



# OIG Status Update on Recommendations

**May 2026**

*Presented by the Office of the Inspector General*

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Integrity | Accountability | Transparency | Honesty

# Benefits & Progress: OIG Recommendations



**\$15M+**

Potential Benefits  
Identified

**\$2M**

Benefits  
Realized to Date

**172**

Total Recs  
Issued

**81%**

Tested Recs  
Sustained

## Key Achievements from OIG Recommendations



### CFO Structure Established

BART consolidated financial functions under a single CFO, aligning with industry best practices and strengthening oversight, coordination, and strategic decision-making.



### Suspension & Debarment Policy Implemented

BART adopted a formal policy to exclude contractors for fraud, misconduct, or poor performance — a critical tool for protecting public funds that was previously absent.



### 81% Sustainability Rate on Tested Controls

Most of corrective actions tested remain fully operational, demonstrating that OIG recommendations, when implemented and monitored, produce lasting results.

# OIG Recommendations At-a-Glance



**162**

Total Recs  
Accepted to Date

**81%**

Tested Recs  
Successfully Sustained

**63**

Total Open  
Recommendations

**13**

Open More Than  
2 Years

**6**

Recs  
Reopened

**1**

New Rec  
Issued

# How We Follow Up: Our Process



1

## Issue Recommendation

OIG finds areas needing improvement and issues recommendations to management with corrective action required.

2

## Monitor Response

Management provides response and evidence of implementation on a semiannual basis.

3

## Review and Test

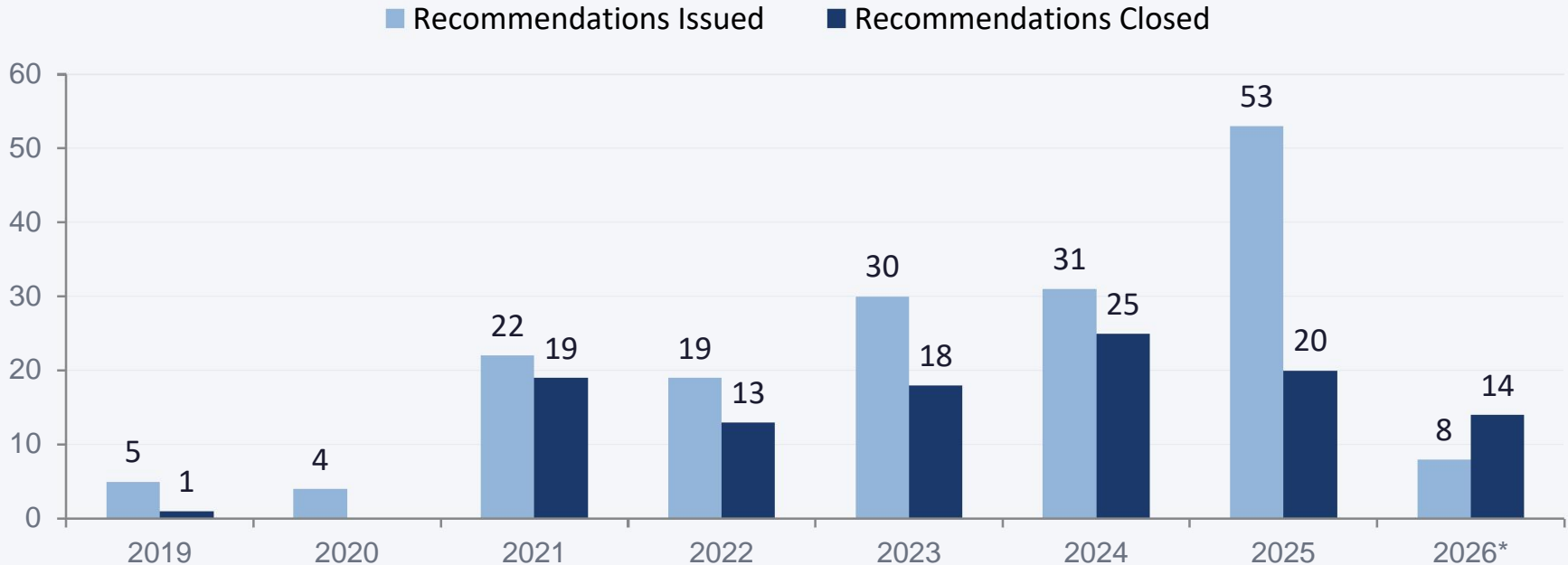
OIG reviews evidence and assesses sufficiency of corrective actions.

4

## Close or Continue

Recommendations are closed when evidence supports full implementation. Otherwise, recommendations remain open and cycle through steps 2 through 4.

# Trend: Recommendations Issued vs. Closed



\* 2026 is a partial year through May 2026

Some lag between issuance and implementation is inherent to the oversight cycle. Nonetheless, our broader analysis shows that several recommendations have remained open for over two years, indicating delays in addressing underlying risks.

# Open Recommendations: Snapshot



63

**Total Open**

Unresolved corrective actions

48

**From Audits**

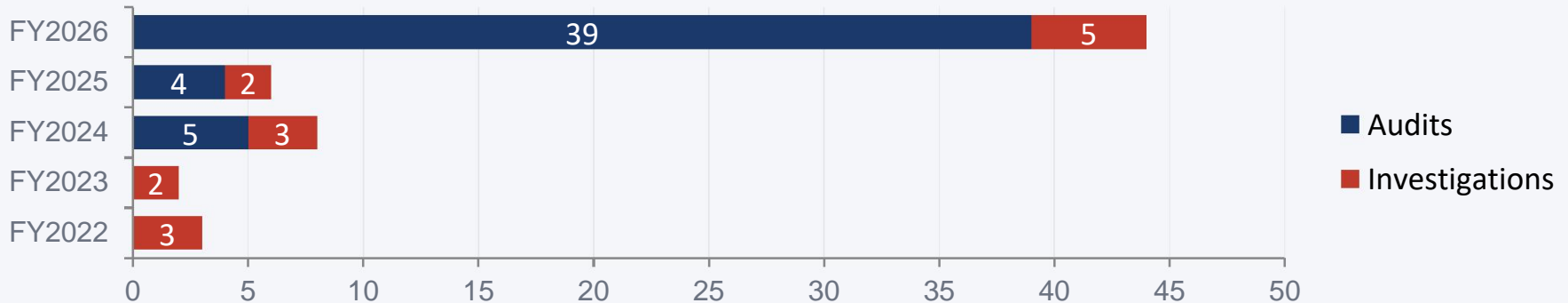
Performance audit findings

15

**From Investigations**

Fraud, waste, or abuse reviews

## Where the open recommendations come from



# Long-Standing Open Recommendations: 2+ Years



## POLICY

*Open since 2022 — 4 Years*

### **Employee Code of Conduct Updates**

revisions remain in progress — no completion timeline provided across multiple reporting periods.

## PROCUREMENT

*Open since 2023 — 3+ Years*

### **Procurement Controls for Subconsultants**

process drafted but not finalized or implemented — no implementation timeline.

## INFRASTRUCTURE

*Open since 2024 — 2+ Years*

### **Infrastructure Planning for Safety Improvements**

work underway — no formal timeline or cost estimate presented to the Board.

## RESOURCES

*Open since 2024 — 2+ Years*

### **Span of Control Framework**

corrective actions encouraged — no concrete directive.

# Testing of Closed Recommendations



We reviewed 81 implemented recommendations and risk-selected 31 to test independently.

**81%**

Remain Fully  
Implemented

**6**

Recommendations  
Reopened

**2**

Limited Response  
Effectiveness Uncertain

## Sustainability Rate by Category

Information Technology (2)

**100%**

Recruitment (4)

**100%**

Procurement (14)

**93%**

Timekeeping (5)

**80%**

Conflict of Interest (2)

**50%**

Personally Identifiable Information (2)

**50%**

Inventory (2)

**0%**

# 6 Recommendations Reopened: What We Found



Previously-closed recommendations found to be no longer implemented or only partially implemented:

## Procurement

### NASPO Training (Aug 2021)

Recurring training never assigned. Completed once in 2021; no follow-on cycles.

## Timekeeping

### SEIU Union Business Time Reporting (Apr 2022)

Large number of 2025 timesheets show incorrect codes and missing comment fields.

## Inventory

### Storeroom Access Procedure – Update (Jan 2021)

Ongoing audit; management identified issues with employees following procedures

## Inventory

### Storeroom Access Procedure – Enforcement (Jan 2021)

Ongoing audit; management identified issues with employees following procedures

## Conflict of Interest

### Conflict of Interest Training (Apr 2022)

Training completed in 2022 but never converted to recurring. Very few employees trained since.

## PII

### NextRequest Dept Folder Structure (Jun 2023)

Department folders not used for any PRAs in the tested sample.

# Risk Exposure: What's at Stake



Each open recommendation is an unmitigated risk, and the 13 items open 2+ years represent sustained risk exposure across five dimensions:

## Financial Risk

Excess spending, disallowed costs, and unauthorized procurement.

## Operational Drag

Wasted staff time, repeated work, and compliance burden when procedures and controls aren't followed.

## Control Erosion

Confusion on requirements and performance risk when corrective actions aren't sustained over time.

## Strategic Impact

Poor program integrity and vendor distrust when procurement and ethics controls remain unfinished.

## Public Trust

Stewardship failures documented without timely resolution undermine rider and voter confidence.

## NEW RECOMMENDATION TO THE BOARD



**The BART Board of Directors should direct the General Manager to ensure the timely implementation of OIG recommendations and to provide periodic reporting to the Board on the reasons for delay and expected timelines for completion.**

### **Purpose of Recommendation**

- ✓ Establish clear accountability for corrective actions.
- ✓ Drive timely closure of long-standing findings.
- ✓ Support the Board's oversight of management's corrective actions.



# Questions?

*The Office of the Inspector General Holds in High Regard Its Duty to Protect the Public's Interests.*

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