



Internal Audit Department
NeighborWorks® America

Audit Review of Professional Services & Vendor Contracts \$20K and Under

Project Number: NW.PROC.CONUNDER20K.2022

Audit Review of Professional Services & Vendor Contracts \$20k & Under

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TO: Members of the NeighborWorks America Audit Committee

FROM: Fred Udochi, Chief Audit Executive

RE: Professional Services and Vendors \$20k and Under

DATE: October 5, 2022

Attached is our draft audit report for the Professional Services & Vendor Contracts \$20k & Under review. Please contact me with any questions you might have.

Thank you.

Frederick Udochi
Chief Audit Executive

Attachment

cc:

M. Rodriguez
S. Ifill
K. Esmond
R. Simmons
A. Weldon

**Function Responsibility and Internal Control Assessment
Audit Review of Professional Services and Vendors \$20k & Under**

Business Function Responsibility	Report Date	Period Covered
Procurement	October 5, 2022	January 1, 2019 to December 31, 2021
Assessment of Internal Control Structure		
Effectiveness and Efficiency of Operations	Inadequate¹	
Reliability of Financial Reporting	Not Applicable	
Compliance with Applicable Laws and Regulations	Not Applicable	

¹ **Legend for Assessment of Internal Control Structure:** **1. Generally Effective:** The level and quality of the process is satisfactory. Some areas still need improvement. **2. Inadequate:** Level and quality of the process is insufficient for the processes or functions examined, and require improvement in several areas. **3. Significant Weakness:** Level and quality of internal controls for the processes and functions reviewed are very low. Significant internal control improvements need to be made.

Executive Summary of Observations, Recommendations and Management Responses

Summarized Observation Risk Rating	Management Agreement with Observation (Yes/ No)	Internal Audit Recommendation Summary	Accept IA Recommendation (Yes/ No)	Management's Response to IA Recommendation	Estimated Date of Implementation (Month/Year)	Internal Audit Comments on Management Response
<p>Observation 1 – Outdated NeighborWorks Procurement Policy Manual</p> <p>Internal Audit noted there are several instances where information in the current NeighborWorks Procurement Policy Manual (December 2018) is not up to date regarding process and procedures (P&P) for Small and Micro Purchases. Although work is already underway to update the current Procurement Policy Manual in response to the FY 20 Contract Administration audit report; this audit report focuses on micro and small purchases P&P to provide clear guidance for each program office in managing post-award contract payment management.</p>	Yes	<p>Recommendation 1</p> <p>Internal Audit recommends the Procurement department evaluate and address the Observations as they update the procurement policies and procedures. After policies and procedures are updated, Internal Audit recommends publishing any subsequent updates, approved by management, via email announcements and/or training sessions to communicate the specifics for processing and managing professional services</p>	Yes	<p>Management will draft policy revisions that present a unified and simplified method for procurements using Small Purchase Procedures.</p> <p>Procurement will communicate the policy revisions to the organization at large via email. Procurement will also host virtual trainings and provide self-guided training materials specific to processing and managing Micro and Small Purchases.</p>	05/31/2023	<p>Internal Audit accepts Management's response.</p>

Summarized Observation Risk Rating	Management Agreement with Observation (Yes/ No)	Internal Audit Recommendation Summary	Accept IA Recommendation (Yes/ No)	Management's Response to IA Recommendation	Estimated Date of Implementation (Month/Year)	Internal Audit Comments on Management Response
<p>Refer to the Observation and Recommendations section in this report for detail.</p> <p>Risk Rating: (b) (5)</p>		<p>fees for micro and small purchases.</p>		<p>The Finance Division now owns the management and policy governing our PCard program/Micro Purchases. This policy will also be updated.</p>		
<p>Observation 2 – Ambiguity and Inconsistencies in the Policy, Process and Procedures</p> <p>Upon completing the data analysis, IA concluded that data anomalies continue to exist due to unclearly defined and inconsistent process and procedures in place to guide the Program Offices from creating POs to applying invoices for vendor payment between \$3,500 and \$20,000. Refer to Observation and</p>	<p>Yes</p>	<p>Recommendation 2</p> <p>IA strongly recommends leveraging the new procurement system PRISM to address the issues in order to mitigate the associated risks accordingly. Establishing data integration between PRISM and NetSuite will be a critical element</p>		<p>The Procurement Division launched the PRISM enterprise contract management system in September 2022 and began revising Procurement Policy to address inconsistencies in how small purchases are managed.</p>		

Summarized Observation Risk Rating	Management Agreement with Observation (Yes/ No)	Internal Audit Recommendation Summary	Accept IA Recommendation (Yes/ No)	Management's Response to IA Recommendation	Estimated Date of Implementation (Month/Year)	Internal Audit Comments on Management Response
<p>Recommendations section below for details.</p> <p>Risk Rating: (b) (5)</p>		<p>to facilitating adequate risk mitigation in terms of system validity checks between PRISM and NetSuite data interflows.</p>		<p>With the implementation of PRISM, all procurements above \$5,000 will be managed in the new system in FY23.</p> <p>While the initial integration included vendor data, the establishment of additional integration needed between PRISM and NetSuite to include risk mitigating validity checks is planned for implementation in FY 23/24 and is contingent on the availability of technical staff to support the work needed to build The Procurement Division has collaborated with Finance/AP and IT&S to develop a scope to</p>		

Summarized Observation Risk Rating	Management Agreement with Observation (Yes/ No)	Internal Audit Recommendation Summary	Accept IA Recommendation (Yes/ No)	Management's Response to IA Recommendation	Estimated Date of Implementation (Month/Year)	Internal Audit Comments on Management Response
				<p>address the inconsistencies detailed in Observation 3.</p> <p>The full implementation of this plan has been postponed until FY23/24 and is contingent on the availability of technical staff to support the work needed to build out the additional integration.</p> <p>NetSuite uses the legal and dba names for vendors as indicated on W-9 and Procurement will adopt the same naming convention. When the system is fully configured both systems will have the same naming conventions.</p>		

Summarized Observation Risk Rating	Management Agreement with Observation (Yes/ No)	Internal Audit Recommendation Summary	Accept IA Recommendation (Yes/ No)	Management's Response to IA Recommendation	Estimated Date of Implementation (Month/Year)	Internal Audit Comments on Management Response
<p>Observation 3-</p> <p>Lack of Unique Vendor Identifier between NEST and NetSuite</p> <p>Internal Audit noted inconsistent vendor names in NEST and NetSuite for the same vendor contract. Vendor ID is unique in NEST but is not adopted in NetSuite. NetSuite Vendor ID is customized with the first few characters of the vendor's legal name which may easily result in duplicates. This may provide the potential for fraud.</p> <p>According to Finance, vendor invoice payment is remitted to the name and address as shown on the vendor's W9 form on file. Without a common unique identifier in place, it makes searching for the same vendor in either system extremely challenging. Of the 111 vendors entered into a contract with NeighborWorks during</p>	Yes	<p>Recommendation 3</p> <p>Internal Audit recommends a collaboration among Procurement, Finance/AP and IT&S to revisit the use of a consistent naming convention process throughout the Procurement/Finance process cycle (from RFP to contract award to vendor pay) to achieve conformity in the consistent use of a vendor name throughout the life cycle process. The naming convention should span across systems from Procurement to Finance.</p>	Yes	<p>The Procurement Division has collaborated with Finance/AP and IT&S to develop a scope to address the inconsistencies detailed in Observation 3. The full implementation of this plan has been postponed until FY23/24 and is contingent on the availability of technical staff to support the work needed to build out the additional integration. NetSuite uses the legal and dba names for vendors as indicated on W-9 and Procurement will adopt the same naming convention. When the</p>	09/30/2024	<p>Internal Audit accepts Management's response</p>

Summarized Observation Risk Rating	Management Agreement with Observation (Yes/ No)	Internal Audit Recommendation Summary	Accept IA Recommendation (Yes/ No)	Management's Response to IA Recommendation	Estimated Date of Implementation (Month/Year)	Internal Audit Comments on Management Response
<p>this audit period (2019-2021), only 12 have identical display names in both NEST and NetSuite, the matching ratio is 11%.</p> <p>Risk Rating: (b) (5)</p>				<p>system is fully configured both systems will have the same naming conventions.</p>		

Risk Rating Legend

Risk Rating: High

A serious weakness which significantly impacts the Corporation from achieving its corporate objectives, financial results, statutory obligations or that may otherwise impair the Corporation's reputation.

Risk Rating: Moderate

A control weakness which could potentially undermine the effectiveness of the existing system of internal controls and/or operational efficiency, integrity of reporting and should therefore be addressed.

Risk Rating: Low

A weakness identified which does not seriously detract from the system of internal control and or operational effectiveness/efficiency, integrity of reporting but which should nonetheless be addressed by management.

Management Responses to The Audit Review of: Professional Services and Vendors \$20k & under		
# Of Responses	Response	Recommendation #
3	Agreement with the recommendation(s)	3
	Disagreement with the recommendation(s)	

Background

Procurement has several methods to obtain goods and services based on the dollar amount. One of those methods is procurement by small purchase procedures. The small purchase procedure is an informal procurement method which should not exceed \$20,000. For this method a price or rate quote should be solicited from enough vendors to ensure adequate price competition. This method is generally overseen by the Procurement department; however, four NeighborWorks divisions such as National Initiatives, Field Operations, Training, and Evaluation, Leadership & Peer Learning (ELP) have authority to enter into contracts without Procurement's direct involvement as long as there is proper delegation of authority. Although the small purchase process is decentralized for these four divisions, they must still follow the organization's procurement policies and procedures.

Objective

The objective of this audit review was to obtain assurance that t professional service agreements and vendor contracts up to \$20K were appropriately supported, justified, documented and executed according to the procurement policy.

Scope

The scope of this audit review includes:

- Professional Service agreements as well as vendor contracts up to \$20K awarded and executed between 01/01/2019 and 12/31/2021.
- The aforementioned agreements, and contracts for all Program Offices in all divisions, excluding Office of General Counsel/Corporate Secretary (OGC), with primary focus on National Initiatives, Field Operations, Training, and Evaluation, Leadership & Peer Learning (ELP).
- GL transactions posted to following expense accounts during this audit period:
 - 5401 Professional Services Fees - General,
 - 5402 Professional Services Fees – Services – Computer Systems, and
 - 5403 Professional Services Fees – Consultant's Expenses.

Objective Methodology

To attain the objectives stated above, following areas were examined in detail throughout the stages of the under \$20K contract management work based on the source data obtained from NEST, NetSuite and the Procurement Task Leads (PTLs) response to Audit Questionnaire² (Appendix A):

- General Overview and Risk and Controls Assessment: to obtain detailed understanding of significant procedures and practices employed in the Business Contract (Contract) process
- Compliance: to evaluate compliance with
 - Procurement policy, standards and procedures.
 - Conflict of interest form for technical evaluation panelist, if required.
- Operational Effectiveness and Efficiency: to evaluate contract process, specifically addressing micro and small purchases.

² Refer to Internal Audit *Audit Questionnaire FY22 Professional Services & Vendor Contracts \$20K and Under.docx* as well as the respective response from survey takers.

- Information and Communications Systems: to evaluate information and communications systems, applications, databases, system interfaces, and records practices, specifically addressing the following:
 - Application security over contracts based on vendor provided SOC2 reports.
 - Electronic or manual interfaces with intra-divisional systems, applications, and/or databases³.
 - Records management policies and practices for both hardcopy and electronic records.

Below are the observations and recommendations that resulted from the testing performed.

Observations and Recommendations

Observations and recommendations below conclude the data analysis of the 162 vendor payments applied to service agreements and vendor contracts up to \$20K through the verification and validation of the GL transactions posted to expense accounts 5401, 5402 and 5403 for professional services fees between 2019 and 2021 based on records pulled from NEST, NetSuite as well as the survey results pooled among the PTLs (Appendix A).

³ Refer to Internal Audit FY19 Audit Review *Final Report - Cloud Service Provider Agreements v4.pdf*

Observation 1 Outdated Procurement Policy Manual

An essential and effective component of internal controls is having adequate policies and procedures that are periodically reviewed to maintain operations and ensure compliance with rules and/or regulations. In response to previous Internal Audit (IA) reports⁴ work is already underway to update the Procurement Policy Manual dated December 2018. However, the following are additional areas specific to micro and small purchases, that are also not clearly reflected or absent in the current policy manual based on IA's data analysis and discussion with Procurement during this audit review:

- Professional Services cannot be paid by Purchase Card (PCard) is not specifically mentioned in the manual.
- Insufficient standards and procedures that are clearly defined to guide Budget Managers (BMs) and PTLs to adequately create/maintain post-award contract management for professional services agreements as well as vendor contracts \$20K and under.
- According to Procurement, the contract review and approval hierarchy based on the contract value threshold as defined in section V on page 18 as well as in Appendix D on page 29 of
- the current Procurement Policy Manual (Appendix C) is outdated and needs to be evaluated and revised.
- Purchase Order (PO) amount does not always reflect the awarded contract value for current period of performance.
- Insufficient Information for the use of Exception Memo and Competitive Price Quote in place of vendor contract for micro and small purchases under \$3,500, this is further elaborated in the last bullet below.
- Accounting Code: accounting code is one of the required information as stated in Procurement Policy Manual section II.C.1.c (refer to Appendix C) to be included in the requisition but there is no placeholder for that on the available procurement templates for record keeping, tracking and monitoring purposes (templates listed on the Procurement Inside NeighborWorks Page associated with Contract Award such as Acquisition Plan, Soles Source Justification, Exception Memo, Award Determination Memo).
- Lack of clearly defined standard and guidelines regarding Exception Memo and other documents particularly in the following areas:
 - The proper way to use Exception Memo and the Exclusion List in place of a missing contract
 - Definition and purpose of other forms of contract support documents, such as Service Call letter, Memo of Understanding (MOU), Note to File, Statement of Work (SOW), Scope of Services, email approval, etc. (Appendix D).

Recommendation 1

Internal Audit recommends the Procurement department evaluate and address the Observations as they update the procurement policies and procedures. After policies and procedures are updated, Internal Audit recommends publishing any subsequent updates, approved by management, via email announcements and/or training sessions to communicate the specifics for processing and managing professional services fees for micro and small purchases.

⁴ FY 2015 Procurement Governance, FY2017 Vendor Master File Maintenance, FY 2020 Contract Administration

Observation 2 Ambiguity and Inconsistencies in the Policy, Process and Procedures

Upon completing the data analysis, IA concluded that data anomalies exist due to unclearly defined and inconsistent process and procedures in place to guide the Program Offices from creating POs to applying invoices for vendor payment between \$3,500 and \$20,000. Below are IA's findings:

- 2.1 *Discrepancies in Contract number between Procurement system (NEST) and Finance system (NetSuite)* (Appendix F): NetSuite's Purchase Order (PO) screen allows for a custom field with free-form text attributes without an inherent systemic validity checking and validation. Due to manual entry, the data value cannot be validated systematically. According to the online Instructions for PO included in NetSuite, a contract number needs to be entered exactly as it appears in NEST. Based on IA's data analysis, the value entered in NetSuite for contract number is inconsistent, i.e. does not conform to the NEST format of CON99999 for contract number or CMOD99999 for contract modifications. As mentioned earlier, since the Contract # field is a custom field within the PO/Bill screen, the field has a free form text attribute without systemic validity checking or validation.
- 2.2 *Insufficient Purchase Order (PO) Instructions*: per the current PO Instructions in NetSuite (Appendix F), a valid Exception Memo (EM) for PO values over \$3500 and no contract; or for award determinations, an approved/signed vendor Competitive Price Quote (CPQ) are the acceptable contract supporting documents for vendor pay. Based on data analysis, only 8 (eight) EMs and 0 CPQs were provided of the 253 POs reviewed. This finding illustrates the inconsistency between PO Instructions and actual review/approval practiced by Finance to substantiate vendor pay.

Recommendation 2

IA strongly recommends leveraging the new procurement system PRISM to address the aforementioned issues in order to mitigate the associated risks accordingly. Establishing data integration between PRISM and NetSuite will be a critical element to facilitating adequate risk mitigation in terms of system validity checks between PRISM and NetSuite data interflows.

Observation 3: Lack of Unique Vendor Identifier between NEST and NetSuite

Internal Audit noted inconsistent vendor names in NEST and NetSuite for the same vendor contract. Vendor ID is unique in NEST but is not adopted in NetSuite. NetSuite Vendor ID is customized with the first few characters of the vendor's legal name which may easily result in duplicates. This may provide the potential for fraud.

According to Finance, vendor invoice payment is remitted to the name and address as shown on the vendor's W9 form on file. Without a common unique identifier in place, it makes searching for the same vendor in either system extremely challenging. Of the 111 vendors entered into a contract with NeighborWorks during this audit period (2019-2021), only 12 have identical display names in both NEST and NetSuite, the matching ratio is 11%.

Recommendation 3

Internal Audit recommends a collaboration among Procurement, Finance/Ap and IT&S to revisit the use of a consistent naming convention process throughout the Procurement/Finance process cycle (from RFP to contract award to vendor pay) to achieve conformity in the consistent use of a vendor name throughout the life cycle process. The naming convention should span across systems from Procurement to Finance.

Conclusion

The Procure to Pay process remains one of the most complex business processes, often spanning across multiple systems and operations. The use of a unique identifier number for the Procure to Pay cycle would greatly facilitate the tracking of contracts across systems and operations. Management is highly encouraged to set this as a critical element of an efficient contracting system. It would also allow for establishing lead times for monitoring by setting benchmarks for improvements.

In addition, based on the Audit Survey (Appendix G) feedback and comments provided by each division and program office it is essential to have a simplified process and procedures in place with short turnaround times to satisfy specific acquisition needs in managing under \$20K professional services agreements and contracts.

Appendix A - Audit Questionnaire Response Summary

Survey Document Returned		Divisional Program Office (Business Unit)	Number of Respondents
Questionnaire	Contract List		
✓	✓	Administrative Services	2
		Communications & Marketing (formerly PR)	2
✓	✓	Corporate Strategy & Impact (CSI)	1
✓	✓	Finance	3
X	X	Financial Planning Analysis and Contracts	1
✓	✓	Human Resources	4
✓	✓	Information Technology & Services (IT&S)	2
X	X	ELP - Community Impact Measurement	0
X	X	ELP - Leadership Development	0
✓	✓	ELP - Success Measure	2
✓	✓	NI - National Homeownership Program	1
X	X	NI - Community Initiatives	1
X	X	NI - Operations	
X	X	NI - Real Estate Programs	
✓	✓	FOs - Midwest & Western Regions	1
✓	✓	FOs - Northeast Region	1
		FOs - Southern Regions	
✓	✓	FOs - Western Region	1
✓	✓	Training	1
X	X	OCEO	1
X	X	OCFO	0
X	X	OCOO	0
✓	✓	Organizational Assessment (OAD)	1
✓	✓	OGC/S	1
✓	✓	PPLA - Applied Research	1
✓	X	Procurement	1
✓	X	Resource Development	1

Appendix B – NeighborWorks Procurement Policy Manual: Review and Approval Requirements

V. NeighborWorks Review and Approval Process

NeighborWorks procurement are subject to pre-solicitation and pre-award review requirements based on established dollar thresholds. Tables describing those requirements are included in Appendix D.

VI. Process for Protest, Disputes, and Post-Award Debriefs

- A. **Policy.** NW policy requires that all prospective contractors be accorded fair and equal consideration in the solicitation and award of contracts. To that end, any interested party shall have the right to an audience with the Procurement Division to convey any alleged biases or failures of the procurement process, and to have its issues heard and evaluated. “Interested party” is defined as an actual or prospective offeror whose direct economic interest was or would have been impacted by the award of a contract or by failure to award a contract.
- B. **Protests and Disputes.** The Protest and Dispute Process is an opportunity for an Interested Party to provide notice to NW about an error in the Procurement process that is so egregious that but for that error the Interested Party may have been awarded the contract.

² Earlier SAM checks can be conducted after receipt of bids or proposals.

Appendix D-NeighborWorks Review and Approval Requirements

The tables below describe the reviews that are required:

\$3,500-\$20,000	BU Requestor	PTL	Budget Manager	BU Officer	Director Proc
Contract/Modification Request	x	x	x		x
Sole Source	x	x		x	x
Award Memo		x			x

\$20,001-\$100,000	BU Requestor	PTL	Budget Mgr	BU PPC	BU with DOA	BU SVP	BU Officer	SVP Proc	IT&S (if needed)
SAP-Simplified Acquisition Plan		x		x	x		x		x
Contract/Modification Request	x	x	x		x				
Sole Source	x	x			x	x	x	x	
Award Memo							x	x	

\$100,001-\$500,000	BU Requestor	PTL	Budget Mgr	BU PPC	BU with DOA	BU SVP	SVP Proc	CFO/COO OGC	IT&S (if needed)
AP-Acquisition Plan		x		x		x	x	x	x
Contract/Modification Request	x	x	x		x	x			
Sole Source					x	x	x	x	
Award Memo							x		

>=\$500,000	BU Requestor	PTL	Budget Mgr	BU PPC	BU with DOA	BU SVP	SVP Proc	CFO/COO OCC	CEO	Board	IT&S (if needed)
AP-Acquisition Plan		x		x		x	x	x	x	x	x
Contract or Modification Request	x	x	x		x	x					
Sole Source					x	x	x	x	x	x	
Award Memo							x				

Appendix C – NeighborWorks Procurement Policy Manual: New Procurements Requisitioning Requirements (Section II.C.1)

C. Requisitioning

5

All NW procurements above the micro purchase threshold shall be processed in accordance with the procurement guidelines that set forth competition, unless deemed exempt. Also, all requisitions above \$3,500 shall be processed through NEST. These should be initiated by preparation and submission of a requisition by the Business Unit as follows:

1. For new requirements of value \$3,501 through \$20,000, the Business Unit Program Procurement Coordinator shall prepare and submit a requisition to the PTL or to the Procurement Department for processing, as determined by whether or not the Business Unit possesses decentralized procurement authority. The requisition must contain, at a minimum, the following elements:
 - a. Program Procurement Coordinator
 - b. Scope of Services
 - c. Accounting Code
 - d. Amount Budgeted/Estimated Value



Appendix D - Breakdown of PO Supporting Documentation Submitted Other Than Exception Memo (EM) and Competitive Price Quote (CPQ)

Name of Supporting Documentation	Count
Competitive Price Quote (CPQ)	0
Email Exchange with vendor	35
Exception Memo (EM)	30
Memo to File	49
Scope/Service of Work	50
Service Agreement	15
Service Call letter	1

Appendix E– Online PO Instructions in NetSuite

ORACLE NETSUITE WeConnect Search

Activities Billing Customers Vendors Payroll and HR Financial Reports Analytics Documents Setup AvidXchange Payments Fixed Assets

Purchase Order PO13197 Sheila Squier dba SASquier Consulting LLC FULLY BILLED

Actions StickyNotes New

Primary Information

DATE 6/11/2021	DEPARTMENT NI - Homeownership	Summary TOTAL 3,500.00
VENDOR Sheila Squier dba SASquier Consulting LLC	APPROVAL STATUS Approved	
PO # PO13197	AMOUNT PAID 3,500.00	
MEMO American Rescue Plan- Housing Counseling Stability Program Design Planning	AMOUNT REMAINING 0.00	
CREATED BY: Angela M. Laughman	INSTRUCTIONS Your home Department will be defaulted on the PO after the transaction is saved. If you need to book expenses to another department, change the department via the drop-down field at the header level. If your purchase is over \$3500, enter the Contract Number exactly as it appears in NEST or enter an Exception Memo. If your purchase is under \$3500, enter the Competitive Price Quote (Sales Quote or Price Quote from vendor) or enter an Exception Memo Selecting Project, Funds and other accounting segment - use the pop-up windows to select accounting segments. DO NOT TRY TO MANUALLY CHANGE THE VALUE VIA THE DROP-DOWN MENU! If you need the change a segment value, select the Project and go through the series of pop-up windows again.	

Focus

Appendix F - Samples of Invalid Contract Number Entered in NetSuite

In NetSuite:

Anomaly/ PO#	Date	Period	Ty	Bill #	Vendor Name	Contract #	Amount	Department
Contract not found in NEST								
	3/30/2020	May 2020	Bill	51922001	Christopher M Spence dba Wealth & Wisdom	Christopher Spence Wealth and Wisdom Inv #	1,600.00	OAD
	2/14/2020	Feb 2020	Bill	068-1-2.14.20	Alys Mann dba Alys Mann Consulting, LLC	CON2309769	7,500.00	Success Measures
	3/26/2020	Mar 2020	Bill	068-2-3.26.20	Alys Mann dba Alys Mann Consulting, LLC	CON2309769	1,175.00	Success Measures
				3	(Unique) 2			
Contract # entered in free form descriptive text (not conform to NEST syntax of CON999999 or CMOD999999)								
	1/16/2019	Jan 2019	Bill	135	Eduardo R Corredera	CON2131481 (Option Year)	1,034.70	NI - Homeownership
	2/7/2019	Feb 2019	Bill	142	Eduardo R Corredera	CON2131481 (Option Year)	259.65	NI - Homeownership
	12/1/2020	Dec 2020	Bill	302	First Story Strategies LLC	CONPO7874-	412.00	Field Operations - DFO
	3/2/2020	Mar 2020	Bill	172	Demarra West dba Change Agent Consulting	CON2510692 MOD001	8,000.00	NI - Homeownership
	3/30/2020	May 2020	Bill	51922001	Christopher M Spence dba Wealth & Wisdom	Christopher Spence Wealth and Wisdom Inv #	1,600.00	OAD
	11/16/2021	Nov 2021	Bill	NWA2021-6	Tulp Shah DBA Keystone Strategic Advisor	na	5,000.00	OAD
				6	(Unique) 5			

In NEST:

The screenshot shows the WeConnect search interface. The search criteria are: Vendor Name, Plan Title, Solicitation Title, Contract Description, and Form Number (CON2309769). The search results table is empty. A red arrow points to the 'Support' link in the left navigation menu.

Appendix G –Survey Question 16 Response Summary (from 13 Program Offices)

<u>No</u>	<u>Questions</u>	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Comments</u>
16	Do you feel the current process for contracts \$20K and under work well for you? If there's room for improvement, what would a more efficient process entail? Please elaborate in the Comments area.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The benefit is that there is no waiting period for the Procurement Division to upload documents into NEST.</p> <p>The only under 20k we manage outside of Procurement are BPA calls and RFQs. We operate with the understanding that anything over \$3500 that is competitive (RFP) needs to be done in coordination with Procurement. The BPA has proved to be an effective and efficient tool once it is in place. The initial procurement is done with Procurement.</p>
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>It would be helpful to receive notifications/alerts to track approvals etc. instead of always having to send follow up emails to procurement specialists.</p> <p>Provide recorded how to videos with training recordings for new and existing PTLs who infrequently enter into contracts on INWS, in addition to templates, workflows and updated policy.</p>
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>It would be a lot more helpful if there was a clearer workflow that is documented somewhere for reference. Perhaps a flowchart of some sort since the process can get a bit complicated. Also if a notification system was implemented in our procurement system so PTLs were informed once one step in the process was completed (ie someone approves) and the notification advises the PTL on the next step. Things change way too much and there is never a 100% clear process for each procurement. Part of the reason why the process takes so long is because for each procurement additional due diligence is needed to be sure every step is covered-</p>

					mostly to ensure that no new steps that the PTL was not aware of were missed.
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The biggest struggle are procurements for services and goods that are on the border of \$20k. We might perform market research which shows a range of market costs just below \$20k and proceed with a procurement process internally in our business unit only to receive proposals that are slightly higher than \$20k which then requires us to shift the responsibility of the process to Procurement. This can cause confusion.
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NW was mandated by Congress to have a centralized Procurement Department. All contracts should be processed by the Procurement Department.
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The process for \$20K and under is overwhelming, lots of paperwork and requirements to complete. This creates much additional work for the team when this is not our main workload.
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	It would be nice if IT&S could handle some of the under 20k procurements when time is of the essence. Example: an unknown need for an urgent license. But it is nice having Procurement handle them on a regular basis.
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Documentation for purchases under 3500 and then the processes for 3501-20000 are unclear. The policy documents are vague around anything that isn't a 20k plus engagement. There is almost no information available for 3500 and under purchase policies. A FAQ and other documentation to help through processes would be helpful, as well as knowing that processes are set in place and aren't depending on each individual procurement action.

		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Not a good use of limited bandwidth to spend so much time on procuring subscriptions. Should be streamlined and not given the negative connotations of a sole source contract.</p> <p>Also, although important, the IT&S review of **WARNING** PO containing computer items (cyber security & technology review) email, this delays payments. Suggestion: allow payments to go through while doing the review.</p>
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I do not know the process so I cannot speak to its efficiency.
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	An amended (quicker) process based on dollar value would be helpful (under \$20K process). For example, if I'm procuring a vendor for goods/services that is \$4k annually, the process takes just as long (up to 6 months) as if I were procuring for a contract that was worth \$300K annually.
		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Our processes could be simplified for huge gains in efficiency and still have us able to maintain high level accountability and proof of good stewardship. We often word-smith ourselves into knots and into a straightjacket with unnecessarily complicated processes/procedures/protocols. We should write or procedures for our business needs, not for the auditors. It often seems like we have it backwards such that again, we tie ourselves in knots and into a straight jacket. We over complicate and overcompensate.