

Leadership Recommendations

#	Recommendation	Concur/ Do Not Concur	Responsible Position	Projected Implementation Date	Management Response
1	We recommend the OEMS Director communicate with all OEMS Deputy Directors and OEMS staff a commitment to working with VDH leadership and Central Operations administrative offices such as Office of Financial Management (OFM), Office of Human Resources (OHR), Office of Procurement and General Services (OPGS) on improving collaboration and adhering to all Code of Virginia requirements, and VDH and State policies and procedures.	Concur	OEMS Director	Ongoing	VDH leadership gave a clear directive to OEMS leadership that they are to work hand in hand with VDH leadership and Administrative offices to improve operations at OEMS. VDH leadership also gave a clear directive to OEMS leadership that they are responsible for the fiscal and operational accountability of OEMS. Starting in the Summer of 2023, the VDH COO held weekly meetings with the OEMS team at the VDH Central Office as the financial state of OEMS became apparent. These meetings continued through 2023. In January of 2024, daily stand-up meetings were introduced to the OEMS leadership team, coordinated by the Assistant Deputy Commissioner for Population Health and Preparedness, prior to the appointment to the Interim OEMS Director role. These were attended by the OEMS Deputy Directors, a Fitch and Associates representative, and the Assistant Deputy Commissioner. These daily meetings laid the foundation of collaboration between VDH leadership and OEMS leadership. When the Assistant Deputy Commissioner began as the Interim OEMS Director in March 2024, weekly, then bi-weekly meetings were set up with all staff in addition to the daily leadership meetings. These meetings, which still continue, are designed to instill trust, collaboration and open dialogue between the Office of EMS and the VDH leadership team. Furthermore, in an effort to create more collaboration between VDH and OEMS, as well as a budget positive action, the OEMS team will be moving to the Central VDH Office, occupying the first floor Mezzanine in a remodeled space beginning in the summer of 2025. Current rent in Glen Allen is over \$22,000 per month and this will allow the use of those funds for programmatic activity. It will also encourage greater collaboration between OEMS and their VDH leadership and colleagues.

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2	We recommend the OEMS Director and Deputy Director Trauma and Administration determine and communicate clear delineation of responsibilities and proper segregation of duties regarding administration functions such as Budget, Procurement, Accounts Payable, Human Resources, in both a process and position level.	Concur	OEMS Director & Deputy Director Trauma & Administration	10/2023	In October 2023, VDH leadership placed a temporary Business Manager into the Office of EMS to start the process of separating duties and clearly defining roles and responsibilities to ensure adherence to VDH and State policy. On 2/10/24, VDH hired a permanent Business Operations Manager through a wider initiative to improve fiscal accountability across the Agency. To allow for a successful transition of duties, the new Business Operations Manager was afforded a 6-week transition and training period where they were able to work with the temporary business manager and wider Agency Fiscal support staff to ensure continuity of operations, and continued adherence to State Policy. The Interim Office Director and OEMS leadership team has worked to ensure that duties are segregated, and that the Office follows all State and VDH policies and procedures. Roles and responsibilities have been clarified and EWP's have been updated.
3	We recommend the Chief Operating Officer and Deputy Commissioner for Administration evaluate Central Operations processes to remove inefficiencies, establish performance metrics, and regular evaluation of metrics for procurement, financial, and human resources transactions for OEMS programs through Budget/Financial meetings, Monthly Operating Review meetings or such.	Concur	COO and Deputy Commissioner for Administration (CFO)	Ongoing	Towards the end of FY23, VDH Operational leadership instigated budget reviews of each Office. It was this process that initially highlighted the financial concerns that realized the discovery of fraudulent activities. Since the instigation of this process, the Office of EMS has met routinely with VDH fiscal, HR and Senior leadership to discuss the challenges the office is facing. The Interim Director routinely meets with the Chief Operating Officer to raise concerns and to advocate for change, where change is required. In addition to these meetings, which were initially held weekly, then biweekly and have now been returned to a monthly status, the Office works directly with administrative leadership to ensure fiscal and HR accountability. The Interim Office Director has taken an active role in ensuring that the issues and challenges that are raised at daily meetings are escalated and addressed in a timely manner. Across VDH, each Office now participates in Monthly Operating Reviews where each Office Director meets with Senior VDH Operational and Administrative leadership monthly to review Finances, Human Resources data, Objectives with Key Results, and their Employee Engagement plans. Administrative functions of the greater VDH are addressed through the newly created "Healthy Financial Operations" Steering committee where Agency leaders work through Administrative process issues, to include retention and recruitment of administrative staff, travel reimbursement, invoice processing, grant administration, and other matters.

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4	We recommend the OEMS Director, Deputy Director Trauma and Administration, Chief Operating Officer and Deputy Commissioner for Administration establish a method for communication between OEMS and Central Offices operations regarding administrative transactions, with built in accountability for who is responsible at each step in the process.	Concur	OEMS Director, Deputy Director Trauma and Administration, Chief Operating Officer and Deputy Commissioner for Administration	8/1/2023 and ongoing	In September of 2023, a temporary pause was placed on all transactions at the Office of EMS while a realignment of fiscal priorities was conducted. During this realignment phase, a temporary process was instigated to ensure fiscal transparency of all transactions being made. The temporary business manager (followed by the permanent Business Operations Manager) was required to validate all expenditures created in F&A with further review being completed by the Interim Office Director. Once transactions were verified, a further oversight step was introduced prior to payment release. The OEMS leadership team meets daily to discuss payments being made, and budget to actual information is shared with every team member at the All staff meetings that occur on a bi-weekly basis. In addition to this, all budget managers have received guidance from the BOM on their budgets, codes and what can be expended in their budget. Budget to actual information is routinely shared with EMS Leadership and the Deputy leadership to ensure that there is transparency and fiscal accountability.
5	We recommend the OEMS Director and Deputy Director Trauma and Administration work with the HR Business Partner assigned to OEMS to determine whether the OEMS Associate Director position needs to be eliminated. If the position is maintained, what the roles and responsibilities of the OEMS Associate Director (08316) position should be, and the EWP is revised to ensure the roles and responsibilities are clearly stated prior to filling the position.	Concur	OEMS Director and Deputy Director Trauma and Administration	3/13/2024	In March of 2024 the OEMS Organizational chart was updated to create the OEMS leadership team to ensure better oversight of positions. Instead of the Director having 11 direct reports, the span of control was reduced to 4 direct reports, including three Deputy Directors, with better alignment and grouping of work areas. In addition to this, the role of Associate Director was eliminated, spreading the accountability for the Office across three Deputy Directors. This allowed for more comprehensive oversight of programmatic and financial aspects in the day-to-day operations of the Office.
6	We recommend the OEMS Director and Deputy Director Trauma and Administration work with the HR Business Partner assigned to OEMS to review the Human Services Program Coordinator (02322) and OEMS Business Manager (EM039) positions to ensure the roles and responsibilities are clearly stated and revise the EWP, as necessary	Concur	OEMS Director and Deputy Director Trauma and Administration	2/10/2024 & 09/01/2024	VDH leadership hired a new Business Operations manager on 02/10/2024. This role was provided with a fully standardized EWP that fully outlined the roles and responsibilities associated with that position. As part of a wider initiative to ensure accountability and responsibility at all levels within the Office, a full review of all other OEMS position EWPS is being completed during September 2024.
7	We recommend the OEMS Director and Deputy Director Trauma and Administration work with the HR Business Partner assigned to OEMS review and revise the reporting structure for the OEMS Business Manager (EM039) position, as needed	Concur	OEMS Director and Deputy Director Trauma and Administration	3/13/2024	The Business Operations Manager role was restructured with other key organizational roles on 03/13/2024. The role was assigned to the Director of Trauma and Administration. Once a permanent Director of OEMS is appointed, the role will report directly to them. It is anticipated that the Director position will be in filled by the end of calendar year 2024.

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8	We recommend the OEMS Director and Deputy Director Trauma and Administration work with the HR Business Partner assigned to OEMS to revise the OEMS Business Manager (EM039) EWP to clearly state what positions the OEMS Business Manager will manage.	Concur	OEMS Director and Deputy Director Trauma and Administration	3/13/2024	In March 2024, the Office of EMS organizational chart was restructured to ensure better accountability at all levels within the organization. The Director previously had 11 direct reports that did not provide for appropriate span of control. Following the restructure, the Director had just 4 Direct Reports allowing for greater oversight. This allowed the Director to be able to focus much more closely on fiscal control and programmatic oversight. Further changes are proposed once the Director role is permanently filled, with the Business Operations Manager directly reporting to the Director and any positions reporting to the BOM will be defined.
9	We recommend the Deputy Commissioner for Administration and Deputy Director Trauma and Administration ensures the OEMS Business Manager is properly trained and given the resources to assume their role and responsibilities according to their EWP.	Concur	Deputy Commissioner for Administration and Deputy Director Trauma and Administration	2/10/2024	The Business Operations Manager (BOM) hired 2/10/2024 has a standard EWP with the financial expectations required for this position updated prior to hire. The BOM received extensive training and support through the onboarding and training team during the onboarding process. This training consisted of learning VDH, and State financial controls and policies and procedures put into place by the State to ensure good fiscal oversight. In addition to this classroom training, the BOM spent an additional six weeks shadowing the interim Business Manager at OEMS to ensure that the best practices implemented were continued and built upon. This included ensuring that there was thorough understanding of the budget including designated uses of the funds that were coming into the Office. The BOM continues to interact with BOMs from other VDH Offices and with the Assistant Deputy for Administration through regularly held forums and information sharing opportunities.
10	We recommend the Deputy Director Trauma and Administration and OEMS Business Manager ensure OEMS SPCC cardholders only charge their SPCC for purchases that support OEMS objectives and programs.	Concur	Deputy Director Trauma and Administration and OEMS Business Manager	2/10/2024	The Deputy Director for Trauma and Administration has put controls into place to ensure that SPCC Cards are only used to procure programmatic required items. OEMS has implemented the Bank of America Works tool with regard to the use of their two SPCC cards. The supervisor of the cardholder utilizes the Bank of America Works system to approve all of the charges which have attached receipts, to ensure the charges are appropriate, with monthly reconciliation.

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11	We recommend the Deputy Director Trauma and Administration and OEMS Business Manager ensure OEMS SPCC cardholders include an invoice or PO # on all SPCC logs.	Concur	Deputy Director Trauma and Administration and OEMS Business Manager	Immediate and ongoing	OEMS has implemented the Bank of America Works tool regarding the use of their two SPCC cards. The supervisor of the cardholder utilizes the Bank of America Works system to approve all of the charges which have attached receipts, to ensure the charges are appropriate, with monthly reconciliation. All purchases are appropriately tracked and aligned to an invoice of purchase order number.
12	We recommend the Deputy Director Trauma and Administration and OEMS Business Manager ensure OEMS SPCC cardholders reconcile SPCC charges at least monthly and by year end.	Concur	Deputy Director Trauma and Administration and OEMS Business Manager	2/10/2024	OEMS has implemented the Bank of America Works tool with regard to the use of their two SPCC cards. The supervisor of the cardholder utilizes the Bank of America Works system to approve all of the charges which have attached receipts, to ensure the charges are appropriate, with monthly reconciliation. These charges are now reconciled monthly.

Budget Recommendations

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1	We recommend the OEMS Director, Deputy Director Trauma and Administration, and OEMS Business Manager ensure that all OEMS Division Directors responsible for fiscal decisions regarding their division have input on creating the budget, have access to their budgets with funds coming in and going out, and regular communication from the OEMS leadership regarding status updates of their budgets. This will ensure that there is ongoing communication on the needs of the Divisions, including any increase in OEMS costs of doing business are potentially included in the budget.	Concur	OEMS Director, Deputy Director Trauma and Administration, and OEMS Business Manager	7/1/2024	The OEMS Interim Director has ensured that all Deputy Directors, and Division Directors are part of the Business Operations Manager's budget building process. Work started in this process for the current fiscal year on 7/1/24 and following receipt of Cash Balances from the VDH Office of Financial Management (OFM). Work is continuing to ensure that the FY25 budget is completed properly. Upon completion of this activity, the budget will be fully communicated to all staff at the "All hands meeting", and updates given monthly on the budget to actual expenses being incurred. This will ensure that every team member has accountability and buy-in for long term fiscal accountability across the Office.
2	We recommend the OEMS Director, OEMS Deputy Director Trauma and Administration and OEMS Business Manager establish segregation of duties and an internal review, approval, and reporting process for OEMS transactions to ensure accountability at all levels for fiscal decisions made for OEMS programs and activities	Concur	OEMS Director, Deputy Director Trauma and Administration, and OEMS Business Manager	2/10/2024	The Interim Office Director and OEMS leadership team has worked to ensure that duties are segregated, and that the Office follows all State and VDH policies and procedures. Roles and responsibilities have been clarified and EWP's have been updated. The OEMS is utilizing the VDH Invoice Portal to track invoices received. These are approved by the Division Directors before following the VDH standard process of approval. Once approved for payment release, there are additional steps in place to check that the Office has sufficient funding available before a request is made to the Accounts Payable (AP) team and the Deputy Commissioner of Administration for funds to be released, which is an additional step to the standard VDH process. At the end of FY25, budgets should be sufficient to reduce this additional release steps. These expenses are also communicated to all staff regularly at the All Staff meetings.

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3	We recommend the OEMS Director, OEMS Deputy Director Trauma and Administration and OEMS Business Manager work with the Deputy Commissioner for Administration and OFM Deputy Director for Budget to determine and communicate clear delineation of responsibilities for creating, approving, and monitoring the OEMS budget and the special funds that they have.	Concur	OEMS Director, OEMS Deputy Director Trauma and Administration and OEMS Business Manager	Ongoing	In October 2023, upon the appointment of a temporary Business Manager a review was completed to thoroughly track the expenditures versus income received and to create a plan to move forward including paying vendors. Once the initial crisis management steps were completed, the BOM and Assistant Deputy Commissioner worked closely with the OEMS Leadership team to create a process for determining the remaining budget for FY24, and to put controls in place to ensure expenditures were all accounted for. In February 2024, a permanent Business Operations Manager was assigned, who then became responsible for developing and monitoring budgets moving forward. Daily meetings have been held by the Interim Office Director with the OEMS leadership team, including the Business Operations Manager to ensure that spending priorities and money available is monitored daily. An FY25 budget has now been created and will be used as the basis for spending moving forward. Budget to actual expenditures will be communicated to all staff at the All Staff meeting to ensure that the full financial picture is communicated to all staff members. In addition, all staff with spending authority will receive additional budget information at least monthly, which will be reviewed with the Business Manager to ensure that spending is kept within budget limits. Once the process is fully established the cadence of the monitoring will be appropriate.
4	We recommend the OEMS Director, Deputy Commissioner for Administration and OFM Deputy Director for Budget establish an escalation process, including accountability for actions taken when OEMS Office Director, Deputy Director Trauma and Administration and/or OEMS Business Manager is not properly or timely responding to budget concerns or when the Offices operate in a deficit.	Concur	OEMS Director, Deputy Commissioner for Administration and OFM Deputy Director for Budget	8/1/2023	The OEMS Leadership team meets at 8:30 am daily to discuss budget oversight and programmatic issues. All issues relating to budget are discussed during those meetings, and concerns are escalated as needed to OFM staff. In addition to this, budgets and spending are communicated openly to all staff, to ensure that all staff are informed to the fiscal accountability of the Office. In addition to this Office level review, weekly meetings were created by the VDH leadership team with the OEMS leadership team to create sound fiscal oversight of spending and budgets. Following the appointment of the Assistant Deputy Commissioner to Interim Director these meetings have shifted to become a Monthly Operating Review in line with other Offices. Any issues in the OEMS budget during the year are brought to the Acting Office Director immediately. The issues are also escalated to the OFM Deputy Director for Budget.

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5	We recommend the OEMS Director, Deputy Commissioner for Administration and OFM Deputy Director for Budget ensure that the Budget Analyst assigned to OEMS is properly trained to understand how OEMS is funded with the special funds and the unique requirements for spending to ensure compliance with the Code of Virginia requirements.	Concur	OEMS Director, Deputy Commissioner for Administration and OFM Deputy Director for Budget	Ongoing	The OFM budget analyst assigned to OEMS has been trained on what the OEMS funds are to be used for and how to monitor them and how to review and analyze OEMS spending vs its budget. The analyst is involved in reviewing and approving the OEMS budget and will have a clear understanding of what is included and not included. Any issues in the OEMS budget during the year are brought to the Acting Office Director immediately. The issues are also escalated to the OFM Deputy Director for Budget. Furthermore, an effort is underway to ensure that code mandated programs are funded to the degree which OEMS is required and programs require for effectiveness. One code mandated program that will shift in the coming year is the access to the Patient Care Repository (PCR). Code requires that OEMS provide access to a Data Repository system. OEMS has provided and paid for that system, but gone above code requirement and paid for any EMS agency in the Commonwealth to have an Electronic Patient Care Record provided free of charge as well. That will change in July 2025. VDH took over the contract for the PCR through ESO that was routed Western EMS Council in July 2024. VDH is in a 12-month sole-source contract with ESO to continue those same services, allowing any EMS agency in the Commonwealth to maintain that system free of charge through June 2025. An RFP is being initiated in September 2024 to procure services on a state contract for the Data Repository with the requirement beginning in July 2025 that EMS agencies will be required to pay for their own EPCR system.
6	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager optimize the OEMS budget to account for expected revenue in each fund and have the proper percentages for each Four-For-Life project budgeted for each fiscal year.	Concur	OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager	10/2023	The BOM reviews projected revenues to actual revenues received on a monthly basis and highlights any concerns in revenue decrease to the OEMS leadership team for review. Budgets have been created to ensure that only items allowed to be allocated to each fund code are budgeted and spent. Spending is reviewed daily at the OEMS leadership team meeting to ensure that budgets are on target. In addition to this, budgets to actuals (both revenue and pending) are communicated with all budget holders and at all staff meetings. This ensures that all staff at OEMS have a transparent view on the budget and all understand their part on ensuring that budgets are maintained appropriately.
7	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager consult with the Deputy Commissioner for Administration, OFM Director, and OFM Deputy Director for Budget to review and correct all instances where employees and contractors are being incorrectly paid with OEMS funds and ensure that this is no longer occurring.	Concur	OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager	7/1/2024 and ongoing	Following a wider restructuring and reorganization of the cost allocation of the VDH central fiscal, HR and OIM charges, controls have been put in place to ensure better transparency of charges that are incurred by all offices. Only those resources actually allocated and working for an office should now be charged to that Office's cost code. In addition to this central control, the BOM for OEMS reviews every expenditure and cross references to the allocated budget and where a discrepancy occurs action is taken by the BOM to investigate the expenditure and ensure that it is reallocated to the correct cost center through the journalling process. Where discrepancies occur, these are communicated to the OEMS Leadership team and full documentation of the journal is retained for audit purposes.

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8	We recommend the OEMS Deputy Director Trauma and Administration and OEMS Business Manager work with the Office of Financial Management Director and Budget Office Director to review all OEMS cost codes at the COA level, and eliminate any that are no longer used or needed.	Concur	OEMS Business Manager	5/2024 and ongoing	The BOM has reviewed all cost and task codes allocated to and associated with the OEMS. All cost and task codes are now programmatic and item specific and training has been given to all Deputy Directors to ensure that the correct codes are used. This has allowed the BOM to give much more detailed oversight into the items being purchased for the OEMS. All redundant codes have been eliminated to reduce the risk of coding error.

Trauma Center Fund Recommendations

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1	We recommend the OEMS Director and Trauma and Critical Care Division Director work with the OFM Director and OFM Deputy Director for Budget to establish a process to ensure all Trauma Center Funds are properly budgeted and timely disbursed to the qualifying Trauma Centers by the end of the fiscal year, possibly through quarterly payments.	Concur	OEMS Director, Business Operations Manager and Trauma Manager	4/2024.	Following a thorough review of the Trauma Center funding disbursement model, the VDH COO and OEMS Trauma leadership team met with representatives of the Virginia Hospital and Healthcare Association (VHHA), and the CFOs of all Trauma centers to discuss altering the way that payments are reviewed to ensure fiscal transparency. This included altering the annual payment to bi-annual, ensuring transparency in the information shared to how those payments were computed, and committing to set times of those payments with the goal April and October of each year. Additionally, the trauma admission data received now matches the time period of the actual trauma funds received, and when paid out the entirety of the fund balances will be dispersed. The VHHA and Trauma Center CFOs agreed to this change, and it was implemented in the Spring of 2024 with the next payment scheduled to go out in October of 2024.
2	We recommend the OEMS Director and Trauma and Critical Care Division Director ensure that Trauma Center Funds are only used to make disbursements to qualifying Trauma Centers, and Trauma Center funds are properly used for trauma specific activities only.	Concur	OEMS Director and Trauma Manager	Ongoing	The Business Operation Manager works closely with the Trauma and Data management Team to ensure that the data provided is accurate, and calculations regarding the percentage of the fund being allocated to each trauma center are accurate and transparent. Numerous meetings are held during the process, and prior to the data being finalized, the information is communicated to the wider OEMS leadership team for further review. The VDH Deputy Commissioner of Population Health and Preparedness will review the payment calculation method to ensure transparency and accuracy in payment plan prior to funds being released. When funds are dispersed the BOM will ensure that only Trauma funds are used for the disbursement and that all State policies are followed to record each transaction made. The Trauma Manager and BOM will develop an auditing method to ensure that finds dispersed to Trauma Centers are solely used for approved Trauma related purposes.
3	We recommend the OEMS Director, Deputy Director Trauma and Administration and Trauma and Critical Care Division Director review and provide justification for the Trauma Center Distribution Fund policy language, or remove it from the policy to remain consistent with Code of Virginia § 18.2-270.01.	Concur	OEMS Director and Trauma Manager	Fall 2024	The Trauma Center Distribution Fund policy is being updated to reflect the changes being made to the disbursement process that allows for better fiscal oversight and transparency to the trauma centers on how the money is being allocated. The policy will go through peer review by members of the various Trauma committees to ensure that it complies with all State Codes and meets the needs of the trauma centers with regard to being open and transparent, and setting clear expectation and time frames for financial disbursements to be made.

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4	We recommend the OEMS Director and Deputy Director Trauma and Administration ensure the Trauma and Critical Care Division Director is involved in the budget, expenditure, and reporting of Trauma Center Funds, and ensure that carryover funds are minimized.	Concur	OEMS Director and Trauma Manager	8/2023	The Business Operation Manager works closely with the Trauma and Data management Team to ensure that the data provided is accurate, and calculations regarding the percentage of the fund being allocated to each trauma center are accurate and transparent. Numerous meetings are held during the process, and prior to the data being finalized, the information is communicated to the wider OEMS leadership team for further review as well as review by the VDH Deputy Commissioner for Population Health and Preparedness. When funds are dispersed, care is taken by the BOM to ensure that only Trauma funds are used for the disbursement and that all State policies are followed to record each transaction made. The Deputy Director for Trauma and Administration will review the disbursements for accuracy, followed by approval by OFM AP.
5	We recommend the OEMS Director, Deputy Director Trauma and Administration and Trauma and Critical Care Division Director ensure that the required annual reports are submitted of the projected use and actual use of trauma funds by the November 15 and February 15 deadlines.	Concur	OEMS Director, Deputy Director Trauma and Administration	3/2024	The Trauma Division will review reports submitted by the Trauma Centers to ensure compliance with the policy for approved projected and actual use of Trauma Fund payments.
6	We recommend the OEMS Director, Deputy Director Trauma and Administration and Trauma and Critical Care Division Director ensure that financial audits are performed for Trauma Centers that receive \$200K per year, or audits as needed for Centers that receive less than \$200K.	Concur	OEMS Director, Deputy Director Trauma and Administration	07/2025	Upon successful implementation of the twice yearly payment to the Trauma system the OEMS Leadership team, and Specifically the Trauma and Administration Director, will work with the various Trauma committees of the EMS Advisory Board to review the audit process and reinstate auditing of hospitals receiving trauma funds in FY26.

Four for Life Recommendations

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1	We recommend the OEMS Director and Deputy Director Trauma and Administration establish written procedures for managing Four-for-Life funds to include controls and accountability to ensure compliance with the Code of Virginia requirements, and State and VDH internal policies and procedures	Concur	OEMS Director, Deputy Director Trauma and Administration, and OEMS Business Manager	Ongoing	During FY25, the Office of EMS will be establishing SOPs that will help with training and onboarding of new staff coming into the office to give greater awareness of the code mandated funding streams received by the office and the required limits to its spending. All accounts are regularly reviewed with transparency and compliance assured by the OEMS leadership team. On appointment of the BOM, a full and thorough training was given by the VDH budget team, the interim Business Manager, and the Assistant Deputy Commissioner on the funding streams utilized by the OEMS and what each could be used for. In addition to this thorough training, the BOM received State training on all other fiscal controls, such as the CAPP and DAMM manuals.
2	We recommend the State Health Commissioner and Deputy for Population Health and Preparedness establish a method of accountability for the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager to ensure that Four-for-Life funds are properly managed and spent to ensure compliance with the Code of Virginia requirements for OEMS programs	Concur	State Health Commissioner and Deputy for Population Health and Preparedness	Ongoing	VDH leadership reviews the Office operations monthly through the VDH Monthly Operating Review process where OEMS leadership will discuss their financial status, human resources opportunities, a review of their stated objectives, and employee engagement activities. The Deputy Commissioner for Population Health and Preparedness will review the budget monthly to ensure compliance with Four-for-Life budgetary requirements according to the Code of Virginia.
3	We recommend the OEMS Director, Deputy Director Trauma and Administration, and OEMS Business Manager closely monitor spending in each project code for the Four-for-Life funds to ensure compliance with the Code of Virginia requirements for OEMS programs.	Concur	OEMS Director, Deputy Director Trauma and Administration, and OEMS Business Manager	Ongoing	During FY25 the Office of EMS will be establishing SOPs that will help with training and onboarding of new staff coming into the Office to give greater awareness of the code mandated funding streams received by the office and the required limits to its spending. All accounts are regularly reviewed with transparency and compliance assured by the OEMS leadership team. On appointment of the BOM, a full and thorough training was given by the VDH budget team, the interim Business Manager, and the Assistant Deputy Commissioner on the funding streams utilized by the OEMS and what each could be used for. In addition to this thorough training, the BOM received State training on all other fiscal controls, such as the CAPP and DAMM manuals. The Office of EMS follows these State Procedures. VDH leadership reviews the Office operations monthly through the VDH Monthly Operating Review process where OEMS leadership will discuss their financial status, human resources opportunities, a review of their stated objectives, and employee engagement activities. Additionally, the OEMS will submit an annual review to the Board of Health on its Four-for Life financial status to accompany the required state EMS plan.

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4	We recommend the OEMS Director, OEMS Deputy Director Trauma and Administration and OEMS Business Manager develop a tool for OEMS Four-for-Life obligations for better tracking and monitoring, and annual reporting to the Board of Health of the OEMS Four-for-Life fund.	Concur	OEMS Director, OEMS Deputy Director Trauma and Administration and OEMS Business Manager	Ongoing	The OEMS will continue to report the required State EMS Plan to the Board of Health and include information on its Four-for Life financial status. VDH is in the process of procuring a financial management software to replace the antiquated F&A financial software which will provide an improved platform for tracking and monitoring.
5	We recommend the OEMS Director, OEMS Deputy Director Trauma and Administration and OEMS Business Manager develop a written internal procedure to reconcile and monitor Return to Locality disbursements to avoid duplicate payments to localities.	Concur	OEMS Director, Deputy Director Trauma and Administration, and OEMS Business Manager	1/24	A close working relationship has been established between the Business Operations Manager and the EMS System Funding Manager with them both currently reporting to the same Deputy Director. This has ensured the removal of silos in the Office, creating a collaborative work environment that ensures that proper payments are being processed in a timely manner. Routine meetings are being held between the BOM and the System Funding Manger, with shared data to ensure that upcoming payments are being communicated and planned for. This reconciliation will eliminate the possibility of duplicate payments.
6	We recommend the OEMS Director, OEMS Deputy Director Trauma and Administration and OEMS Business Manager make Return to Locality disbursements from the Four-for-Life fund only, and not other funds such as the RSAF.	Concur	OEMS Director, Deputy Director Trauma and Administration, and OEMS Business Manager	8/23	The BOM checks fund balances daily to ensure that expenditures made do not exceed revenues received. All payments from each fund source are reviewed regularly by the BOM and Deputy Director for Trauma and Administration ensuring that the proper controls have been put into place to ensure that Return to Locality (RTL) payments are only made from the correct fund. Prior to any funds being released from OEMS an additional verification step is completed by the Deputy Director for Trauma and Administration to ensure that payments being released are correctly coded. The Deputy Director for Trauma and Administration is completing this additional verification and has received training and guidance on what can be spent under each cost/task code.
7	We recommend the OEMS Director, OEMS Deputy Director Trauma and Administration and OEMS Business Manager monitor spending to ensure no funding source in the Four-for-Life fund is overspent and journal entries to transfer money are not made without reasonable justification and written supporting documentation	Concur	OEMS Director, Deputy Director Trauma and Administration, and OEMS Business Manager	Ongoing	The BOM checks fund balances on a daily basis to ensure that expenditures made do not exceed revenues received. Revenue generated from the Four for Life is monitored on a daily basis and the Business Operations Manager plans expenditure according to revenue received. Any discrepancies found are escalated to the Office Director. Journaling will only be when necessary and with approval of the Office Director and AP in OFM.

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8	We recommend the OEMS Director, OEMS Deputy Director Trauma and Administration, OEMS Business Manager and OEMS Grants Manager/EMS System Funding review the Return to Locality Share of EMS Four-for-Life policy to make sure localities are compliant with the policy and properly using the funds outlined in the policy based on review of supporting documentation.	Concur	OEMS Director, Deputy Director Trauma and Administration, EMS Systems Funding Manager, and OEMS Business Manager	Ongoing	The Office of EMS completes annual checks to ensure that money allocated through the Four-For-Life Return to Locality program is being spent in accordance with policy. This process is completed annually and before any additionally money is released. The EMS System Funding Manager records these audits. The Deputy Director for Trauma and Administration will be responsible for ensuring the records are accurate and comply with the policy. The policy is being reviewed for any necessary updates.
9	We recommend the OEMS Director, OEMS Deputy Director Trauma and Administration, OEMS Business Manager and OEMS Grants Manager/EMS System Funding encourage the use of Return to Locality funds within one year, and discourage the carryover of funds for multiple years as outlined in the policy.	Concur	OEMS Director, OEMS Deputy Director Trauma and Administration, OEMS Business Manager and OEMS Grants Manager/EMS System Funding	Ongoing	The EMS System Funding Manager works closely with localities to ensure that funding is provided to localities when due, and that localities do not carry money over fiscal years. Previously OEMS practice allowed for jurisdictions to build up a surplus of RTL funds to allow the purchase of greater value items. This practice is being discouraged so as to ensure that OEMS is not unnecessarily holding locality money. OEMS is investigating which avenues can be taken to encourage use of funds when they are awarded. The Office of EMS will work with the EMS Advisory Board over the next twelve months to incorporate this into policy.

Regional Council Recommendations

#	Recommendation	Concur/ Do Not Concur	Responsible Position	Projected Implementation Date	Management Response
1	We recommend the OEMS Director and OEMS Deputy Director Operations work with the Chief Operating Officer to review the Regional Council Hybrid model, including but not limited to the reporting structure, assignment of staff, and payment of operating expenditures, to determine viability and sustainability as well as compliance to the Code of Virginia and the intended purpose of the Regional Councils.	Concur	Chief Operating Officer, OEMS Director, and OEMS Deputy Director for Operations	7/1/2025	Following VDH leadership investigation, it has been determined that appropriate legal approval was not sought within VDH or outside approving entities prior to the creation of Hybrid Regional EMS Councils and their subsequent contracts. This has led to State Employee's supervising non-profit employees and simultaneously being responsible to the Board of Directors that manage the not-for-profit aspect of the Councils. Additionally, it has led to expenditures being covered for the Hybrid Councils which are outside of the scope of the original intention of creating these agreements. VDH leadership will be working with the Office of EMS leadership team to restructure the Hybrid Offices to bring them into compliance with State Human Resources, procurement, and other compliance areas.
2	We recommend the OEMS Director and OEMS Deputy Director Operations establish a method for ensuring that all expenditures related to Regional EMS Councils can be traced to each individual Regional EMS Council.	Concur	OEMS Director and Deputy Director for Operations	8/2023	The OEMS Business Operations Manager has created a robust and transparent system in the Chart of Accounts of expense coding to ensure that all expenses can be tracked programmatically. All expenses relating to the operation of both Hybrid and Traditional Councils for which OEMS has been responsible have been divided out to ensure that full visibility of the cost of performing these programs can be captured. Training has been given to all OEMS staff with financial duties to ensure that they are aware of and using the correct expense tracking codes.
3	We recommend the OEMS Director and OEMS Deputy Director Operations review how Regional Councils (both traditional and hybrid) are funded for their activities and establish formal standardized policies and procedures with built in accountability for both OEMS and the Regional Council Directors.	Concur	OEMS Director and Deputy Director for Operations	Ongoing	Over the last twelve months, the Interim Director has worked to understand the various tasks and duties completed by the Regional EMS Councils as a starting basis for creating standardization and a baseline expectation across the State. In time for re-designation in July 2025, it is the intention of VDH Leadership to have a single standard that EMS councils will be held accountable to, with full fiscal transparency into what is being funded by the Office of OEMS and what is a Council Obligation.
4	We recommend the OEMS Director and the OEMS Deputy Director Operations work with the State Health Commissioner to determine if statewide projects should be managed by Regional Councils, and if so, an annual budget with established limits and accountability for what Regional Councils can be allowed to expense on behalf of Statewide projects should be determined.	Concur	State Health Commissioner, EMS Director and Deputy Director for Operations	Ongoing	Over the last twelve months, the Interim Director has worked to understand the various tasks and duties completed by the Regional EMS Councils as a starting basis for creating standardization and a baseline expectation across the State, including statewide projects. In time for re-designation in July 2025, it is the intention of VDH Leadership to have a single standard that EMS councils will be held accountable to, with full fiscal transparency into what is being funded by the Office of OEMS and what is a Council Obligation.
5	We recommend the OEMS Director and the OEMS Deputy Director Operations work to determine what State policies and procedures regarding procurement and asset management should be followed by Regional Councils in relation to OEMS funded transactions.	Concur	OEMS Director and Deputy Director for Operations	Ongoing	VDH is in the process of redetermining the model for the Regional Councils and State policies and procedures regarding procurement and asset management will be followed according to the chosen model.

#	Recommendation	Concur/ Do Not Concur	Responsible Position	Projected Implementation Date	Management Response
6	We recommend the OEMS Director and the OEMS Deputy Director Operations work with the Chief Operating Officer on resolving OEMS's contractual obligations and insufficient funding to meet them.	Concur	COO, OEMS Director, and Deputy Director for Operations	7/2024	Funding issues were resolved temporarily due to additional funding provided by the Governor and the General Assembly. Moving forward contracts will only be procured that fall within the OEMS budget limits. Following the decoupling of VDH from contracts operating through EMS Councils, VDH will ensure that all Statewide projects are managed and contracted through the Office of EMS only, following all State Procurement rules. As part of this process, numerous contracts such as Blackboard, "State IT Contract" and HandTevy have been eliminated while others, such as ESO and ImageTrend have been negotiated on an Emergency Sole Source Contract and contracted through the Office of EMS. As contracts end and opportunity allows, contracts will be sourced through State procurement processes such as RFP and Sole Source as appropriate to ensure that the use of Councils for the purpose of contracts is eliminated.
7	We recommend the OEMS Director and the OEMS Deputy Director Operations ensure all Regional Council expenditures have proper supporting documentation for their purchases on behalf of OEMS before paying invoices.	Concur	OEMS Director, and Deputy Director for Operations	8/2023	OEMS staff are now following State protocols in the requirements for full documentation prior to an invoice being paid. Only those agreed upon expenses that are supported with documentation are processed for payment. As contracts/MOUs are renegotiated with Regional Councils, clearer guidelines will be instigated in the items that are eligible for reimbursement through the Office of EMS. The Deputy Director for Operations, who now oversees all Regional Councils, will be responsible for reviewing all invoices prior to payment.
8	We recommend the OEMS Director and the OEMS Deputy Director Operations follow the VDH Travel policy for reimbursing non-employee travel	Concur	OEMS Director and Business Operations Manager	1/1/2024	As part of a wider VDH compliance initiative, the Office of EMS is following new procedures initiated by the Office of Financial Management with regard to the reimbursement of travel expenses. All staff and non-staff members are now submitting travel through newly created VDH Travel Portal and are reimbursed in line with VDH expectations. Moving forward, the Assistant Deputy Commissioner of Administration along with the OEMS BOM will ensure that staff and board members are trained in any new system being procured as part of larger Agency initiative.
9	We recommend the OEMS Director and the OEMS Deputy Director Operations ensure all Regional Council expenditures are supported by updated and fully executed procurement agreements.	Concur	OEMS Director and Deputy Director for Operations	1/1/2024	OEMS staff are now following State protocols in the requirements for full documentation prior to an invoice being paid. Only those agreed upon expenses that are supported with documentation are processed for payment. As contracts/MOUs are renegotiated with Regional Councils clearer guidelines will be instigated in the items that are eligible for reimbursement through the Office of EMS.

#	Recommendation	Concur/ Do Not Concur	Responsible Position	Projected Implementation Date	Management Response
10	We recommend the OEMS Director and the OEMS Deputy Director Operations ensure that invoices paid for Regional Councils have complied with the terms of the procurement contract both for the amount charged and completion of goods/services	Concur	OEMS Director and Deputy Director for Operations	1/1/2024	OEMS staff are now following State protocols in the requirements for full documentation prior to an invoice being paid. Only those agreed upon expenses that are supported with documentation are processed for payment. As contracts/MOUs are renegotiated with Regional Councils clearer guidelines will be instigated in the items that are eligible for reimbursement through the Office of EMS. The Deputy Director for Operations verifies the receipt of goods or services consistent with the executed contract and the BOM submits the invoice for payment to OFM AP team who authorizes the payment in Cardinal.
11	We recommend the OEMS Director and the OEMS Deputy Director Operations ensure Regional Council expenditures are coded consistently and accurately for ease of budget development and tracking	Concur	OEMS Director, Deputy Director for Operations, and Business Operations Manager	Ongoing	The OEMS Business Operations Manager has created a robust and transparent system of expense coding in the Chart of Accounts to ensure that all expenses can be tracked programmatically. All expenses relating to the operation of both Hybrid and Traditional Councils have been divided out to ensure that full visibility of the cost of performing these programs can be captured. Training has been given to all OEMS staff with financial duties to ensure that they are aware of and are using the correct expense tracking codes. The BOM in collaboration with the OEMS Leadership team will ensure that Councils remain within their OEMS allocated budgets, raising any issues with the Deputy Director for Operations in advance of any over expenditure occurring.
12	We recommend the OEMS Director and the OEMS Deputy Director Operations ensure Regional Council expenditures are reviewed and reconciled at least monthly to ensure that all expenditures have been accurately coded.	Concur	OEMS Director, Deputy Director for Operations, and Business Operations Manager	Ongoing	All expenditures are reviewed by the Business Operations Manager and the OEMS Director as vouchers are created. In addition, in FY25 weekly reports will be produced highlighting each Divisions spending. Additionally, there is a monthly reconciliation report completed by the BOM and submitted to OFM for review.

Western Council Recommendations

#	Recommendation	Concur/ Do Not Concur	Responsible Position	Projected Implementation Date	Management Response
1	We recommend the OEMS Director and the Deputy Director Operations evaluate OEMS’ operating relationship with WVEMS to ensure that funds transferred to WVEMS are spent in a manner consistent with VDH and State policies and procedures	Concur	OEMS Director, Deputy Director for Operations	Immediate	Following the decoupling of VDH from contracts operating through EMS Councils, VDH will ensure that all Statewide projects are managed and contracted through the Office of EMS only, following all State Procurement rules. As part of this process, numerous contracts such as Blackboard, "State IT Contract" and HandTevy have been eliminated while others, such as ESO and ImageTrend have been negotiated on an Emergency Sole Source Contract and contracted through the Office of EMS. As contracts end and opportunity allows, contracts will be sourced through State procurement processes such as RFP and Sole Source as appropriate to ensure that the use of Councils for the purpose of contracts is eliminated.
2	We recommend the OEMS Director and the Deputy Director Operations establish and enforce internal controls over OEMS expenditures, including separation of duties, management review and approvals, management monitoring of procurements, procurement compliance, budget, and expenditure approval compliance, effective reviews of financial report reconciliations paid for by all Regional Councils.	Concur	OEMS Director, Deputy Director for Operations	Ongoing	When the OEMS contracts with the Regional Councils are renegotiated, there will be specifics on the internal controls over OEMS expenditures, including separation of duties, management review and approvals, management monitoring of procurements, procurement compliance, budget, and expenditure approval compliance, with effective reviews of financial report reconciliations paid for by all Regional Councils.
3	We recommend the OEMS Director and the Deputy Director Operations build into all OEMS projects contingencies for the possibility of increased participation and related costs. This should include establishing limits, and regular reporting, and communication of financial increases up the chain of command.	Concur	OEMS Director, Deputy Director for Operations	Immediate	The OEMS Director and Deputy Director of Operations will appropriately budget for projects including contingencies and set limits for the budget. Project modifications will require further budget analysis and Office Director approval prior to execution.
4	We recommend the OEMS Director and the Deputy Director Operations obtain a legal opinion regarding who owns the Intellectual Property created or developed in the performance of WVEMS and ESO’s efforts to develop the Data Project, which was funded by OEMS.	Concur	OEMS Director, Deputy Director for Operations	Ongoing	The former contract with WVEMS to procure the ESO product is no longer in effect. OEMS contracted directly with ESO for services through a Sole Source contract and will advertise an RFP for future services. It will be clear in upcoming agreements where ownership of any patient data is held. Following the decoupling of VDH from contracts operating through EMS Councils, VDH will ensure that all Statewide projects are managed and contracted through the Office of EMS only, following all State Procurement rules.

Other Recommendations

#	Recommendation	Concur/ Do Not Concur	Responsible Position	Projected Implementation Date	Management Response
1	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager ensure that for administrative job duties that require timely processing of OEMS transactions, a backup responsible position is identified for taking over these duties in case of long-term leave or vacancies	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager	Ongoing	The Office had appointed a dedicated Business Operations Manager who is supported by a team of analysts that can help support the day to day operations of the unit. In addition to this, the BOM works closely with OFM to ensure that coverage is available when staff are absent for prolonged periods to ensure business continuity occurs. Additionally OEMS has implemented all newly updated VDH policies to adhere to procurement and prompt pay procedures.
2	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager ensure all travel reimbursements are processed in a timely manner.	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager	Ongoing	OEMS is now following VDH processes and entering requests for travel reimbursement through the Office of Financial Management (OFM). OFM is working to improve its internal processing through additional staff, better training, and simplification of VDH policy to enable prompter decision making. OEMS will continue to follow VDH policy and complete additional training on new systems as they become available and are implemented.
3	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager ensure all interest income is moved to an OEMS project in a timely manner.	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager	5/2024	The new Business Operations Manager role is now responsible for ensuring that any interest accrued is being appropriately moved to the correct cost code in a timely manner with oversight and coordination from Deputy Director for Trauma and Administration and OEMS Director. These transactions are correctly documented and recorded in F&A.
4	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager develop a process to ensure compliance with VDH's Fixed Asset Policy and Commonwealth Accounting Policies and Procedures (CAPP) Manual.	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager	Ongoing	VDH Office of Financial Management has hired and onboarded a dedicated FTE that will be responsible for ensuring Agency wide compliance with the Fixed Assets Policy. The OEMS BOM is responsible for ensuring that all Fixed Assets and procurements are maintained according to VDH policy.
5	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager determine what position will be responsible for consistently maintaining the equipment inventory and provide training to the position.	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager	Ongoing	The Fixed Assets Manager in OFM will provide direction to OEMS on how to properly account for fixed assets. Under the direction of the Business Operations Manager, OEMS Fleet Asset Manager is working to inventory all equipment that it owns, and ensure that it is appropriately asset tagged and tracked where necessary.

#	Recommendation	Concur/ Do Not Concur	Responsible Position	Projected Implementation Date	Management Response
6	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager perform a thorough inventory of FAACS list (floor to sheet and sheet to floor) and ensure inventory tags are affixed and the inventory list updated.	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager	Ongoing	The Fixed Assets Manager in OFM will provide direction to OEMS on how to properly account for fixed assets. Under the direction of the Business Operations Manager, OEMS Fleet Asset Manager is working to inventory all equipment that it owns, and ensure that it is appropriately asset tagged and tracked where necessary.
7	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager periodically perform a reconciliation of the F&A expenditure report to determine if any equipment purchases meeting controllable and FAACS criteria have not been added to the controllable and FAACS inventory.	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager	Ongoing	VDH Office of Financial Management has hired and onboarded a dedicated FTE that will be responsible for ensuring Agency wide compliance with the Fixed Assets Policy. On a monthly basis, the BOM will reconcile the F&A expenditure report with the FAACS inventory to ensure alignment.
8	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager work with the Office of Information Management (OIM) Director or Information Security Officer to evaluate the use of computer equipment and software by OEMS and what requires adherence to VITA requirements	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager, and Information Management Director	Ongoing	The Interim Director has sought the support of the Director of OIM in ensuring that existing software is compliant with state policy, and seeking for alternative solutions when/if issues are identified. Going forward, the Office of EMS will follow all VITA and internal OIM requirements for the procurement of new software.
9	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager to ensure that modifications to multi-year contracts should specify whether the good/service being added to the agreement is an one-time transaction or expected to be paid yearly, reflective of the revised total.	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager	Ongoing	The Office of EMS is in the process of renegotiating all contracts and MOUs to comply with all State procurement rules. All new contracts must be reviewed by VDH Office of Procurement and General Services.
10	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager work with the OPGS Director to maintain a complete listing of contracts and modifications and keep OPGS informed of all contracts and modifications entered into the F&A Contract module	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager	Ongoing	The Office of EMS has developed a complete list of OEMS contracts and modifications and are entering them into the F&A Contract module. The BOM, in conjunction with OPGS, is responsible for maintaining an accurate and up-to-date list of contracts.

#	Recommendation	Concur/ Do Not Concur	Responsible Position	Projected Implementation Date	Management Response
11	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager work with the OPGS Director to develop a process to ensure the review and monitoring of all OEMS contracts and contract modifications to ensure accuracy and compliance to VDH and State procurement policies.	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager, and Director of Procurement and General Services	Ongoing	The Office of EMS is required to run all contracts through the OPGS prior to signature. OPGS assists OEMS in following all State procurement rules. The OEMS team is following RAP process (internal VDH spend approval), ensuring that signatures are obtained from the relative designated authority. Currently the Business Operations Managers reviews all requests to ensure that sufficient funding is available. In addition, the OEMS procurement specialist is in the process of renewing VCA credentials with the Commonwealth.
12	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager work with the OPGS Director to ensure OEMS procurements comply with procurement delegated authority.	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager, and Director of Procurement and General Services	Ongoing	VDH's policy regarding procurement delegated authority will be provided to all OEMS staff responsible for procurements, ensuring that signatures are obtained from the relative designated authority. As part of their review, OPGS will ensure that the final signature authority complies with the delegated authority policy. Currently the Business Operations Managers reviews all requests to ensure that sufficient funding is available.
13	We recommend the OEMS Director, Deputy Director Trauma and Administration and OEMS Business Manager ensure that all OEMS contracts and modifications are fully signed and dated by all parties, and a complete listing and copies maintained in a central area of the fully executed agreements on file in compliance with State record retention policies. Any unsigned drafts should be marked as Drafts and kept separately from the Final contract versions.	Concur	OEMS Director, Deputy Director for Trauma and Administration, Business Operations Manager, and Director of Procurement and General Services	Ongoing	The Office of EMS BOM is responsible for maintaining the final executed copy of all contracts associated with OEMS. OPGS must also keep a final copy.