



## **Corrective Action Plan Follow-up Review: Audit of the Procurement Process for the Bond Program Management Advisory Services (RFQ #17-069)**

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### **Final Follow-up Report**

**Audit Plan Code: 20-12**

Twenty-five of the 26 corrective action plan (CAP) activities were implemented by management to address the findings and recommendations in the original audit report.

The activity not implemented was no longer applicable since management took a stricter stance than initially planned. As such, this follow-up review represents the close-out of the corrective action plan.



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## Abbreviations

CAP	Corrective Action Plan
CBAC	Citizens Bond Advisory Committee
EPISD	El Paso Independent School District
IIA	Institute of Internal Auditors
RFQ	Request for Qualifications
SOP	Standard Operating Procedures



# Follow-up Review

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## Background

The Institute of Internal Auditors' (IIA) International Standards for the Professional Practice of Internal Auditing, Performance Standard 2500 - Monitoring Progress, require we "...establish and maintain a system to monitor the disposition of results communicated to management." Internal Audit has established the Corrective Action Plan (CAP) process to meet this requirement. The process includes monitoring and reporting whether management has implemented corrective actions to address audit findings and recommendations.

Internal Audit issued the Procurement Process for the Bond Program Management Advisory Services (RFQ #17-069) Audit Report to District management and administration on January 25, 2018. We performed the audit as part of the Board approved 2017-2018 Internal Audit Plan. The objective of the audit was to provide reasonable assurance to the Board of Trustees the procurement process for the Bond Program Management Advisory Services (RFQ #17-069) was conducted in a strategic, transparent, ethical, and impartial manner in accordance with local/state laws and regulations, and best practices. The scope covered the procurement process for RFQ #17-069 from the pre-solicitation phase to the award phase.

Our audit found the procurement process for RFQ #17-069 was conducted in accordance with District policies and state laws/regulations. However, we identified practices that give the appearance the pre-solicitation phase was not conducted in a strategic or transparent manner. In addition, we found indicators of vendor favoritism, insider information, and bid tailoring. These indicators, based on procurement best practices, give the appearance the pre-solicitation and evaluation phases were not conducted in a transparent, ethical, and/or impartial manner. To be clear, these indicators are a warning of a potential risk and not a certain sign of improprieties.

The original audit report included four (4) findings and nine (9) recommendations. For reference, we provided a summary of the original audit report results in **Exhibit A**. District management and administration agreed with our recommendations and developed a corrective action plan (CAP) with 26 activities to address the findings.

## Objective and Scope

The objective and scope of this follow-up review were to determine whether management implemented the 26 CAP activities or took other actions to address the four (4) findings and nine (9) related recommendations outlined in the Procurement Process for the Bond Program Management Advisory Services (RFQ #17-069) Audit Report.

## Methodology

To achieve our follow-up review objective, we:

- Held meetings and communicated with persons responsible for carrying out the CAP activities.
- Reviewed supporting documentation maintained by management as evidence of completion of the CAP activities provided to Internal Audit.



## Inherent Limitations

This follow-up review was limited in scope covering only the actions taken by management to address the original audit findings and recommendations stated in the Objective and Scope section of this report. No representations of assurance are made to other areas or periods not covered by this follow-up review.

## Summary of Results

CAP Activities	Implemented	Overall CAP Status
26	25	Closed

Management implemented 25 of the 26 activities in the CAP. The activity not implemented was no longer applicable since management took a stricter stance than initially planned. As such, this report represents the close-out of the CAP.

## Original Recommendations and Status of CAP Activities

The original recommendations, the person(s) responsible, and the status of the CAP activities are outlined below:

1

**Original Recommendation:** The District should develop a Board Policy that outlines the District's commitment to procurement key values of ethics, transparency, impartiality, and accountability. The policy should include the following:

- 1.1 Outline the Board's expectations that all employees are expected to ensure all vendors are treated fairly, equally, and receive the same opportunities, so that they may all compete for the District's business on an even basis with the same information and knowledge.
- 1.2 Establish a period of silence that covers the procurement process from the pre-solicitation phase to the award phase, during which vendor visits and meetings are not allowed, to protect the integrity of the procurement process. This will help safeguard the process from undue influences prior to the recommendation of award. Also, it ensures there is no appearance of favoritism nor an opportunity to sway or obtain information on the competitive activity.
- 1.3 A statement which explains that it is not acceptable for a potential/current vendor to participate in determining the scope of work, strategic direction, technical specifications, or evaluation criteria for competitive bids/proposals for which the vendor may be bidding.
- 1.4 Outline the Board's expectations of all employees regarding interactions/communications with vendors, especially those who may be seeking to bid or are currently going through a bid process.
- 1.5 Employees who do not meet the Board's expectations should be held accountable for their actions.

**Management and Leadership Response:** Agreed with the recommendation and incorporated into the CAP as activities one (1) through six (6) as follows:

**Activity 1:** "The Board will develop a policy that outlines the District's commitment to procurement key values of ethics, transparency, impartiality, and accountability. The policy will include the following:"

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**Persons Responsible:** Board Policy Committee; General Counsel as Chair of the Board Policy Committee; Deputy Superintendent for Finance and Operations; and Executive Director for Procurement Services

**Status:** Implemented

**Activity 2:** “Outline the Board’s expectations that all employees are expected to ensure all vendors are treated fairly, equally, and receive the same opportunities, so that they may all compete for the District’s business on an even basis with the same information and knowledge.”

**Persons Responsible:** Board Policy Committee; General Counsel as Chair of the Board Policy Committee; Deputy Superintendent for Finance and Operations; and Executive Director for Procurement Services

**Status:** Implemented

**Activity 3:** “Establish a period of silence that covers the procurement process from the pre-solicitation phase to the award phase, during which vendor visits and meetings are not allowed, to protect the integrity of the procurement process. This will help safeguard the process from undue influences prior to the recommendation of award. Also, it ensures there is no appearance of favoritism nor an opportunity to sway or obtain information on the competitive activity.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 4:** “A statement which explains that it is not acceptable for a potential/current vendor to participate in determining the scope of work, strategic direction, technical specifications, or evaluation criteria for competitive bids/proposals for which the vendor may be bidding.”

**Persons Responsible:** Board Policy Committee; General Counsel as Chair of the Board Policy Committee; Deputy Superintendent for Finance and Operations; and Executive Director for Procurement Services

**Status:** Implemented

**Activity 5:** “Outline the Board’s expectations of all employees regarding interactions/communications with vendors, especially those who may be seeking to bid or are currently going through a bid process.”

**Persons Responsible:** Board Policy Committee; General Counsel as Chair of the Board Policy Committee; Deputy Superintendent for Finance and Operations; and Executive Director for Procurement Services

**Status:** Implemented

**Activity 6:** “Employees who do not meet the Board’s expectations will be held accountable for their actions.”

**Persons Responsible:** Board Policy Committee; General Counsel as Chair of the Board Policy Committee; Deputy Superintendent for Finance and Operations; and Executive Director for Procurement Services

**Status:** Implemented

2

**Original Recommendation:** Based on the Board's expectations regarding interactions/communications with vendors, the District's Procurement Manual should include examples of when it is appropriate and not appropriate to meet with vendors for all employees.

For example (not all-inclusive):

It is appropriate to meet with vendors as follows:	It is <b>not</b> appropriate to meet with vendors under the following circumstances:
<ul style="list-style-type: none"> <li>When the vendor has an existing contract with the District and there is a need to provide support or updates on service levels.</li> <li>When there are issues with existing contracts that need to be addressed.</li> </ul>	<ul style="list-style-type: none"> <li>When a bid or competitive activity is likely or in progress.</li> <li>If it is a new vendor seeking to do business with the District, they should be directed to Procurement Services.</li> <li>When new products or information on new products is needed, meeting with a supplier for informational purposes only is acceptable (i) if it does not meet one of the criteria listed above and (ii) it does not create any perceived advantage or commitment.</li> <li>When a special favor or special treatment is requested or you are being pressured to make decisions that do not seem to be in the District's best interest.</li> </ul>

**Management and Leadership Response:** Agreed with the recommendation and incorporated into the CAP as activity seven (7) as follows:

**Activity 7:** "Based on the Board's expectations regarding interactions/communications with vendors, the District's Procurement Manual will include examples of when it is appropriate and not appropriate to meet with vendors for all employees."

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

3

**Original Recommendation:** The Board and the CBAC should have an opportunity to review and comment upon major changes in Bond-funded activities, allocations, and projects prior to final action being taken. The Board should determine the threshold for what a major change entails based on a dollar amount or percentage of the Bond funds.

**Management and Leadership Response:** Agreed with the recommendation and incorporated into the CAP as activity eight (8) as follows:

**Activity 8:** "The Board and the CBAC will have an opportunity to review and comment upon major changes in Bond-funded activities, allocations, and projects prior to final action being taken. The Board will determine the threshold for what a major change entails based on a dollar amount or percentage of the Bond funds."

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director of Planning and Innovative Schools Construction

**Status:** Implemented

4

**Original Recommendation:** Define the role, expectations, and responsibilities of a bid owner involved in the bidding process to build ownership and ensure accountability throughout the entire procurement process. This should also include the process to follow if a transfer of ownership is necessary.

**Management and Leadership Response:** Agreed with the recommendation and incorporated into the CAP as activity nine (9) as follows:

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**Activity 9:** “Define the role, expectations, and responsibilities of a bid owner involved in the bidding process to build ownership and ensure accountability throughout the entire procurement process. This will also include the process to follow if a transfer of ownership is necessary.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

5

**Original Recommendation:** A manual, similar to standard operating procedures (SOP), should be developed to support the CBAC Charter. The purpose of it is to provide assistance to CBAC committee members on how to carry out their duties and responsibilities.

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**Management and Leadership Response:** Agreed with the recommendation and incorporated into the CAP as activity ten as follows:

**Activity 10:** “A manual, similar to standard operating procedures (SOP), will be developed to support the CBAC Charter. The purpose of it is to provide detailed instructions to CBAC committee members on how to carry out their duties and responsibilities.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Original Recommendation:** We recommend the District develop procurement ethics training for all employees involved in the procurement process. The following components should be included:

- 6.1 The training should be phase-specific (pre-solicitation, solicitation, evaluation, and award phases).
- 6.2 Training for employees should be tracked using the District’s Professional Development System to ensure records are in a central location and available for future audit purposes.
- 6.3 Appropriate and not appropriate District-vendor interactions/communications should be covered in the training, including socialization with vendor scenarios.
- 6.4 Procurement Services’ staff should receive procurement ethics training at least on a yearly basis.
- 6.5 Procurement ethics training should be provided to all District employees involved in any of the procurement phases. The frequency of training should be established by administration.
- 6.6 Non-employees should also receive ethics training prior to them serving on any District’s evaluation committee. The frequency of training should be established by administration.

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**Management and Leadership Response:** Agreed with the recommendation and incorporated into the CAP as activities 11 through 16 as follows:

**Activity 11:** “The District will develop procurement ethics training for all employees involved in the procurement process. The following components will be included:

- 6.1 The training will be phase-specific (pre-solicitation, solicitation, evaluation, and award phases).”



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**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 12:** “The District will develop procurement ethics training for all employees involved in the procurement process. The following components will be included:

6.2 Training for employees will be tracked using the District's Professional Development System to ensure records are in a central location and available for future audit purposes.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 13:** “The District will develop procurement ethics training for all employees involved in the procurement process. The following components will be included:

6.3 Appropriate and not appropriate District-vendor interactions/ communications be covered in the training, including socialization with vendor scenarios.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 14:** “The District will develop procurement ethics training for all employees involved in the procurement process. The following components will be included:

6.4. Procurement employees will receive procurement ethics training at least on a yearly basis.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 15:** “The District will develop procurement ethics training for all employees involved in the procurement process. The following components will be included:

6.5 Procurement ethics training will be provided to all District employees involved in any of the procurement phases. The frequency of training will be established by administration.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 16:** “The District will develop procurement ethics training for all employees involved in the procurement process. The following components will be included:

6.6 Non-employees will also receive ethics training prior to them serving on any District's evaluation committee. The frequency of training will be established by administration.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Not implemented. Management will not allow non-employees to serve in evaluation committees and stated so in the Procurement Manual. This activity is no longer applicable and considered closed.



**Original Recommendation:** We recommend the District develop and implement procedures and related internal controls to guide the pre-solicitation phase of the procurement process. These should be incorporated into the District's Procurement Manual. The purpose is to have a consistent procurement process that focuses on transparency and fair competition, which can minimize the risk of ethical misconduct or the appearance of it. The following components should be incorporated:

7.1 A formal needs assessment is a procurement best practice and should be performed and documented during the pre-solicitation phase when services/goods reach a dollar limit established by administration:

- The purpose of the needs assessment should be to evaluate and help determine whether the proposed services/goods are aligned with the District's/Board goals and fits a strategic plan (either financial, instructional, or other).
- In the long term, a needs assessment can promote transparency of the procurement process, which could lead to improving public confidence that District employees are good stewards of public funds.
- Professionals, knowledgeable in the services being sought, should participate during the needs assessment in order to ensure all related variables are taken into consideration to identify the need and extent of it. For major initiatives, District key stakeholders should be involved to ensure the needs of the District are clearly identified.

7.2 The scope of work should be developed by professionals knowledgeable in the services being sought by the District.

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**Management and Leadership Response:** Agreed with the recommendation and incorporated into the CAP as activities 17 through 19 as follows:

**Activity 17:** "The District will develop and implement procedures and related internal controls to guide the pre-solicitation phase of the procurement process. These will be incorporated into the District's Procurement Manual. The purpose is to have a consistent procurement process that focuses on transparency and fair competition, which can minimize the risk of ethical misconduct or the appearance of it."

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 18:** "A formal needs assessment is a procurement best practice. This procedure will be performed and documented during the pre-solicitation phase when services/goods reach a dollar limit established by administration:

- The purpose of the needs assessment should be to evaluate and help determine whether the proposed services/goods are aligned with the
- District's/Board goals and fits a strategic plan (either financial, instructional, or other).
- In the long term, a needs assessment can promote transparency of the procurement process, which could lead to improving public confidence that District personnel are good stewards of public funds.
- Professionals knowledgeable in the services being sought should participate during the needs assessment in order to ensure all related variables are taken into consideration to identify the need and extent of it. For major initiatives, District key stakeholders should be involved to ensure the needs of the District are clearly recognized/identified."

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**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 19:** “The scope of work will be developed by professionals knowledgeable in the services being sought by the District.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Original Recommendation:** We recommend the process followed during the evaluation phase be outlined and documented in the District’s Procurement Manual. The purpose is to maintain a consistent level of transparency, fairness, and impartiality during the evaluation phase. The following components should be included:

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- 8.1 Establish a period of silence for members serving in an evaluation committee. The purpose is to have members refrain from any communication with any bidder for a defined time period to maintain the integrity, confidentiality, fairness, and impartiality expected for this process.
- 8.2 Develop an evaluation committee member questionnaire for individuals to complete prior to beginning the evaluation selection process. The questionnaire should seek to identify any potential biases or disqualifying information (such as period of silence violations). Individuals should be disqualified from participating in the evaluation committee when appropriate. This questionnaire will complement the conflict of interest control form already in place.
- 8.3 Develop a form that requires bidding vendors to disclose if they have had any contact with District employees or Board members during the period of silence. Contact also includes providing assistance in developing specifications, scope of work, presentations, or educating/training District employees/Board members. The disclosure should be submitted as part of their bid response. Vendors should be disqualified from bidding when appropriate.
- 8.4 Develop a set of criteria or requirements bid owners should follow when selecting evaluation committee members. Bid owners should select key stakeholders that possess the professional knowledge in the goods/services being sought to obtain the best value for the District.
- 8.5 Incorporate language on whether it is allowable to have non-employees serve in a bid evaluation committee, including a justification for having a non-employee serve in a bid evaluation committee as opposed to having an employee serve. If allowed, expectations, including whether non-employees will abide by same policies and procedures as District employees, should be established and documented in the District’s Procurement Manual. Ultimately the District is and will be held accountable for procurement decisions. The District can hold employees/contractors accountable for their actions, but cannot do the same for non-employees.

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**Management and Leadership Response:** Agreed with the recommendation and incorporated into the CAP as activities 20 through 25 as follows:

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**Activity 20:** “The process followed during the evaluation phase will be outlined and documented in the District’s Procurement Manual. The purpose is to maintain a consistent level of transparency, fairness, and impartiality during the evaluation phase.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 21:** “Establish a period of silence for members serving in an evaluation committee. The purpose is to have members refrain from any communication with any bidder for a defined time period to maintain the integrity, confidentiality, fairness, and impartiality expected for this process.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 22:** “Develop a process to include questions for proposed evaluation committee members to complete prior to beginning the evaluation selection process. The questions will seek to identify any potential biases or disqualifying information (such as period of silence violations). Individuals will be disqualified from participating in the evaluation committee when appropriate. This These (spelling) questions will complement the evaluation committee non-disclosure statement control already in place.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 23:** “Develop a process that requires bidding vendors to disclose if they have had any contact with District employees or Board members during the period of silence. Contact also includes providing assistance in developing specifications, scope of work, presentations, or educating/ training District employees/Board members. The disclosure will be submitted as part of their bid response. Vendors will be disqualified from bidding when appropriate.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 24:** “Develop a set of criteria or requirements bid owners will follow when selecting evaluation committee members. Bid owners will select key stakeholders that possess the professional knowledge in the goods/services being sought to obtain the best value for the District.”

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

**Activity 25:** “Incorporate language on whether it is allowable to have non-employees serve in a bid evaluation committee, including a justification for having a nonemployee serve in a bid evaluation committee as opposed to having an employee serve. If allowed, expectations, including whether non-employees will abide by same policies and procedures as District

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employees, will be established and documented in the District's Procurement Manual. Ultimately the District is and will be held accountable for procurement decisions. The District can hold employees/contractors accountable for their actions, but cannot do the same for non-employees."

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented

9

**Original Recommendation:** Develop a process to handle filings of the relatively new form Certificate of Interested Parties (Form 1295). Procurement Services should follow-up on (to the best and reasonable extent possible) information listed on this form and share its results with all parties affected as early as possible in the evaluation procurement phase in case it may disqualify a vendor. This process should be included in the District's Procurement Manual.

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**Management and Leadership Response:** Agreed with the recommendation and incorporated into the CAP as activity 26 as follows:

**Activity 26:** "Develop a process to handle filings of the relatively new form Certificate of Interested Parties (Form 1295). Procurement Services will develop written procedures related to the Form 1295 to include timelines/timing when form should be submitted by vendors and reviewed by Procurement Staff. This will be incorporated into the Procurement Manual."

**Persons Responsible:** Deputy Superintendent for Finance and Operations and Executive Director for Procurement Services

**Status:** Implemented



## Exhibit A – Summary of Original Audit Results

Finding	Summary Finding
1	<p>We identified some practices that were not in accordance with public procurement best practices, which give the appearance the <u>pre-solicitation phase</u> of the Bond Program Management Advisory Services (RFQ #17-069) was not conducted in a strategic and transparent manner. We found the following:</p> <p>1.1 A needs assessment was not performed or documented for RFQ #17-069.</p> <p>1.2 Key stakeholders were not included or asked to participate in determining whether the District needed Bond Program Management Advisory Services.</p>
2	<p>During our audit, we found indicators associated with vendor favoritism, insider information, and bid tailoring which give the appearance the pre-solicitation phase of RFQ #17-069 was not conducted in an impartial and ethical manner. <u>These indicators are a warning of a potential risk and not a certain sign of improprieties.</u></p> <p>2.1 On April 24, 2017, approximately two and a half weeks before the release of RFQ #17-069, the Superintendent organized and attended a meeting titled "Meeting... (interview of oversight firm)" along with two Gafcon (RFQ #17-069 awarded vendor) representatives, a Board member, the Citizens Bond Advisory Committee (CBAC) chair, and a community member.</p> <p><i>The Superintendent stated, "I consult with vendors across many sectors about their products and services to determine how and if they will generally fit in our infrastructure and with our framework. In this particular instance, I felt it was appropriate to educate myself to specifically understand the role an oversight company would play with Jacobs and with EPISD staff."</i></p> <p>2.2 When asked if there were any discussions of a potential contract for oversight services for the EPISD Bond during this meeting, the Superintendent stated, "not that I recall, it was...generally what would a statement of work look like...what would the scope...what would they have to do to be successful...what kind of authority would they have to have...what would it look like...to try to do an oversight right...what would a day to day look like."</p> <p>2.3 A meeting with a vendor prior to the release of the RFQ can compromise the appearance of fair treatment and equal opportunity for other vendors who would like to do business with the District. The April 24, 2017 meeting gives the appearance that the vendor was favored, had insider information, and was given the opportunity to get a head start on planning and preparing their proposal for this RFQ.</p>
3	<p>The internal controls in place, outlined in the District's Procurement Services Purchasing Manual, did not identify risks which give the appearance the <u>evaluation phase</u> of RFQ #17-069 was not conducted in a transparent and impartial manner in accordance with best practices.</p> <p>3.1 An evaluation committee member, the CBAC chair, did not disclose s/he had met with one of the bidding vendors approximately seven weeks prior to the bid evaluation (i.e. the April 24, 2017 meeting). According to Procurement Services and other evaluation committee members, if s/he had disclosed that information, they would have disqualified him/her from scoring or being part of the evaluation committee.</p>

Finding	Summary Finding
	<p>3.2 By participating in the evaluation committee, the CBAC chair helped in the selection of a professional service firm. According to their charter, the CBAC can provide counsel and input to administration and the Board. However, the CBAC does not have management responsibilities and is not responsible for the selection of architects, engineers, construction managers, and such other professional service firms.</p>
4	<p>We noted a deficiency in an internal control (i.e. procedures, procurement practices) that does not violate District policies and state laws/regulations, but worth mentioning to administration in order to determine as to whether it should be addressed.</p> <p>Procurement practices do not require Procurement staff to inquire as to the role of an interested party (listed on Form 1295 Certificate of Interested Parties) <u>prior to the award phase</u> of the procurement process. Early identification (e.g., during the evaluation phase) of interested parties can help identify indicators of potential procurement improprieties.</p>



## EL PASO INDEPENDENT SCHOOL DISTRICT

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