CITY OF RICHMOND

Fleet Fuel Program Audit

Office of the City Auditor (OCA)
An Independent Office of the Richmond City Council

Audit Report

"Promoting open and accountable City government through independent audit services."

Report# OCA 2026-01
July 1, 2025

TABLE OF CONTENTS

Internal controls over the fuel program were ineffective, leading to inconsistent oversight and at least $44,000 in questionable transactions.

Fleet's fuel card policies and procedures were inadequate leading to ineffective guidance for departments.

The City did not adequately manage the fuel contracts, including properly reviewing invoices and ensuring only contracted fuel types were purchased.

Office of the City Auditor (OCA)

Executive Summary

Background

The City of Richmond's Fuel Program is managed by the Fleet Management Division (Fleet). During the scope of the audit, this Division was within the Department of Public Works. As of July 1, 2024, Fleet was transferred to the Department of General Services. Fleet supports vehicle and equipment fueling through a vendor contract that includes access to 15 fueling stations across the City. Fuel cards and employee PINs are issued by Fleet. While Fleet provides centralized management and policy guidance, 49 departmental Fuel Custodians are responsible for reviewing transactions, managing PINs, and enforcing compliance at the departmental level. In fiscal years 2023 and 2024, the City purchased fuel totaling approximately $3,154,789 and $3,403,249, respectively.

Overall Conclusion

The City's Fuel Program plays a critical role in supporting essential government services, enabling departments to keep vehicles operational and services uninterrupted. The Fleet Department has established foundational elements of a Fuel Program, including a vendor contract, policy documents, a Fuel Administrator, and designated Fuel Custodians. Its structure allows departments to access fuel efficiently across multiple locations, supporting both routine operations and emergency response.

However, the City's Fuel Program lacks the controls necessary to ensure accountable and efficient use of taxpayer dollars. Internal controls over fuel card usage, monitoring, and oversight were inconsistently applied. Although policies and procedures exist, they lack specificity, and are not uniformly enforced across departments.

While Fleet is responsible for program administration, it relies heavily on departmental Fuel Custodians who have not received sufficient training, tools, or guidance to detect irregularities. The absence of defined review procedures and use of exception reports limited the City's ability to identify unauthorized transactions. Additionally, inadequate PIN management, insufficient tracking of card and PIN activity, and inconsistent controls over supervisor and rental cards further reduced oversight. In fact, in a risk-based sample of transactions reviewed, the OCA's audit identified at least $44,000 in questionable transactions and referred multiple individuals to the Office of the Inspector General for further review.

Additionally, the City did not perform effective oversight of its fuel vendor contracts. Invoices were paid without adequate reconciliation, fuel types outside the contract were purchased at retail rates, and pricing was not consistently verified.

Many of the issues observed, such as insufficient monitoring, lack of training, and policy noncompliance, mirror deficiencies noted in the OCA's audit of the City's Purchasing Card (P-Card) program. Without prompt corrective action and a strategic reevaluation of the Fuel Program's oversight process, the City remains at a heightened risk for fraud, waste, and abuse.

Summary of Recommendations and Management Response

The OCA issued nine recommendations, all of which management concurred with. In their response, Fleet Management committed to addressing each audit finding and provided detailed implementation steps. Additionally, Fleet Management provided the OCA with:

- Fuel exception reports to support ongoing monitoring,

- Documentation of fuel card and PIN inventories in process,

- An updated fuel card and PIN user agreement,

- Reconciliation logs for supervisor cards and fuel trucks, and

- Records of a more detailed fuel transaction review conducted by the Fleet Department.

The OCA will assess all supporting documentation and the implementation status of all recommendations as part of its Quarterly Open Recommendation Follow-Up Review. A detailed listing of recommendations and management responses are included in **Appendix C**.

Summary of Opportunities for Improvements

Finding 1

The City lacked an effective internal control system over its fuel program, leading to inconsistent oversight across departments. The fuel program is jointly monitored by Fleet and departmental Fuel Custodians but contained unclear responsibilities, inconsistent monitoring practices, and minimal training.

Specifically, the OCA identified:

- No formal procedures for reviewing fuel transactions or analyzing usage patterns.

- Fuel Custodians lacked training and were sometimes responsible for reviewing their own fuel usage.

- Exception reports, odometer data, and vehicle tank limits were not reviewed.

- Unused fuel cards and PINs were not monitored or deactivated, even when linked to terminated employees or sold vehicles.

- Transaction data revealed PIN sharing and questionable fueling transactions.

- The City did not reconcile fuel logs or verify fuel purchases at its mobile and stationary fuel tanks.

Finding 2

The City's fuel card policies and procedures were inconsistently applied and lacked essential detail needed to guide staff and enforce accountability. The OCA found that key operational areas, including the use of supervisor cards, the entry of odometer readings, and the management of rental fuel cards, were not clearly defined in Fleet's policy. As a result, departments developed their own interpretations and applied inconsistent practices that deviated from policy expectations.

Finding 3

The City lacked effective oversight of its fuel vendor contracts and did not adequately review invoices. Although Fleet is responsible for verifying monthly billing statements and comparing vendor pricing to contractual terms, the OCA found that invoices were not reconciled against transaction data prior to payment. Fuel prices were not consistently verified against the daily OPIS benchmark as required, and in at least three of five months reviewed, the vendor charged incorrect fee amounts without amending the contract.

The City also regularly purchased non-contracted fuel types, totaling approximately $101,721, during the audit period. In addition, invoices for bulk fuel and compressed natural gas were paid without review or reconciliation. These lapses in contract management, price verification, and invoice oversight increase the risk of overbilling, payment for unauthorized goods, and vendor noncompliance.

Background and Internal Controls

Background

A fuel program refers to a system or a set of processes that a government agency uses to manage, track, and control the purchase, distribution, and use of fuel for its fleet of vehicles and equipment. The City of Richmond's fuel program is managed by the Fleet Management Division (Fleet). During the scope of the audit, this Division was within the Department of Public Works. As of July 1, 2024, Fleet was transferred to the Department of General Services. The Fuel Administrator manages the fuel program under the supervision of the Operations Manager who oversees the entire program. The Fuel Administrator's responsibilities include:

- Issuing fuel cards for City vehicles,
- Managing employee PINs,
- Generating and reviewing monthly transaction reports form the vendor's system, and
- Providing monthly reports to City departments for review and approval.

The City has one primary contract with a vendor to supply fuel for its fleet. Under this contract, fuel can be purchased at any of 15 fueling stations located throughout the City. The agreement specifies the types of fuel available and the rates charged to the City. During fiscal years 2023

and 2024, the City completed fuel transactions totaling approximately $3,154,789 in FY 2023 and $3,403,249 in FY 2024.

Fleet issues fuel cards through the vendor to facilitate purchases at fueling sites. Fuel cards are required at the pump and are configured with restrictions such as transaction limits, approved fueling locations, and authorized fuel types. As of July 3, 2024, the City had 1,960 active fuel cards.

These cards fall into two categories:

- **Vehicle Cards**: Assigned to a specific City vehicle, rental vehicle, or large equipment and multiple employees can use these cards.

- **Supervisor Cards**: Assigned to an individual supervisor and used for fueling gas cans, small equipment, or vehicles without an assigned card. These cards may also be used in emergencies or when a vehicle card malfunctions.

Per the City's policy, cards are to be used only by the designated vehicle or supervisor. This ensures that fuel usage can be accurately tracked and attributed to the appropriate asset.

To use a fuel card, employees must enter a unique Personal Identification Number (PIN) assigned to them by Fleet upon request from their department. The PIN must be active and entered at the pump to initiate a transaction. Each PIN is exclusive to an individual employee and cannot be duplicated.

Unlike fuel cards, which may be used by different authorized employees depending on the situation, PINs are intended for use only by the employee to whom they are assigned. An employee's PIN can be used in combination with any City-issued fuel card, enabling the City to track fuel usage by individual employees. When an employee leaves their department or separates from City service, their PIN should be deactivated. As of August 14, 2024, the City maintained 2,535 active PINs across 23 departments.

The final input required to complete a fuel transaction is the current odometer reading of the vehicle or equipment being fueled. Each transaction requires the employee to enter this reading at the pump. If the entered value falls outside a system-defined acceptable range, the transaction is automatically voided and will not proceed. This control is intended to ensure that fuel is dispensed only into the assigned vehicle or equipment associated with the card.

To support Fleet in overseeing the Fuel Program, each department designates Fuel Custodians to monitor its own fuel usage. These custodians are responsible for enforcing Fleet's policy and managing their department's fueling activities.

Key responsibilities of Fuel Custodians include:
- Reviewing monthly fuel transactions for irregularities.
- Requesting new fuel cards and PINs as needed.
- Requesting PIN deactivations when employees leave the department or the City.

During the audit period covering fiscal years 2023 and 2024, 49 Fuel Custodians were active across the City. **Table 1** below highlights the eight custodians overseeing the highest fuel expenditures during this period. These eight Fuel Custodians performed the review for 75% of total fuel expenditures and 79% of the number of transactions citywide.

Table 1
Top Eight Fuel Custodians by Departmental Fuel Usage
Fiscal Years 2023 to 2024

Department/Division	Total Fuel Purchased	Number of Fuel Transactions
Richmond Police Department	$2,255,654	84,040
Richmond Fire Department	$790,495	18,575
Department of Public Works – Solid Waste	$563,045	10,301
Department of Parks, Recreation and Community Facilities	$352,178	6,450
Department of Public Works – Roadways	$340,072	5,188
Department of Public Utilities – Gas and Water	$314,047	5,836
Department of Public Works – Grounds	$295,649	5,762
Department of Public Utilities – Customer Service	$283,790	6,974

Source: Prepared by the OCA based on the City's fuel transaction data. Totals were rounded to the nearest dollar.

Fuel Program Best Practices

Similar to the City of Richmond, other local governments, state and federal agencies, and institutions of higher education are responsible for managing fleet fueling programs. As shown in **Figure 1**, the OCA reviewed policies, procedures, and best practices from these entities and identified key components that support the effective daily operation of a Fuel Program.[1]

Figure 1: Fuel Program Best Practices

Best Practice	Why is it Important?
Adopt, Train, and Enforce a Fueling Policy	A formal policy provides clear guidance to staff, promoting consistent behavior and expectations. Training and enforcement ensure consistent application, prevent confusion, and support program effectiveness. Without clear policies, data may become unreliable, and irregularities or theft may go undetected.

---

[1] Policies and Procedures and Best Practices Reviewed:
- Office of the Washington State Auditor - Best practices for fueling government owned vehicles, Best-practices-for-fueling-government-owned-vehicles_2.pdf
- Virginia Department of General Services - Office of Fleet Management Services Policies and Procedures Manual, policies-for-ofms-2020.pdf
- California DGS Office of Fleet and Asset Management – State Fleet Card Oversight Usage and Responsibilities, Fleet Card Oversight Usage and Responsibilities
- Cal Poly - Fleet Fuel Card Policies and Procedures, cp-fleet-fuel-card-policy-manual-2021.pdf
- OCA reviewed Policies and Procedures supplied by Henrico, VA and Hanover, VA.

Best Practice	Why is it Important?
Require Authorization Forms	Requiring formal authorization documentation ensures that only approved employees are issued fuel cards or PINs. This control helps prevent unauthorized access.
Collect Odometer Readings at the Pump	Accurate odometer readings are necessary to calculate fuel efficiency (e.g., miles per gallon) and detect inappropriate fuel usage. Systems should block fueling if odometer entries are invalid.
Establish Denial Limits and Exception Reports	Setting transaction limits and generating automated exception reports help staff efficiently identify and review questionable activity.
Review Fuel Users and Vehicle Lists; Conduct Physical Checks	Regularly reviewing active users and vehicles helps ensure only current employees and vehicles have access to fuel. Removing inactive users and conducting periodic physical checks reduce the risk of misuse, including theft by former employees or lost/stolen cards.
Implement a Monitoring Plan and Monthly Review of Exceptions	Ongoing transaction monitoring and clearly defined review criteria help identify unusual or unauthorized purchases. This reduces the risk of fraud or loss
Oversee Reviewers	Central oversight ensures that departmental or decentralized reviewers fulfill their responsibilities, improving accountability and the accuracy of transaction verification.

Source: Compiled by the OCA using identified best practices cited in Footnote 1.

In addition to the primary vendor agreement, the City maintains two other contracts for specific fuel needs. **Table 2** summarizes the type, purpose, and total amount expended under these contracts during fiscal years 2023 and 2024.

Table 2
Supplemental Fuel Contracts
FY 2023 – 2024

Type	Purpose	Amount Paid[2]
Bulk Fuel	Used to supply the Cemeteries fuel tank, which supports vehicle fueling for cemetery staff.	$27,643
Compressed Natural Gas	Used to fuel certain City vehicles that operate on compressed natural gas.	$221,762

Source: Prepared by the OCA based on information obtained from the City's financial system.

---

[2] Amounts are rounded to the nearest whole number.

Findings and Recommendations

Finding 1: Internal controls over the fuel program were ineffective, leading to inconsistent oversight and at least $44,000 in questionable transactions.

Per the GAO, management designs control activities in response to the entity's objectives and risks to achieve an effective internal control system. These control activities help ensure that management's directives are carried out and risks are addressed.[3] At the City, internal controls regarding the fuel card program are designed by the Fleet Management Division (Fleet), documented in policies and procedures, and communicated to staff by their assigned Fuel Custodian.

As part of this audit, the OCA assessed the city's internal control structure over fuel usage. This assessment included a review of the City's fuel program policies and procedures, interviews with nine[4] Fuel Custodians across multiple departments and divisions;[5] analysis of fuel card transaction data from FY 2023 to FY 2024; and review of fueling station footage.

The OCA found that the City lacked a well-functioning internal control system for fuel usage and oversight. Oversight of both the Fuel Administrator in the Fleet Division and the fuel custodians at the department level was ineffective. Specifically, existing controls were insufficient to prevent misuse, detect irregularities in a timely manner, or ensure accountability among cardholders and approving officials. In fact, the OCA's audit identified at least $44,000 in questionable transactions and referred multiple individuals to the Office of the Inspector General for review. [6]

1A. The Fleet Division and City departments inadequately monitored fuel usage and did not detect irregular transactions.

Per best practices in fuel card programs, ongoing transaction monitoring and clearly defined review criteria help identify unusual or unauthorized purchases and reduce the risk of fraud and loss.[7] Accordingly, fuel card monitoring should incorporate direct analysis of transaction-level data to detect irregularities and support timely oversight.

---

[3] U.S. Government Accountability Office. *Standards for Internal Control in the Federal Government* (GAO-14-704G), paragraph 10.03, p. 45, September 2014. https://www.gao.gov/assets/gao-14-704g.pdf

[4] One department had two different custodians during the audit scope. As such, the OCA interviewed both the current and former custodian.

[5] Some departments have multiple Fuel Custodians. The custodians are responsible for their division or unit's fuel purchase review.

[6] The OCA defines questionable expenditures as any transaction that lacks sufficient documentation, appears unrelated to a legitimate government purpose, or does not comply with contracts, policies, laws, regulations, or ethical standards. Given the significant number of policy violations identified during this audit, the OCA applied a conservative threshold when designating expenditures as questionable. As a result, not all violations were counted toward the final total.

[7] According to the Association of Certified Fraud Examiners (ACFE), proactive data monitoring and analysis is one of the least commonly implemented anti-fraud controls, yet it ranks among the most effective at reducing both the cost and duration of fraud.

Fuel transactions are monitored through both centralized and decentralized process. As stated above, at the centralized level, the Fuel Administrator is responsible for overseeing the program and is managed by an Operations Manager. In parallel, the City's decentralized process relies on Fuel Custodians within each department. These individuals are responsible for requesting PINs for their staff, monitoring the appropriate use of fuel cards, reviewing department-specific fuel usage data, and identifying any unusual activity for further review.

The OCA identified several significant weaknesses in the centralized oversight of the fuel program and the Fuel Administrator:

1. **Inadequate Segregation of Duties and Backup Coverage**

   The Fuel Administrator has complete control over key elements of the fuel program, including the ability to request, receive, and manage fuel cards; create and remove employee PINs; and review monthly fuel transactions. This level of access lacks appropriate segregation of duties and creates a single point of control, increasing the risk of undetected errors or fraud. Additionally, there is no designated backup for the position.

2. **Lack of Training Fuel Custodians**

   The Fuel Administrator indicated that they only provided informal training to Fuel Custodians that were assigned the role during the Fuel Administrator's tenure. The OCA found that Fleet did not provide any training to the top eight Fuel Custodians, who were responsible for reviewing 79% of the City's fuel transactions during FY 2023 and FY 2024. In part, due to the lack of training, multiple custodians did not detect questionable fuel purchases by employees.

   While Fleet's Standard Operating Procedures (SOPs) describe administrative responsibilities such as requesting PINs and handling billing, they do not provide guidance on how to conduct fuel transaction reviews.

3. **Fleet Did Not Utilize Vendor Exception Reports**

   During the audit, the OCA obtained an exception report generated by the primary fuel vendor. This report is designed to flag anomalies such as fuel purchases exceeding tank capacity or transactions involving fuel types that are not assigned to the vehicle. The report organizes exception activity by employee PIN and can help identify patterns of irregular behavior.

   Fleet was unaware of the vendor's exception report and had never used it as part of the transaction review process or provided it to Fuel Custodians. Although Fleet received individual fraud alerts from the vendor, these alerts do not help identify patterns of potential repeated misuse by specific employees, as the exception report is designed to do.

4. **Inadequate Oversight and Transaction Review**

   There are no formal procedures for reviewing fuel transactions established by Fleet. Fleet's review does not examine the number of gallons purchased, the fuel type, or odometer readings, even though odometer data is required at the pump and is a critical control feature.

   In addition, transactions made with Supervisor Cards, which are not assigned to specific vehicles, are not reconciled by Fleet to usage logs. This limits the City's ability to determine whether such purchases were valid.

   Fleet does not require Fuel Custodians to confirm that monthly transaction reports, annual PIN inventory reports, and annual card inventory reports were reviewed. If no response was received, the Fleet Administrator assumed the data had been reviewed and that there are no issues.

In interviews with Fuel Custodians, the OCA identified several issues affecting the effectiveness of the City's decentralized transaction review process:

1. **Lack of Formal Review Procedures and Inconsistent Reviews**

   As noted above, the City's SOPs outline administrative responsibilities for Fuel Custodians, such as requesting PINs and reviewing transactions. However, the procedures do not provide guidance on how to review fuel transactions. As a result, review practices vary significantly across departments, and custodians lack the tools and guidance necessary to identify irregularities.

   Among the nine Fuel Custodians interviewed, all of whom were responsible for a high volume of transactions, at least three reported reviewing reports line by line without using any structured method to identify trends or misuse. Notably, none of the questionable transactions identified by the OCA were flagged by their assigned Fuel Custodians. A formal review process is essential to help staff detect errors, enforce compliance, and improve oversight.

2. **Limited Ability to Analyze Transaction Data**

   The OCA observed that fuel transaction data was provided to all Fuel Custodians in electronic software by Fleet. However, four of the nine Fuel Custodians interviewed had limited proficiency in using the software to analyze large datasets effectively. This reduced their ability to identify irregular activity, including fuel purchases by terminated employee PINs, transactions made outside of work hours, and instances of inconsistent odometer entries.

3. **Custodians Reviewing a Large Number of Transactions**

   The two departments responsible for 57% of all fuel transactions in the City only had one Fuel Custodian assigned to review these transactions even though operations for these departments were geographically distributed across the City. Given the volume of transactions, the Fuel Custodians may not have had sufficient time to determine the operational necessity of fuel transactions. In fact, both custodians informed the OCA that additional reviewers would be beneficial.

4. **Custodians Reviewing Their Own Transactions**

   In several departments, Fuel Custodians were responsible for both conducting fuel transactions and reviewing their own activity. This lack of separation between execution and review creates a significant conflict of interest. The Fuel Administrator confirmed that no independent review of individual custodian transactions is performed, further increasing the risk that inappropriate use may go undetected.

These inconsistencies in monitoring practices not only allowed irregular transactions to occur undetected but also limited the City's ability to manage fuel expenditures effectively and enforce accountability.

1B. The City lacks a structured approach to monitoring fuel card transactions, allowing irregularities and policy violations to go undetected.

As described in **Finding 1A**, the City lacks a structured, data-driven approach to review fuel transaction. In addition, the OCA found that the City's fuel oversight processes do not incorporate key industry best practices, such as reconciling fuel usage against expected consumption, reviewing for unused cards, or requiring documentation authorizing fuel purchases at retail locations. This further limited the City's ability to detect fraud, waste, or operational inefficiencies.

As part of our assessment, the OCA conducted its own analysis, including a review of:

- Monthly fuel transaction data,
- Vehicle and card inventory records,
- Fuel tank reconciliation logs, and
- Video footage for 238 transactions during FY 2024 and July 2024.

1B1. Odometer Readings Were Inaccurate and Unmonitored

Best practices and Fleet policy require employees to enter actual odometer readings during fueling. Odometer and miles per gallon (MPG) data are critical for detecting irregular vehicle usage. For example, the MPG can identify low or unexpected MPG which can potentially be a sign of misuse. As noted earlier, for 79% of transactions occurring in FYs 2023 and 2024 neither Fleet nor the Fuel Custodians reviewed the odometer or MPG readings.

At each fueling station, employees are prompted to enter their vehicle's current odometer reading at the kiosk. If the entry falls outside a designated range from the previous recorded value, the system flags it as invalid and initially declines the transaction. However, according to the vendor, an override exists that will negate the prior odometer reading and accept the new one. This override mechanism significantly weakens the effectiveness of the odometer control and corresponding data.

During the audit scope, the OCA identified 64 employees used the same odometer reading at least five times when fueling the same vehicle. For example, one employee entered "1" as the odometer reading in 266 separate transactions over a two-year period. In another example, an employee used "12345" as the odometer reading in 130 fuel transactions. Additionally, we noted a Fuel Custodian entered "144220," which is the vehicle number, in 48 fuel transactions.

To evaluate the integrity of odometer entries, the OCA analyzed fuel transaction data for a three-month period from January 2023 through March 2023. The analysis revealed widespread and recurring inconsistencies. Anomalies observed in the data included:

- Transactions with less than 3 MPG
- MPG values that fluctuated outside expected ranges for the assigned vehicle.
- Repeated odometer entries were used minutes, hours, or even days apart.
- Transactions showing implausibly high MPG values (greater than 40 MPG).

To illustrate the issue, **Table 3** below shows one example of odometer readings from a vehicle for transactions in February 2023.

Table 3
Odometer Entries for One Vehicle
February 2023

Transaction Date	Odometer Entries
2/1/2023	42,569
2/1/2023	46,789
2/7/2023	45,639
2/18/2023	46,596
2/20/2023	23,658
2/22/2023	57,487
2/27/2023	49,556

Source: Prepared by the OCA based on transaction data.

This analysis demonstrated that the odometer control was not effective. Irregularities in mileage entries were going unnoticed and unaddressed. Although not always an indicator of unauthorized

transactions, odometer tracking is one of the primary controls in a fuel management program. Without accurate and routinely reviewed odometer entries, irregularities in vehicle usage will go undetected. In the City's case, this failure contributed to questionable transactions.

1B2. Fuel Transaction Data Was Not Reviewed for Signs of Irregular Usage

Best practices state a fuel monitoring program should include clearly defined instructions and training on how to review transactions. This structure allows reviewers to identify patterns of misuse and investigate outliers that may indicate unauthorized transactions or policy violations. The OCA conducted data analysis on fields available in the monthly transaction reports provided to Fuel Custodians and identified the following issues:

1. **Fuel Purchases Outside of Normal Work Hours Were Irregular**

The OCA analyzed transactions occurring outside standard work hours and reviewed some available video footage. Although not all instances of fueling outside standard work hours are indicative of unauthorized transactions, it serves as a useful baseline for many departments across the City and should be considered by Fuel Custodians.

The OCA found multiple full-time and temporary employees who utilized other employee's PINs and consistently fueled outside normal work hours, and the transactions appeared to not be related to City business.

To further determine if employees were purchasing fuel outside normal hours, the OCA compared timesheet data to fuel transaction records for six employees who had some of the most fuel purchase on supervisor cards. The analysis identified 299 transactions, totaling approximately $16,208, where fuel activity occurred when the supervisor was not clocked in at work. When the OCA met with Fuel Custodians, we were informed that inappropriate activity occurred using some of these employees' PINs. The OCA notes there was not an assigned Fuel Custodian reviewing some of these transactions in FYs 2023 and 2024.

The OCA concludes that some of the issues identified in our review appear to be caused by employees sharing their PINs. The OCA referred transactions needing further review to the OIG.

2. **Tank Capacity Reviews Were Not Performed**

Fleet submits vehicle tank capacities when requesting new fuel cards from the vendor. However, the vendor's system only accepts tank sizes in five-gallon increments, which results in rounding up or down from the actual value. For example, a 22-gallon tank may be entered as 25 gallons. The OCA found several issues with the tank capacity process:

- The vendor did not consistently round up or down. In some cases, the tank size was increased to the nearest increment of five; in others, it was decreased.

- In one instance, the vendor entered a tank size that was 225 gallons higher than what Fleet submitted.

- Fleet staff were unaware that rounding occurred or that inconsistencies existed in vendor entries.

- Fleet does not receive fraud alerts when a vehicle reaches its assigned tank capacity, even though such alerts are a key fraud detection control.

The OCA's analysis of transactions in FY 2023 and 2024 identified 169 employees who fueled a vehicle to or beyond its assigned capacity. The OCA reviewed video footage of fuel purchases for 13 of these employees and noted:

- Fuel cards were used for vehicles they were not assigned to.

- Multiple vehicles were being fueled in a single transaction.

- PINs were being shared among employees.

- Some transactions appeared to not be related to City business and were referred to the OIG for review.

Fleet does not provide custodians with tank capacity data, so they were generally unaware of when transactions were occurring at or beyond the maximum capacity. Several Fuel Custodians stated that they do not monitor the amount of fuel filled per transaction.

1B3. Retail Fuel Access Was Inadequately Supported and Managed

Fleet policy requires departments to notify the Fleet when a City vehicle will be used for travel extending 30 miles or more outside City limits. To support such travel, Fleet instructs employees to complete a Travel Request Form with the dates of travel. Upon approval, Fleet contacts the vendor to temporarily enable retail fuel access on the specified dates. The vendor is responsible for disabling access once the vehicle returns.

As of July 3, 2024, 424 fuel cards had retail fueling privileges. The Fuel Administrator could not explain why so many cards had this access and stated they believed some cards may have been issued with retail access already enabled by the vendor.

The OCA requested Travel Request Forms from the Fuel Administrator for 64 fuel cards with retail transactions that occurred in FYs 2023 and 2024. We did not receive 40 of these forms. The Fuel Administrator explained the forms were likely not available because Fleet accepted informal email requests for retail access and many departments were unaware of the required form. The Fuel Administrator provided the OCA with four emails related to 22 travel requests. The OCA reviewed these emails and noted that all of them lacked beginning and end dates for retail access and three lacked justifications as would be required on the Travel Request Form.

The Fuel Administrator acknowledged that no formal criteria exist to assess whether retail access is appropriate and could not explain why no forms or emails existed for the remaining 18 cards in our sample.

Since becoming aware of the issue, the Fuel Administrator has informed the OCA they now receive a monthly report from the vendor that identifies retail access cards. The Fuel Administrator is currently working to remove retail access for cards that do not need it.

1B4. Fuel Card Inventory Was Not Reviewed for Inactivity

Best practices recommend regularly reviewing fuel card activity and deactivating cards that show no usage or minimal usage, unless there is a documented justification. Fleet policy requires departments to conduct a fuel card inventory twice per year (excluding years when cards are reissued), but the policy does not define when a card should be deactivated or require justification for keeping underused cards open.

The OCA identified 74 fuel cards that were active for the full two-year audit period but showed no transactions. Of these:

- Five (5) cards were assigned to rental vehicles.
- Twenty-eight (28) cards were designated as supervisor cards.

These card types are considered higher risk. Supervisor cards are not tied to specific vehicles and transactions are often not logged, reducing transparency. In addition, rental cards are often retained beyond the life of the vehicle or used across multiple vehicles, making tracking difficult. In fact, the OCA analyzed rental fuel cards with transactions between FYs 2023 and 2024 and noted that they remained active for (1) a minimum of 197 days, (2) a maximum of 2,786 days (more than 7.5 years), and (3) an average of 1,155 days (over 3 years).

Additionally, the OCA found 87 fuel cards were used to purchase less than 100 gallons of fuel over two fiscal years. The justification for these cards should be reviewed, and they should be deactivated if not needed as underused cards remain vulnerable to unauthorized use.

The OCA also identified two additional fuel cards linked to sold vehicles. While those cards were not used post-sale, they remained active until the OCA inquired, at which point both were cancelled.

Interviews with Fuel Custodians revealed they were unaware of which fuel cards remained unused, as Fleet does not provide departments with inactivity reports. The Fuel Administrator confirmed that inactivity is not monitored centrally, and that Fleet relies on departments to self-identify and justify continued use of inactive cards.

This lack of clearly defined responsibility has resulted in inconsistent oversight, particularly for higher-risk card types. The absence of an inactivity review process increases the risk of fuel card misuse and operational inefficiencies.

1B5. Fuel Reconciliations Were Not Performed by Fleet or Departments

The City has one fuel truck and two stationery tanks that can be used to fill fuel and require fuel logs for use. A fuel reconciliation should be performed for both the truck and stationery tanks to ensure appropriate fuel use.

1. **Fuel Truck Usage is Not Reconciled**

Fleet policy states the fuel truck operator should keep a log of fuel transactions, and a Department of Public Work's Operations Manager is responsible for reconciling the monthly fuel transactions on the log. The policy requires the fuel truck log to be completed and submitted to the Fuel Administrator within the first five business days of each month. However, the Fuel Administrator informed the OCA they do not receive the fuel truck logs.

To evaluate the effectiveness of fuel tracking and reconciliation and compliance with City policies, the OCA compared vendor fuel transaction data to the corresponding fuel truck logs. The following discrepancies were identified:

- In January 2023, 30.6 more gallons were purchased than recorded in the log.

- In February 2023, 95.8 more gallons were purchased than recorded. Additionally, 14.1 gallons were recorded on the log that did not appear in the vendor transaction data.

- In March 2023, 120.2 more gallons were purchased than recorded. Additionally, 50.1 gallons were recorded on the log but not found in the vendor data.

- In May 2023, 75.8 more gallons were purchased than recorded.

The fuel truck operator explained they may have forgotten to record some transactions on the fuel truck log. Regarding instances where gallons were recorded in the log but did not appear in vendor data, the Operator stated that these may represent residual fuel from previous purchases that was still available in the tank.

The OCA notes the discrepancies identified in our reconciliation are most likely the result of a breakdown in routine logging, failure to perform reconciliation, and the absence of oversight or enforcement of policy requirements. These factors create an environment where small errors or omissions compound over time and where misuse could go undetected.

2. **Stationary Fuel Tanks Were Not Reconciled**

The City maintains two stationary fuel tanks: a 500-gallon gasoline tank and a 300-gallon diesel tank. These tanks are owned and operated by the Department of Parks and Recreation. Fleet coordinates the delivery and is responsible for paying the associated invoices for the deliveries. These tanks are filled by a bulk fuel vendor under a contract that is separate from

the City's primary fuel program. This vendor does not require PINs or fuel cards to retrieve fuel from the tanks.

According to the Maintenance Specialist assigned to the cemetery, when the fuel level reaches approximately 130 gallons, they contact the Fuel Administrator to request a delivery. The following procedures are in place to manage access and track usage:

- A stick test is performed before and after each delivery using a yardstick to estimate remaining fuel, which is then converted into gallons.

- Two maintenance specialists are authorized to access the tanks.

- The tanks remain locked when not in use and can only be opened by a maintenance specialist.

- After dispensing fuel, the employee records the number of gallons used based on the tank meter display and logs the transaction manually.

Based on this process, the OCA notes that fuel reconciliations were not performed by the Maintenance Specialist. To assess inventory controls over the cemetery fuel tanks, the OCA performed a reconciliation using logs maintained at the cemetery. The review covered the period from January 2024 through April 2024. The OCA identified a discrepancy of 237 gallons of unaccounted fuel during this four-month period.

The absence of regular reconciliation procedures limited the department's ability to detect errors in the logs or determine whether fuel had gone missing. Without an established process to compare delivered, stored, and dispensed fuel, discrepancies go unresolved and may indicate potential loss or misuse.

1C. The City did not effectively manage fuel PINs, resulting in widespread control breakdowns including PIN-sharing, employees with multiple PINs, unused PINs and former employees with active PINs.

As previously noted, fuel cards are assigned to vehicles or equipment, while PINs are assigned to individual employees. Each PIN is intended to be used exclusively by the employee to whom it was assigned and serves as a credential for authorizing and tracking fuel transactions.

Fleet policy requires that departments complete and submit a Fuel Card/PIN User Agreement before a PIN is issued. Authorization must come from a Fuel Custodian or department Operations Manager. Fleet then issues the PIN and is responsible for monitoring its use in coordination with the department's Fuel Custodian. PINs are a critical control mechanism to ensure traceability and accountability for fuel usage.

The OCA assessed PIN management controls by requesting the current active PIN list from the vendor, which contained 2,535 PINs as of August 2024. The OCA reviewed the employment status of PIN holders, analyzed PIN activity, and reviewed video footage. The review identified

significant control weaknesses in the issuance, monitoring, and deactivation of fuel PINs as outlined below.

1. Fuel PINs Were Routinely Shared in Violation of Policy

Fleet's user agreement requires employees not to share their PINs with anyone other than the designated Fuel Custodian. Despite this, PIN sharing was common across departments and contributed to questionable transactions identified by the OCA. Specifically:

- Supervisors shared their PINs with staff. For example, 26 transactions were reviewed for a single PIN and only one was performed by the supervisor.

- Employees shared PINs with each other and with temporary workers.

These violations undermine the purpose of employee-assigned PINs and compromise accountability.

2. PINs Were Not Deactivated After Separation or Transfer and Were Used After Employee Separation

Fleet conducts a PIN inventory once per year by sending each Fuel Custodian a list of PINs assigned to their division. Custodians are expected to review the list and identify PINs that should be deactivated. If no response is received, all PINs remain active. Fleet does not currently have a policy to deactivate unused PINs.

The OCA found that some PINs were assigned to groups rather than employees and found numerous instances where PINs remained active after an employee had left City employment.

- The active PIN list included at least 50 former employees.

- Some departments were unable to confirm whether individuals with active PINs were current or former employees.

Furthermore, the OCA identified at least nine PINs that were used after the associated employee separated, totaling approximately $10,000. Many of these transactions were likely a result of employee PIN sharing. However, two of these PINs appeared to be used in questionable fuel transactions described above.

The OCA concludes that the deactivation process currently in place relies heavily on manual validation from Fuel Custodians, despite the scale and risk associated with PIN misuse. Often times, Fuel Custodians may not respond to the PIN inventory request and PINs will remain active indefinitely, allowing continued access to City fuel resources and increasing the risk of fraud, waste, or abuse.

3. PINs Were Issued but Never or Rarely Used

The OCA identified 712 PINs that had not been used at all during FY 2023 or FY 2024. Some of these PINs were associated with separated employees as described above and some could be related to brand new PINs issued in FY 2024. Although the Fuel Administrator was aware of unused PINs, they were not providing that information to Fuel Custodians. Accordingly, Fuel Custodians stated they were not aware that PINs were active but unused.

Without a mechanism for routine PIN reconciliation or activity review, inactive PINs can remain in circulation indefinitely, increasing the risk of unauthorized use.

4. Some Employees Had Multiple Active PINs

The OCA identified at least 10 instances of employees having multiple active PINs.[8] The Fuel Administrator explained that multiple PINs may be issued when original PINs are not properly distributed, and new requests are made. In one of these instances, a Fuel Custodian acknowledged changing their PIN but retaining both old and new PINs as active. Allowing employees to have multiple active PINs complicates fuel transaction monitoring and increases the risk of inappropriate fuel purchases.

Ultimately, the OCA concluded that the City's management of fuel PINs lacked fundamental internal controls, failed to enforce existing policy requirements, and contributed to conditions that allowed questionable transactions to occur. Strengthening the City's PIN management process is necessary to protect taxpayer dollars and restore accountability over fuel transactions.

Finding 2: Fleet's fuel card policies and procedures were inadequate leading to ineffective guidance for departments.

Clear policies and procedures are a critical component of any fuel card program. They promote consistency, especially in decentralized environments, and help reduce the risk of fraud, waste, and abuse. Best practices recommend that organizations maintain updated guidance covering fuel card issuance, usage, transaction monitoring, reconciliation, and overall oversight responsibilities.

Fleet's policy lacked sufficient detail, leaving important control areas undefined or inconsistently applied. Key processes, including how rental fuel cards should be used, how fuel transactions should be reviewed, and how usage limits should be monitored, were vague or missing altogether. As a result, departments interpreted policies differently and applied inconsistent practices across the City.

---

[8] There were an additional 17 employees that appeared to have multiple PINs, but the OCA could not confirm if they were. These were provided to the Fuel Administrator for further review.

The OCA reviewed written policy, analyzed transactional data, interviewed the Fuel Administrator, and met with Fuel Custodians across departments. The following examples illustrate the disconnect between policy, actual practices, and Fleet's expectations:

1. **Supervisor Fuel Cards**

Supervisor cards were often used in ways that did not align with policy and were not subject to adequate oversight. **Figure 2** below summarizes the supervisor card policy, actual practices observed at departments, and the Fuel Administrator expectations and oversight procedures.

Figure 2: Comparison of Policy, Expectation, and Practice

Area	Written Policy	Fuel Administrator Expectation	Observed Practice
Purpose of Card	Supervisor cards are to be used for filling fuel cans and small equipment. They should not be used to fuel the same vehicle or equipment repeatedly.	Supervisor cards should be used only in emergencies, such as when a vehicle's fuel card is not working and for filling fuel cans and small equipment.	Supervisor cards were used to complete high-volume transactions instead of or filling fuel cans and small equipment. For example, one card was used for 10 transactions in a single day, all exceeding 38 gallons.
Access to Cards	Departments should maintain a written record of all people who have physical access to the Supervisor card. For example, a sign out sheet for the card or a list of persons who has access to the locked desk, drawer, or filing cabinet.	The card should not be shared, and the supervisor should be present during fueling.	Staff PINs were used on the supervisor's card, indicating that the card was being shared.
Documentation of Use	Fuel Custodians are required to send biweekly supervisor card logs to Fleet.	Fleet does not request logs. They provide a log template if departments ask for one.	None of the nine Fuel Custodians interviewed maintained or submitted supervisor logs.

Source: Prepared by the OCA based on Fleet policies, OCA observations, and interviews.

2. **Odometer Readings**

Odometer readings are a required input when using a fuel card and are intended to help monitor vehicle usage and detect irregularities. Fleet policy provides specific guidance on what values should be entered when fueling equipment, gas cans, or rental vehicles. **Figure 3** below summarizes the odometer policy, actual practices observed at departments, and the Fuel Administrator expectations and oversight procedures.

Figure 3: Comparison of Policy, Expectation, and Practice

Area	Written Policy	Fuel Administrator Expectation	Observed Practice
Odometer Input	For fuel cans: enter "000100." For equipment without an assigned number: enter "000200."	000100 is for fuel cans, 000200 for small equipment, and 000300 for rental vehicles. These codes should only be used with supervisor cards.	Departments used 000100, 000200, and 000300 on vehicle-assigned cards, not just on supervisor cards.

Source: Prepared by the OCA based on Fleet policies, OCA observations, and interviews.

3. **Rental Fuel Cards**

Rental fuel cards are issued for temporary vehicles and are intended to support short-term operational needs. Fleet policy states that a rental card may be issued if the rental agreement exceeds six months; otherwise, departments are expected to use supervisor cards. However, the policy does not provide guidance on how rental fuel cards should be managed once the rental period ends. The OCA identified inconsistent practices across departments regarding the issuance, reuse, and deactivation of rental cards. These inconsistencies increase the risk of cards remaining active after the vehicle is no longer in use. **Figure 4** below summarizes the policy, actual practices observed at departments, and the Fuel Administrator expectations and oversight procedures.

Figure 4: Comparison of Policy, Expectation, and Practice

Area	Written Policy	Fuel Administrator Expectation	Observed Practice
Usage and Termination	Fuel cards may be issued for rentals kept 6 months or more. For rentals under 6 months, departments must use a supervisor card. The policy does not specify what to do with the card once the rental ends.	No formal process was in place during the audit period for how rental fuel cards should be used or managed.	Some departments reused rental fuel cards across different rentals, while others deactivated and re-ordered cards.

Source: Prepared by the OCA based on Fleet policies, OCA observations, and interviews.

The OCA concluded the City's fuel card policies and procedures lacked clarity and were not uniformly enforced. In key areas such as supervisor card use, odometer entry, and rental card management, departments applied inconsistent practices that deviated from policy expectations. These inconsistencies were further compounded by a lack of centralized monitoring and enforcement from Fleet. Without clear guidance and effective oversight, critical controls over fuel usage are weakened, increasing the risk of unauthorized transactions.

Finding 3: The City did not adequately manage the fuel contracts, including properly reviewing invoices and ensuring only contracted fuel types were purchased.

Strong contract oversight and invoice review are critical controls in managing purchases. The City's fuel policy states the Fuel Administrator is responsible for verifying vendor billing statements each month and comparing them to actual fuel usage and invoiced amounts. Fleet is also required to check the vendor's base fuel prices against the Oil Price Information Service (OPIS) benchmarks.

The OCA found Fleet's oversight of the fuel vendor contracts, pricing verification, and invoice review were inadequate. These deficiencies are described below.

1. Invoices Were Not Reconciled Against Transaction Reports

The City receives two fuel invoices per month, covering transactions from the 1st through the 15th and the 16th to the end of the month. According to the Fuel Administrator, Fleet does not generate a complete transaction report until the end of each month, meaning that the first invoice is paid before any departmental review occurs.

To assess this process, the OCA reviewed 30 vendor invoices from January 2023 through March 2024 and compared them to the transaction reports reviewed by Fleet. The OCA found that six invoices did not match the corresponding transaction reports, totaling $10,813.

The OCA found that this was due to the Fuel Administrator running transaction reports prior to all transactions posting. These transactions were ultimately paid without Fuel Custodian review.

The Fuel Administrator confirmed they did not reconcile vendor invoices to transaction data during the audit scope. This limits the City's ability to verify that fuel transactions are accurate and complete before payment is made.

2. Non-Contracted Fuel Types Were Routinely Purchased

According to the City's contract, the vendor is authorized to sell only three fuel types at contracted rates: On-Road Diesel, Unleaded Fuel, and Diesel Exhaust Fluid (DEF). Despite this, the OCA identified recurring purchases of non-contracted fuel types, including premium and mid-grade gasoline, in FYs 2023 and 2024, totaling approximately $101,721. When this issue was discussed with the Fuel Administrator, they stated they were aware of the fuel types being purchased but were not aware that those types were not included in the contract.

The City should explore contracting opportunities for fuel that is necessary for operations but that is not included in the contract as contracts allow goods and services to be purchased at a bulk discount price.

3. Fuel Prices Were Not Verified Against Contract Terms

The contract states that the City's price per gallon should equal the daily OPIS benchmark price plus a fixed cost differential and applicable fees. The OCA calculated the expected price for five months and compared it to the vendor's actual charges. The following issues were identified:

- The vendor charged incorrect "applicable fee" amounts for fuel in three of the five months reviewed.

   o For example, in September 2023, the contracted fee for regular gas was $0.008929 per gallon, but the City was charged $0.012439.

   o The vendor acknowledged updating fees without amending the contract.

- The Fuel Administrator did not receive the correct OPIS reports and was therefore unable to confirm daily pricing.

- Once the correct report was provided, the Fuel Administrator stated if prices were within five cents per gallon, no further review was conducted.

The OCA also noted price fluctuations within a single day. For example, on October 16, 2023, the price per gallon for regular fuel was listed at $2.36, $2.38, and $2.41. Although the vendor attributed this to a system glitch, the OCA observed similar discrepancies on other dates.

For Diesel Exhaust Fluid (DEF), pricing is based on the contracted fixed fee plus the vendor's supplier cost. To verify the DEF price, Fleet would need to review supplier invoices. The Fuel Administrator stated they were unaware of this pricing structure and had never requested supplier billing records.

4. Bulk Fuel and Compressed Natural Gas Invoices Were Not Reviewed

In addition to retail fuel, the City purchases fuel through bulk delivery. Fleet is responsible for paying these invoices but did not review or reconcile them during the audit scope.

For compressed natural gas (CNG), the Department of Public Utilities (DPU) holds the contract, but Fleet pays the invoices. The DPU contract administrator stated their review involves confirming the fuel went to known vehicles and that quantities appear reasonable. Fleet confirmed it does not perform any review of CNG transactions.

Ultimately, the OCA found that Fleet did not maintain adequate oversight of its fuel vendor contracts or the associated invoicing process. Pricing was not consistently verified against contract terms, non-contracted fuel types were purchased without restriction, and invoices were paid without validation or reconciliation. These breakdowns in control expose the City to overbilling, payment for unauthorized goods, and the inability to detect vendor errors or noncompliance. Strengthening contract management and implementing a structured invoice review process are essential to improving financial accountability over fuel expenditures.

Recommendations

Recommendation 1	High Priority

We recommend that the Director of General Services update, enhance, and implement a formal fuel policy that defines review criteria, documentation standards, escalation procedures, and responsibilities across departments, to include adequate oversight of the Fleet Fuel Program. At a minimum, the Fleet policy should:

- Define roles and responsibilities for all employees involved in the fuel program, including PIN holders, fuel custodians, and fleet management and staff.

- Include criteria for reviewers to detect irregular activity in alignment with fuel monitoring best practices and observations noted throughout the report.

- Ensure vendor exception reports are reviewed.

- Require all departments to certify with Fleet that they have conducted periodic transaction reviews and documented any issues.

- Establish segregation of duties, to include ensuring that no single employee has complete control over PIN, card, and transaction review processes.

- Clarify requirements for supervisor card use, odometer entry, rental card issuance and deactivation.

- Require the consistent use and review of supervisor fuel logs for irregular usage patterns or excessive activity.

- Establish review thresholds to ensure that no single fuel custodian is responsible for an excessive workload that compromises the quality of oversight.

In addition, we recommend that policies are periodically reviewed, updated, and timely communicated to staff.

Recommendation 2	High Priority

We recommend that the Director of General Services evaluate whether the City's current tools provide sufficient functionality to support effective fuel oversight. At a minimum, Fleet should:

- Review whether the current vendor offers enhanced tools such as automated alerts, exceptions reporting, configurable controls, or PIN lockout features. If they do not, assess whether moving to a new fuel system or vendor would better suit the City's needs.

- Assess if the City's current fleet management software allows more robust fuel management oversight for an integrated approach to overall fleet management. If it does not, Fleet should consider if an update to the current system or a better system would suit their needs.

- Engage with peer cities to identify available technology solutions that improve control over decentralized fuel usage.

Recommendation 3	High Priority

We recommend that the Director of General Services ensure that Fleet adopts a data-driven oversight process for centralized fuel management. At a minimum, Fleet should:

- Develop a standard data driven protocol that is based on best practices described in this report and that is utilized to detect abnormal transactions.

- Use data to help determine if fuel custodians are performing appropriate review and oversight. When fuel oversight appears to be lacking, Fleet should retrain or require replacement of fuel custodians.

When any abnormal activity is identified, Fleet should ensure escalation procedures are followed and that potentially fraudulent activity is referred to investigative agencies.

Recommendation 4	High Priority

We recommend that the Director of General Services develop a formal fuel training program for Fleet employees, PIN holders, and fuel custodians. At a minimum, the training program should:

- Cover roles and responsibilities for Fleet employees, PIN holders, and fuel custodians as well as mandatory City policies.

- Include training for Fleet employees and Fuel Custodians that covers transaction review procedures, use of vendor exception reports, fraud red flags, and data analysis.

In addition, we recommend that this training should occur when a PIN holder or fuel custodian are assigned their responsibility and refresher training should occur at least annually.

Recommendation 5	High Priority

We recommend that the Director of General Services redesign the City's PIN management process to improve accountability, compliance with policy, reduce risk, and ensure PIN access is actively monitored. At a minimum, Fleet should:

- Strategically reissue PINs across the City where irregularities are detected.

- Require departments to verify at least annually that each employee with an active PIN is still employed, still assigned to their department, and has signed a valid user agreement.

- Develop and enforce accountability measures for employees identified to be sharing their PIN.

- Establish a process to generate and review periodic reports of inactive PINs and follow up with departments to determine whether deactivation is appropriate.

- Implement system checks to identify and flag employees with multiple PINs.

- Develop a centralized, digital archive of signed PIN User Agreements and require departments to resubmit missing forms for any active PINs.

Recommendation 6	Medium Priority

We recommend that the Director of General Services improve card oversight by enforcing policy compliance and ensuring consistent deactivation practices. At a minimum, Fleet should:

- Implement periodic reports to identify and follow up on inactive cards, especially supervisor and rental cards, and deactivate them when deemed appropriate.

- Ensure transaction limits assigned to fuel cards are appropriate, especially those assigned to supervisor cards.

- Develop a process to identify fuel cards assigned to vehicles that are taken out of service and deactivate them as needed.

- Ensure that cards are set up to only access fuel types that are compatible with the assigned vehicle, unless written justification for department need is submitted and approved.

- Require departments comply with fuel policy and submit a formal, standardized request form to justify retail fueling access on cards and ensure retail access is time-limited and reviewed regularly.

- Conduct an inventory of all fuel cards provided by the compressed natural gas vendor.

Recommendation 7	Medium Priority

We recommend that the Director of General Services implement a formal invoice reconciliation process and strengthen oversight of vendor billing and contract compliance. At a minimum, Fleet should:

- Ensure that the staff fully understand the terms of all fuel contracts, including approved product types, pricing formulas, and documentation requirements.

- Reconcile mid-month and end-of-month invoices submitted by the vendor to the transaction reports generated by Fleet.

- Ensure departments have the opportunity to review all transactions associated with their cards before the related invoices are paid.

- Verify that billed prices align with the contracted amounts, investigate price deviations, and recover overpayments where applicable.

- Require vendors to provide written notification and contract amendments for any pricing changes before billing adjustments are accepted.

- Disable access to premium, mid-grade, or other non-contracted products unless approved and documented.

- Evaluate if the vendor or alternative vendors have an available cooperative contract for fuel types not in the current agreement but that are necessary for City operations.

- Establish procedures to review all bulk fuel and compressed natural gas (CNG) invoices for reasonableness, and ensure they are supported by usage logs or vehicle data prior to payment.

Recommendation 8	Low Priority

We recommend the Director of General Services collaborate with the Director of Parks and Recreation to develop and implement a periodic reconciliation process for fuel tanks to ensure the accuracy of fuel inventory records. At a minimum, the City should:

- Periodically compare physical measurements with recorded usage and deliveries to identify and investigate discrepancies.

- Require vehicles that have fuel cards to purchase fuel from vendor established locations.

Recommendation 9	Low Priority

We recommend the Director of General Services collaborate with the Director of the Department of Public Works to develop and implement a periodic reconciliation process for the fuel tank truck to ensure the accuracy of fuel inventory records. At a minimum, the City should:

- Measure, record, and maintain the remaining fuel in fuel tank after each transaction.

- Compare physical measurements with recorded usage and deliveries to identify and investigate discrepancies.

Appendix A
Compliance Statement, Objectives, Scope, Methodology, Management Responsibility and Conclusion on Internal Controls

Compliance Statement

This performance audit was conducted in accordance with the Generally Accepted Government Auditing Standards promulgated by the Comptroller General of the United States. 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 the audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on the audit objectives.

Objectives

Evaluate the internal controls, monitoring, and efficiency of fuel usage for the City's Fleet.

Scope

The Fuel Management Process for the 24-month period ending June 30, 2024, and the current operating environment.

Methodology

The OCA performed the following procedures to complete this audit:
- Reviewed three fuel contracts for bulk delivery, fuel purchases, and CNG.
- Researched and reviewed best practices for fuel programs.
- Interviewed Fleet staff to understand the process and procedures for PINs, fuel cards, and invoice review, and data review.
- Analyzed and reviewed fuel transactions for FYs 2023 and 2024 to look at odometer readings, MPG, time of purchase, PIN and card usage, types of gas purchased, and gallons purchased.
- Met with Parks and Recreation staff to understand and perform a reconciliation of the bulk fuel tank.
- Met with the Department of Public Works staff to understand the use of the fuel truck.
- Met with the Department of Public Utilities staff to understand the process of purchasing and monitoring compressed natural gas.
- Reviewed retail access and support documentation for all cards with expenditures in FYs 2023 and 2024.

- Reviewed timesheets for some employees and compared work times to their PIN usage.
- Reviewed contracted prices against invoices to determine if the City was accurately billed.
- Conducted other tests as deemed necessary.

Management Responsibility

City management is responsible for ensuring resources are managed properly and used in compliance with laws and regulations; programs are achieving their objectives; and services are being provided efficiently, effectively, and economically.

Conclusion on Internal Controls

According to the Government Auditing Standards, internal control, in the broadest sense, encompasses the agency's plan, policies, procedures, methods, and processes adopted by management to meet its mission, goals, and objectives. Internal control includes the processes for planning, organizing, directing, and controlling program operations. It also includes systems for measuring, reporting, and monitoring program performance. An effective control structure is one that provides reasonable assurance regarding:

- Efficiency and effectiveness of operations;
- Accurate financial reporting; and
- Compliance with laws and regulations.

Based on the audit test work, the OCA concluded that internal controls were insufficient as documented throughout this report. See the Executive Summary for our overall conclusion.

Appendix B

Definition of Audit Recommendations Priorities

The Office of the City Auditor (OCA) assigns priority ratings for the recommendations based on the importance and impact of each recommendation to the City, as outlined in the table below. The OCA is responsible for assigning priority ratings for recommendations, and the City Administration is responsible for establishing target dates for implementing the recommendations.

PRIORITY LEVEL	PRIORITY LEVEL DEFINITION
HIGH	The recommendation addresses critical issues that are occurring that pose significant risks to the organization, including significant internal control weaknesses, non-compliance with laws and regulations, financial losses, fraud, and costly or detrimental operational inefficiencies.
MEDIUM	The recommendation addresses moderate issues that could escalate into larger problems if left unaddressed. While they may not pose an immediate risk, they could lead to significant financial losses or costly operational inefficiencies over time. There is potential to strengthen or improve internal controls.
LOW	The recommendation improves overall efficiency, accuracy, or performance in City operations.

MANAGEMENT RESPONSES
OCA 2026-01
Fleet Fuel Program Audit

RECOMMENDATION #1

We recommend that the Director of General Services update, enhance, and implement a formal fuel policy that defines review criteria, documentation standards, escalation procedures, and responsibilities across departments, to include adequate oversight of the Fleet Fuel Program. At a minimum, the Fleet policy should:

- Define roles and responsibilities for all employees involved in the fuel program, including PIN holders, fuel custodians, and fleet management and staff.

- Include criteria for reviewers to detect irregular activity in alignment with fuel monitoring best practices and observations noted throughout the report.

- Ensure vendor exception reports are reviewed.

- Require all departments to certify with Fleet that they have conducted periodic transaction reviews and documented any issues.

- Establish segregation of duties, to include ensuring that no single employee has complete control over PIN, card, and transaction review processes.

- Clarify requirements for supervisor card use, odometer entry, rental card issuance and deactivation.

- Require the consistent use and review of supervisor fuel logs for irregular usage patterns or excessive activity.

- Establish review thresholds to ensure that no single fuel custodian is responsible for an excessive workload that compromises the quality of oversight.

- In addition, we recommend that policies are periodically reviewed, updated, and timely communicated to staff.

Concur (Yes/No)	Yes
ACTION STEPS	
(Please describe the steps you will take or have taken to address the recommendation)	

The Fleet Division will revise and implement a formal fuel policy that addresses the weaknesses identified in the audit and aligns with best practices. The policy will clearly document the responsibilities of PIN holders, Fuel Custodians, Fleet personnel, department leadership, and, where applicable, Fuel Committees. Each Fuel Custodian will be required to sign an annual agreement confirming their understanding and commitment to these responsibilities.

Structured guidelines will be developed to support transaction review and identify irregular activity, including outlier MPG readings, after-hours use, PIN and card mismatches, odometer anomalies, and transactions that exceed assigned tank capacity. These criteria will be incorporated into monthly reviews and reinforced through training.

All fuel transaction and exception reports will be distributed to departments via DocuSign. Custodians or designated reviewers will be required to complete their review and sign within three business days. Failure to respond within this timeframe will result in temporary

deactivation of the PINs associated with unreviewed transactions.

Exception reports from the fuel vendor will be reviewed monthly by Fleet and shared with departments for review and sign-off, including any necessary follow-up or explanations.

Fleet will establish and enforce appropriate segregation of duties to ensure that no single employee controls PIN issuance, card management, and transaction reviews. In larger departments such as Police, multiple Fuel Custodians or a formal Fuel Committee will be required to ensure adequate oversight and workload distribution.

Supervisor card logs must be completed and submitted to Fleet monthly. Logs will be reviewed for volume and irregular usage and maintained as part of the program's audit records.

The revised policy will also be introduced:

- Validation of odometer entries to detect anomalies and ensure accuracy.

- A requirement that vehicles be returned with no less than half a tank of fuel at the end of each shift.

- A defined escalation process for repeat policy violations or failure to comply with oversight responsibilities.

Oversight workload will be monitored, and no Fuel Custodian will be responsible for more transactions than they can reasonably manage. Tasks will be redistributed as needed.

Lastly, the Fleet Fuel Policy will be reviewed and updated annually. All updates will be documented, distributed to departments, and incorporated into required training programs and compliance communications.

Target Date or Date Implemented	1 September 2025
Title of Responsible Employee	Fleet Operations Manager, in coordination with the Director of General Services

RECOMMENDATION #2
We recommend that the Director of General Services evaluate whether the City's current tools provide sufficient functionality to support effective fuel oversight. At a minimum, Fleet should: • Review whether the current vendor offers enhanced tools such as automated alerts, exceptions reporting, configurable controls, or PIN lockout features. If they do not, assess whether moving to a new fuel system or vendor would better suit the City's needs. • Assess if the City's current fleet management software allows more robust fuel management oversight for an integrated approach to overall fleet management. If it does not, Fleet should consider if an update to the current system or a better system would suit their needs. • Engage with peer cities to identify available technology solutions that improve control over decentralized fuel usage.

Concur (Yes/No)	Yes

ACTION STEPS
(Please describe the steps you will take or have taken to address the recommendation)
Fleet will conduct a comprehensive evaluation of the City's current fuel vendor to determine whether tools such as automated alerts, exception reporting, PIN lockout, and configurable transaction controls can be enabled or expanded. If these features are unavailable or ineffective, Fleet will coordinate with Procurement to explore alternate vendors or cooperative contracts that better support program oversight. Fleet will also explore RFID or FOB-based fueling technology that requires physical verification of the vehicle before dispensing fuel. This would reduce the need for manual PIN entry and help prevent unauthorized transactions. As vehicles are gradually equipped with telematics, Fleet will integrate GPS and usage data to confirm that a vehicle was present at the fuel site during each transaction. This will provide an additional verification layer and help identify suspicious activity. Fleet will assess whether the current fleet management software supports enhanced integration with fuel data, exception reporting, and telematics. If it does not, Fleet will develop options to upgrade or replace the system for better operational visibility. To guide these decisions, Fleet will consult with peer cities to understand what technologies they use to manage decentralized fuel programs. These findings will help inform future system improvements and strategic upgrades.

Target Date or Date Implemented	1 September 2025
Title of Responsible Employee	Fleet Operations Manager, in coordination with the Director of General Services

RECOMMENDATION #3
We recommend that the Director of General Services ensure that Fleet adopts a data-driven oversight process for centralized fuel management. At a minimum, Fleet should: • Develop a standard data driven protocol that is based on best practices described in this report and that is utilized to detect abnormal transactions. • Use data to help determine if fuel custodians are performing appropriate review and oversight. When fuel oversight appears to be lacking, Fleet should retrain or require replacement of fuel custodians. When any abnormal activity is identified, Fleet should ensure escalation procedures are followed and that potentially fraudulent activity is referred to investigative agencies.

Concur (Yes/No)	Yes

ACTION STEPS
(Please describe the steps you will take or have taken to address the recommendation)

Fleet is developing a formal, data-driven oversight protocol based on industry best practices and the audit's recommendations. This protocol will define how transaction data is reviewed and will include automated flags for red flags such as repeated odometer entries, fuel dispensed beyond tank capacity, inconsistent MPG, and fueling activity outside of normal work hours.

Monthly fuel transactions and exception reports will be sent to departments through DocuSign. Fuel Custodians or their designated reviewers will be required to sign and confirm their review within three business days. If no response is received, Fleet will begin deactivation of the PINs associated with unreviewed transactions until confirmation is provided.

Fleet will monitor review quality and timeliness using performance benchmarks. If Custodians fail to detect repeated red flags or submit reports late, they will be retrained. If deficiencies continue, Fleet will formally recommend the reassignment or replacement of the Custodian. When abnormal or suspicious activity is identified and cannot be justified through operational need, Fleet will follow a structured escalation procedure. All suspected fraud, theft, or intentional misuse will be referred to the Office of the Inspector General, as required by City Code. Additional referrals may be made to Human Resources or department leadership depending on the nature of the issue.

By formalizing this process and using tools like DocuSign, Fleet will ensure a transparent chain of accountability and consistent oversight across all departments.

Target Date or Date Implemented	1 September 2025
Title of Responsible Employee	Fleet Operations Manager, in coordination with the Director of General Services

RECOMMENDATION #4

We recommend that the Director of General Services develop a formal fuel training program for Fleet employees, PIN holders, and fuel custodians. At a minimum, the training program should:

- Cover roles and responsibilities for Fleet employees, PIN holders, and fuel custodians as well as mandatory City policies.

- Include training for Fleet employees and Fuel Custodians that covers transaction review procedures, use of vendor exception reports, fraud red flags, and Excel-based data analysis.

In addition, we recommend that this training should occur when a PIN holder or fuel custodian are assigned their responsibility and refresher training should occur at least annually.

Concur (Yes/No)	Yes

ACTION STEPS
(Please describe the steps you will take or have taken to address the recommendation)

Fleet will develop and implement a formal fuel training program for all personnel involved in the Fuel Program, including Fleet staff, departmental Fuel Custodians, and PIN holders. Training will outline specific responsibilities and reinforce compliance with all City policies.

Training will be delivered through the NEOGOV Learn platform and will be mandatory for all new PIN holders and Custodians upon assignment. Refresher training will be required annually. To support deeper learning, Fleet will host quarterly Fuel Oversight Boot Camps. These in-person sessions will cover practical skills such as reviewing transaction data, using exception reports, identifying fraud indicators, and basic Excel analysis. The sessions will also offer an opportunity for departments to share best practices and address common challenges collaboratively.

Participation in all training activities will be tracked. Fleet will maintain manual rosters and NEOGOV completion records. Each attendee will also sign a DocuSign acknowledgment to confirm they understand their responsibilities under the policy.
Training content will incorporate real examples from past audits and will include expectations for timely report review, use of supervisor logs, validation of odometer entries, and awareness of the City's escalation and disciplinary protocols.

This approach will help standardize knowledge, strengthen accountability, and ensure that everyone involved in the Fuel Program is equipped to detect and address irregularities.

Target Date or Date Implemented	1 September 2025
Title of Responsible Employee	Fleet Operations Manager, in coordination with the Director of General Services

RECOMMENDATION #5
We recommend that the Director of General Services redesign the City's PIN management process to improve accountability, compliance with policy, reduce risk, and ensure PIN access is actively monitored. At a minimum, Fleet should: • Strategically reissue PINs across the City where irregularities are detected. • Require departments to verify at least annually that each employee with an active PIN is still employed, still assigned to their department, and has signed a valid user agreement. • Develop and enforce accountability measures for employees identified to be sharing their PIN. • Establish a process to generate and review periodic reports of inactive PINs and follow up with departments to determine whether deactivation is appropriate. • Implement system checks to identify and flag employees with multiple PINs. • Develop a centralized, digital archive of signed PIN User Agreements and require departments to resubmit missing forms for any active PINs.

Concur (Yes/No)	Yes

ACTION STEPS
(Please describe the steps you will take or have taken to address the recommendation)
Fleet is redesigning the City's PIN management process to increase accountability, reduce misuse, and ensure ongoing compliance with policy. PINs will be strategically reissued when misuse, duplication, or sharing is discovered. These reissues will be documented and tracked for follow-up. Departments will complete quarterly PIN verifications using rosters distributed via DocuSign. Each department must confirm that all listed PIN holders are still actively employed, assigned to their department, and have a signed PIN User Agreement on file. If departments fail to certify this review, Fleet may begin PIN deactivation until updated documentation is received. To ensure timely removal of access, Fleet will coordinate with Human Resources to receive employee separation updates. When an employee separates from the City, their PIN will be deactivated as soon as notification is received. Fleet will also: • Enforce accountability measures for employees confirmed to have shared their PIN or used another employee's credentials. • Review quarterly inactivity reports and require departments to justify retention or proceed with deactivation. • Use system-level checks to identify employees with multiple active PINs and resolve discrepancies. • Maintain a centralized digital archive of all signed PIN User Agreements and require departments to resubmit any missing forms before maintaining active access. These updates ensure that only authorized, active employees retain fuel access and that PIN activity is monitored, documented, and subject to correction when policy is not followed.

Target Date or Date Implemented	1 September 2025
Title of Responsible Employee	Fleet Operations Manager, in coordination with the Director of General Services

RECOMMENDATION #6
We recommend that the Director of General Services improve card oversight by enforcing policy compliance and ensuring consistent deactivation practices. At a minimum, Fleet should:

- Implement periodic reports to identify and follow up on inactive cards, especially supervisor and rental cards, and deactivate them when deemed appropriate.

- Ensure transaction limits assigned to fuel cards are appropriate, especially those assigned to supervisor cards.

- Develop a process to identify fuel cards assigned to vehicles that are taken out of service and deactivate them as needed.

- Ensure that cards are set up to only access fuel types that are compatible with the assigned vehicle, unless written justification for department need is submitted and approved.

- Require departments comply with fuel policy and submit a formal, standardized request form to justify retail fueling access on cards and ensure retail access is time-limited and reviewed regularly.

- Conduct an inventory of all fuel cards provided by the compressed natural gas vendor.

Concur (Yes/No)	Yes

ACTION STEPS
(Please describe the steps you will take or have taken to address the recommendation)

Fleet is strengthening its oversight of all fuel cards to ensure compliance, reduce misuse, and address risks related to inactive or improperly configured cards.

Quarterly reports will be generated to identify fuel cards with little or no usage, especially supervisor and rental cards. These reports will be sent to departments via DocuSign, and reviewers must confirm whether each card remains operationally necessary. Cards lacking a clear justification will be deactivated.

Transaction limits, particularly for supervisor cards, will be reviewed and adjusted to reflect actual usage patterns. Logs for supervisor card use will be reviewed regularly to ensure appropriate volume and purpose.

Fleet will implement a process to flag fuel cards linked to vehicles that have been sold, salvaged, or retired from service. These cards will be automatically deactivated as part of the vehicle lifecycle tracking system.

All active fuel cards will be evaluated and reprogrammed to ensure they can only access fuel types appropriate for the assigned vehicle or equipment. If a department requires broader access, a formal written justification will be required. All exceptions, including those for retail fuel access, must be time-limited and reviewed on a recurring basis.

Fleet will also perform a full inventory and compliance review of compressed natural gas (CNG)

cards to verify they are assigned correctly and remain in active use.

These actions will ensure that fuel cards are properly managed, appropriately limited, and deactivated when no longer needed, improving transparency and reducing risk across the program.

Target Date or Date Implemented	1 September 2025
Title of Responsible Employee	Fleet Operations Manager, in coordination with the Director of General Services

RECOMMENDATION #7

We recommend that the Director of General Services implement a formal invoice reconciliation process and strengthen oversight of vendor billing and contract compliance. At a minimum, Fleet should:

- Ensure that the staff fully understand the terms of all fuel contracts, including approved product types, pricing formulas, and documentation requirements.

- Reconcile mid-month and end-of-month invoices submitted by the vendor to the transaction reports generated by Fleet.

- Ensure departments have the opportunity to review all transactions associated with their cards before the related invoices are paid.

- Verify that billed prices align with the contracted amounts, investigate price deviations, and recover overpayments where applicable.

- Require vendors to provide written notification and contract amendments for any pricing changes before billing adjustments are accepted.

- Disable access to premium, mid-grade, or other non-contracted products unless approved and documented.

- Evaluate if the vendor or alternative vendors have an available cooperative contract for fuel types not in the current agreement but that are necessary for City operations.

- Establish procedures to review all bulk fuel and compressed natural gas (CNG) invoices for reasonableness, and ensure they are supported by usage logs or vehicle data prior to payment.

Concur (Yes/No)	Yes
ACTION STEPS	
(Please describe the steps you will take or have taken to address the recommendation)	

Fleet is establishing a formal invoice reconciliation process to ensure accurate billing, enforce contract compliance, and prevent overpayments.

Fleet staff will be trained to understand the terms of all active fuel contracts, including approved product types, pricing formulas tied to OPIS benchmarks, documentation requirements, and any contract-specific exceptions. This understanding will serve as the foundation for consistent and accurate invoice reviews.

A dual reconciliation process will be implemented. Mid-month and end-of-month vendor invoices will be matched to transaction reports generated from the fuel management system. This review will be documented through DocuSign, and Fleet reviewers will be required to sign off prior to any payment authorization.

Departments will receive summaries of their transactions for each billing cycle to allow for review and correction before invoices are paid. These summaries will also be sent through DocuSign and will require departmental sign-off to confirm accuracy.

Fleet will verify that fuel prices are aligned with contract terms. Any price discrepancies will be investigated, and any identified overpayments will be recovered. Vendors will be required to submit formal written notification and execute a contract amendment before implementing any pricing changes.

Access to premium, mid-grade, or other non-contracted fuel types will be restricted. Departments seeking access to these fuels must submit a written request with justification, and access will only be granted with documented approval. Fleet will also assess whether current or alternative vendors can provide necessary non-contracted fuel types under cooperative agreements.

All bulk fuel and CNG invoices will be reviewed for reasonableness and must be supported by usage logs or vehicle data. Fleet will use a standardized checklist to maintain consistency in these reviews and ensure proper documentation is maintained.

These procedures will improve billing accuracy, enforce compliance, and ensure the City pays only for authorized fuel purchases at agreed-upon rates.

Target Date or Date Implemented	1 September 2025
Title of Responsible Employee	Fleet Operations Manager, in coordination with the Director of General Services

RECOMMENDATION #8

We recommend the Director of General Services collaborate with the Director of Parks and Recreation to develop and implement a periodic reconciliation process for fuel tanks to ensure the accuracy of fuel inventory records. At a minimum, the City should:

- Periodically compare physical measurements with recorded usage and deliveries to identify and investigate discrepancies.

- Require vehicles that have fuel cards to purchase fuel from vendor established locations.

Concur (Yes/No)	**Yes**

ACTION STEPS
(Please describe the steps you will take or have taken to address the recommendation)

Fleet will collaborate with the Director of Parks and Recreation to implement a recurring reconciliation process for on-site fuel tanks. This process is intended to improve inventory accuracy, reduce the risk of fuel loss, and maintain accountability.

Physical measurements, including stick readings or tank meter checks, will be compared to usage logs and delivery records on a regular basis. Any discrepancies between recorded and delivered gallons will be flagged and investigated immediately. Reconciliations will be documented using a standardized log format and retained for audit and internal review.

Fleet will reinforce the policy that vehicles assigned a fuel card must use vendor-established fueling stations. If a department believes local tank fueling is operationally necessary, they must submit a written request for approval. These exceptions will be limited, documented, and subject to periodic review.

To ensure compliance, Fleet will review tank activity logs quarterly and coordinate with Parks and Recreation to confirm logs are accurate and submitted on time. Spot checks will be conducted as needed to verify field activity and compliance with procedures.
These actions will help ensure fuel usage is properly documented, inventory is accurate, and any irregularities are addressed promptly.

Target Date or Date Implemented	1 September 2025
Title of Responsible Employee	Fleet Operations Manager, in coordination with the Director of General Services

RECOMMENDATION #9
We recommend the Director of General Services collaborate with the Director of the Department of Public Works to develop and implement a periodic reconciliation process for the fuel tank truck to ensure the accuracy of fuel inventory records. At a minimum, the City should: • Measure, record, and maintain the remaining fuel in fuel tank after each transaction.   • Compare physical measurements with recorded usage and deliveries to identify and investigate discrepancies.

Concur (Yes/No)	Yes
ACTION STEPS *(Please describe the steps you will take or have taken to address the recommendation)*	

Fleet will work with the Department of Public Works to implement a formal, recurring reconciliation process for the City's fuel tank truck to ensure inventory records are accurate and auditable.

Operators will be required to measure and record the remaining fuel in the tank after each transaction. These readings will be taken using either the truck's built-in meter or a manual dipstick and logged on a standardized form. Each log entry will include the date, gallons dispensed, vehicle or equipment number, and operator initials.

Fleet will conduct monthly reconciliations comparing physical tank readings and log entries with vendor delivery records and total usage. Any discrepancies between fuel delivered, fuel dispensed, and the remaining inventory will be flagged for investigation. Unexplained differences will be escalated to the appropriate leadership for corrective action.

All reconciliation records will be maintained by Fleet and made available for audit or internal review. In addition, Fleet will perform quarterly reviews of fuel truck logs to confirm that reconciliation procedures are being followed and that fuel is dispensed in accordance with City policy.

These steps will bring the fuel truck into alignment with the same oversight expectations that apply to fixed fueling infrastructure, improving transparency and accountability.

Target Date or Date Implemented	1 September 2025
Title of Responsible Employee	Fleet Operations Manager, in coordination with the Director of General Services

The OCA is an independent office organized under the Richmond City Council. We aim to serve as a trusted partner in strengthening transparency and accountability in local government through independent, impactful audits that enhance public trust and improve City operations.

Our audits evaluate the effectiveness, efficiency, and compliance of City programs and services. We offer recommendations to improve performance, safeguard public resources, and promote sound governance.

City Auditor

Riad Ali, CPA, CIGA

Audit Conducted by:

William "Bret" Lewis, CPA, CFE, MBA, Deputy City Auditor
Chassidy Comer, Senior Auditor

Contact us:

Phone: 804-646-5616
Email: askcityauditor@rva.gov
Website: https://www.rva.gov/office-city-auditor