

Construction Fraud Division

Quarterly Status Report

Report Period: 1/1/2017 to 3/31/2017

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OIG NEW ORLEANS OFFICE OF
INSPECTOR GENERAL

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I. SUMMARY

This report is issued quarterly to provide a periodic status update on the work of the Office of Inspector General's Construction Fraud Division (CFD) for the New Orleans Aviation Board (NOAB). This report includes a summary of actions and accomplishments of the CFD from **January 1, 2017 through March 31, 2017**.

The CFD created detailed goals and objectives that connect directly to the mission of the Division and serve as a road map for future activities. In the first quarter of 2017, CFD staff reviewed the Division's goals and objectives to meet the current needs of the program. The results of the review are outlined in a set of planned action items for 2017.

The main headings of this quarterly report are tied to the CFD's established goals and objectives, and the action items will be discussed therein.

II. DEVELOPMENT OF GOALS AND OBJECTIVES

During the first quarter of 2017, CFD staff reviewed the division's goals and objectives for the past 12 months of work. The review included a year-end assessment of the status of each objective and methods to improve the Division's processes. CFD managers updated specific objectives and action items and revised the Division's goals by updating the strategy used to prevent and detect fraud on the North Terminal Airport Project.¹ CFD staff will include the status of each action item and an update of the Division's goals and objectives in subsequent quarterly status reports.

¹ This document can be found in Appendix A of this report.

III. BUILD AND MAINTAIN AN EFFECTIVE OVERSIGHT UNIT

Establish Liaisons: Building relationships with stakeholders on the North Terminal Airport Project continues to be essential. Since its inception in July 2012, CFD team members—through their prior employment, education, and outreach—have been extremely successful at developing a network of stakeholders in the design/construction industry, law enforcement, and public sector oversight communities. These relationships continue to provide useful and worthwhile intelligence and/or input on all CFD deliverables.

CFD team members have been involved in Strategic Project meetings, including progress meetings, internal airport staff meetings, consultant selection committee meetings, NOAB Board meetings, Executive Staff meetings, Strategic Infrastructure Project Coordination meetings, financial feasibility meetings, and Steering Committee meetings.

CFD staff also established positive relationships with the Construction Manager (CM), Program Manager, legal consultants, and the Terminal Design Team. These relationships have proved to be highly useful to airport staff and project consultants. As the North Terminal Airport construction project progresses, CFD staff intend to establish relationships with the following:

- Contractors and subcontractors who may be selected for airport projects;
- Regional representatives from the Federal Aviation Administration and Department of Transportation; and
- Local unions.

CFD staff continued to attend Boh Bros. weekly compliance meetings. CFD staff believe attendance at these meetings has been beneficial to both parties, and the CFD intends to expand this activity with other contractors and subcontractors involved in the project. Division managers believe that the development of relationships with key participants in the airport's construction will ensure success for all project stakeholders and promote awareness of the CFD.

Quarterly Status Reporting: One of the future tasks of the CFD will be to develop a mailing list of individuals, companies, and organizations with a stake in the success of the North Terminal Airport Project. An effective way to increase public awareness about the Division's activities would be to send Quarterly Status Reports directly to those groups as well as making it available to the general public on the website.

Visibility of CFD: Since its inception, the CFD has been located in NOAB offices and involved in all facets of the North Terminal Airport Project. This access enables the CFD to provide independent oversight that serves not only the NOAB, but contractors, vendors, and the public at large. Effective oversight leads to the elimination of fraud, waste, and abuse and the ethical stewardship of public funds. These efforts translate into improved credibility and trust amongst credit rating agencies, which result in favorable rates in terms of funding. Improving the visibility of the CFD's oversight efforts should enhance public trust in the Project and result in ongoing financial benefits.

Prompt Monthly Invoicing: The CFD has been paid timely for all invoices submitted July 2013 through February 2017. An invoice for March 2017 was submitted to the airport on April 6, 2017. The CFD expects to receive these funds within 30 days.

CFD managers now include a summary sheet in the CFD monthly invoices that lists employee hours per project code to make its invoices clearer and more transparent. The summary sheet includes the hours each employee bills to each project and the corresponding project code. Also, CFD timesheets have been amended to coincide with the summary sheet.

The Deputy Assistant Inspector General resigned on January 27, 2017. It is the intent of the CFD to rehire for this position.

Continuous Professional Development of CFD Staff: The CFD is committed to the continued training, education, and professional advancement of its team members. It is important to keep knowledge of industry trends and perspectives related to construction fraud current. Due to staffing concerns and division priorities, no training was received during the reporting period.

IV. CREATE AND IMPLEMENT FRAUD DETERRENCE PROGRAM

PUBLIC OUTREACH PROGRAM

Create Public Awareness of CFD: The first step in creating an effective fraud prevention and detection program for the NOAB was to generate public awareness of the CFD and the mission and vision of the Division. The CFD has a dedicated space on the OIG website introducing the CFD, outlining its mission, and providing all contact information. The CFD also has a link on the Long-Term Development page of the NOAB website. In addition, CFD staff created several ways for anonymous reporting of possible fraud, waste, or abuse of resources dedicated to the NOAB Long Term Strategic Infrastructure Plan, including via:

- hotline (504-303-7630),
- in-person reporting,
- e-mail (CFD@nolaoig.gov), and a
- complaint form located on the nolaoig.gov website.

A link to the CFD has been placed on the website of the Construction Manager, HGBM-JV.com.

In coordination with these dedicated modes of communication, CFD staff also developed a best practices needs assessment for the Division's fraud hotline to encourage submission of anonymous tips. As a result of the needs assessment, CFD staff created a detailed coding process for incoming tips, researched website-embedded reporting forms, and developed additional methods of communication with the public.

The OIG also created a YouTube video of the CFD's work at the airport, which included interviews with the Assistant Inspector General for the CFD and the Airport Director. The video (<https://www.youtube.com/watch?v=e1QDtjlr7TY>) highlights the CFD's activities and its value to the North Terminal Airport Project.

The website, hotline, e-mail, video, and posters are intended not only to deter fraud, waste, and abuse during the course of the project but also to provide safe, anonymous ways for the public to report suspected questionable activity confidentially.

Create Fraud Awareness Training Program: To carry out its mission successfully, the CFD must educate companies and individuals employed on the infrastructure project regarding their duty to comply with established ethical standards. Toward

that end, the Division developed a set of ethical guidelines and a fraud awareness training program. Each training session includes an audience questionnaire to evaluate the effectiveness of the presentation and make any necessary improvements.

The training session is a critical component of the CFD's fraud deterrence program, but the CFD has been unable to conduct any Fraud Awareness Training sessions due to staffing limitations and priority matters. When scheduling permits, the CFD will resume these training sessions.

Code of Ethics & Conduct for Vendors & Contractors: Established ethical guidelines are an essential component of an organization's fraud deterrence program. The Code of Ethics and Conduct establishes a baseline of ethical conduct, which all vendors and contractors must meet while under contract with the NOAB to provide services for the North Terminal Airport Project. This document includes a violations and penalties clause with commensurate consequences to vendors or contractors who violate the Code of Ethics and Conduct.

Division managers believe that this Code of Ethics and Conduct will improve vendor and contractor integrity and can play an important role in assisting the NOAB to complete the Long Term Strategic Infrastructure Project.

Although the Code of Ethics and Conduct was not issued to any vendors and subcontractors during the reporting period, the CFD will continue to work with Airport Executives, the Program Management Team, and the Construction Manager to ensure that all vendors and contractors associated with the Long Term Strategic Infrastructure Project are in receipt of, and in compliance with these documents.

Vetting Contractor Responsibility: CFD staff noted in a previous quarterly report that there was no effort given to determine whether a low bid general contractor possessed the ability, character, or financial capacity to complete construction of the actual project. This omission often resulted in a contractual relationship with a general contractor for work that the company was not qualified to perform for one or more reasons. In these scenarios, the project could suffer and public funds could be misspent.

The NOAB selected the Construction Manager-at-Risk (CMAR) project delivery method in December 2015. The CMAR project delivery method requires a commitment by the Construction Manager to deliver the project under a Guaranteed Maximum Price. The CFD has had ongoing discussions with the

Construction Manager regarding implementation of this initiative. As a result, the Construction Manager has provided the CFD with the “Subcontractor Capabilities Questionnaire.” Subcontractors were required to submit this document during the bid process. The CFD continues to review and evaluate the questionnaires in an effort to prevent the aforementioned concerns and determine if those selected are capable of performing the contracted work.

The CFD is also reviewing all subcontractor agreements related to the North Terminal Airport Project. The CFD will create and maintain a subcontractor database populated with the questionnaires and other related documents.

V. MANAGEMENT AND CONTINUATION OF OVERSIGHT

Investigations and/or Audits into Allegations of Fraud, Waste, and Abuse: The CFD has created an extensive network to expand its effectiveness while promoting awareness. This network lays the foundation for the CFD to conduct any inquiries, investigations, or audits needed for effective oversight. CFD staff conducted several inquiries into matters relating to the Strategic Infrastructure Project during this reporting period. Since its creation, the CFD has inquired into 31 complaints/allegations relating to the Strategic Infrastructure Project, but due to the sensitive nature of those inquiries, no further details will be provided. The CFD maintains constant communication with the NOAB Disadvantaged Business Enterprise (DBE) Officer, NOAB Legal Department, U.S. Department of Transportation/Office of Inspector General, and the U.S. Department of Justice/Federal Bureau of Investigation.

Review Project Documentation: The OIG-NOAB Resolution states that the OIG will “audit and review data, invoices, and other materials related to consultants and contractors performing work to implement the Plan.” Throughout the reporting period, this assignment has taken the majority of the Division’s focus, energy, and time. Since its inception, the CFD has reviewed over 490 invoices with an approximate value of 269 million.

Division managers have altered the routing of documents and information to increase efficiency by expediting review, comment, and approval of these documents. The changes have increased communication and facilitated the processing of documents through the NOAB chain of approval. These alterations have been met with positive feedback from all project stakeholders.

Use of Surveillance: It is widely believed that the use of electronic/video surveillance, and more importantly the knowledge of this surveillance, deters various types of illegal activity such as theft and fraud. Division managers believe that video surveillance in the proper locations could have a dramatic effect on the deterrence of fraud related to the North Terminal Airport Project.

As a result of discussions with the Program Management Team and the Construction Manager, the Construction Manager has installed video surveillance equipment and the CFD has been given full access to this secure, restricted web-based surveillance system.

The following photographs were obtained by CFD staff during regular site visits, from the aforementioned surveillance system and the Construction Manager.

The following photographs were taken on March 31, 2017.







Integrity Monitors: Integrity Monitors are firms that provide independent monitoring services to ensure all work is performed to the highest ethical standards. The CFD and the Program Management Team have discussed the use of integrity monitors. The NOAB, through the Program Manager, has contracted with a firm to provide quality assurance/quality control services for the North Terminal Airport Project. The CFD routinely meets with the Program Management Team regarding these services as well as the overall status of the project.

Site Visits: In an effort to increase awareness of the CFD, and provide enhanced monitoring and oversight services, the CFD has started making regular, unscheduled site visits to the construction site.

VI. CFD SUPPLEMENTAL CONSTRUCTION OVERSIGHT

In fulfilling its commitment to prevent fraud, waste, and abuse at Louis Armstrong New Orleans International Airport, the CFD is providing oversight and assistance on the following matters outside of the Long Term Strategic Infrastructure Plan.

- CFD staff maintains regular interaction with the OIG Investigations Division on airport matters; however, due to the sensitive nature of those matters, no further details will be provided.
- CFD staff reviewed contracts and letters of authorization documenting ongoing NOAB construction projects outside of the Strategic Plan scope.

This document summarizes the status of the work performed by the Office of Inspector General's Construction Fraud Division from January 1, 2017 through March 31, 2017.

If there are any questions or additional information is needed, please call the Office of Inspector General at (504) 303-7553.



Attachment "A"

CONSTRUCTION FRAUD DIVISION

OFFICE OF INSPECTOR GENERAL, CITY OF NEW ORLEANS

2016 - 2017 Review of Goals and Objectives

2016 - Year in Review and 2017 - Planned Actions

GOAL #1: BUILD & MAINTAIN EFFECTIVE OVERSIGHT UNIT			2016 - YEAR IN REVIEW		2017 - PLANNED ACTIONS		
No.	Objective	Description of CFD Task	Target Conclusion	2016 Status	2016 Status Remarks	2017 Items to Discuss/Questions	2017 Action Items
1	Establish Liaisons	Identify those groups and individuals that will be closely linked to the implementation and success of the design and building of the new airport. Establish, develop and maintain a trusting relationship with these individuals.	Establishment of robust and productive relationships with LANOIA employees and contracted professionals involved with the process for design and building of the new airport.	Good	The CFD has been very successful in building effective relationships with consultants related to the airport Infrastructure Project including Parsons Brinckerhoff (Project Managers), CCAT (Design Team), HGBM-JV, along with many subconsultants and subcontractors of these entities; The OIG has also made contact with many outside agencies and personnel to strengthen liaison contacts.	<ul style="list-style-type: none"> How to strengthen existing relationships? What existing relationships need strengthening? What groups/Whom to target for relationship building? What "outside" agencies/groups to target for contact? 	<p>Target the following:</p> <ul style="list-style-type: none"> HGBM-JV Team - In 2017; Contractors & Subs for New Terminal; FAA - Local representative; DOT - Local/State representatives; Reach out to Local Union Associations
2	Quarterly Status Reporting	Development & delivery of quarterly status reports to LANOIA documenting CFD performance of deliverables.	Timely submission of status report to LANOIA offering comprehensive documentation on CFD Oversight Measures including status on all established goals and objectives.	Good	All quarterly status reports for 2016 have been promptly delivered to the airport Director and his Deputy. The subsequent quarterly report is expected to be submitted on January 28, 2017. These reports may be found on the City of New Orleans OIG website: nola.ig.gov	<ul style="list-style-type: none"> How to make format of report more robust? Ideas for changing format to provide easier reading and public understanding? Revise G&O: 	<ul style="list-style-type: none"> Incorporate additional charts & graphs for clarity and ease; Create a standard mailing list of individuals/Companies that will be issued CFD quarterly Reports;
3	Visibility of CFD	Identify regular meetings, work sessions, assemblies or gatherings regarding the building of the new terminal. The CFD shall customarily attend all functions to promote the mission of the CFD and emphasize the focus of the CFD on the LANOIA Long Term Strategic Plan.	All Board Members, LANOIA employees and all contracted professionals involved with the long term strategic infrastructure plan will be educated on the existence and mission of the CFD.	Good	The CFD has been involved with a plethora of internal airport meetings associated with the Infrastructure Project including: Design Meetings, NOAB Board Meetings, HGBM-JV Meetings, Finance Meetings, Project Status meetings and other Internal NOAB meetings;	<ul style="list-style-type: none"> How to increase airport visibility of CFD? How to increase public awareness of existence of CFD at airport? 	<p>Investigate the following options to balance cost and demographics:</p> <ul style="list-style-type: none"> Advertisement in local small publications: Gambit, Etc. On-line advertisement: Nola.com;
4	Prompt Monthly Invoicing	Development & delivery of monthly invoices to LANOIA documenting work performed during invoice period.	Timely submission of monthly invoices to LANOIA offering comprehensive documentation regarding CFD work performed.	Good	All invoices from July, 2013 through March, 2017 have been submitted and paid.	<ul style="list-style-type: none"> CFD IS consistently prompt at monthly invoicing. How can format of invoicing be clearer? Review overall Budget: 1. Deductions vs. Invoicing; 2. CFD 2016 Misc expenses 	<ul style="list-style-type: none"> Regarding end of year budget: Rectify costs with AFIN and Request assistance from City regarding discrepancy in budget.
5	Continuous Development of CFD Staff	Identify opportunities and commit to the continuing education, training and advancement of CFD staff in direct regard to current trends and prospectives within the Construction Fraud Industry. Grow system of network professionals within similar industries.	Gain and employ robust knowledge of Construction Fraud industry trends in regard to deterrence. Creation of strong network of professionals within the like industry.	Good	The CFD has taken advantage of several educational opportunities during the past year including: CMAA Infrastructure Conference and Monthly Development Sessions.	<ul style="list-style-type: none"> Discuss additional CFD staffing to increase capabilities and enhance performance of goals. What is the process for hiring additional Staff? Upcoming targets or projected focus on 2017 development of CFD... new industry trends? 	<ul style="list-style-type: none"> Begin to research & plan path and strategy to add to CFD staff;

GOAL #2: CREATE & IMPLEMENT FRAUD DETERRENCE PROGRAM			2016 - YEAR IN REVIEW		2017 - PLANNED ACTIONS		
No.	Objective	Description of OIG Task	Target Conclusion	2016 Status	2016 Status Remarks	2017 Items to Discuss/Questions	2017 Action Items
1	Public Outreach Program				Public Outreach Program		
	Create Public Awareness of CFD	Utilize CFD Website, hotline & email for the reporting of Fraud, Waste & Abuse during the LANOIA Infrastructure Plan. Posters will be utilized to promote awareness of CFD Oversight and informing individuals of their duty to report fraud, waste and abuse.	Utilization of Website, hotline & email as an effective tool for reporting fraud, waste or abuse during LANOIA Infrastructure Plan. Posters shall be plainly and prominently visible at all design studios, PM and CM offices and Construction sites. Info on Posters shall advertise the CFD and instructions for the simplicity of reporting.	Good	The CFD website, dedicated hotline and email has been established. Many posters have been distributed within the airport and to several consultants, HGBM-JV, and Subs offices working on the Infrastructure project.	<ul style="list-style-type: none"> How to gain more public awareness of these tools? How to measure public awareness? Are these tools effective? 	<ul style="list-style-type: none"> Investigate the following options: <ul style="list-style-type: none"> examine other options/places for installing CFD posters; Install posters at local Union Halls; Develop a needs assessment for the fraud hotline
	Create Fraud Awareness Training Program	Develop and implement an educational and training program regarding fraud, waste & abuse within design & construction projects. This program shall target the understanding of opportunities and consequences of fraud, waste and abuse and elaborate on the duty to report such activities. This program will also address the expected ethical conduct of all LANOIA vendors and contractors.	Educational & Training programs shall occur on a quarterly basis and be tailored directly and specifically toward the group of individuals being trained. Targeted groups will include: NOAB staff, PM team, Design Team, CM Team, General Contractors and Prime Contractors.	Good	The Fraud & Ethical Awareness Education program and presentation has been fully developed. In 2014, it was administered to the Program Management Team and the Finance Dept. at NDAB. Both groups provided positive feedback.	<ul style="list-style-type: none"> Ideas for launching training program? How to measure effectiveness of training program? Review Evaluation of training session 	<ul style="list-style-type: none"> Evaluation will play an important role in the effectiveness of the training program: Use as a tool for improvement.
2	Code of Ethics & Conduct for Vendors & Contractors	Develop and coordinate the successful implementation of a comprehensive Vendor/Contractor code of Ethics that will detail expected conduct and behavior of all LANOIA contracted professionals. This document shall be utilized as standard practice during the realization of the Infrastructure Plan.	All LANOIA contracted professionals will acknowledge and understand expected Code of Ethics and Conduct along with penalties for violations of this policy. This document will be issued as a part of the executed contract. Systematic re-evaluation of the Code will be completed to guarantee inclusion of all relative issues and gauge the achievement of this document.	Good	The Code of Ethics & Conduct has been developed by the CFD. The Code of Ethics, as well as the Louisiana Code of Governmental Ethics, was issued to all members of the HGBM-JV and numerous subs. Distribution will continue to CMAR partners and Subs.	<ul style="list-style-type: none"> Where does the value of the Code of Ethics lie? Ideas for implementation of the Code where it will be MOST effective? 	<ul style="list-style-type: none"> CFD believes that the Code of Ethics & Conduct brings much awareness, attention and education to those it will be implemented with; Plan for implementation with Enabling Contractors/Sub-contractors & CMAR will be established;
3	Vetting Contractor Responsibility				Vetting Contractor Responsibility		
	Evaluate Vetting Methods	CFD and LANOIA shall appraise in detail the two proposed structures of vetting the responsibility of contractors that may be performing contracted work on the long term infrastructure plan. CFD and LANOIA shall offer consideration to all pros and cons of each method of evaluation.	Selection of a method of Vetting the Responsibility of Contractors based on the mutual benefit of the Owner and the proposed contractor. Begin exercising the accountability of a public entity to defend the effective & efficient expending of funds.	Fair	The OIG has received from the CMAR/HGBM-JV all required bid documents submitted to date, including the Subcontractor Suitability Questionnaire for vetting purposes.	<ul style="list-style-type: none"> Create succinct objective in regard to changing situation: <ul style="list-style-type: none"> Continue to work with HGBM-JV on pre-qualify sub-contractors How to integrate CFD into CM@R pre-qual process? Answer question: What is CFD non-negotiable criteria for sub-contractor selection? 	<ul style="list-style-type: none"> CFD believes that the Subcontractor Suitability Questionnaire can bring valuable intelligence to the OIG; CFD believes that the information drawn from this form can, in some cases, prove extremely important; Plan for implementation with Enabling Contractors/Sub-contractors & CMAR will be established;
	Create Comprehensive Action Plan for Contractor Vetting	Based on the selected method of vetting, a step-by-step action plan will be developed to assure successful implementation of the system. The plan will include all work necessary, identify expected obstacles, include all required support, etc.	Development of an action plan that will be thorough and will expedite progress toward successful contractor vetting.				
	Develop Contractor Evaluation System	<ul style="list-style-type: none"> Develop Contractor Information Form (CIF) Develop Evaluation Standards & Review Procedures Implement CIF via Web form for Maximum Access 	Development of an evaluation system that is fully researched and based on proven techniques of vetting the capability of contractors to perform specified work. This system shall be mindful and inclusive of industry protocols and trepidation with such systems of evaluation.				
	Build & Maintain Vendor Database	Based on the selected structure of vetting, a Vendor Database may be necessary to organize and maintain all vendor information. This tool could be critical to the success of Vetting vendors/contractors.	Established database promoting ease of information contribution, evaluation of contractors, organization of information, and reporting/sharing of information.				

GOAL #3: MANAGEMENT & CONTINUATION OF OVERSIGHT			2016 - YEAR IN REVIEW		2017 - PLANNED ACTIONS		
No.	Objective	Description of OIG Task	Target Conclusion	2016 Status	2016 Status Remarks	2017 Items to Discuss/Questions	2017 Action Items
1	Investigations and/or Audits into allegations of Fraud, Waste and Abuse	Upon discovery, or receipt of a complaint or allegation of Fraud, Waste or Abuse, CFD will conduct an Investigation or Audit as deemed necessary and employ all resources as required to arrive at a satisfactory conclusion. CFD shall inform or make recommendations to LANOIA as deemed necessary or essential to the success of the Long Term Infrastructure Plan.	Ensure all reviews, investigations, and inquiries are conducted in a thorough and effective manner and all matters are resolved appropriately. Referrals to Federal, State, and Local Law Enforcement will be made when warranted. Maintain integrity of all on-going investigations or audits.	Good	The CFD has received several allegation of fraud, waste or abuse, and has conducted the appropriate reviews/inquiries into these matters with the responsible Federal Agency.	<ul style="list-style-type: none"> How to create opportunity for investigations, evaluations, reviews or audits? Where to direct CFD attention during different phasing? Create plan for DBE program review 	<ul style="list-style-type: none"> Create new Goal for "Detection of Fraud, Waste and Abuse" which will house all mini reports, evaluations, recommendations, etc. including: DBE program review and risk assessment and management
2	Review Project Documentation	Assess review standards and processes for typical documentation, offer feedback for the improvement of set standards and processes. Random analysis, as deemed necessary, of typical documentation. Documents including: Invoicing, Construction Change Directives, Change Proposals, Change Orders, Request for Information, etc.	Improvement of standards and processes for reviewing project documentation resulting in the thorough and expeditious assessment of project documents.	Good	During the CFD's tenure at the airport, the majority of the Division's time has been dedicated to reviewing countless contracts, Letters of Authorization and invoices related to the Infrastructure Project. Invoices reviewed have totalled over \$40 million dollars.	<ul style="list-style-type: none"> Discuss current process for reviewing documentation Opportunity for improvement? OR anything we do that we should change for better? Is CFD review timing ok? 	<ul style="list-style-type: none"> This function will be on-going and timing of OIG reviews is viewed as acceptable; With the initiation and implementation of: <ul style="list-style-type: none"> Invoice & LOA Process review Coversheet; Invoice, Contract & LOA review checklists; These documents currently provide enhanced visibility and a faster overall process.
3	Use of Surveillance	Determine use and design for surveillance application on construction jobsite. The plan should be inclusive of all security measures promoting the deterrence of fraud, waste and abuse during active construction.	Development of a successful "Team designed" surveillance and security plan that is to the satisfaction of all stakeholders including LANOIA, security team and CFD. Plan shall actively deter attempts at any type of fraud, waste and abuse.	Good	The CFD had discussed with HGBM-JV and PM the need for increased surveillance at the new terminal location, and as a result a site camera has been installed with restricted access. The CFD has access to the site camera.	<ul style="list-style-type: none"> What is CFD criteria? 	<ul style="list-style-type: none"> CFD will establish a full list of criteria which may include: <ul style="list-style-type: none"> Careful consideration of what preventable or detectable scenarios are at highest risk; Careful consideration regarding site confinement;
4	Use of Integrity Monitors	Use of an on-site independent organization with legal, auditing, investigative, environmental, safety and loss prevention skills to ensure compliance with relevant laws, regulations and contracts. Also to deter, prevent, uncover and report unethical or illegal conduct.	Evaluation of existing internal controls. Recommend best practices to minimize fraud risks. Act as conduit from construction jobsite to CFD.	Good	The CFD staff will be providing this service during the actual construction of the airport terminal along with QA/QC monitors employed by the Program Manager.	<ul style="list-style-type: none"> Investigate "best practices" on Integrity Monitoring. Best method to document & compile site visits 	<ul style="list-style-type: none"> CFD believes that the careful & thoughtful implementation of this objective can prove to be very valuable;