

## Recommendations of the LAC's Review of the South Carolina Department of Transportation – April 2016

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1. The General Assembly should amend SC Code 1-30-10 to designate either the Secretary or the Commission, but not both, as the governing authority of the S.C. Department of Transportation.

Agency and Commission Response: CONCUR

2. The General Assembly should amend SC Code 57-1-360 to prohibit the S.C. Department of Transportation Commission from taking action that impairs the independence of the chief internal auditor or is in conflict with accepted standards as identified in the appropriate professional association pertaining to the internal audit.

Commission Response: CONCUR

3. The Audit Committee of the S.C. Department of Transportation should change the three revisions to the Chief Internal Auditor's position description back to the original wording.

Commission Response: NONCONCUR - The Internal Audit functions should focus on risk assessment. According to IIA Standard 2100, "the internal audit activity must assess and make appropriate recommendations for improving the governance process in its accomplishment of the following objectives: 1) promoting appropriate ethics and values within the organization; 2) ensuring effective organizational performance management and accountability; and 3) communicating risk and control information to appropriate areas of the organization.

4. The S.C. Department of Transportation should require that interpretations of the statute creating and concerning the Office of the Internal Auditor be constructed and submitted through the regulatory process so that the regulations receive legislative approval.

Commission Response: CONCUR

5. The General Assembly should amend SC Code 57-1-360 to include the Chief Internal Auditor's duties.

Commission Response: CONCUR

6. The S.C. Department of Transportation Commission's Office of the Chief Internal Auditor should conduct annual department-wide risk assessments to determine which areas within the organization to audit.

Commission Response: CONCUR

7. The S.C. Department of Transportation Commission should consider incorporating the Corporation of Sponsoring Organizations' enterprise risk management program at the department.

Commission Response: CONCUR

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8. The S.C. Department of Transportation Commission should reinstall the hotline under the Office of Chief Internal Auditor or ensure that the Office of the Chief Internal Auditor is aware of all complaints that are referred by the Inspector General if the hotline is not reestablished under the Office of the Chief Internal Auditor.

Commission Response: NONCONCUR - The Institute of Internal Auditors (IIA) Standard 2100 (Nature of Work) makes it clear Internal Audit has an obligation to look at governance. According to IIA Standard 2100, "the internal audit activity must assess and make appropriate recommendations for improving the governance process in its accomplishment of the following objectives: 1) promoting appropriate ethics and values within the organization; 2) ensuring effective organizational performance management and accountability; and 3) communicating risk and control information to appropriate areas of the organization.

9. The S.C. Department of Transportation Commission should develop an investigator or compliance officer position within the Office of the Chief Internal Auditor.

Commission Response: CONCUR that the position should be established; NONCONCUR that it should be housed within the Office of the Chief Internal Auditor.

10. The S.C. Department of Transportation should notify all employees that complaints should be directed to the Office of the Chief Internal Auditor's compliance officer or investigator.

Commission Response: CONCUR that complaints should be directed to a Compliance Officer; NONCONCUR that the compliance officer be under the Chief Internal Auditor.

11. The Office of the Chief Internal Auditor should periodically conduct a risk assessment on major IT systems at the S.C. Department of Transportation to determine any vulnerable systems that need to be audited.

Commission Response: CONCUR

12. The Office of the Chief Internal Auditor should establish a follow-up process to monitor the implementation of audit recommendations.

Agency and Commission Response: CONCUR

13. The Office of the Chief Internal Auditor should conduct follow-up audits of its BAMS-DSS and SiteManager audits.

Agency and Commission Response: CONCUR

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14. The S.C. Department of Transportation should seek equivalency approvals from the Division of State Human Resources for those employees who do not meet the minimum qualifications for their job class and for whom there is not an approval on file and reclassify those not approved.

Agency Response: CONCUR

15. The S.C. Department of Transportation should request a change of the state job classification to separate the “engineer” and “associate engineer” positions into separate classifications with appropriate minimum educations and experience requirements for each.

Agency Response: CONCUR

16. The S.C. Department of Transportation's Human Resources Department should ensure that all changes to salaries include a justification.

Agency Response: CONCUR

17. The S.C. Department of Transportation should add performance measures related to encroachment permit processing times to the annual accountability report and make the information available on the department website.

Agency Response: CONCUR

18. The S.C. Department of Transportation should add stronger controls to the encroachment permit processing system to prevent employees from altering dates or permit status after being set by the system.

Agency Response: CONCUR

19. The S.C. Department of Transportation should measure and report the timeliness of completing maintenance work requests submitted by the public on a quarterly basis on the department website.

Agency Response: CONCUR

20. The S.C. Department of Transportation should capture and retain work request completion timeliness data so that performance can be measured over time.

Agency Response: CONCUR

21. The S.C. Department of Transportation should require that any county maintenance office or district that is not meeting the target completion percentage file a plan with the Director of Maintenance to meet the goal within a defined period of time.

Agency Response: CONCUR

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22. The S.C. Department of Transportation should implement a policy to require that any requests for assistance from a local government entity for work to be performed outside of the department's right-of-way be submitted in writing on official letterhead.

Agency Response: CONCUR

23. The S.C. Department of Transportation should reinstate Departmental Directive 49 addressing the prohibition of the use of departmental resources on private property and it should be applicable to all departmental employees, not just those in engineering units.

Agency Response: CONCUR

24. The General Assembly should add language to state statute prohibiting the use of S. C. Department of Transportation resources, including personnel and equipment, on private property unless there is a legitimate departmental purpose involved.

Agency Response: NO AGENCY RESPONSE REQUIRED

25. The S.C. Department of Transportation should revise Engineering Directive 34 to require that the decisions of the Value Engineering Review Committee and the alternatives considered be presented to the Secretary of Transportation and the SCDOT Commission.

Agency Response: CONCUR

26. The S. C. Department of Transportation should incorporate environmental sustainability, project delivery, and organizational excellence into its current strategic plan.

Agency Response: NONCONCUR – SCDOT agrees that project delivery and organizational excellence would be good additions to the next update of the Strategic Plan, which staff is scheduled to begin work on in summer 2016. In the interim, project delivery and organizational performance metrics have been included in the Secretary's Monthly Management report which is now posted on the agency's website.

27. The S.C. Department of Transportation should include performance measures in its strategic direction plan.

Agency Response: CONCUR

28. The S.C. Department of Transportation should evaluate objectives and write measurable and time-bound objectives.

Agency Response: CONCUR

29. The S.C. Department of Transportation should create and document action steps they plan on using to meet their objectives of the strategic plan.

Agency Response: CONCUR

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30. The S.C. Department of Transportation should ensure that all units create business plans according to the guidelines.

Agency Response: CONCUR

31. The S.C. Department of Transportation should ensure that all divisions create division plans to support the department's strategic direction plan.

Agency Response: CONCUR

32. The S.C. Department of Transportation should set targets for all performance measures.

Agency Response: CONCUR

33. The S.C. Department of Transportation should review performance measures to ensure that all are relevant, understandable, timely, comparable, reliable, cost-effective, useful, influential, significant, and feasible.

Agency Response: CONCUR

34. The S.C. Department of Transportation should evaluate performance measures to ensure there are no acronyms and that measures are not written as objectives.

Agency Response: CONCUR

35. The S.C. Department of Transportation should consider creating a customer satisfaction performance measure.

Agency Response: CONCUR

36. The S.C. Department of Transportation should track and report annual safety expenditures by type of safety project or improvement.

Agency Response: CONCUR

37. The S.C. Department of Transportation should include in its Strategic Plan and Accountability Report performance targets for specific safety measures that reflect the department's role in statewide highway safety efforts more closely than the broad measures of statewide fatalities and injuries that are currently used.

Agency Response: CONCUR

38. The S.C. Department of Transportation should implement a procedure for updating the statewide, long-range transportation plan that will allow it to abide by the five-year schedule prescribed in S.C. Regulation 63-10(B).

Agency Response: NONCONCUR – While SCDOT will strive to target a five-year schedule for the updates to be in compliance, there is actually no timeframe mandated in

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the federal regulations regarding the schedule. As encountered with the last multimodal plan update, there may be extenuating circumstances that introduce unanticipated delays into the update process, such as changes at the federal levels with new surface transportation acts or state procurement processes.

39. The S.C. Department of Transportation should update S.C. Regulation 63-10(B) to reflect the title under which the statewide, long-range transportation plan will be published.

Agency Response: CONCUR

40. The S.C. Department of Transportation should fully implement an electronic STIP preparation process and ensure that the new process provides accurate, timely, and understandable information to the public and other stakeholders.

Agency Response: CONCUR

41. The S.C. Department of Transportation should track and report expenditures related to pavement maintenance and capacity-building activities separately in order to provide information crucial to long-term planning and decision making.

Agency Response: CONCUR

42. The S.C. Department of Transportation Commission should add the federal charge code reimbursement (Project Fund Management Group) process to the OCIA's list of risk areas to be subject to risk assessment analysis.

Agency and Commission Response: CONCUR

43. The S.C. Department of Transportation should complete proper decision analysis, including cost-benefit analysis, for large multi-million dollar projects requiring bond issuance.

Agency Response: CONCUR

44. The S.C. Department of Transportation should keep all decision analysis documents related to projects paid for with bonds until the debt-service is paid.

Agency Response: CONCUR

45. The S.C. General Assembly should index the state motor fuel user fee to fuel prices or another economic indicator in order to offset the decline in realized revenue from this fee.

Agency Response: NO AGENCY RESPONSE REQUIRED

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46. The General Assembly should diversify the sources of state transportation funding in order to minimize the effect of increasing fuel economy.

Agency Response: NO AGENCY RESPONSE REQUIRED

47. The S.C. Department of Transportation should seek clarification from the General Assembly on the permitted or intended uses of the Non-Federal Aid Highway Fund under current state law.

Agency Response: CONCUR

48. SCDOT should develop a process for identifying the proper treatment timing for roads so that opportunities for preservation treatments are not missed and the pavement does not deteriorate into the next most expensive treatment category.

Agency Response: CONCUR

49. SCDOT should annually provide to the Commission information on the location of pavement that is about to deteriorate into the next most expensive treatment category. This information should also be disseminated to the public, the General Assembly and other stakeholders.

Agency Response: CONCUR

50. The S.C. Department of Transportation should publically disseminate its Maintenance Assessment Program report on its website and continue to produce this report on an annual basis.

Agency Response: CONCUR

51. The S.C. Department of Transportation should ensure that its information systems allow users to easily access road condition data from road maintenance contract information.

Agency Response: CONCUR

52. The S.C. Department of Transportation should periodically monitor its preservation activities to determine their effectiveness level.

Agency Response: CONCUR

53. The S.C. Department of Transportation should periodically monitor preservation activities to ensure that the “worst first” policy is not continuing.

Agency Response: CONCUR

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54. The S.C. Department of Transportation should analyze and document its performance in meeting ideal industry cycle times for resurfacing roads.

Agency Response: CONCUR

55. The S.C. Department of Transportation should employ strategies to reduce the number of lane miles under its responsibility and consider alternatives to projects that add lane miles.

Agency Response: CONCUR

56. The S.C. Department of Transportation Commission should prioritize funding infrastructure preservation and maintenance.

Commission Response: NONCONCUR - If capacity issues are ignored, maintenance costs will increase dramatically as the vehicular trips per day on the existing lanes continue to increase far beyond the design intent.

57. The S.C. Department of Transportation should review and consider increasing their design standards to include heavy loads in order to minimize premature pavement maintenance.

Agency Response: NONCONCUR – SCDOT disagrees that it is beneficial to increase the current design standards to universally account for heavy loads. Unilaterally increasing pavement thicknesses across the state may be cost prohibitive and over-designing pavements for roads that carry little to no truck traffic. SCDOT's current design standards include maximum legal load limits, average daily traffic amounts and percent truck traffic. These factors are typically reviewed for specific routes when paving projects are planned, which may yield a thicker pavement design for a route that actually carries heavy trucks or high truck volumes.

58. The S.C. Department of Transportation should seek legislation to amend the fees charged to overweight trucks to offset the damage they cause.

Agency Response: NONCONCUR – SCDOT believes this policy issue is best addressed by the General Assembly.

59. The General Assembly should review the fees charged to overweight trucks.

Agency Response: NO AGENCY RESPONSE REQUIRED

60. The General Assembly should review the ability of trucks to use alternative routes to bypass weigh stations.

Agency Response: NO AGENCY RESPONSE REQUIRED



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61. When investigating project failures, the S.C. Department of Transportation should ensure that its reports timely and comprehensively address all major problems and recommend appropriate corrective actions.

Agency Response: CONCUR

62. The S.C. Department of Transportation should develop a formal training program for employees assigned to the in-house full-depth reclamation crews.

Agency Response: CONCUR

63. The S.C. Department of Transportation should develop a set of written procedures, implementing best practices, to guide the process of full-depth reclamation.

Agency Response: CONCUR

64. The S.C. Department of Transportation should ensure that the work of full-depth reclamation crews is regularly inspected by engineering-level management to ensure best practices are being followed.

Agency Response: CONCUR

65. The S.C. Department of Transportation should conduct a comprehensive study of the costs associated with the in-house full-depth reclamation crews and contracted full-depth reclamation work to determine whether cost savings are being realized.

Agency Response: CONCUR

66. The S.C. Department of Transportation should have an independent expert analyze fairly newly paved roads exhibiting roughness, seams, and pitting, etc. to determine the cause and take corrective action as necessary.

Agency Response: NONCONCUR – SCDOT construction and pavement engineers will review the specific sites of concern by the LAC.

67. The S.C. Department of Transportation should consider development of a focus group of in-house experts to develop and implement a plan to monitor pavement quality and address pavement issues contributing to shortened pavement life.

Agency Response: CONCUR

68. The General Assembly should amend S.C. Code of Laws 57-1-370(B)(8) to specify whether all nine criteria listed in the section are to be used when ranking projects.

Agency Response: NONCONCUR – This amendment is not needed as the General Assembly has already approved the use of relevant criteria for each project category through Regulation 63-10(C)(3).

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69. The S.C. Department of Transportation should document its consideration of Act 114 criteria for each project category.

Agency Response: CONCUR

70. The S.C. Department of Transportation should document in S.C. Regulation 63-10 and in its engineering directives the rationale for any criteria that it determines are not relevant, as well as, for any additional criteria it uses and update these documents whenever modifications are made.

Agency Response: CONCUR

71. The S.C. Department of Transportation should update in S.C. Regulation 63-10 and its engineering directives to reflect its complete prioritization methodologies and update them whenever modifications are made.

Agency Response: CONCUR

72. The S.C. Department of Transportation should only use criteria to prioritize projects that have been approved by the Commission.

Agency Response: CONCUR

73. The S.C. Department of Transportation should perform lifecycle cost analyses on all roadway new location, widening, and capacity projects and that this criterion be incorporated into the ranking process in accordance with Act 114.

Agency Response: NONCONCUR – SCDOT believes a better measurement of financial viability would be to compare the agency's ability to fund the project with "reasonable availability of funding," similar to the requirements the Federal Highway Administration expects for inclusion into the STIP.

74. The S.C. Department of Transportation should comply with SC Regulation 63-10 and defer the development of any future priority lists until an engineering directive has been issued.

Agency Response: NONCONCUR – This item has already been resolved. The recommendation references a specific project category prioritization list for which an Engineering Directive (52) has already been issued.

75. The S.C. Department of Transportation should place all Commission-approved priority lists on its website.

Agency Response: CONCUR

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76. The S.C. Department of Transportation should mandate that its engineering directives are reviewed and approved by the current Deputy Secretary of Engineering and the Commission or other responsible authority.

Agency Response: NONCONCUR – Engineering Directives are issued by the position, not the person. Approval by the Commission is not necessary because Engineering Directives are strictly administrative guidance, not a policy decision.

77. The S.C. Department of Transportation should specify in its SC Regulation 63-10 and directives which software systems are used in prioritizing projects and how the data is inputted and used by those systems in calculating project rankings.

Agency Response: CONCUR

78. The S.C. Department of Transportation should ensure that it archives all data and information relevant to justifying prioritization rankings of projects.

Agency Response: CONCUR

79. The S.C. Department of Transportation should ensure that it complies with the S.C. Department of Archives and History's records retention schedule of ten years for retaining data related to the prioritization of projects.

Agency Response: CONCUR

80. The S.C. Department of Transportation should test the validity of all data it uses to calculate prioritization scores.

Agency Response: CONCUR

81. The S.C. Department of Transportation should ensure that all raw data and formulae for prioritization lists are properly archived so that prioritization scores can be tested and verified for accuracy.

Agency Response: CONCUR

82. The S.C. Department of Transportation should review its normalization of prioritization criteria to ensure the process results in the appropriate score for the criteria.

Agency Response: NONCONCUR – SCDOT has reviewed its normalization of prioritization criteria and all criteria are normalized except PQI. There is no need to normalize (set to a 0-5 scale) PQI scores, as the scores already match, exactly, with a 0-5 scale.

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83. The S.C. Department of Transportation should examine its financial viability prioritization scoring to account for the possibility of funding larger projects.

Agency Response: NONCONCUR – The financial viability criteria is currently 10% for interstate and non-interstate upgrades. Reasonable availability of funding must be shown before the Federal Highway Administration will sign an environmental document to allow a project to proceed to right of way and/or construction. The issue of possibility funding larger projects is more closely connected to the funding allocation step (Step 1) of prioritization than the ranking of individual projects step (Step 2).

84. The S.C. Department of Transportation should ensure that its engineering directives specifically detail how each prioritization criteria is used to generate prioritization lists.

Agency Response: CONCUR

85. The S.C. Department of Transportation should calculate new priority list scores when criteria, weightings, and related data changes; if this results in a change in ranking, the list should be submitted to the Commission for approval.

Agency Response: NONCONCUR – SCDOT actually does update many rankings either annually (such as the pavement categories) or approximately every two years (such as bridge and safety project categories). The interstate upgrade project is not re-ranked with a shorter frequency due to the extended period that it takes to develop and implement those large projects.

86. The S.C. Department of Transportation should comply with Engineering Directive 56 and include the top ranked 75 segments on its interstate capacity priority list.

Agency Response: NONCONCUR – Engineering Directive 56 should be modified to eliminate the mention of 75 segments. All future interstate widening lists will rank the entire interstate system, not segments.

87. The S.C. Department of Transportation should acquire approval from the Commission or other designated authority for all priority lists as required by Act 114.

Agency Response: CONCUR

88. The S.C. Department of Transportation should clearly identify when criteria and weights have been approved by the Commission in a centralized location on its website with its priority lists by including the Commission action approving the change(s) and the relevant page number(s). We further recommend that when changes have been made to the prioritization process, SCDOT should clearly reference both the old and new Commission actions for comparison so that the public can determine what changed.

Agency Response: CONCUR

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89. The S.C. Department of Transportation should comply with Act 114 and establish a single priority list of projects that addresses all Act 114 criteria and informs stakeholders of the paramount needs of South Carolina's infrastructure.

Agency Response: NONCONCUR – A single statewide ranking list would not be consistent with the funding categories and the restrictions on funds that are flowing to SCDOT both at the state and federal level. Additionally, a single statewide ranking list would create an equity issue, especially with the rural counties, regarding the distribution of paving funds across the entire state. SCDOT agrees that significant improvements need to be made with regards to how the agency provides information on funding and priorities within those funding categories to the public, Commission and other stakeholders.

90. The S.C. Department of Transportation should make its project prioritization process fully transparent and easily understandable for the public.

Agency Response: CONCUR

91. The S.C. Department of Transportation should review its project priority lists and its website to determine if errors are present and update information accordingly.

Agency Response: CONCUR

92. The S.C. Department of Transportation should comply with Act 114 and S.C. Regulation 63-10 and prioritize all federal and non-federal aid projects under the scope of Act 114 and include their rankings in the STIP.

Agency Response: NONCONCUR – The Act 114 prioritized federal aid projects are included in the STIP. The non-federal aid projects are actually reflected in the State Program. SCDOT agrees that significant improvements need to be made with regards to how the agency provides information to the public, Commission and others, on funding and priorities within these two programmatic areas (federal and state).

93. The S.C. Department of Transportation should comply with Act 114 and prioritize maintenance projects related to preservation of roads.

Agency Response: NONCONCUR – Preservation projects are selected by SCDOT engineers based on actual condition of the road at the time. Prioritizing a crack seal treatment versus an ultra-thin lift is not feasible since these two treatments are applied at different levels of pavement deterioration.

94. The S.C. Department of Transportation should comply with S.C. Regulation 63-10 and provide the full methodologies for ranking projects in its directives, ensuring this is done in a manner that is easily comprehended by the public.

Agency Response: CONCUR

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95. The S.C. Department of Transportation should comply with Regulation 63-10 and include the applicable weights for each criterion in its engineering directives.

Agency Response: CONCUR

96. The S.C. Department of Transportation should seek to develop performance measures to test all criteria and weights of each criterion that are used to prioritize projects to ensure projects are being selected that will meet SCDOT's goals.

Agency Response: CONCUR

97. The S.C. Department of Transportation should develop goals for all non-federally funded projects and include this information in the State Program.

Agency Response: CONCUR

98. The S.C. Department of Transportation should develop performance measures to test how successful projects were in achieving goals and provide this information to the public and the Commission.

Agency Response: CONCUR

99. The S.C. Department of Transportation should make its project prioritization process fully transparent and easily understandable for the public.

Agency Response: CONCUR

100. The S.C. Department of Transportation should establish a point of contact for any questions related to its prioritization of projects.

Agency Response: CONCUR

101. The S.C. Department of Transportation should place all of its related project prioritization documentation in a centralized location on its website for public dissemination.

Agency Response: CONCUR

102. The S.C. Department of Transportation should consider establishing a centralized office for prioritization.

Agency Response: CONCUR

103. The S.C. Department of Transportation should provide the final project scores on the priority lists and submit them to the Commission.

Agency Response: CONCUR

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104. The S.C. Department of Transportation should provide all of its data and project-ranking calculations publicly on its website and when soliciting public comment on its priority lists and in a manner that allows for easy interpretation of the methodologies and resulting scores.

Agency Response: CONCUR

105. The Commission should provide written justification for any and all deviations from the project priority ranking list and the specific circumstances under S.C. Regulation 63-10 under which the deviation was justified. Also, these justifications should be clearly referenced on the project priority list and in the Statewide Transportation Improvement Program.

Agency Response: CONCUR

106. The S.C. Department of Transportation should modify its project priority ranking lists to standardize its formats and the information contained thereon.

Agency Response: CONCUR

107. The S.C. Department of Transportation should provide the status of the projects contained on the project priority lists for all of the lists and include a timeframe on the list for when the statuses of the projects are updated.

Agency Response: CONCUR

108. The General Assembly may wish to evaluate the specifics of the ability of the S.C. Department of Transportation Commission to override Act 114 prioritization requirements.

Agency Response: NO AGENCY RESPONSE REQUIRED

109. The S.C. Department of Transportation should identify and date projects that have been programmed into the STIP.

Agency Response: CONCUR

110. The S.C. Department of Transportation should not use the same priority rank for different projects on its lists.

Agency Response: CONCUR

111. The S.C. Department of Transportation should develop, formalize, and make public its process for determining which projects from its priority lists are programmed into the State Transportation Improvement Program.

Agency Response: CONCUR

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112. The S.C. Department of Transportation should include documentation of FHWA's and FTA's approvals, referred to as the *planning finding*, in the STIP on its website.

Agency Response: CONCUR

113. The S.C. Department of Transportation should provide direct links to all of the MPO TIPs on its website.

Agency Response: CONCUR

114. The S.C. Department of Transportation should indicate who sponsors projects in the State Transportation Improvement Program and specify the sources of project funding.

Agency Response: CONCUR

115. The S.C. Department of Transportation should define all acronyms in the STIP.

Agency Response: CONCUR

116. The S.C. Department of Transportation should provide detailed explanation in the STIP regarding how other entities can request additional funding and how it is used.

Agency Response: CONCUR

117. The S.C. Department of Transportation should list the specific source(s) of local funding.

Agency Response: CONCUR

118. The S.C. Department of Transportation should incorporate a financial plan into the Statewide Transportation Improvement Program.

Agency Response: CONCUR

119. The S.C. Department of Transportation should break down STIP project funding between federal and state dollars when listing the sources of these funds for each phase of the project.

Agency Response: CONCUR

120. The S.C. Department of Transportation should update its website to differentiate between its current and outdated Statewide Transportation Improvement Program to prevent confusion.

Agency Response: CONCUR



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121. The S.C. Department of Transportation should consider providing the Statewide Transportation Improvement Program in Spanish.

Agency Response: [CONCUR](#)

122. The S.C. Department of Transportation should consider implementing a longer comment period to allow the public and stakeholders more time to comment on proposed Commission actions.

Agency Response: [CONCUR](#)

123. The S.C. Department of Transportation should conduct public meetings regarding its Statewide Transportation Improvement Program.

Agency Response: [CONCUR](#)

124. The S.C. Department of Transportation should provide all Act 114 project rankings in the State Transportation Improvement Program.

Agency Response: [CONCUR](#)

125. The S.C. Department of Transportation should include narratives in the STIP for each project that include, at a minimum, the purpose and need for each project.

Agency Response: [CONCUR](#)

126. The S.C. Department of Transportation should include information in the STIP on how to contact the department with questions.

Agency Response: [CONCUR](#)

127. The S.C. Department of Transportation should make project National Environmental Policy Act "Purpose and Need" statements publicly available in a centralized location on its website in a manner that allows for easy project identification.

Agency Response: [CONCUR](#)

128. The S.C. Department of Transportation should continue to improve the presentation of the information in its STIP so as to be more informative to the public and stakeholders.

Agency Response: [CONCUR](#)

129. The S.C. Department of Transportation should include in the STIP more assistive tools for interpreting the information it contains.

Agency Response: [CONCUR](#)

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130. The S.C. Department of Transportation should identify in the STIP anything that is not defined, such as highlighting of project information.

Agency Response: CONCUR

131. The S.C. Department of Transportation should include information related to the project priority ranks on the map on its website.

Agency Response: CONCUR

132. The S.C. Department of Transportation Commission should discontinue providing non-required funding to metropolitan planning organizations and councils of governments.

Commission Response: CONCUR

133. The S.C. Department of Transportation Commission should discontinue providing state funds to transportation management areas.

Commission Response: NONCONCUR – This is a federal requirement which must be met (\$44 million). If a road is on our system, SCDOT should be responsible for providing the State match.

134. The S.C. Department of Transportation should consider strategies to transfer future maintenance costs of projects to the entities that sponsor the projects.

Commission Response: NONCONCUR – Unless ample funding accompanies the transfer, as well as requirement to prioritize maintenance of these roadways, they should remain within the State's area of responsibility as they are State roads. It is the Commission's policy not to accept new or additional roads into the system that are not part of the established freight network or are considered to be a primary traffic corridor.

135. The S.C. Department of Transportation should periodically audit the application of COGs' and MPOs' prioritization processes to ensure proper applications.

Agency Response: CONCUR

136. The S.C. Department of Transportation should mandate that all COGs and MPOs use the statewide ranking criteria specified under Act 114 if receiving non-required funding from SCDOT.

Agency Response: CONCUR

137. The S.C. Department of Transportation should provide links to COG TIPs or provide the documents themselves in a centralized location on its website for easy accessibility.

Agency Response: CONCUR

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138. The S.C. Department of Transportation should update the links on its website to provide all of the MPO TIPs and to periodically review and update the links as necessary to ensure the public has easy access to these documents.

Agency Response: CONCUR

139. The S.C. Department of Transportation should consider revising its regulations to allow it to determine whether a business affiliated with a trust that benefits a close family member of a debarred party should be denied prequalification.

Agency Response: CONCUR

140. The S.C. Department of Transportation should monitor prequalified businesses that are affiliated with trusts that benefit close family members of debarred parties to ensure that debarred parties do not engage in unauthorized activities in South Carolina.

Agency Response: CONCUR

141. In its notices of revocation of prequalification to businesses, the S.C. Department of Transportation should state the basis for its revocations, include findings supporting the revocations, and inform affected businesses of any rights to an administrative hearing or other recourse.

Agency Response: CONCUR

142. The S.C. Department of Transportation should consider options to verify, independently, the answers provided by contractors in their prequalification applications.

Agency Response: CONCUR

143. The S.C. Department of Transportation should ensure that the reason for any reversals of the contract administration engineer's initial decisions regarding the prequalification of contractors is sufficiently documented.

Agency Response: CONCUR

144. The S.C. Department of Transportation should review its policies and procedures for maintaining the confidentiality of engineers' estimates and other confidential information periodically, but at least annually.

Agency Response: CONCUR

145. The S.C. Department of Transportation should evaluate the performance of warm mixed asphalt technology and require its use where its use is effective and will allow for greater competition among asphalt producers.

Agency Response: NONCONCUR – SCDOT does not agree that requiring warm mix technology allows for greater competition. SCDOT believes that its required use would

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reduce competition, as this assumes that all asphalt producers have warm mix capability and that each producer that has the capability would elect to run warm mix to meet a project specific requirement.

146. The S.C. Department of Transportation should maximize its use of analysis to detect bid rigging and collusion and expand opportunities for competition in the letting process.

Agency Response: CONCUR

147. The S.C. Department of Transportation should expand its efforts to broaden participation in its lettings so as to increase the level of competition in the marketplace.

Agency Response: CONCUR

148. The S.C. Department of Transportation should complete work on a design-build manual.

Agency Response: CONCUR

149. The S.C. Department of Transportation should implement a system to allow for online bid submissions for design-build projects.

Agency Response: CONCUR

150. The S.C. Department of Transportation should implement a system for analyzing bids on design-build projects to detect collusion, bid rigging, and other activity that undermines the integrity of the bidding process.

Agency Response: CONCUR

151. The S.C. Department of Transportation should complete a valid comparative evaluation of the design-build approach to project delivery and the design-bid-build approach to determine its impact on cost and quality when compared to the design-bid-build approach to project delivery.

Agency Response: CONCUR

152. The S.C. Department of Transportation should revise its Notice to All Consulting Firms to require that the names of individuals who will work on the project be submitted as the individual's formal name, including the full first, middle, and last name and maiden name, if appropriate.

Agency Response: CONCUR

153. The S.C. General Assembly should address the potential confusion in S.C. Code 11-35-310(22) which is referenced in S.C. Code 8-13-760 regarding the definition of "participating directly in procurement."

Agency Response: NO AGENCY RESPONSE REQUIRED

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154. The General Assembly should amend S.C. Code 12-28-2740 to establish terms of office and minimum qualifications for members of county transportation committees.

Agency Response: NO AGENCY RESPONSE REQUIRED

155. The S.C. Department of Transportation should regularly review the fee structure to ensure that fees collected reflect actual costs incurred in the administration of the C Program and its findings should be reviewed by an outside entity.

Agency Response: CONCUR

156. The S.C. Department of Transportation should implement a process to track time spent by all employees on C Program-related duties to properly capture associated costs.

Agency Response: CONCUR

157. The General Assembly should amend S.C. Code 12-28-2740 to specify the types of projects that are ineligible to receive C Funds such as parking lots and other non-road or non-bridge improvements that are not related to safety or traffic improvements.

Agency Response: NO AGENCY RESPONSE REQUIRED

158. The General Assembly should amend S.C. Code 12-28-2740 to require the County Transportation Committees to provide details of the projects in their plans and prioritize the projects for the countywide transportation plan.

Agency Response: NO AGENCY RESPONSE REQUIRED

159. The General Assembly should amend S.C. Code 12-28-2740 to require the County Transportation Committees to develop, at a minimum, a two-year transportation plan and make the plan conspicuous to the public.

Agency Response: NO AGENCY RESPONSE REQUIRED

160. The General Assembly should amend S.C. Code 12-28-2740 to require the County Transportation Committees to advertise meetings on their county websites at the beginning of each calendar year.

Agency Response: NO AGENCY RESPONSE REQUIRED

161. The General Assembly should amend S.C. Code 12-28-2740 to require any county receiving C Program funds to have a transportation plan posted on its website.

Agency Response: NO AGENCY RESPONSE REQUIRED

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162. The S.C. Department of Transportation should provide the countywide transportation plans on its website.

Agency Response: CONCUR

163. The General Assembly should amend S.C. Code 12-28-2740 to require an annual report for all 46 County Transportation Committees to be prepared and compiled into an annual statewide report submitted to the General Assembly.

Agency Response: NO AGENCY RESPONSE REQUIRED

164. The S.C. Department of Transportation should document C Program Fund expenditures on a per-project basis in a report for all County Transportation Committees that are administered by the S.C. Department of Transportation.

Agency Response: CONCUR

165. The SC Department of Transportation should collect and use data to compare resurfacing project costs with those incurred by county governments to determine if cost savings could be realized by either the department or county governments to complete transportation projects.

Agency Response: CONCUR

166. The General Assembly should amend S.C. Code 12-28-2740 to require that county transportation committees submit detailed project invoices before payments are approved by the S.C. Department of Transportation C Program administration office.

Agency Response: NO AGENCY RESPONSE REQUIRED

167. The General Assembly should amend S.C. Code 12-28-2740 to require that programming requests submitted to the S.C. Department of Transportation by county transportation committees include specific project details such as road segments and mileages.

Agency Response: NO AGENCY RESPONSE REQUIRED

168. The General Assembly should repeal the S.C. Department of Transportation's exemption from the S.C. Consolidated Procurement Code.

Agency Response: NO AGENCY RESPONSE REQUIRED

169. The S.C. Department of Transportation should implement a written policy to receive and investigate protests made regarding its exemption from the S.C. Consolidated Procurement Code.

Agency Response: CONCUR

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170. The General Assembly should amend state law to authorize an independent authority to investigate protests related to the S.C. Department of Transportation's exempted procurements.

Agency Response: NO AGENCY RESPONSE REQUIRED

171. The General Assembly should amend state law to specify who administers penalties against the S.C. Department of Transportation for violations pertaining to its exemption from the S.C. Consolidated Procurement Code and under which section of law(s) they are to be administered.

Agency Response: NO AGENCY RESPONSE REQUIRED

172. The General Assembly should amend S.C. Code 57-1-490 such that Materials Management Office's reviews of the S.C. Department of Transportation's exemption from the S.C. Procurement Code be conducted every five years, but discontinued after ten years if those reviews are without significant findings.

Agency Response: NO AGENCY RESPONSE REQUIRED