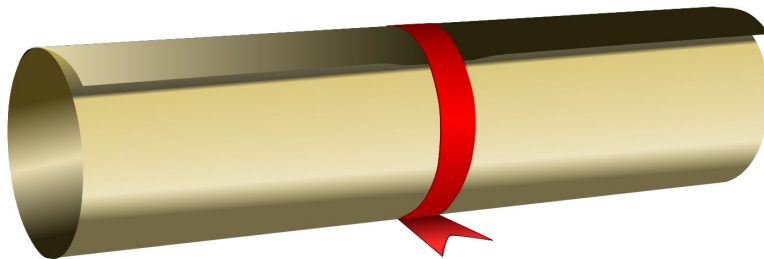




**OFFICE OF THE INSPECTOR GENERAL  
LAUREL, MARYLAND**

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**PROFESSIONAL LICENSURE  
AND CERTIFICATION COMPLIANCE AUDIT  
PRODUCTION DEPARTMENT  
UTILITY SERVICES DEPARTMENT  
ENGINEERING AND CONSTRUCTION DEPARTMENT  
HUMAN RESOURCES OFFICE  
OCCUPATIONAL HEALTH AND SAFETY OFFICE**



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**OIG PROJECT NUMBER 26-PLC-01**

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**FROM:** DAISY QIAN, AUDITOR  
OFFICE OF THE INSPECTOR GENERAL

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**DATE:** JUNE 11, 2026

**SUBJECT: OFFICE OF THE INSPECTOR GENERAL  
PROFESSIONAL LICENSURE AND CERTIFICATION COMPLIANCE AUDIT**

We have performed a compliance audit of WSSC’s professional licensure and certification program. The detailed report is attached for your review. The OIG conducted the audit in accordance with the U.S. Government Accountability Office’s *Generally Accepted Government Auditing Standards* (GAGAS).

We have already discussed with management issues of concern and their action plans are included in this report. We appreciate the assistance provided by management and other personnel. We hope the information and recommendations presented in our report are helpful.

Attachment

- cc: Corporate Secretary, (J. Montes De Oca)
- Chief of Staff, (J. DeVantier)
- Performance & Accountability Director, (H. Hagos)
- Deputy General Manager Mission Support, (D. McDonough) Deputy
- General Manager Operations, (A. Tesfaye)
- Director of Production, (B. Thompson)
- Director of Utility Services, (G. Diaz)
- Chief Engineer, (A. Wong)
- Chief of Human Resources Office, (V. Farrar)
- Chief of Health & Safety, (D. Gill)
- Division Manager, Performance & Accountability, (W. Morris)

# EXECUTIVE SUMMARY



## Why The OIG Did This Audit

In accordance with the Washington Suburban Sanitary Commission's (WSSC) Office of the Inspector General's (OIG) Fiscal Year 2026 Risk-Based Work Plan and the authority granted to the OIG pursuant to Public Utilities Article ("PUA"), § 17-605 (a)(6) of the Annotated Code of Maryland, the OIG conducted a compliance audit of the professional licensure and certification program. The OIG conducted the audit in accordance with the U.S. Government Accountability Office's *Generally Accepted Government Auditing Standards*.

WSSC requires certain employees to maintain professional licenses and certifications based on their assigned duties and positions.

Maintaining valid professional licenses and certifications is essential to ensuring employees are qualified to perform specialized duties, comply with applicable regulatory requirements, support safe, reliable, effective utility operations, and maintain public confidence.

## Strategic Alignment

This report addresses WSSC's Strategic Priority: Workforce Development & Culture.

## OIG Contact Information

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## *The Audit Highlights Opportunities to Strengthen Professional Licensure and Certification Oversight*

### What the OIG Found

The objectives of this audit were to provide management with an independent and objective assessment of the professional licensure and certification program. To accomplish the objectives, the OIG reviewed the positions within the Production, Utility Services, and Engineering & Construction departments that required professional licenses or certifications during the period of July 1, 2024, to June 30, 2025. OIG also assessed whether those licenses and certifications remained valid during audit fieldwork conducted in March 2026.

Based on the audit work performed, the OIG determined that WSSC has implemented processes to administer its professional licensure and certification program. The audit also identified opportunities to strengthen controls related to credential verification, monitoring, documentation, and policy governance. Specifically, the OIG identified the following deficiencies:

- Failure to conduct required FMCSA Clearinghouse queries for CDL drivers;
- Incomplete driver qualification files;
- Failure to maintain continuous CDL MEC compliance;
- Failure to consistently verify and maintain active operator certifications;
- Informal and inconsistently applied processes governing the use of current job descriptions;
- Lack of standardized HR controls for verifying professional licenses and certifications; and
- Lack of formalized departmental controls to monitor license and certification renewal requirements.

The OIG presented the following recommendations to WSSC's management to improve the administration and oversight of professional licensure and certification:

- Strengthen Clearinghouse compliance controls;
- Strengthen driver qualification file controls;
- Establish and enforce CDL MEC monitoring controls;
- Strengthen certification tracking and verification controls;
- Strengthen controls over use of current job description;
- Establish standardized HR controls for licensure and certification; and
- Establish formal license and certification monitoring controls.

WSSC management agrees with each of the OIG's recommendations, and where applicable, presents operational improvements or provides corrective action plans with anticipated due dates. OIG accepts management's response and will track the status of management's remediation plans.



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## **Background**

In accordance with the Washington Suburban Sanitary Commission's (WSSC) Office of the Inspector General's (OIG) Fiscal Year (FY) 2026 Risk-Based Work Plan and the authority granted to the OIG pursuant to Public Utilities Article ("PUA"), § 17-605 (a)(6) of the Annotated Code of Maryland, the OIG conducted a compliance audit of the professional licensure and certification program. The OIG conducted the audit in accordance with the U.S. Government Accountability Office's *Generally Accepted Government Auditing Standards (GAGAS)*.

WSSC provides drinking water and wastewater services to customers throughout Montgomery and Prince George's Counties, Maryland. To support its operations and comply with applicable legal and regulatory requirements, WSSC requires certain employees to maintain professional licenses and certifications based on their assigned duties and positions. These credentials include, but are not limited to, water and wastewater operator or superintendent certifications, professional engineering licenses, master plumber and gasfitter licenses, commercial driver's license (CDL), certain medical qualifications, water sampler certification, and other specialized licenses or certifications required for operational, technical, and safety-related functions. Maintaining valid professional licenses and certifications is essential to ensuring employees are qualified to perform specialized duties, comply with applicable regulatory requirements, support safe, reliable, effective utility operations, and maintain public confidence.

The Human Resources Office (HRO), in coordination with departments engaged in operational functions, established job descriptions that identify the required licensure and certification qualifications for applicable positions. Through the hiring process, WSSC communicates applicable licensure and certification requirements through job postings, offer letters, and related employment documentation. Departments are responsible for monitoring and tracking employee license and certification renewals for positions within their respective departments.

## **Objective**

The objectives of this audit were to provide management with an independent and objective assessment of the professional licensure and certification program. Specifically, the OIG:

- a) verified whether employees in positions requiring professional licenses or certifications maintained active and valid credentials;
- b) assessed whether WSSC has effective monitoring and tracking systems in place to ensure timely renewals of licenses and certifications; and
- c) evaluated the adequacy of policies governing verification of credentials at the time of hiring and throughout employment.

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### **Scope and Methodology**

The scope of this audit included positions within the Production, Utility Services, and Engineering & Construction Departments that required professional licenses or certifications during the period of July 1, 2024, to June 30, 2025. The OIG also assessed whether those licenses and certifications remained valid during audit fieldwork conducted in March 2026.

To achieve the audit's objective, the OIG performed the following methods and procedures:

- Reviewed applicable laws, regulations, policies, procedures, standards, and internal documentation to establish audit criteria;
- Interviewed personnel from the HRO, Production Department, Utility Services Department, Engineering and Construction Department, and Occupational Health and Safety Office to obtain information and an understanding of their respective professional licensure and certification programs;
- Identified WSSC positions requiring professional licenses or certifications to determine the population subject to audit testing;
- Reviewed job descriptions and qualification requirements to identify required licenses and certifications for applicable positions;
- Obtained employee listings and supporting records to identify employees occupying positions requiring professional licenses or certifications;
- Verified whether sampled employees possessed the required credentials for their assigned positions;
- Verified whether required credentials were valid at the time of hire and remained active during employment, including during audit fieldwork, where applicable;
- Independently verified credentials with issuing authorities, licensing boards, and regulatory databases to confirm credential validity and status, when available;
- Reviewed hiring and promotion documentation to determine whether management verified required credentials during the personnel action process;
- Evaluated documentation of management's monitoring activities to assess controls over license and certification renewals;
- Reviewed the Learning Management System (system for tracking employee training and certification records) and other tracking spreadsheets and related records, to assess how departments monitor, maintain, and verify employee licenses and certifications;
- Reviewed driver qualification files, Commercial Driver's License (CDL) medical certification records, and Federal Motor Carrier Safety Administration (FMCSA) Clearinghouse query documentation to assess compliance with applicable CDL-related requirements (licensing, medical certification and driver eligibility); and

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- Assessed the adequacy and effectiveness of policies, procedures, and internal controls established to verify, monitor and maintain compliance with professional licensure and certification requirements.

GAGAS requires the OIG to plan and perform the audit to obtain sufficient, appropriate evidence that will provide a reasonable basis for our findings and conclusions based on the audit objectives. Accordingly, based on the audit's scope and objectives, and the evidence obtained, we provide a reasonable basis for our findings and conclusions stated herein.

### **Conclusion**

Based on the audit work performed, the OIG determined that WSSC has implemented processes to administer its professional licensure and certification program. The audit also identified opportunities to strengthen controls related to credential verification, monitoring, documentation, and policy governance. Specifically, the OIG identified the following deficiencies:

- Failure to conduct required FMCSA Clearinghouse queries for CDL drivers;
- Incomplete driver qualification files;
- Failure to maintain continuous CDL medical examiner certification (MEC) compliance;
- Failure to consistently verify and maintain active operator certifications;
- Informal and inconsistently applied processes governing the use of current job descriptions;
- Lack of standardized HR controls for verifying professional licenses and certifications; and
- Lack of formalized departmental controls to monitor license and certification renewal requirements.

The OIG appreciates the cooperation and acknowledges the efforts of the HR Office, Production Department, Utility Services Department, Engineering and Construction Department, Occupational Health and Safety Office, and other personnel who contributed to this audit despite their demanding schedules. Their collaboration in providing information and addressing inquiries was invaluable in ensuring a comprehensive audit.

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**FINDINGS, MANAGEMENT RESPONSES AND ACTION PLANS**

**Finding 1: Failure to Conduct Required FMCSA Clearinghouse Queries for CDL Drivers**  
**Risk Rating: HIGH**

Under 49 C.F.R. Part 382, Commercial Motor Vehicle (CMV) operators must comply with federal drug and alcohol testing requirements designed to ensure that they can safely perform safety-sensitive functions.<sup>1</sup> Employers such as WSSC are responsible for ensuring that CDL drivers performing safety-sensitive duties, including driving, operating, or controlling a CMV, comply with all applicable federal drug and alcohol testing requirements.

To promote public safety and ensure compliance with federal drug and alcohol testing requirements applicable to CDL drivers, FMCSA established the Drug and Alcohol Clearinghouse as a centralized database for tracking drug and alcohol program violations and driver eligibility information. Under 49 C.F.R. § 382.701 (a) and (b), effective January 6, 2020, employers are required to:

- Conduct a full pre-employment query of the Clearinghouse to confirm the driver has no unresolved drug or alcohol violations; and
- Conduct at least one annual Clearinghouse query for each CDL driver subject to controlled substance and alcohol testing.

A driver cannot be hired to perform, or permitted to continue performing, safety-sensitive functions involving a CMV unless the employer verifies Clearinghouse compliance. These requirements serve as a federal prerequisite and condition of employment for CDL drivers performing safety-sensitive functions, and the failure to perform the required queries renders a driver unqualified under federal law.

Based on the review, the audit identified that the WSSC's Occupational Health & Safety Office (OHS) did not conduct required Clearinghouse queries for approximately 300 CDL drivers from the effective date of mandatory compliance, January 6, 2020, through March 31, 2026. Specifically:

- Pre-employment queries were not performed for CDL drivers prior to allowing them to perform safety-sensitive functions; and
- Annual queries were not conducted for CDL drivers as required.

According to OHS management, following the January 6, 2020, effective date of the FMCSA Clearinghouse requirements, competing priorities, resource constraints, and periods of organizational change affected the implementation and oversight of the related compliance program, resulting in requirements not being fully addressed through March 31, 2026.

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<sup>1</sup> See 49 C.F.R Part 382 Controlled Substances and Alcohol Use and Testing.

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Failure to ensure Clearinghouse compliance undermines both regulatory compliance and public safety by increasing the risk that drivers with unresolved drug or alcohol violations perform safety-sensitive functions involving CMVs. Such noncompliance also exposes the Commission to civil penalties under 49 U.S.C. § 521(b) and creates significant operational and liability risk.<sup>2</sup>

**Recommendation 1: Strengthen Clearinghouse Compliance Controls**

The OIG recommends that OHS management comply with Clearinghouse requirements by establishing and implementing formal written procedures that align with FMCSA Clearinghouse requirements, including both pre-employment and annual queries for all CDL drivers prior to performing safety-sensitive functions. The OIG also recommends that OHS management immediately remediate this deficiency by conducting all overdue Clearinghouse queries for current CDL drivers and ensuring complete and appropriate supporting documentation evidencing compliance. In addition, the OIG further recommends that OHS management implement a monitoring and supervisory review process to track Clearinghouse query completion, verify compliance, and ensure timely corrective action where deficiencies are identified. Implementing these recommendations will strengthen regulatory compliance, enhance oversight of CDL drivers, and reduce operational and liability risks.

**Management Response and Action Plan (including anticipated due date):**

**Response to Recommendation: Establish and Implement Formal Written Procedures Aligned with FMCSA Clearinghouse Requirements**

OHS concurs with this recommendation. Prior to the commencement of the OIG audit, OHS had independently identified gaps within the CDL program and proactively initiated efforts to address them. As part of this effort, OHS communicated FMCSA Clearinghouse requirements through in-person training delivered to all CDL drivers between 08/12/2025 and 11/03/2025. Following the training, OHS facilitated the registration for nearly all the 300 CDL drivers in the FMCSA Clearinghouse system.

During this process, OHS identified additional deficiencies in licensing record tracking within the legacy APMIS system, an outdated, unsupported Microsoft Access-based platform. To ensure accurate and comprehensive tracking of all driver licenses, including CDLs, OHS partnered with the Office of Information Technology to develop a modern, application-based licensing tracking system. This new OHS Driver's Licensing Application went live on 01/07/2026 and reflects OHS's broader strategic commitment to digital transformation and enhanced data integrity.

OHS is currently working with the Human Resources Office (HRO) and the Office of Procurement to expand the scope of services under the existing pre-employment background check

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<sup>2</sup> Under 49 U.S.C. § 521(b), the FMCSA is authorized to pursue enforcement actions and assess civil monetary penalties against persons including employers for violations of applicable federal motor carrier safety regulations.

## **PROFESSIONAL LICENSURE AND CERTIFICATION COMPLIANCE AUDIT**

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vendor contract to include Previous Employment History verification, Drug and Alcohol Clearinghouse pre-employment queries, and Motor Vehicle Records checks and ongoing monitoring services the vendor currently provides but which are not included under the existing contract. Once the updated contract scope is finalized, OHS will develop and formalize comprehensive written procedures governing both pre-employment and annual Clearinghouse query requirements for all CDL drivers.

**Anticipated Completion Date: December 31, 2026**

### **Response to Recommendation: Immediately Remediate Overdue Clearinghouse Queries and Ensure Complete Supporting Documentation**

OHS concurs with this recommendation. On April 20, 2026, OHS notified all CDL drivers via the Safety Department email that annual Clearinghouse queries would be conducted on April 23, 2026. The annual query cycle has since been completed. There are fourteen (14) CDL drivers who did not provide consent, had a drug or alcohol violation, or whose current job descriptions no longer require CDL operation. Those CDL drivers have had their licenses downgraded accordingly through the OHS Driver's Licensing Application. Supporting documentation of query completion and resulting actions is maintained within the FMSCA Drug and Alcohol Clearinghouse and the OHS Driver's Licensing Application.

**Status: Completed — April 23, 2026**

### **Response to Recommendation: Implement a Monitoring and Supervisory Review Process to Track Query Completion and Ensure Timely Corrective Action**

OHS concurs with this recommendation. The newly implemented application-based licensing tracking system provides the foundational infrastructure for ongoing monitoring of CDL licensing compliance. In the interim period, OHS will coordinate with HRO to ensure timely notification of any newly hired CDL drivers so that pre-employment Clearinghouse queries are conducted prior to the performance of safety-sensitive functions. Upon finalization of the expanded vendor contract, OHS will formalize the end-to-end compliance monitoring process, including supervisory review procedures and defined corrective action protocols, as part of the comprehensive written procedures referenced in the response to Recommendation 1.

**Anticipated Completion Date: December 31, 2026**

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**Finding 2: Incomplete Driver Qualification Files**  
**Risk Rating: HIGH**

Federal regulations require employers to maintain a complete Driver Qualification (DQ) file for each CMV operator. Pursuant to 49 C.F.R. § 391.51, WSSC must maintain complete and accurate DQ files for each CDL driver containing the following:

- Driver's completed employment application (§ 391.21);
- Motor Vehicle Records (MVRs) from each state of licensure (§ 391.23);
- Road test certificate or equivalent CDL skills test documentation (§ 391.31);
- Annual MVR review and certification of violations (§ 391.25);
- Copy of current Medical Examiner's Certificate (§§ 391.41–391.45); and
- Documentation of previous employer safety performance history (§ 391.23(e))

The DQ file serves as the official federal compliance record demonstrating that a driver met applicable qualification requirements at the time of hire and continued to satisfy those requirements throughout the course of employment. Missing, incomplete, or expired documentation increases the risk of noncompliance with federal recordkeeping and driver qualification requirements and reflects weaknesses in internal controls.

Based on the sample of 121 employees required to hold CDL licensure, audit testing identified incomplete DQ files that did not meet applicable federal requirements. Specifically:

- None of the sampled employees had documentation of previous employer safety performance history maintained in their DQ files, and the OIG did not find evidence that management requested or reviewed this information;
- None of the sampled employees' DQ files contained documentation evidencing completion of the required annual MVR reviews and driver certification of violations; and
- Management did not obtain MVRs from 7 employees with out-of-state licensure.

According to OHS management, competing priorities, resource constraints, and periods of organizational change affected management's ability to establish and maintain a driver qualification file compliance process that met federal requirements. As a result, management relied on existing background check procedures rather than a dedicated process designed to satisfy all federal DQ file documentation requirements.

Incomplete DQ files prevent management from confirming that drivers met qualification requirements at the time of hire and remained qualified during their employment at WSSC. In the absence of complete supporting documentation, WSSC cannot demonstrate compliance with FMCSA regulations or ensure that drivers with prior violations, suspensions, or disqualifying events were appropriately reviewed before operating CMVs. These deficiencies increase the risk that CDL drivers with prior violations, suspensions, or disqualifying events were not identified and continued operating CMVs without the required annual review and certification. As a result, WSSC is exposed to increased

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safety, regulatory, and liability risks, including potential federal enforcement actions and civil penalties under 49 U.S.C. § 521(b).

**Recommendation 2: Strengthen Driver Qualification File Controls**

The OIG recommends that OHS management establish, implement and enforce a standardized DQ file process that aligns with applicable regulatory requirements for both pre-employment and ongoing employment compliance. This process should include obtaining and retaining MVRs from each state of licensure, including out-of-state jurisdictions, before allowing drivers to operate CMVs.

OIG also recommends that OHS management request, review, and retain the previous employer's safety performance history documentation for all CDL drivers, perform and document annual MVR reviews and driver certifications of violations for each CDL driver, and implement supervisory review controls to verify that DQ files are complete, accurate, current, and maintained records in a consistent and auditable format. Implementing these recommendations will strengthen compliance with FMCSA driver qualification requirements, improve oversight of CDL driver records, and reduce safety, regulatory, and liability risks.

**Management Response and Action Plan (including anticipated due date):**

**Response to Recommendation: Establish, Implement, and Enforce a Standardized Driver Qualification File Process**

OHS concurs with this recommendation. OHS recognizes the importance of maintaining complete, accurate, and regulatory-compliant Driver Qualification (DQ) files for all CDL drivers and is committed to establishing a standardized process that aligns with applicable FMCSA requirements. OHS has assessed the current state of DQ file maintenance and is taking a forward-looking approach to achieving full compliance in a practical and sustainable manner.

**Approach to Historical Records**

OHS acknowledges that retroactively reconstructing complete DQ files for the entire current CDL driver population is not operationally feasible, given that many drivers have tenures spanning decades with the agency. Attempting to obtain historical documentation, such as previous employer safety performance history, for long-tenured employees would place a significant administrative burden on the agency while yielding limited safety or compliance value. Accordingly, OHS will focus its remediation efforts on establishing a fully compliant DQ file process for all new CDL drivers and ensuring ongoing compliance requirements are met for current drivers moving forward.

**Pre-Employment Driver Qualification File Requirements**

OHS is currently working with HRO and the Office of Procurement to expand the scope of services under the existing pre-employment background check vendor contract to include Motor Vehicle Records checks and monitoring, Previous Employment History verification, and Drug and

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Alcohol Clearinghouse pre-employment queries. If the vendor expansion is successfully executed, DQ file compilation and management for new CDL drivers will be incorporated into the pre-employment onboarding workflow, ensuring that MVRs from all applicable states of licensure, including out-of-state jurisdictions, and previous employer safety performance history documentation are obtained, reviewed, and retained prior to allowing any new driver to operate a CMV.

In the event that the vendor contract expansion is not feasible, OHS will leverage the OHS Driver's Licensing Application to house and manage DQ file documentation, ensuring that required records are captured, stored, and accessible in a consistent and auditable format.

For the current CDL driver population, OHS will implement the following ongoing compliance requirements as part of the formalized written procedures under development:

- **Annual MVR Reviews:** OHS will conduct and document annual MVR reviews for all CDL drivers, utilizing either the pre-employment background check vendor or the Safety Licensing application to record and retain results.
- **Supervisory Review Controls:** OHS will establish supervisory review controls to verify that DQ files are complete, accurate, current, and maintained in a consistent and auditable format, with defined roles and responsibilities documented in the formal written procedures.

As part of the comprehensive written procedures anticipated for completion by December 31, 2026, OHS will clearly define the roles and responsibilities of OHS program staff, supervisors, and HRO liaisons with respect to DQ file initiation, maintenance, and periodic review. Procedures will establish documentation standards to ensure records are retained in a format that supports regulatory audits and internal oversight reviews.

**Anticipated Completion Date: December 31, 2026**

**Status of Immediate Actions: In Progress**

OHS is actively engaged with HRO and the Office of Procurement to finalize the vendor contract expansion. In the interim, OHS will coordinate with HRO to ensure DQ file requirements are incorporated into the onboarding process for any new CDL drivers. The OHS Driver's Licensing Application remains available as an alternative or supplementary records management solution should the vendor pathway not be fully realized within the required timeframe.

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**Finding 3: Failure to Maintain Continuous CDL MEC Compliance**  
**Risk Rating: HIGH**

Under 49 C.F.R. Parts 383 and Part 391, WSSC is required to ensure that employees operating CMVs maintain a valid CDL, including all required endorsements, as well as a current FMCSA Medical Examiner's Certificate (MEC).<sup>3</sup> Federal regulations prohibit employers from allowing drivers to operate CMVs unless they satisfy applicable medical and physical qualification standards under FMCSA.

A MEC is generally valid for up to 24 months, unless a shorter certification period is imposed due to medical conditions necessitating more frequent evaluation and monitoring. Pursuant to 49 C.F.R. § 391.45, drivers must undergo reexamination prior to the certificate's expiration to maintain continuous qualification to operate a CMV.

Federal regulations place affirmative responsibilities on employers. Specifically, WSSC must:

- Ensure that CDL drivers possess a current MEC before operating a CMV;
- Maintain MEC documentation as part of each driver's qualification file;
- Track expiration dates and prevent drivers from operating CMVs once medical certification lapses; and
- Ensure that CDL records reflect current medical qualification status, as required by 49 C.F.R. § 383.71(h).

Based on the testing sample of 121 employees who were required to hold CDL licensure with a valid MEC, the audit identified 18 instances where CDL drivers did not maintain compliance with CDL and/or MEC requirements.

The exceptions included:

- Drivers experienced CDL downgrades due to expired MECs, creating lapses between MEC expiration dates and subsequent renewal effective dates. During these periods, the drivers did not maintain the qualifications required for positions designated CDL-required;
- Management did not receive or document timely notification of CDL status changes and identified these changes only after delayed or ad hoc reviews; and,
- Management did not consistently track MEC expiration dates or enforce requirements to prevent drivers from operating CMVs or remaining in CDL-required positions.

WSSC management relied primarily on employee self-reporting to identify MEC expirations and CDL status changes rather than implementing proactive management-level monitoring and independent verification.

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When drivers do not meet federal medical qualification requirements, the deficiency increases the risk of noncompliance with applicable federal regulations and exposes WSSC to potential regulatory penalties, operational disruptions, liability, and public safety risks. In addition, the lack of timely monitoring and enforcement may allow continued noncompliance and weaken control over driver qualification requirements.

**Recommendation 3: Establish and Enforce CDL MEC Monitoring Controls**

The OIG recommends that OHS management establish and implement a formal process to ensure continuous compliance with CDL medical certification requirements. This process includes the implementation of a centralized tracking mechanism to monitor MEC status and expiration dates for all CDL drivers, as well as routine supervisory review and verification of certification status.

The OIG further recommends that OHS require verification of a valid MEC before assigning or allowing drivers to operate CMVs or remain in CDL-required positions. Additionally, the OIG recommends that OHS management clearly define and document roles and responsibilities for compliance monitoring and establish procedures for the timely reporting and review of CDL status changes, including downgrades, suspensions, or expirations. Implementing these recommendations will strengthen oversight of CDL medical certification compliance, improve accountability and monitoring controls, and reduce associated safety, regulatory, operational and liability risks.

**Management Response and Action Plan (including anticipated due date):**

**Response to Recommendation: Establish and Implement a Formal Process for Continuous Compliance with CDL Medical Certification Requirements**

OHS concurs with this recommendation. Prior to the issuance of this finding, OHS had already identified the need for a more robust and centralized approach to tracking CDL Medical Examiner's Certificate (MEC) compliance and had taken significant steps to address this deficiency through the development and deployment of the application-based Safety Licensing system referenced in the response to the preceding recommendation.

The new OHS Driver's Licensing Application serves as the centralized tracking mechanism for MEC status and expiration dates for all CDL drivers. Medical Examiner's Certificates are now uploaded directly into the system, providing a single authoritative source of record for certification status across the CDL driver population. The application has been configured to automatically generate notification emails to drivers in advance of MEC expiration dates, ensuring drivers and supervisors have sufficient lead time to take corrective action. Additionally, the system generates automated notifications when a CDL downgrade is triggered as a result of an expired or invalid MEC, creating a documented, auditable record of all status changes.

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<sup>3</sup> 49 C.F.R. Parts 383 and 391 establish federal requirements governing CDL qualifications, driver medical certification standards, employer oversight responsibilities, and DQ file maintenance for CMV operators.

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**Verification Prior to CMV Operation**

The OHS Driver's Licensing Application provides real-time visibility into driver certification status, enabling supervisors and program managers to verify the validity of a driver's MEC prior to assignment to CMV operations or CDL-required positions. OHS will incorporate this verification requirement into the formal written procedures currently under development, as referenced in the response to Recommendation 1, to ensure this step is consistently applied and documented.

As part of the formal written procedures anticipated for completion by December 31, 2026, OHS will clearly define and document the roles and responsibilities of all parties involved in MEC compliance monitoring, including OHS program staff, supervisors, and HRO liaisons. These procedures will establish clear protocols for the timely reporting and review of CDL status changes, including downgrades, suspensions, expirations and will define the escalation and corrective action steps required when a driver's certification lapses or is otherwise rendered invalid.

**Anticipated Completion Date: December 31, 2026**

**Status of Immediate Actions: Completed**

The deployment of the OHS Driver's Licensing Application, including MEC upload capability, automated expiration notifications, and automated downgrade notifications, has been completed and is currently operational. These system capabilities directly address the centralized tracking and routine supervisory review components of this recommendation and represent a significant and sustainable improvement to OHS's compliance monitoring posture.

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**Finding 4: Failure to Consistently Verify and Maintain Active Operator Certifications**  
**Risk Rating: MEDIUM**

The State of Maryland requires individuals who operate, supervise, or exercise responsible charge over waterworks and wastewater systems to maintain appropriate operator certification in accordance with Maryland Code, Environment Article, §§ 12-101–12-203, and the implementing regulations set forth in COMAR 26.06.01 *et seq.*<sup>4</sup> These requirements generally apply to operational and supervisory personnel, such as water treatment plant operators, wastewater treatment plant operators, chief operators, shift supervisors, and other employees responsible for the operation or regulatory compliance of waterworks and wastewater systems.

Under COMAR 26.06.01.05 (A), “a person may not operate a waterworks, wastewater works, or industrial wastewater works unless the person is certified by the Board [Maryland Department of the Environment Board of Waterworks and Waste System Operators].” Further, operators must maintain certification through timely renewal and completion of continuing education. Any lapse, expiration or failure to maintain certification constitutes noncompliance with COMAR 26.06.01 and Md. Code Ann., Env’t §§ 12-101–12-203, regardless of whether the employee previously held the credential. Because COMAR 26.06.01 establishes operator certifications that are time-limited and subject to periodic renewal and continuing education requirements, WSSC has an affirmative obligation to maintain systems capable of tracking certification status and renewal deadlines.

In addition, Md. Code Ann., State Government Article (SGA), §10-226 (b) provides that a license does not expire if the licensee submits a renewal application at least two calendar weeks prior to expiration and is under Board review. Employees performing duties requiring licensure must maintain a valid certification status or meet the statutory “safe harbor” provision under SGA, §10-226 (b). Management is responsible for maintaining accurate, complete and current licensure and certification records.

Additionally, WSSC job descriptions require certain employees to obtain and maintain valid operator certifications as a condition of employment and performance of assigned duties.

The OIG reviewed a sample of 45 employees from the Production Department and 58 from the Utility Services Department to assess compliance with operator certification requirements. Audit testing identified two exceptions for the Production Department and three exceptions within the Utility Services Department. The OIG also noted that certification tracking and monitoring processes are decentralized and are not standardized across departments.

In total, the audit identified five exceptions where operator certification status was not maintained as active or could not be verified. These exceptions included expired certifications, untimely or incomplete submissions, and instances where sufficient documentation was unavailable to confirm continuous certification status. In each instance, employees continued performing duties requiring operator certification during periods when certification status was inactive, expired or otherwise unverified. The specific exceptions identified are as follows:

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- Production Department:
  - An employee's operator certification application could not be verified in the Maryland Board of Waterworks and Waste Systems Operators (Board) records, and there was no documentation that the employee had obtained a valid certification.
  - An employee's renewal application was submitted after the certification had expired and remained unapproved. The renewal could not be verified, and during this period, the employee continued performing duties requiring an active operator certification.
- Utility Services Department:
  - An employee did not obtain the required certification within the prescribed timeframe and did not meet the certification requirements while performing duties requiring certification.
  - An employee's operator certification expired, and the renewal application was not received by the Board due to submission-related issues. A reinstatement application was later submitted following the lapse in certification.
  - An employee's renewal application was submitted after expiration but remained incomplete.

The WSSC Learning and Development Division records key certification data in the Learning Management System (LMS) for employees progressing through career ladder and flexible work advancement programs within the Production and Utility Services departments. The LMS, however, does not maintain or store supporting certification documentation.

For certification outside of these programs, Production Department employees are expected to provide certification updates to the Learning and Development Division, while divisions within the Utility Services Department maintain separate manual tracking spreadsheets. These decentralized processes rely heavily on manual reporting and updates that are not consistently provided, communicated, verified, or centrally monitored.

Further, there is no centralized system of records to ensure certification information is complete, accurate, and consistently maintained across departments. As a result, certification records are incomplete, inconsistent, and unreliable for effective monitoring and verifying ongoing compliance requirements.

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<sup>4</sup> COMAR 26.06.01 *et seq.*, establishes the regulatory framework governing Waterworks and Wastewater Systems Operators in Maryland.

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When employees perform duties without verified or valid credentials, it increases the risk of noncompliance with Maryland statutory and regulatory requirements and can expose the Commission to regulatory enforcement actions by MDE. Additionally, lapses in required certifications, even temporarily, can increase operational and public health risks and undermine the effectiveness and reliability of licenses and certifications compliance controls.

### **Recommendation 4: Strengthen Certification Tracking and Verification Controls**

The OIG recommends that WSSC management establish and implement a centralized, standardized process for tracking and verifying operator certifications, monitoring certification status and renewal deadlines, processing renewal documentation, and maintaining a complete and accurate supporting records within a reliable system of record. The OIG further recommends that management implement monitoring and supervisory controls designed to prevent or restrict employees from performing certification-required duties when certification status is inactive, expired, or otherwise cannot be verified. Implementing these recommendations will strengthen oversight of certification compliance, improve the accuracy and reliability of certification records, and reduce operational, regulatory, and public health risks.

### **Management Response and Action Plan (including anticipated due date):**

Management agrees with the recommendation and recognizes the importance of maintaining accurate, complete, and verifiable operator certification records to ensure compliance with Maryland statutory and regulatory requirements. While existing processes are in place to track certifications associated with career ladder and flexible worker programs, the audit identified opportunities to strengthen consistency, centralization, and oversight across departments.

Management agrees with the recommendation and acknowledges the certification exceptions identified during the audit. While management concurs that improvements to certification tracking and verification processes are warranted, additional context is noted for the two Production Department exceptions. In one instance, delays in certification renewal resulted from ongoing coordination with the Maryland Department of the Environment (MDE) to determine the appropriate certification status and application path following examination activities. In another instance, renewal documentation was submitted by WSSC within the required timeframe and supporting evidence of submission was provided during the audit. Although confirmation of receipt could not be independently verified through available MDE records at the time of audit testing, the certification has subsequently been issued by MDE, providing evidence that the renewal application was ultimately received and processed. Management has nevertheless included both instances in its evaluation of opportunities to strengthen certification tracking, documentation retention, and verification controls.

The Production Department and Utility Services Department will work collaboratively to develop and implement a standardized certification tracking and verification process. This process will include clearly defined roles and responsibilities for certification monitoring, renewal tracking, documentation retention, and verification of active certification status. Management also intends for the Commission's

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future Learning Management System (LMS) to serve as the centralized system of record for certifications and licensures, including the ability to maintain supporting documentation, monitor renewal deadlines, and improve reporting and compliance oversight capabilities.

In addition, management will review and strengthen supervisory controls to ensure employees performing certification-required duties maintain valid and verifiable certifications. Corrective actions may include periodic compliance reviews, enhanced monitoring procedures, and standardized escalation processes for certifications approaching expiration or identified as inactive, expired, or otherwise unverified.

Management anticipates completing the development and implementation of an initial standardized certification tracking and verification process, including defined roles and responsibilities, documentation requirements, periodic compliance reviews, and supervisory controls, by December 31, 2026.

Management anticipates implementing a new Learning Management System by June 30, 2027. Following system selection and implementation, management will evaluate and refine certification tracking workflows and processes to align with the capabilities of the new system. Certification and licensure tracking functionality, including centralized recordkeeping, document retention, reporting capabilities, automated monitoring where feasible, and final standardized workflows and procedures, is anticipated to be fully implemented by December 31, 2027.

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**Finding 5: Informal and Inconsistently Applied Processes Governing the Use of Current Job Descriptions**  
**Risk Rating: MEDIUM**

In accordance with the U.S. Government Accountability Office Standards for Internal Control in the Federal Government (Green Book), Principle 12, management should implement control activities through documented policies and procedures and periodically review them for continued relevance and effectiveness.<sup>5</sup>

WSSC job descriptions define the minimum qualifications for positions, including required licenses, certifications and any applicable timeframe for obtaining such credentials. Human Resources Office (HRO) relies on the most current, approved job descriptions when preparing job postings and offer letters to ensure position requirements are accurately communicated to applicants and selected candidates.

The audit disclosed that HRO used an informal and undocumented process for incorporating current job descriptions into recruitment documents, and the process was not consistently followed. In addition, HRO did not consistently perform a final verification review before recruitment documents were issued. Specifically, the OIG identified one job posting in which the HRO used an outdated job description that omitted a required operator certification included in the approved version. Consequently, the corresponding offer letter also failed to communicate the requirement that the selected candidate obtain the operator certification within the specified timeframe.

The audit further determined that responsibilities for updating and applying job descriptions are not clearly defined, reinforced, or verified during personnel transitions. As a result, the process lacked sufficient controls to ensure that recruitment documents consistently reflected current position requirements.

The use of an outdated job description and the omission of licensure certification requirements from recruitment increases the risk that applicants and selected candidates cannot receive complete and accurate information regarding required qualifications and compliance obligations. This increases the risk that candidates are selected without awareness of required qualifications and that employees do not meet or obtain required licensure in a timely manner. In addition, the absence of standardized verification controls increases the likelihood that such errors will recur when future job description revisions are implemented.

**Recommendation 5: Strengthen Controls Over Use of Current Job Description**

The OIG recommends that HRO management formalize and document standardized procedures for ensuring that current and approved job descriptions are consistently used in the preparation of job postings and offer letters. The OIG also recommends that HRO management clearly define and communicate roles and responsibilities for updating, applying, reviewing, and verifying job descriptions, including during personnel transitions and staffing changes.

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In addition, the OIG further recommends that HRO management implement a documented final verification step to confirm that job postings and offer letters reflect the current, approved job description, including required licenses, certifications, and applicable timeframe, before issuance. Implementing these recommendations will strengthen controls for communicating licensure and certification requirements, improve the accuracy and consistency of recruitment documentation, and help ensure that employees obtain required credentials within established timeframes.

**Management Response and Action Plan (including anticipated due date):**

HRO management agrees with the findings and will take the following actions to strengthen controls over job descriptions, job postings, and offer letters.

1. HRO will create and implement internal operating procedures (IOPs) to establish the process for verifying the latest approved job descriptions that are used when preparing job postings and offer letters.
2. The IOPs will define roles and responsibilities, inclusive of final verification step.
3. The IOPs will be completed by **October 31, 2026**.

These actions will improve the accuracy and consistency of recruitment documentation, enhance communication of licensure and certification requirements, and help ensure that employees obtain required credentials within established timeframes.

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<sup>5</sup> See U.S. Government Accountability Office, *Standards for Internal Control in the Federal Government* (Green Book), GAO-25-107721, Principle 12 (2025 rev.), <https://www.gao.gov/products/gao-25-107721> (last visited April 29, 2026).

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**Finding 6: Lack of Standardized HR Controls for Verifying Professional Licenses and Certifications**  
**Risk Rating: MEDIUM**

Federal, state, and professional licensing authorities, including the MED, Maryland Department of Labor, and other applicable licensing boards, require individuals performing regulated duties to maintain valid licenses or certifications, renew such credentials in a timely manner, and meet continuing education or competency requirements. Individuals who do not maintain active credentials may not lawfully perform regulated duties requiring licensure or certification.

According to the Green Book, GAO-25-107721, ¶¶ 10.03–10.04, 12.01–12.03, management is responsible for designing and implementing control activities that respond to risks, including human capital and compliance-related control activities, through documented policies and procedures that clearly define responsibilities, required actions, and documentation requirements.

WSSC job descriptions for certain positions require employees to possess specific licenses or certifications at the time of hire or within a defined timeframe after hire, promotion, or transfer. These requirements establish minimum qualifications and require the HRO and hiring departments to verify that candidates meet applicable job requirements and to retain documentation supporting such verification.

The audit disclosed that HRO had not established standardized controls for verifying and retaining documentation of required licenses and certifications for employees at the time of hire, promotion, transfer, or throughout employment. Specifically, HRO had not developed procedures aligned with applicable federal, state, and professional licensing requirements that define verification requirements, assign responsibilities between HRO and hiring departments, or establish documentation retention standards for credential verification. During testing of 82 employees hired, promoted, or transferred, the audit identified four instances in which required licenses or certifications were not verified, and supporting documentation was not retained.

HRO currently relies on informal, decentralized practices across departments to verify licensure and certifications rather than implementing a formally documented, centralized verification process.

This control deficiency increases the risk that individuals who do not meet the required licensure or certification qualifications are placed in positions that require such credentials. In addition, the absence of consistent verification and documentation controls limits WSSC management's ability to demonstrate compliance with established job qualifications and applicable regulatory or professional licensing requirements.

**Recommendation 6: Establish Standardized HR Controls for Licensure and Certification**

The OIG recommends that HRO develop and implement formal policies and procedures governing the verification and documentation of required licenses and certifications for employees at the time of hire, promotion, transfer, and throughout employment. The OIG also recommends that the

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policies and procedures include verification requirements, assign responsibilities between HRO and departments, and establish documentation retention requirements to ensure consistent application across the Commission. Implementing these recommendations will strengthen controls over licensure and certification verification, improve consistency in credential documentation and retention, and reduce the risk of employees performing regulated duties without verified qualifications.

### **Management Response and Action Plan (including anticipated due date):**

HRO management agrees with the findings and will take the following actions to strengthen controls over licensure and certification verification, HRO will:

1. Develop an internal operating procedure (IOPs) to centralize the verification of required licenses and certifications at hire, promotion, transfer, and throughout employment. This IOP will define the HRO and department responsibilities as well as retention requirements by **October 31, 2026**.
2. HRO will centralize the licensure and certification requirement utilizing Oracle EBS and implement alerts for when licensures and certification requirements are expiring. This will be implemented by **November 30, 2026**.

These actions will improve consistency, strengthen credential oversight, and reduce the risk of employees performing regulated duties without verified qualifications.

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**Finding 7: Lack of Formalized Departmental Controls to Monitor License and Certification Renewal Requirements**  
**Risk Rating: MEDIUM**

Regulations governing Waterworks and Wastewater Systems Operators under COMAR 26.06.01 require that individuals who operate, supervise, or exercise responsible charge over water and wastewater systems maintain active certifications. WSSC management is responsible for ensuring continuous compliance by maintaining systems to track certification status and renewal deadlines.

The Maryland Department of Labor administers licensing and renewal requirements for multiple regulated professions relevant to WSSC operations, including Professional Engineers, Master Plumbers and Gasfitters, Cross-Connection/Backflow Prevention Specialists, and Professional Land Surveyors. These licensing frameworks require active licensure prior to performing regulated work, periodic renewal at prescribed intervals, and completion of continuing education or competency requirements, as applicable.

Maryland law generally prohibits individuals from practicing regulated professions without a valid license and subjects violators to administrative, civil, and, in some cases, criminal penalties. Employees performing duties reserved for licensed professionals must maintain current, active licenses. Because licenses are subject to expiration and renewal requirements, WSSC must maintain effective monitoring processes to ensure licenses and certifications remain valid and that renewal documentation is obtained and retained in a timely manner. Additionally, WSSC internal job descriptions require certain employees to obtain and maintain valid certifications as a condition of performing assigned duties.

During the walkthrough, the audit disclosed that the Engineering & Construction Department had not established a formal process to monitor the expiration, renewal, and continuing education requirements for employees who must maintain professional licenses and certifications. Instead, monitoring responsibilities were primarily decentralized at the individual employee level. Individual employees are responsible for monitoring their own certification status and initiating renewal activities. Departmental involvement is generally limited to reviewing and approving payment requests associated with license and certification renewals submitted by the employee.

Additionally, the audit noted that the department did not maintain a tracking system, automated alerts, or periodic monitoring processes to ensure licenses and certifications are renewed in a timely manner. WSSC Management does not have visibility into license and certification status, expiration dates, or renewal deadlines for employees within the department.

The Engineering & Construction Department management stated that it has historically considered professional license and certification renewal to be the responsibility of individual employees rather than a department-level compliance function.

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The absence of formal monitoring controls increases the risk that required licenses and certifications expire without timely renewal or management awareness. In addition, the lack of centralized monitoring can result in employees performing regulated duties without valid credentials, thereby increasing the risk of noncompliance with applicable regulatory requirements and exposing WSSC to operational, safety, and reputational risks.

**Recommendation 7: Establish Formal License and Certification Monitoring Controls**

The OIG recommends that the Engineering and Construction Department management establish and implement formal monitoring controls to track license and certification status and renewal deadlines, and ongoing compliance requirements for employees performing regulated duties. The OIG also recommends that management implement a centralized tracking system, assign monitoring and oversight responsibilities, establish automated reminders or notification processes for monitoring activities, and conduct periodic reviews to ensure licenses and certifications remain current and active. Implementing these recommendations will strengthen monitoring of license and certification renewal, improve management oversight of regulated employees, and reduce operational, regulatory, and reputational risks associated with expired credentials.

**Management Response and Action Plan (including anticipated due date):**

The Engineering and Construction (E&C) management agrees with the findings.

In response to the findings, the Department will collaborate with the Human Resources Department on a Commission wide centralized tracking system. It is our understanding that this system however will not be implemented until November 30, 2026. In the interim, the following actions will be taken by the E&C Department to establish a formal process to monitor the expiration, renewal, and continuing education requirements for employees who must maintain professional licenses and certifications.

1. Establish and implement an Internal Operating Procedure (IOP) that formally outlines a process to log and monitor the status of required licenses and certifications and continuing education requirements utilizing SharePoint as the centralized location, by July 31, 2026.
2. Clearly define roles and responsibilities for each action within the IOP in the logging, tracking monitoring and review process. This will include reminder actions of upcoming expiration of licenses or certifications.
3. Develop audit/review frequency of the licensing and certification requirements. The IOP will outline the required frequency of reviews.