

# City Vehicle Accident Prevention Audit

July 26, 2024

#### Mayor

Mattie Parker

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# City of Fort Worth Department of Internal Audit

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#### **Audit Staff**

Patrice Randle, City Auditor Brian Burkland, Assistant City Auditor Sam King, Business Process Analyst II





The City Vehicle Accident Prevention Audit was conducted as part of the Department of Internal Audit's Fiscal Year 2023 Annual Audit Plan.

#### **Audit Objective**

The objective of this audit was to determine whether City vehicle accident prevention and mitigation strategies are adequate.

#### **Audit Scope**

Our audit included a review for the period October 1, 2018 through September 30, 2022. Activity beyond this period was reviewed as deemed necessary.

#### **Opportunities for Improvement**

All-inclusive employee driver's license checks

Enhanced vehicle accident reporting and monitoring

Compliance with defensive driving training requirements

Updated policies and procedures

#### **Executive Summary**

As part of the Fiscal Year 2023 Annual Audit Plan, the Department of Internal Audit conducted a City Vehicle Accident Prevention Audit. To achieve our audit objective, we reviewed processes and internal controls to determine whether the City minimized risks associated with City vehicle accidents.

We concluded that the City has procedures in place to help prevent City vehicle accidents. For example, the City has adopted written policies and procedures, and the Fleet Maintenance Division has developed a preventative maintenance program to help ensure City vehicles are properly maintained. Additionally, some City vehicles are equipped with safety features to help prevent vehicle accidents.

While we acknowledge the City has taken measures to help prevent vehicle accidents, audit testing identified opportunities to improve internal controls related to employee driver's license checks and ensuring compliance with the City's defensive driving training requirement. Also, policies and procedures related to scheduling and maintaining defensive driving records were sometimes inconsistent with current practice.

While incidents reported by third parties are reported to the City Manager's Office, first party reports are considered internal and are not reported to executive management (i.e., the City Manager's Office).

The City executed two contracts with a vendor for online training. Although the contracts were for similar services and exceeded \$100,000.00 when combined, Mayor and City Council approval was not obtained. Furthermore, contract terms referenced on the vendor's invoices differed from those in PeopleSoft. Also, the vendor's invoices were not always detailed to conform with the scope of work noted within the contract.

Our audit findings are discussed further within the <u>Detailed Audit Findings</u> section of this report. Management has responded as to how they plan to address each audit finding and related recommendations. We feel that management's responses adequately address our audit recommendations and once implemented, will help mitigate risks associated with City vehicle accidents.

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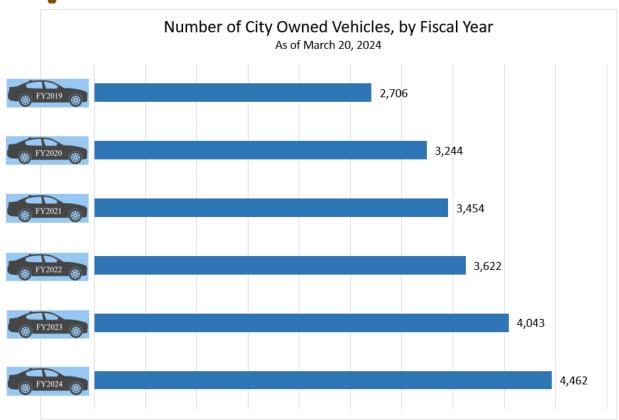


# **Background**

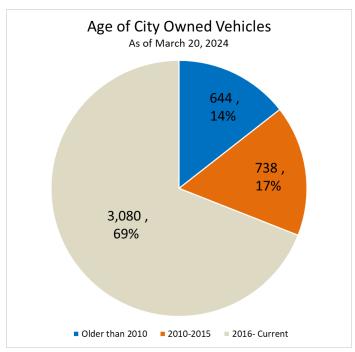
The City of Fort Worth (CFW) has adopted Personnel Rules and Regulations (PRRs) and a Safety Manual, to help prevent City vehicle accidents. Additionally, the Fleet Management Division of the Property Management Department has processes in place to help prevent City vehicle accidents. Some examples include:

- routine preventative maintenance schedules;
- additional extended side mirrors on larger vehicles with wider blind spots;
- low profile tool boxes;
- spot lights on work trucks;
- hands-free Bluetooth;
- light bars;
- backup alarms and cameras;
- bumper stickers with the City's phone number; and,
- Automatic Vehicle Location cameras that provide:
  - > the ability to view driver behavior in real time; and,
  - logs of driving alerts, such as speeding and harsh braking.





Source: Fleet Services Division of the Property Management Department



Source: Fleet Services Division of the Property Management Department



The City's Risk Management Division is responsible for developing, maintaining and implementing city-wide occupational health, safety, and accident-prevention programs. However, Department Directors and each City employee who drives a City or personal vehicle on City business is also responsible for employee safety.

The City's PRRs specify roles and responsibilities of Department Safety Coordinators (DSC), supervisors, managers, and employees to ensure compliance with the City's safety program. Per the PRRs, DSCs must retain records, provide quarterly and annual accident reports and statistics to Department Directors, and include suggestions for accident prevention.

Defensive Driving Requirement: A three-year defensive driving requirement is stipulated within the General Employees and Police Department PRRs, as well as the Fire Department's written policies and procedures.

City Vehicle Use Form: The City has a City Vehicle Use Form (See Exhibit I) with a dropdown for City-sponsored defensive driving. However, the form is not used to help ensure that employees sign up for and/or complete required defensive driving courses.

Compliance with Safety Training Requirements: City PRRs assign the responsibility of safety inspections, coordinating safety training safety training schedules, ensuring program compliance etc. to Safety Coordinators for general and Police Department employees. For the Fire Department, supervisors and mid-management personnel are assigned the responsibility.

Recordkeeping/Records Retention: City PRRs require DSCs to maintain safety training, safety inspection reports, and accident investigation reports for general and Police Department employees. City policy requires the Human Resources Department maintain defensive driving training records.

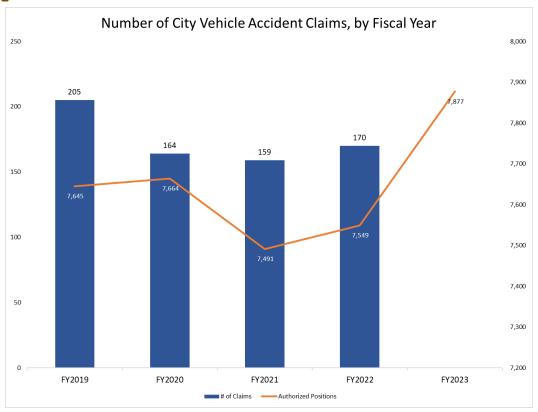
Oversight and Monitoring: Risk Management conducts driver's license record checks through the Texas Department of Public Safety, to identify employees whose licenses are suspended or revoked.

Departments have established Accident Review Boards (ARB) to conduct reviews of vehicular accidents, property damage, and work-related injuries. CFW PRRs indicate that, typically, large departments establish a departmental ARB and smaller departments refer matters to the centralized Safety Committee for review. The ARB or centralized Safety Committee will then review all vehicular/equipment accidents, and any work-related injuries that lead to treatment from a licensed medical provider. Internal Audit did not review Accident Review Board or Safety Committee activity as a part of this audit.

*Safety Manual:* A Safety Manual, dated November 2016, addresses a myriad of safety issues, ranging from City work sites and work activities, to processes and systems such as training calendars, new employee orientation, routine safety training meetings, and safety committees.

Vehicle Accident Claims: Based on vehicle accident records maintained by Risk Management, the number of vehicle accident claims, per year, are as noted in the following chart. These total claims do not include reported incidents where the City determined a City vehicle was not involved.





Sources: Risk Management and the Annual Budget

	Number of Reported Accident Claims by Department, by Year <sup>2</sup>												
Fiscal									Muni	Prop	Neighbor	Econ	Grand
Year	Police	Fire	Water	TPW	Park	Code	P & D	Aviation	Court	Mgmt	hood S	Dev	Total
FY2019	112	24	30	8	9	10	3	2		5	2		205
FY2020	81	22	10	16	18	10	1	1	2	2		1	164
FY2021	88	21	19	17	5	8	1						159
FY2022	88	22	21	11	11	11	1	1	1	3			170
Total	369	89	80	52	43	39	6	4	3	10	2	1	698

<sup>&</sup>lt;sup>2</sup> - Only City vehicles

Source: Risk Management



The objective of this audit was to determine whether City vehicle accident prevention and mitigation strategies are adequate.

### Scope

Our audit covered the period October 1, 2018 through September 30, 2022. Activity beyond this period was reviewed as deemed necessary.

This audit was limited to accident prevention related to City automobiles only. Our audit did not include a review of personal vehicles used to conduct City business, and did not include a review of preventative maintenance performed since preventative maintenance is one of our planned data analysis projects.

Internal Audit acknowledges that the risk for vehicle accidents is increased when employees take City vehicles home. A take-home vehicle audit was recently completed by the City's Fort Worth Lab. Those related findings are being addressed by management, and were not considered as a part of this audit.

## Methodology

To achieve the audit objective, the Department of Internal Audit performed the following:

- reviewed CFW written policies and procedures;
- interviewed Human Resources, Fire, Police, and Property Management Department employees;
- reviewed defensive driving course data related to general employees, Fire Department employees, and Police Department employees;
- compared names of employees who did not complete defensive driving to names of employees who received mileage reimbursements;
- reviewed training vendor contracts;
- reviewed Motor Vehicle Reports generated by the Texas Department of Public Safety;
- compared list of employees on the state's Motor Vehicle Report to employees on the City's payroll during the same timeframe; and,
- evaluated internal controls related to City vehicle accident prevention.

We conducted this performance audit in accordance with generally accepted government auditing standards, except for peer review<sup>1</sup>. 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 and conclusions based on our audit objectives.

Government auditing standards require audit organizations to undergo an external peer review every three years. A peer review was due in June 2024, but is not planned until FY2025, for the three-year period ending December 31, 2023.



To help ensure employee driver safety, the City is required to routinely check City employee driving records maintained by the Texas Department of Public Safety. A review of those records is deemed necessary to help ensure employees with driving violations are identified, and that proper action is taken to address the area(s) of violations and decrease the risk for City vehicle accidents and related costs. Our audit testing identified internal control weaknesses that result in an incomplete employee driving records check.

CFW PRRs require that employees who operate a personal or City vehicle for City business complete a City-sponsored defensive driving course at least every three years. However, based on our test results, employees did not complete the required defensive driving course and there was no monitoring to ensure compliance. The City also implemented a City Vehicle Use Form that included a section for employees to input defensive driving information. However, there was no follow-up to ensure that the form was completed, and the defensive driving information recorded onto the form was not used to help monitor for compliance.

City employees who are involved in accidents are to complete an online incident report (Form 106) within Origami, the City's risk management software. Risk Management indicated they receive hundreds of incident reports within a calendar year. However, only reports filed by third parties (parties seeking to recover damages arising from or caused by asserted City liability) are reported to the City Manager's Office. Risk Management indicated the remaining incident reports are considered internal or first party reports that are not reported to the City Manager's Office.

The CFW contracted with an online vendor to provide training (e.g., defensive driving) to general employees and employees within the Fire and Police Departments. The vendor was awarded two contracts for similar services. Since each contract was less than \$100,000.00, Mayor and City Council approval was not obtained. When combined, the contracts exceeded the \$100,000.00 approval threshold, as illustrated in the following table. Chapter 2, Section 2-9 of the City Code requires Mayor and City Council approval of contracts and agreements that exceed \$100,000.00.

Vendor: Lexipol							
<b>Employee Category</b>	Training Course	City Contract No.	City Contract				
General Employees	Defensive Driving	49046	\$00,000,003				
Fire	Defensive Driving	49046-A1	\$99,990.00 <sup>3</sup>				
Police	Peace Officer Training	53467	\$ 12,565.00				
		Total:	\$ 112,555.00				

Source: CFW City Secretary Contracts

The Fire Department maintained their own defensive driving records and training schedules, although City PRRs indicate that the Human Resources Department was to maintain those records.

The City's contractual obligations are set up in PeopleSoft as a "PSK," to help ensure payments are made as specified in the related contract. Administrative Regulation C13 requires that each invoice contain the amount due, with sufficient detail to confirm that line-item amounts correspond to those allowed under the contract. However, contract periods noted in PeopleSoft and on the vendor's invoices differed from terms

<sup>&</sup>lt;sup>3</sup>The contract is silent as to how the total contract amount of \$99,990.00 is allocated between general employees and the Fire Department.



specified in the contracts, as depicted below. Internal Audit found no exceptions with vendor invoices related to Police employee training.

	Contract Start and End Date Comparison							
	City							
	Contract							
Dept	Number	Contract Period	PSK Period	Invoice Period				
General	49046 A1	05/09/2021 - 05/08/2022	09/24/2020 - 09/23/2021	09/24/2021 - 09/23/2022				
Police	53647	07/01/2021 - 06/30/2022	07/01/2021 - 06/30/2022	07/01/2021 - 06/30/2022				
Fire	49046 A1	05/09/2021 - 05/08/2022	09/24/2021 - 09/23/2022	04/01/2022 - 03/31/2023				

Source: CFW PeopleSoft Financials

City payments made under the LocalGov and Fire Rescue 1 contract (Contract #49046 and 49046A1, respectively) exceeded the contract amounts. The overpayments resulted because PSKs were created in the amount of the vendor invoices versus the amount of the authorized contract.

City of Fort Worth Contract-to-Vendor Invoice Comparison

				LOCALGOV			FIRE			
					LocalGov			Fire Rescue 1		
				LocalGov	Payments		Fire Rescue 1	Payments		
			LocalGov	Invoice/	Over	Fire Rescue 1	Invoice/	Over		
City			Contract	City	Contract	Contract	City	Contract		City
Contract	Contract	Contract	Amount	Payments	Amount	Amount	Payments	Amount	Vendor Invoice	Payment
Number	Start Date	End Date	(A)	(B)	(B-A)	(C)	(D)	(D-C)	Number	Date
49046	5/9/2017	5/8/2018	\$ 49,000	\$ 49,000	\$ -	\$ -	\$ -	\$ -	010132-9944	7/26/2017
49046	5/9/2018	5/8/2019	45,000	45,000	-	-	1	-	010132-9946	7/17/2018
49046 A1	5/9/2019	5/8/2020	60,000	60,000	-	39,990	39,990	-	010134-9783	10/25/2019
49040 A1	3/9/2019	3/ 8/ 2020	1	-	-		30,000	30,000	INV9038	12/4/2020
49046 A1	5/9/2020	5/8/2021	60,000	60,000	-	39,990	39,990	-	INV3970	12/11/2020
49046 A1	5/9/2021	5/8/2022	60,000	61,810	1,810	39,990	·	(39,990)	INVPRA5589	9/10/2021
49040 A1	3/9/2021	3/ 6/ 2022	ı	-	-		70,000	70,000	INVPRA9308	4/1/2022
49046 A1	9046 A1 5/9/2022	5/8/2023	60,000	61,810	1,810	39,990	-	(39,990)	INVPRA109135	12/23/2022
+70+0 A1	31 31 2022	3/ 6/ 2023	-	-	-	-	10,000	10,000	INVPRA114823	4/26/2023
		\$ 334,000	\$ 337,620	\$ 3,620	\$ 159,960	\$ 189,980	\$ 30,020			

Source: CFW PeopleSoft Financials

The City Attorney's Office stated that the multiple contracts should have been combined into one, the contract period should not have changed from the original contract period, and the invoices should have indicated the correct contract period.

In FY2024, the Human Resources Department replaced LocalGov with the MollyU Learning Management System.



# **Overall Risk Evaluation**

High	Medium	Low
Not including all employees in routine driver's license checks		
Non-reporting of first party incidents to executive management		
	Non-compliance defensive driving requirements	
	Written policies that are inconsistent with the current practice	



## **Detailed Audit Findings**

#### 1. Routine employee driver's license checks did not include all City employees.

Section 1.7 of the PRRs (Driver's License Verification and Record Check) states that the Human Resources Department conducts driver's license checks on all employees with driver's licenses. The PRRs are not specific as to frequency; however, the procedures state that periodic driver's record checks may be conducted to verify employees' compliance with the policy. The PRRs further state that employees whose names appear on the Motor Vehicle Report (MVR), due to an invalid driver's license (e.g., expired, revoked, suspended, or withdrawn) shall have their City driving privileges suspended and shall not be allowed to drive a City or personal vehicle on City business or to drive onto City premises.

- Risk Management stated they conduct employee drivers' license checks twice per year. Per Risk Management, they send the Texas Department of Public Safety information for all CFW employees who have driver's license information recorded in the PeopleSoft Human Capital Module. The Texas Department of Public Safety then sends Risk Management a MVR in .pdf format.
  - Internal Audit reviewed PeopleSoft HCM data and concluded that as of 4/18/2024, the driver's license data field was blank for 175 employees. Positions held by those 175 employees ranged from Office Assistant to Department Directors. Department Directors received car allowances and would be required to drive on City business. However, they would have been excluded from employee driver's license checks based on the City's current practice.
  - We reviewed a February 1, 2022 MVR that included three drivers' license statuses of clear, moving violation, and suspended, as well as a February 13, 2024 MVR that included drivers' license statuses of clear, DUI, and suspended. The reports did not include cancelled, denied, expired, revoked, or withdrawn drivers' license statuses that are specifically mentioned in the PRRs. Human Resources Department staff indicated that since the MVR included no entries for cancelled, denied, expired, revoked, or withdrawn, there were no CFW employees with any of those drivers' license statuses. Internal Audit was unable to determine whether those drivers' license statuses were omitted because there were no employees in those specific categories, or if those specific categories are just not a part of the MVR report.
  - Internal Audit conducted tests to determine whether all active City employees were included in the February 2022 drivers' license checks. Based on our test results, 503 of the City's 6,871 employees were excluded from the February 1, 2022 MVR. For example, some employees whose driver's license information was recorded in HCM were not included in the MVR. However, those 503 employees were paid during that applicable pay period (i.e., pay period ending February 11, 2022). To help ensure accurate test results, Internal Audit verified that none of the 503 employees were hired between February 1, 2022 (MVR report date) and February 11, 2022 (payroll end date).
    - Internal Audit also conducted tests to determine whether all active City employees were included in the February 2024 drivers' license checks. Based on our test results, 492 of the City's 7,094 employees were excluded from the February 13, 2024 MVR. As with our review of the February 2022 report, Internal Audit verified that our count did not include employees who were hired between date of the MVR and the payroll end date.
- Section 1.7 of the PRRs (Driver's License Verification and Record Check) also states that if the driver's license check reveals a policy violation, the Human Resources Department will notify the employee's Department Director or designee, by email, for appropriate action. Risk Management indicated that



the City does not pursue employees whose drivers' license check reveals a policy violation, if those employees have no driving requirements in their job descriptions.

**Recommendation 1A:** The Human Resources Director should require that HR staff (e.g., HRIS) routinely run a query to identify blank driver's license fields within PeopleSoft HCM, and forward the query results to applicable Department Directors for remediation.

**Auditee's Response:** Concur. HRIS has developed a monthly report that will go to the primary HRCs and Assistant Director on the 1<sup>st</sup> of each month and will include all active employees where driver's license field is null, driver's license is not Texas and driver's license expiration date is within 2 months.

This report will assist departments in reconciling any outstanding driver's license requirements in PeopleSoft. The new report will be launched at the annual MRC/HRC training in September 2024 and HR will be publishing an SOP on the Intranet for instructions on how to update employees DL's information in PeopleSoft.

Target Implementation Date: January 1, 2025

**Responsibility:** Human Resources – HRIS

Applicable Department Director: Dianna Giordano, Human Resources Department Director

Applicable Assistant City Manager: Jesica McEachern

**Recommendation 1B:** The Human Resources Director should report all unsatisfactory driver's license statuses to Department Directors, regardless of whether the employees have driving requirements in their job descriptions.

**Auditee's Response:** Partially Concur. HRIS runs a PeopleSoft query of all active employee driver's license information and runs a driver's license verification and record check against the TXDPS portal, semi-annually. HRIS recently made some modifications to the query to capture all active employees.

HRIS provides the results of the TXDPS check to HR Safety Risk Management. HR Safety Risk Management isolates any records not showing a clear status (suspended, DUI, etc.) and validates whether the employee resides in a position that meets the new driver's license verification criteria:

New Driver's License Verification Criteria:

- Job Description: Valid Driver's License requirement;
- Vehicle Use Form: Use City Vehicle and/or Use Personal Vehicle for City business;
- Receive Executive Car Allowance.

If the employee is determined to meet driver's license verification criteria, a Driver's License Verification Notification Letter will be emailed to the Designated Department Contacts (DDC), Assistant Directors and Department Heads. The DDC will issue DL Verification Notification Letter to the employee in-person with a signed employee acknowledgement or via certified mail. The DDC will provide a copy of the signed letter [to] HR Safety and HRIS. Once the employee is notified by the DDC the employee has 10 business days from the date of the signature (DL Verification Notification Letter) to run their DL through the DPS website to obtain Type 1 or higher eligibility.

Target Implementation Date: October 1, 2024



Responsibility: HR Safety Risk Management

Applicable Department Director: Dianna Giordano, Human Resources Department Director

Applicable Assistant City Manager: Jesica McEachern

**Recommendation 1C:** The Human Resources Department Director should inquire as to whether the Texas Department of Public Safety provides driver's license statuses specifically referenced in the City's PRRs (e.g., canceled, denied, etc.). If the Texas Department of Public Safety's practice is to not provide statuses specifically mentioned in the City's PRRs, the PRRs should be revised accordingly.

**Auditee's Response:** Concur. The PRRs will be updated to reflect the corresponding TXDPS reporting categories.

Target Implementation Date: October 1, 2024

Responsibility: HR Safety Risk Management

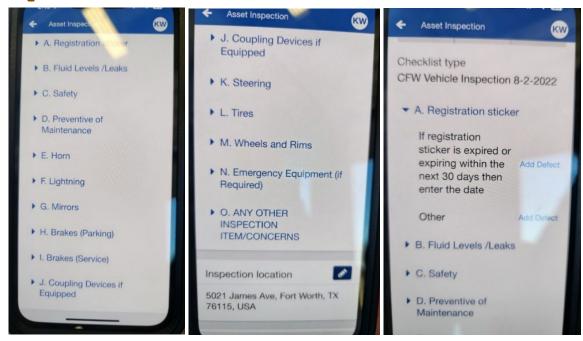
Applicable Department Director: Dianna Giordano, Human Resources Department Director

Applicable Assistant City Manager: Jesica McEachern

- 2. The City's current incident reporting practice does not provide executive management with information/data to identify vehicle accident trends and/or necessary corrective action that could help prevent future and/or recurring accidents.
  - The City currently has multiple means by which employees can report vehicle accidents.
    - Initial Notification Form to notify the department/supervisor; provides information related specifically to City employees and provides incident details. (Exhibit II)
    - Vehicle Incident Report provides more specific details regarding the incident, and provides information related to third-parties, including third-party insurance and damages sustained by third-parties. (Exhibit III)
    - Online Incident Report (Form 106) Form provides driver insurance information for both parties, and the ability to attach pictures and other documents, etc. (Exhibit IV)
    - The Safety Manual references an accident reporting kit. However, during a site visit to the Fleet Services Division, Internal Audit was informed that Fleet Services was unaware of an accident reporting kit.

Employees who are assigned City vehicles have access to GeoDrive software. As shown in the following illustration, GeoDrive is used to document drivers' vehicle inspections prior to vehicle use. Internal Audit observed City vehicle insurance information in the glove compartment.





Source: GeoDrive

➤ Incident reports are entered and stored on "Form 106," within Risk Management's software (Origami). Risk Management indicated that external incident reports, filed by third parties, are reported to the City Manager's Office. First party/internal reports, per Risk Management, are not reported.

The Committee of Sponsoring Organizations of the Treadway Commission's (COSO) framework of effective internal control states that an effective internal control is to communicate internally to support controls, and to conduct ongoing and/or separate evaluation. Effective communication and evaluations could help minimize risks related to City vehicle accidents and thus, help minimize costs (e.g., vehicle repair and/or replacement costs, medical expenses, workers' compensation, legal expenses, etc.). Without such, the City is unable to determine if drivers are consistently compliant with City directives and/or if vehicle accidents are being minimized through efforts such as vehicle safety features, driver training courses, preventative maintenance, etc.

**Recommendation 2A:** The Human Resources Department Director, in conjunction with the Property Management Department Director and Department Directors, should create a process for routinely reporting all first and third-party vehicle accidents to executive management for trending and other actions, as deemed appropriate.

**Auditee's Response:** Concur. Risk will execute this process change, which involves working in collaboration with the Property Management Department.

Currently, Risk submits a weekly report of incoming liability claims filed against the City by external third parties to the City Manager's Office before planned executive sessions.

In order to identify noted trends or opportunities for other actions, as deemed appropriate, Risk will incorporate the added process of reporting all vehicle accidents, regardless of liability or claim pursuit, to executive management that is comprised of City department heads, with a copy to their respective Assistant



City Managers. This report will be scheduled for distribution on a quarterly basis using Origami software, which is licensed to the City of Fort Worth. The report will be distributed to all designated parties in a systematic manner, as specified.

**Target Implementation Date:** February 1, 2025

**Responsibility:** HR Property & Casualty

Applicable Department Director: Dianna Giordano, Human Resources Department Director

Marilyn Marvin, Interim Property Management Department

Director

Applicable Assistant City Managers: Jesica McEachern (Human Resources Department)

Dana Burghdoff (Property Management Department)

**Recommendation 2B:** The Human Resources Department Director, in conjunction with the City Attorney's Office, should determine whether any of the incident reporting forms can be combined into one.

**Auditee's Response**: Concur. The 106-incident report is currently available on the forms portal, which is accessible through the City's intranet. This is the designated incident reporting source for all departments when filing a notice of claim for damage to a City vehicle or building.

Currently, other agencies in the City use similar types of incident reports, which may disproportionately report losses to the Risk department or mislead a department to believe it has met the reporting requirement when in fact it is using a form that is not recognized by the Risk department. To address this, Risk will locate each report and review it for relevant material to incorporate into the existing 106 incident report, as well as update the existing 106 incident report to a streamlined version that is applicable across departments. Upon completion of this upgrade, any remaining duplicate reports will be removed from the system, and the revised 106 incident report will be re-introduced to City departments to be utilized as the sole source of reporting on a City-wide basis.

**Target Implementation Date:** February 1, 2025

**Responsibility:** HR Risk Management

Applicable Department Director: Dianna Giordano, Human Resources Department Director

Applicable Assistant City Manager: Jesica McEachern

# 3. Not all employees who drove vehicles on City business complied with the City's defensive driving requirement.

• Section 9.1.6 of the General Employees and Police Department PRRs, and the Driver Safety Training and Certification Program section of the Fire Department PRRs require completion of a defensive driving course at least every three years if the employee drives a City or personal vehicle on City business, in the course and scope of the employee's job duties. However, based on our audit results, not all employees completed defensive driving courses as required.



Some employees were reimbursed for mileage between October 1, 2019 and September 30, 2022. However, there was no evidence supporting the employees' completion of a City-sponsored defensive driving course within three years of the mileage reimbursements. For example, City records indicate that *mileage reimbursements were made to*:

- o 19 of 26 (73%) Police Department employees who had no evidence of completing a defensive driving course;
- o 530 of 829 (64%) general employees who had no evidence of completing a City-sponsored defensive driving course; and,
- o 116 out of 605 (19%) Fire Department employees who had no evidence of completing a defensive driving course.
- Administrative Regulation E6 states that any employee who operates either a personal or City vehicle for City business must complete the City's Vehicle Use Agreement Form (referred to by management as a City Vehicle Use Form) which includes a section related to City-sponsored defensive driving. (See Exhibit I)

In FY2018, the City implemented a city-wide, electronic version of the City Vehicle Use Form. While the Property Management Department was responsible for managing the process, Internal Audit saw no evidence that any follow-up action was taken after the electronic form was sent to departments.

The lack of effectively communicating City requirements and monitoring for compliance increases the City's reputational risk. Risk Management staff indicated that awareness of the City's defensive driving training requirement was limited during our audit period, but is currently being addressed in new employee orientation and supervisory training sessions. The Human Resources Department is to be commended for incorporating the City's defensive driving requirement in new employee orientation and routine supervisor training courses.

**Recommendation 3A:** The Human Resources Department Director, in conjunction with Department Directors, should develop a uniform process that identifies all drivers for whom defensive driving courses are required, and require routine monitoring to help ensure employees complete defensive driving courses as required by City policy.

**Auditee's Response:** Concur. HR Safety Risk Management has redefined the criteria for the Defensive Driving requirements to ensure a clear concise outline of positions impacted by the requirement.

Positions that meet the new Defensive Driving criteria are assigned the Defensive Driving course in the new citywide learning management system, MollyU and required to renew every 3 years. MollyU allows us to assign the course and produce reporting on completion and outstanding courses by department and position.

New Defensive Driving Criteria:

- Job Description: Valid Driver's License requirement;
- Vehicle Use Form: Use City Vehicle and/or Use Personal Vehicle for City business;
- Receive Executive Car Allowance.

HR Safety Risk Management will produce quarterly reports for departments to track completion rates and will report annually to CMO on citywide compliance.

The PRRs will be updated to reflect the new process and criteria.



Target Implementation Date: October 1, 2024

Responsibility: HR Safety Risk Management

Applicable Department Director: Dianna Giordano, Human Resources Department Director

Applicable Assistant City Manager: Jesica McEachern

**Recommendation 3B:** The Property Management Department Director, in conjunction with the Human Resources Department Director and City Attorney's Office, should determine whether a Vehicle Use Form is necessary. If the form is considered necessary, the Human Resources and Property Management Department Directors should ensure a process is in place to ensure ownership, timely completion by all applicable employees, and necessary monitoring for compliance with City policy. If the form is not considered necessary, City policies should be revised to remove references to the form.

**Auditee's Response:** Concur. HR Safety Risk Management has determined the Vehicle Use Form is necessary and incorporated the form reporting/query into the Defensive Driving / Driver's License Verification process.

In accordance with Administration Regulation E-6 for Use of City Vehicles, each Department Director should ensure employees in his/her department submit the Vehicle Use Form in a timely manner, as applicable, for compliance with City Policy.

**Target Implementation Date:** October 1, 2024

**Responsibility:** HR Safety Risk Management

Applicable Department Director: Dianna Giordano, Human Resources Department Director

Marilyn Marvin, Interim Property Management Department

Director

Applicable Assistant City Managers: Jesica McEachern (Human Resources Department)

Dana Burghdoff (Property Management Department)

4. The Fire Department's written policies and procedures are inconsistent with the department's practice.

One of the 17 principles within the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework of effective internal controls is to deploy control activities through policies and procedures.

The *Employee Training* section of the Fire Department's Policies and Procedures states that the Occupational Health and Safety Division of the Human Resources Department maintains training records for defensive driving, and is responsible for scheduling defensive driving courses. However, our audit results indicated that the Fire Department currently maintains their department's defensive driving records, as well as defensive driving training schedules.

Fire Department staff were unclear as to why they maintain their own departmental defensive driving records and schedules, versus relying on the Human Resources Department.



Inconsistent policies and procedures could result in the employee not getting scheduled for defensive driving as required, and/or defensive driving records not being created and/or retained as required.

**Recommendation 4:** The Fire Chief, in conjunction with the Human Resources Department Director, should ensure compliance with written policy that requires the Human Resources Department to maintain defensive driving training records and scheduling.

**Auditee's Response:** Concur. The Fire Personnel Rules Regulations are currently under review and language pertaining to defensive driving oversight will be updated to align with the current practice.

**Target Implementation Date:** January 1, 2025

Responsibility: HR Safety Risk Management and Employee & Labor Relations

**Applicable Department Director:** James E Davis, Fire Chief

Dianna Giordano, Human Resources Department Director

Applicable Assistant City Managers: Dana Burghdoff (Fire Department)

Jesica McEachern (Human Resources Department)



# Acknowledgements

The Department of Internal Audit would like to thank the Human Resources, Property Management, Fire and Police Departments, and the City Attorney's Office for their cooperation and assistance during this audit.



#### **Exhibit I: City Vehicle Use Form**



Source: CFW Forms Portal



# **Exhibit II: Accident Notification Form**

INITIAL NOTIFICATION FORM					
OHS Telephone Numbers: (817) 392-8524 (Business Hours) or (817) 269-8635 (Anytime)					
1. OHS Case Number	S Case Number 2. Date & Time OHS Received Report				
Point of Contact for Accident     Information	a. Name:				
b. Position	c. Telephone Number				
4. Accident Classification	5. Date & Time of Accident	6. Period of Day			
7. Type of Equipment/Material Involved	ĺ	8. Department			
9. Accident Location					
10. PERSONNEL INVOLVED	a. Total Number Personnel	Involved			
b. Injuries (List # of Each) Fatalities  Non-Fatal Injuries c. Executives Involved:					
11. Equipment a. Serial/VIN Number: b. Vehicle Number (if applicable c. License Plate: d. Year: e. Model: f. Condition:  12. Weather Conditions:	):				
13. Accident Synopsis (What Happene	d)				
13. Nearest Major Roadway:					
14. WHO WILL INVESTIGATE?	Department City				

Source: CFW Forms Portal



# **Exhibit III: Vehicle Incident Report Form**

#### Vehicle Incident Report



#### VEHICLE INCIDENT REPORT

Location: Place incident occurred: County: City:							
Road on which incident occurred:							
Date of incident:			Day	of week: Hour:			
Vehicle Unit#:		Year:		Make:		Model:	
License Plate #:				Serial Numb			
Driver Name:	Birth	Date:		Driver's Lice	nse#:		State:
Driver Address:						City:	
Driver Destination:							
Describe Vehicle Damage	):						
Other Vehicle:		Year:		Make:	Lic	ense Plate	e#:
Owner:	Address	:				City:	
Driver:	Address	:				City:	
Insurance Company:						'	
Phone #:		-		Policy#:			
Describe Vehicle Damage	):						
Police Respond?	Yes 🗆			City/Police Dept.:			
Tickets? Driver:	Yes 🗆	No 🗖		For:			
Other Co. Driver?	Yes 🗆	No 🗆		For:			
State Briefly What Happer	ned:						

Continued on Next Page



#### Vehicle Incident Report Form (continued)

F	Manual:	Policy Section #:	30 Addendum
FORT WORTH	Safety Policy & Procedures	Page:	2 of 2
	Subject:	Revision:	Original
-	Vehicles Incident Report	Issue Date:	11/2016

	,				•
Witnesses:					
Injuries or Casualti	es:				
Conditions: Light:		□ Dark	□ Dusk		011
Weather: Visual Obstructions	CEW Driver	☐ Rain	☐ Snow	☐ Fog	Other:
	Other Driver:				
Property Damage		es:			
Employee's Signatur	e.			F	-mn ld#·
Operations Manager					
Operations Manager	olgitature				atc
					an Arrowto indicate north A" – Con-Real Vehicle
					B" – Other parties Vehicle
			$\neg$		
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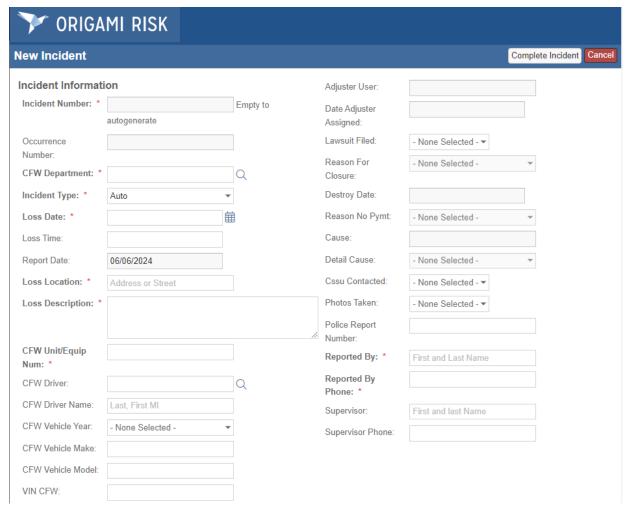
Source: CFW Safety Manual



### **Exhibit IV: Online Incident Reporting (106) Form**

#### Online Incident Reporting Form







## Online Incident Reporting (106) Form (continued)

Claimant/Other P	arty Information		
Other Party/Claimant: *	Last, First MI / Business Name	Minor:	- None Selected - ▼
Claimant Address1:		Parent/Legal Guardian:	
Claimant Address2:		Drivers License	е
Claimant City:		Vehicle Year:	N. O.L.I
Claimant State:	- None Selected -		- None Selected - ▼
Claimant Postal:		Vehicle Make:	
Claimant Day		Vehicle Model:	
Phone:		License Plate	#
Claimant Evening Phone:		VIN:	
Claimant Email:			
Birth Date:			
Claimant Policy I	nformation		
Insurance		Insurer's Claim	1
Company:		Num:	
Policy Num:			
Policy Effective Dt:	(	Ì	
Policy Expiration Dt:	É		
If you would like a co	py of your incident report, plea	e enter your email address below.	
Reporter Email:			
If you would like to atta the right.	ach files or documents, please clic	Complete Incident. The next page will a	allow you to upload files by clicking on the Upload File link on

Source: CFW Intranet