division includes sanitation, snow and ice control, forestry, fleet, parking services, and tow lot operation. The DPW Operations Division has a significant impact on the quality of life of Milwaukee residents. DPW Operations Division personnel acting in a safe manner has a significant impact on both the personnel and the public.

## **III. Audit Conclusions and Recommendations**

The audit concluded that safety controls in place over the DPW Operations Division are adequately designed and are operating effectively. This report identifies recommendations in the areas of safety training and safety activity evidence retention to further enhance the control environment.

### **Safety Training**

Department policies and procedures require onboarding and annual safety trainings for each employee. Internal Audit tested 30 sample selections each for training of new hires and transfers, as well as 30 sample selections for annual training.

Finding: Annual safety trainings were not consistently conducted during the audit period. Onboarding and transfer safety trainings were inconsistently documented and monitored.

Internal Audit notes that annual trainings often occur outside of snow and ice season and execution of the annual safety trainings was affected by the onset of COVID-19 in the last half of the audit period.

Risk: Inconsistent documentation of safety trainings may make the City more vulnerable to litigation. Inconsistent annual training may increase the number and severity of safety incidents. *Risk Rating: Medium*

Recommendation: DPW departments should align with DPW Safety personnel on title-specific evidence to demonstrate that DPW personnel received all necessary onboarding and annual safety trainings for their roles. Then, DPW departments should confirm that all employees received the trainings necessary for their roles, DPW Safety should monitor that confirmation, and DPW Safety should sample test that employees have received the necessary trainings.

### **Document Retention**

Key safety activities have not formally been identified. Therefore, there has been limited expectation (e.g., training activities) of document retention related to safety activities.

Finding: Evidence is inconsistently retained to support the execution of safety activities.

Risk: Lack of ability to evidence training and other safety activities during litigation situations. Reputational risk if the City could not provide evidence of basic safety activities. Lack of ability to monitor performance of safety activities. *Risk Rating: Low*

Recommendation: Management should identify key safety controls and develop and implement a document retention schedule for evidence supporting key safety control activities.

Retaining evidence of safety control activities will enable DPW Safety personnel to monitor safety activities (e.g., perform self-audits).



**Aycha Sawa, CPA, CIA**  
Comptroller

**Joshua Benson**  
Deputy Comptroller

**Toni Biscobing**  
Special Deputy Comptroller

**Richard Bare, CPA**  
Special Deputy Comptroller

December 1, 2021

Honorable Tom Barrett, Mayor  
The Members of the Common Council  
City of Milwaukee

Dear Mayor and Council Members:

With this letter, the Office of the City Comptroller acknowledges receipt of the preceding report, which communicates the results of the Audit of DPW Operations Safety. I have read the report and support its conclusions. Implementation of the stated recommendations will help improve City processes.

As the City Comptroller, I was not involved in any portion of the work conducted in connection with the audit. At all times, the Internal Audit Division worked autonomously in order to maintain the integrity, objectivity, and independence of the audit, both in fact and in appearance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Aycha Sawa", is written over a blue horizontal line. To the left of the signature is a blue checkmark.

Aycha Sawa, CPA, CIA  
Comptroller





Department of Public Works  
Operations Division &  
Administration

Jeffrey S. Polenske, P.E.  
Commissioner of Public Works

Dan Thomas, M.P.A., J.D.  
Director of Administrative Services

Danielle A. Rodriguez, M.B.A.  
Director of Operations

November 29, 2021

Charles Roedel  
Audit Manager  
Office of the Comptroller  
City Hall, Room 404

Attn: Charles Roedel, Audit Manager

Subject: Audit of DPW Operations Safety

On October 29, 2021, the Department of Public Works (DPW) – Operations Division and DPW Administrative Services Division – Safety Section received an Audit of DPW Operations Safety - Management Response Request from the Office of the Comptroller.

The report identified recommendations in the areas of safety training and safety activity evidence retention to further enhance the control environment.

The following is the Departments official management response:

### **Safety Training**

Finding: Annual safety trainings were not consistently conducted during the audit period. Onboarding and transfer safety trainings were inconsistently documented and monitored.

Recommendation: DPW departments (divisions) should align with DPW Safety personnel on title-specific evidence to demonstrate that DPW personnel received all necessary onboarding and annual safety trainings for their roles. Then, DPW departments (divisions) should confirm that all employees received the trainings necessary for their roles, DPW Safety should monitor that confirmation, and DPW Safety should sample test that employees have received the necessary trainings.

Management's Response: The Operations Division and Administrative (Admin) Services Division of DPW submits that while the COVID-19 pandemic did impact the Department's ability to implement/conduct trainings the following actions will be immediately taken:

The Safety Section, within DPW Admin, will collaborate with DPW Operations Division management to identify necessary onboarding and annual safety trainings for title-specific roles. Further, management will maintain documentation of all safety trainings.

DPW Admin – Safety will establish a tracking and reporting system that DPW Operations management will maintain to demonstrate evidence-based compliance practices.

Audits, involving sample tests, will be performed to ensure completion of all onboarding and annual safety trainings. DPW Operations management will perform annual self-audits. DPW Admin – Safety will perform internal annual audits, as well as annual audits of DPW Operations to monitor compliance.

DPW Operations Division and DPW Admin – Safety section management will meet regularly to establish any necessary policies and procedures to support compliance.

**Document Retention**

Finding: Evidence is inconsistently retained to support the execution of safety activities.

Recommendation: Management should identify key safety controls and develop and implement a document retention schedule for evidence supporting key safety control activities.

Management’s Response: The Operations Division and Admin Services Division of DPW submits that the following actions will be immediately taken:

DPW Operations and the Safety Section, within DPW Admin, will follow the City’s Global Records Schedule related to documenting the execution of key safety control activities. Furthermore, DPW Operations Division will collaborate with DPW Admin to identify key safety control activities that are not covered by the current Global Records Schedule to establish department-level standardized retention schedules for those items, thus ensuring records are maintained and destroyed or archived appropriately.

DPW Operations and Admin - Safety will create an internal annual self-audit process for the maintenance of a comprehensive records retention schedule.

DPW Operations Division and DPW Admin – Safety section management will meet regularly to establish any necessary policies and procedures to support compliance.

Sincerely,



Danielle Rodriquez, MBA  
DPW Operations Manager

**DocuSigned by:**  
*Dan Thomas*  
FA7CE1AF35AD4CA...  
Dan Thomas, M.P.A., J.D.  
DPW Administrative Services Director

- C: Lonnie Fischer, Fleet Services Manager
- Rick Meyers, Sanitation Services Manager
- Randy Krouse, Forestry Services Manager
- Tom Woznick, Parking Services Manager
- Shannon Goodwin, Administrative Services Manager
- Andrew Simons, Human Resources Representative
- Allyson Weiss, Safety Supervisor

