

Procurement Services Consultants' Competitive Negotiation Act (CCNA)

Internal Audit Report

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Table of Contents

	Page Number
EXECUTIVE SUMMARY	1
DEFINITIONS	1
BACKGROUND	3
OBJECTIVE, SCOPE, AND METHODOLOGY	4
RESULTS AND RECOMMENDATIONS	5

EXECUTIVE SUMMARY

Why We Did This Audit

Our objective was to evaluate the effectiveness, efficiency and internal controls of the Consultants’ Competitive Negotiation Act (CCNA) program.

This audit was included in the 2024-2025 Annual Audit Plan.

Observations and Conclusion

Audit Results at a Glance			
Results and Observations	Risk / Impact Rating		
	Significant	Moderate	Minor
<u>Source</u> IA - Internal Audit or M - Management	IA-0 M-0	IA-1 M-0	IA-0 M-0
<u>Observation Category</u> D - Deficiency or O - Opportunity	D-0 O-0	D-0 O-1	D-0 O-0

Our overall conclusion is that the CCNA program is generally operating effectively and efficiently, with appropriate internal controls in place. While our assessment indicates that the program is meeting its intended objectives, we have identified areas where enhancements can be made to further strengthen its performance and governance.

Results and Recommendations

The audit concluded that the CCNA program is generally operating effectively and efficiently, with appropriate internal controls in place.

However, opportunities for improvement were identified to enhance documentation practices during the evaluation process.

Specifically, we recommend implementing AI-powered transcription tools (e.g., Otter.ai, Microsoft Teams transcription) to capture evaluators’ verbal comments in real time. This would improve the accuracy, completeness, and transparency of evaluation records in VendorLink, while also reducing administrative burden and ensuring alignment with evaluation criteria.

This audit report has been discussed with management, and they have prepared their response which follows.

DEFINITIONS:

Risk / Impact Ratings

Significant	High risk with a financial impact greater than five percent and/or a significant issue that occurs in multiple processes and/ or noncompliance with Florida Statutes or School Board Policies (high impact and high likelihood)
Moderate	Slight to moderate risk with a financial impact between one and five percent and/or a noticeable issue that may extend beyond local processes (low impact and high likelihood or high impact and low likelihood)
Minor	Low risk with a financial impact of less than one percent and/or an isolated occurrence limited to local processes (low impact and low likelihood)

We categorize risk/ impact as:

- *Significant*
- *Moderate*
- *Minor*

Observations Categories

Opportunity	A process that falls short of best practices or does not result in optimal productivity or efficient use of resources
Deficiency	A shortcoming in controls or processes that reduces the likelihood of achieving goals related to operations, reporting and compliance

We categorize our observations as opportunities or deficiencies.

Criteria for Observations Sourced to Management

- Internal audit was informed of the issue prior to starting detailed testing
- Management identified, evaluated, and communicated the issue to appropriate levels of the district
- Management has begun corrective action with clear, actionable plans and targeted completion dates

No observations in this audit were sourced to management.

BACKGROUND:

The district purchases professional services, particularly in construction-related fields, through a qualifications-based selection process mandated by Florida law. The Consultants' Competitive Negotiation Act (CCNA), outlined in Section 287.055 of the Florida Statutes, governs the procurement of services such as architecture, engineering, landscape architecture, and surveying. Under the CCNA, the district must evaluate providers based solely on their qualifications and experience, without considering pricing during the selection phase. This process is formally known as the Request for Qualifications (RFQ).

To initiate the RFQ process, the Procurement Services Department collaborates with the department needing the services to define the scope of services, establish requirements, and develop evaluation criteria. These criteria are used by an evaluation committee to assess and score the qualifications of the responding firms. Importantly, cost is not a factor in this evaluation, in compliance with the CCNA's stipulations.

The RFQ is published on VendorLink, the district's online platform for solicitation notifications. Registered vendors receive alerts, and additional firms may be notified manually. Interested firms download the RFQ, complete the necessary documentation, and submit their responses electronically by a specified deadline. Once received, the Procurement Services Department distributes the submissions to an evaluation committee for independent review and scoring based on the RFQ's criteria. The evaluation committee is selected by the Chief Operations Officer from a pool of approved evaluators who have completed training conducted by the Procurement Services department and are subject matter experts in various facets of facilities management and operations.

Following the initial evaluation, at least three top-ranked firms are invited to present or interview with the committee. After these presentations, the committee finalizes its rankings and selects the top firm(s). A notice of the intended decision is then posted on VendorLink,

The CCNA governs the procurement of services such as architecture, engineering, landscape architecture, and surveying.

Cost is not a factor in evaluating vendor qualifications.

Following the initial evaluation, at least three top-ranked firms are invited to present or interview with the committee. After these sessions, the committee finalizes its rankings and selects the top firm(s).

allowing a 72-hour window for any protests. If no protests are filed, the recommendation is submitted to the School Board for approval and award of the contract.

OBJECTIVE, SCOPE AND METHODOLOGY:

Objective

The objective of this audit was to evaluate the effectiveness, efficiency and internal controls of the CCNA program.

Scope

The scope of the audit was the RFQ's awarded during July 1, 2024, through April 22, 2025. The negotiation process was not in our scope.

Methodology

We conducted this audit in accordance with *The International Professional Practices Framework (IPPF)* of Institute of Internal Auditors (IIA) which includes the *Global Internal Audit Standards (Standards)*. We performed procedures as deemed necessary to provide reasonable assurance regarding the audit objective. Internal Auditing is an independent, risk-based, and objective assurance and consulting activity designed to add value and improve an organization's operations. It strengthens an organization's ability to create, protect, and sustain value by providing board and management assurance, advice, insight, and foresight.

We are required to note any material deficiencies in accordance with Florida Statutes, School Board Policy and sound business practices. No material deficiencies were noted in this audit. We also offer suggestions to improve controls of operational efficiency and effectiveness.

Details of our audit methodology included interviewing management and reviewing the following documentation:

- Florida Statute 287.055 to obtain an understanding of the CCNA program
- Department procedures manual to obtain an understanding of the RFQ process
- RFQ documents on the Facilities network server

Scope of the audit included RFQ's awarded during July 1, 2024, through April 22, 2025.

We conducted this audit in accordance with the International Professional Practices Framework of the Institute of Internal Auditors.

Our Methodology included reviewing the department's procedures manual to obtain an understanding of the RFQ process; RFQ documents on the Facilities network server; and VendorLink solicitation portal to review evaluation scores and comments.

- VendorLink solicitation portal to review evaluation scores and comments
- Smartsheet 2024-2025 Scorecard to recalculate RFQ cycle time

RESULTS & RECOMMENDATIONS:

Overall Conclusion: Our overall conclusion is that the CCNA program is generally operating effectively and efficiently, with appropriate internal controls in place. While our assessment indicates that the program is meeting its intended objectives, we have identified areas where enhancements can be made to further strengthen its performance and governance. Detailed findings and corresponding recommendations are provided in the sections that follow.

1) Opportunity to Improve Narrative Consistency in Vendor Evaluations (Shortlist & Presentation meetings)

Moderate (Risk or Impact) and Opportunity

Best Practice:

Ensure Comprehensive and Criteria-Based Evaluation Narratives

Evaluation committee members should consistently provide detailed, criteria-based narrative comments in VendorLink to support their scoring decisions. Best practice includes:

- Referring to the solicitation's evaluation criteria directly when documenting assessments
- Clearly articulating strengths, weaknesses, and deficiencies for each proposal category
- Ensuring consistency and completeness in narrative comments across all evaluators to support transparency, fairness, and defensibility of the evaluation process

Audit Result:

While evaluation committee members successfully entered their scores into VendorLink, they did not consistently follow the guidance outlined in the system's Evaluation Details regarding narrative comments. Specifically, the instructions require evaluators to provide written

The CCNA program is generally operating effectively and efficiently and with appropriate internal controls.

Best practice has evaluation comments refer to solicitation criteria, clearly articulate strengths or weaknesses of proposers, and consistent and complete narrative comments.

Committee members successfully entered their scores into VendorLink, but they did not consistently follow the guidance regarding narrative comments.

justifications aligned with the solicitation criteria, which was not fully adhered to in this instance. The instructions were the following:

- Examine each proposal against the evaluation criteria in the solicitation and provide supportive narrative for your selection
- Describe strengths, weaknesses and deficiencies to support your assessment for each of the categories

Below is an example of a comment that fits the outlined guidance:

• **Criteria: Workload**
Evaluator: [Redacted]
Comment: The Architect indicated about 50% of their current workload would fall into the proposed project schedule. The workload table for SGM had significant discrepancies when compared to the SGM workload table used in the Little Diversified and Song submittal, which one is correct? The sub-consultants workloads appeared to be heavy and indicated more than 50% of their projects would be ongoing during the project schedule or did not provide a month/year to be able to adequately evaluate if their work would be a conflict or not. The use of the seasonal terms encompass 3-4 months and some were TBD or Q1 with a year which in my opinion if a clear evaluation is the concern then a month/year should be provided. Specifically Dao's workload table only indicated seasons for project completion. The GBS School of Hospitality is missing from the Real Food Hospitality workload table.

Comments that do not fit the outlined guidance are shown in the second, third and fourth evaluators' comments below. These comments are not adequate.

• **Criteria: Workload**
Evaluator: [Redacted]
Comment: The Architect indicated a small portion of their current workload would fall into the proposed project schedule. The sub-consultants workloads appeared to be heavy and indicated more than 50% for some of the firms where their projects would be ongoing during the project schedule or did not provide a month/year to be able to adequately evaluate if their work would be a conflict or not. The use of TBD was utilized numerous times by one sub-consultant even though one project was indicated as 23% completed.

Evaluator: [Redacted]
Comment:

Evaluator: [Redacted]
Comment: Incomplete information

Evaluator: [Redacted]
Comment: Per RFQ

Recommendation:

Enhance Evaluation Documentation with AI Transcription Tools

To improve the accuracy and completeness of evaluation documentation in VendorLink, we recommend using AI-powered meeting transcription tools (e.g., Otter.ai, Microsoft Teams

A comment that fits the guidance.

Comments that do not fit the guidance.

AI-powered meeting transcription tools can automatically capture and transcribe evaluators' verbal comments during committee meetings.

transcription, or similar). These tools can automatically capture and transcribe evaluators' verbal comments during committee meetings, ensuring that:

- Evaluators' spoken assessments are accurately recorded and aligned with the solicitation's evaluation criteria
- Narrative justifications for scores, including strengths, weaknesses, and deficiencies—are preserved in real time
- Reliance on manual entry of comments is reduced, minimizing the risk of incomplete or non-compliant documentation

Additionally, the language in the VendorLink evaluation instructions should be updated to reflect that evaluator comments may be transcribed using an AI tool selected by the organization.

This approach will support greater transparency, consistency, and accountability in the evaluation process, while easing the documentation burden on evaluators.

We wish to thank Procurement Services Facilities and Construction Contracting for their cooperation and assistance with this audit.



Department / School Name	Procurement
Administrator / Department Head	David R. wheeler
Cabinet Official / Executive Leader	Roberto J. Pacheco

Audit Result / Recommendation	Management Response Acknowledgement/ Agreement of Condition	Responsible Person (Name & Title) And Target Completion Date (MM/YYYY)	Management's Action Plan
<p>Enhance Evaluation Documentation with AI Transcription Tools To improve the accuracy and completeness of evaluation documentation in VendorLink, we recommend the implementation of AI-powered meeting transcription tools (e.g., Otter.ai, Microsoft Teams transcription, or similar). These tools can automatically capture and transcribe evaluators' verbal comments during committee meetings, ensuring that:</p> <ul style="list-style-type: none"> • Evaluators' spoken assessments are accurately recorded and aligned with the solicitation's evaluation criteria. • Narrative justifications for scores—including strengths, weaknesses, and 	<p>Management acknowledges the recommendation</p>	<p>Ed Ames 06/2026</p>	<p>While these meetings are already audio recorded, staff will research tools available to determine the practicality of transcribing meeting discussions. Procurement personnel conducting CCNA evaluations will remind evaluators to align their comments with the point scores they assign to each specific criterion.</p>



<p>deficiencies—are preserved in real time.</p> <ul style="list-style-type: none">• Reliance on manual entry of comments is reduced, minimizing the risk of incomplete or non-compliant documentation. <p>Additionally, the language in the VendorLink evaluation instructions should be updated to reflect that evaluator comments may be transcribed using an AI tool selected by the organization.</p> <p>This approach would support greater transparency, consistency, and accountability in the evaluation process, while also easing the administrative burden on evaluators.</p>			
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