

Date: July 17, 2026

To: Sheryl M.M. Long, City Manager

From: Lauren Sundararajan, CFE, Internal Audit Manager *LS*

Copies to: Internal Audit Committee
Andrew Dudas, Budget Director
Mark A. Riley, Department of Public Services Director

Subject: **Street Sweeping Audit**

Attached is the Street Sweeping audit report. The primary objectives of this performance audit were to assess whether Department of Public Services (DPS) is operating street sweeping in accordance with the Environmental Protection Agency (EPA) guidelines and other applicable federal, state, and local regulations as well as established best management practices. Additionally, IA evaluated the effectiveness of the design and implementation of controls and overall efficiency and effectiveness of the program. This audit was conducted in accordance with the current audit agenda.

We would like to thank the management and staff of the DPS for their assistance and cooperation during this audit.

If you need any further information, please contact me.

Attachment

Street Sweeping Audit

July 2026



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Executive Summary

Internal Audit (IA) conducted a performance audit of the Department of Public Services' (DPS) street sweeping operation. The primary objectives of this performance audit were to assess whether DPS is operating street sweeping in accordance with Environmental Protection Agency (EPA) guidelines and other applicable federal, state, and local regulations, as well as established best management practices. Additionally, IA evaluated the effectiveness of the design and implementation of controls and overall efficiency and effectiveness of the program.

Street sweeping plays a significant role in maintaining clean and safe roadways while supporting compliance with EPA regulations. By removing debris and pollutants from streets, the program helps reduce contaminants entering the sewer system and local waterways. In addition to environmental benefits, effective sweeping operations contribute to roadway safety, neighborhood aesthetics, and the overall effectiveness of the City of Cincinnati's (City) Stormwater Management Program.

The audit identified several opportunities to strengthen internal controls within the street sweeping program. Most notably, the program lacks clearly defined expectations, goals, and strategic direction to guide operations. Key elements such as performance metrics, documented procedures, and resource planning are not established, limiting management's ability to effectively oversee operations. Without a structured framework to guide and evaluate performance, DPS cannot effectively measure results, ensure accountability, or demonstrate compliance with regulatory requirements.

IA also found that the Cincinnati Municipal Code (CMC) related to street sweeping is not being enforced. The absence of accurate street signage limits DPS's ability to restrict parking during operations, which reduces sweeping effectiveness and prevents the City from issuing parking citations. As a result, street sweeping operations experience operational inefficiencies, and the City is forgoing a potential revenue source.

Additionally, contract terms are not enforced. The current contract pays approximately \$1.3 million annually with potential additional payments for ad hoc assignments.¹ Critically, the contract requires submission of supporting documentation to the City, including monthly Global Positioning System (GPS) coordinates. However, required supporting documentation has not been submitted with invoices. As a result, the City lacks assurance that contracted services are performed prior to payment.

Finally, IA found that street sweeping routes have not been evaluated since 2017. As a result, routes are no longer optimized based on current staffing levels, department priorities, and other factors affecting the street sweeping program. Reevaluating routes as conditions change is critical to ensuring that routes can be consistently completed and all City streets are swept at least twice per year in alignment with Ohio EPA regulations.

Overall, IA found that to strengthen internal controls, the following recommendations should be incorporated: develop and implement a strategic plan with defined goals for street sweeping operations; ensure that the CMC and all contractual terms are enforced; and conduct a comprehensive evaluation of street sweeping routes. Implementing these recommendations will ensure that proper internal controls have been established to ensure efficiency, effectiveness, and accountability over the street sweeping program.

¹ Contract 261R005252

I. Introduction

Background

Street sweeping is operated by DPS under the Neighborhood Operations Division (NOD). Street sweeping serves multiple purposes. By removing debris such as litter, sediment, leaves, and pollutants from roadways, street sweeping helps prevent contaminants from entering the storm sewer system and nearby waterways. Effective sweeping programs also improve roadway safety by reducing hazards, enhancing neighborhood aesthetics, and contributing to compliance with EPA regulations. As such, street sweeping is a key component to the City's Stormwater Management Program and DPS operations.

Street sweeping relies on specialized equipment designed to remove debris from surfaces. The current machines utilize mechanical brooms and vacuum systems to sweep up debris. The City recently purchased two new sweeping machines that utilize a regenerative air system, which uses controlled blasts of air to dislodge debris from the road and a suction hose to collect it. This technology is designed to lower long-term maintenance costs, as brooms and vacuums frequently need replacement.

The program is led by the Right of Way (ROW) Supervisor and includes one Service Area Coordinator (SAC), five Automotive Street Cleaning Equipment Operators (ASCEOs), five truck drivers (with one current vacancy), and a ROW clerk typist.² The SAC oversees daily operations. ASCEOs operate street sweeping equipment and perform roadway cleaning, while truck drivers transport collected debris to Rumpke for disposal.

City streets are cleaned based on monthly routes.³ In addition to City employees, a third party is contracted to clean streets within the Central Business District, Over-the-Rhine, Pendleton, and Neighborhood Business Districts.⁴ The sweeping conducted by the City occurs Monday through Friday from 7:00 a.m. - 3:00 p.m. The contractor's sweeping occurs Sunday through Friday from 10:00 p.m. - 6:00 a.m.

Table 1 below reflects the total number of curb miles swept by the City and third party contractor per calendar year (CY) from 23 - 25.

	CY 23	CY 24	CY 25
MILES SWEEPED	26,714	29,478	32,193

Table 1: Miles swept per the MS4 Annual Report.⁵

² As of April 2026.

³ <https://www.cincinnati-oh.gov/public-services/street-sweeping/>

⁴ Contract 191R005252 and Contract 261R005252

⁵ Data obtained from annual MS4 reports filed with Ohio EPA from 2023-2025.

Audit Selection

IA conducted this audit in accordance with the Audit Work Plan.

Audit Objectives

The primary objectives of this performance audit were to assess whether DPS is operating street sweeping in accordance with EPA guidelines and other applicable federal, state, and local regulations as well as established best management practices. Additionally, IA evaluated the effectiveness of the design and implementation of controls and overall efficiency and effectiveness of the program.

Audit Scope and Methodology

In order to achieve the objectives, IA compared current practices to legal regulations, achieved verification of actions through documented reports, interviewed appropriate staff, and analyzed relevant data. Records reviewed included data generated from fiscal year (FY) 24 through present.

Statement of Auditing Standards

As required by the Cincinnati Administrative Code Article II §15, this audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS), except for standard 5.60 pertaining to external peer review requirements. This exception did not have a material effect on the audit.

IA continues to conduct internal quality reviews to assure conformance with applicable GAGAS. IA performed fieldwork between April and June of 2026.

Commendations

IA commends the staff of DPS for their cooperation throughout the audit.

II. Audit Findings and Recommendations

There are no clearly defined expectations or guidelines within street sweeping operations.

For a program to be sustainable, it must have clearly defined expectations and guidelines. Expectations and guidelines create a framework for consistency, efficiency, and effectiveness while also strengthening accountability by establishing standards. These expectations should be evaluated regularly to reflect changes in resources, conditions, and departmental priorities.

IA found that the street sweeping program does not have a strategic plan defining expectations and guidelines. The strategic plan should include, at minimum, the following components:

- Program Objectives: Ensure compliance with Ohio EPA regulations; define performance metrics; establish clear daily expectations (e.g., miles swept and cleanliness standards).
- Route Scheduling: Set sweeping frequency, prioritize routes, and clearly define resources assigned to the program.
- Community Outreach: Incorporate parking signage, parking enforcement strategies, and processes for collecting and responding to community feedback.

Recommendation 1: Develop and implement a strategic plan with defined goals for street sweeping operations.

Department Response: Agree. Neighborhood Operations Division (NOD) will develop a formal Street Sweeping Strategic Plan that establishes goals, performance measures, route coverage expectations, regulatory compliance objectives, and operational standards reporting. The plan will include measurable performance indicators and provide a framework for annual review and adjustments will be made based on staffing levels, equipment availability, and operational priorities. This process will be implemented by April 5, 2027. Responsible party is Deputy Director.

There are no policies and procedures governing the street sweeping program.

Having formally documented policies and procedures in place is crucial for operations to be consistent. IA requested street sweeping standard operating procedures (SOPs) from DPS and none were provided. SOPs are also needed to ensure that the program complies with Ohio EPA regulations.⁶ At a minimum, SOPs should define expectations for equipment cleaning and maintenance, outline procedures for addressing unfinished or missed routes, establish standards for daily operations, and provide guidance to ensure consistent service delivery across all routes.

Recommendation 2: Establish street sweeping policies and procedures for management and staff.

Department Response: Agree. Neighborhood Operations Division (NOD) will create and implement Standard Operating Procedures (SOPS) governing street sweeping operations. The

⁶ Per Ohio EPA General Permit OHQ000004, municipalities should, at a minimum, "Develop and implement a street sweeping program with proper debris management and disposal. Your program shall document debris collected to prioritize areas to sweep and/or document lane miles swept. At a minimum, sweeping shall occur on curbed streets two times per year" and "Document the amount of street sweeping and catch basin cleaning material collected and properly disposed, including disposal location."

SOPs will address route completion requirements, equipment maintenance, documentation standards, debris disposal procedures, missed-routes, supervisory review requirements, and compliance with OEPA documentation requirements. Complete by FY 2028. Responsible party is Deputy Director.

Management review and oversight of program operations need improvement.

Effective management review and oversight is necessary to ensure that street sweeping is operating optimally and in compliance with EPA regulations.⁷ During the audit period (FY24 – FY26) oversight of street sweeping lacked continuity, with responsibility shifting across three SACs. Notably, the SAC assigned in FY26 was not adequately trained on the fleet management system and did not consistently monitor GPS data. IA sampled 123 daily checklists, which are self-reported by ASCEOs. Consequently, there is no assurance that assigned routes are completed as required, increasing the risk of incomplete service delivery and reduced program effectiveness.

Recommendation 3: Ensure the SAC is properly trained, require the SAC to perform and document route reviews, and establish interim oversight of the SAC until they are fully proficient.

Department Response: Agree. DPS has implemented additional oversight measures and will establish a formal training program for NOD supervisors responsible for street-sweeping operations. The Department is currently working with a vendor to optimize sweeping routes, implement telematics for hydraulic tracking for sweeping verifications to support data collection, and include supervisory documentation requirements in this program. Complete by FY 2028. Responsible parties include Deputy Director, NOD Superintendent and Right-of-Way Operations Supervisor.

The Cincinnati Municipal Code is not enforced.

The CMC states that DPS may temporarily restrict parking and act as parking enforcement during street sweeping operations.⁸ Vehicles parked illegally while streets are being swept may be fined \$65.00.⁹ DPS does not currently use parking signage citywide during operations and thus cannot issue citations for illegally parked vehicles. Given that street sweeping occurs five days per week, this represents a potentially significant loss of revenue for the City. Further, the absence of enforcement undermines operational effectiveness, as illegally parked vehicles obstruct cleaning routes.

Recommendation 4: Enforce the Cincinnati Municipal Code.

Department Response: Agree in Principle. DPS agrees that compliance and enforcement tools can improve operational effectiveness. However, implementation will require coordination among Parking Enforcement and other stakeholders to evaluate operational impacts, staffing requirements, public communication, and enforcement authority. As a result, the lack of public awareness of parking restrictions reduces the efficiency of street-sweeping operations. DPS will analyze the comprehensive review and develop recommendations regarding enforcement strategies. Complete by FY2028. Responsible party is Deputy Director.

⁷ Ohio EPA Permit OHQ000004/OHQ000005 (Ohio Small Municipal Separate Storm Sewer Systems or MS4s)

⁸ CMC Sec. 502-3. – Parking Prohibitions During Street Sweeping Operations

⁹ CMC Sec. 515-11. – Parking Infraction Fines

Permanent street sweeping signage is outdated.

Permanent street sweeping signage is necessary to improve public knowledge of street sweeping and ensure that vehicles are moved from curblines during operations. Currently, signage is only in use on four streets in the Clifton area but not citywide. This area was part of a pilot program the City debuted in 2017 in order to gauge the effectiveness and community reception to street sweeping signage. IA found that the permanent street sweeping signage in place is outdated. Signage observed during audit fieldwork indicates parking restrictions from 3:00 a.m. - 7:00 a.m.; however, current street sweeping operations occur between 7:00 a.m. - 3:00 p.m. As a result, there is a lack of public awareness of parking restrictions, which reduces the efficiency of street sweeping operations.

Recommendation 5: DPS management should analyze the results of the pilot program and determine if installing permanent street signage citywide is appropriate. The existing signage should be updated or removed based on the results of the analysis.

Department Response: Agree. DPS is currently conducting an inventory of the condition and effectiveness of existing citywide signage and locations, and determining whether updating, expanding, or removing street-sweeping signage is appropriate. DPS is proactively attending the Community Council Meetings to discuss signage concerns. Completion by April 2027. Responsible parties include NOD Superintendent and Right-of-Way Operations Supervisor.

Contract terms are not being enforced.

A third party is contracted to clean streets within the Central Business District, Over-the-Rhine, Pendleton, and Neighborhood Business Districts. Ensuring contractor compliance is critical to maintaining City standards for downtown street cleaning, and especially important, given the contract pays approximately \$1.3 million annually.

IA examined 34 monthly invoices from July 2023 – April 2026 and found the contractor failed to provide the required GPS coordinates and water usage reports throughout this period, per contract terms. While the billing rates and invoice descriptions align with the contract, IA was unable to verify that contracted services were actually performed. Additionally, per contract terms,¹⁰ an independent observer is tasked with inspecting streets swept by the contractor and scoring them on a four point scale. DPS claims that the ROW supervisor inspects roads cleaned by the contractor. However, there is no evidence confirming this and the streets are not formally rated. This lack of contract oversight reduces the assurance that billed services are actually performed and increases the risk of improper payments.

Recommendation 6: Ensure that all contractual terms are being enforced.

Department Response: Agree. DPS will implement compliance enforcement of contract administration procedures to ensure all required documentation is submitted and reviewed before invoice approval. Monitoring of the contract will include monthly meetings with the contractor for performance verification and contractor compliance review, including GPS reports and daily hydraulic broom reports. Immediate implementation with full documentation enforcement by October 31, 2026. Responsible parties include Deputy Director and NOD Superintendent.

¹⁰ Contract 191R005252 and Contract 261R005252

The current technology is limited in its effectiveness.

Effective street sweeping operations depend on having the right technology in place. However, the current fleet management software provides only basic GPS tracking and lacks the capability to capture data on broom usage. This limitation increases reliance on manual verification processes, such as physical inspection, which reduces efficiency and increases the risk that incomplete or inaccurate data may go undetected. Additionally, the software's slow and unresponsive nature limits management's ability to verify street sweeping performance and decreases overall operational efficiency.

Recommendation 7: Management should determine a method to improve system efficiency to meet the needs of the program.

Department Response: Agree. DPS will implement telematics and piloting route monitoring technologies to improve operational visibility, reporting capabilities, route verification, and performance tracking. Implementation by FY 2028. Responsible party is Deputy Director.

The street sweeping routes need to be reevaluated.

Having up-to-date street sweeping routes is essential to ensure that appropriate coverage of all City streets is in place. Street sweeping routes have not been evaluated since 2017. Since then, changes in staffing, departmental priorities, and other factors have made it difficult to consistently complete all routes. As a result, incomplete routes may go unaddressed until the next scheduled monthly cycle. It is essential that the routes be reevaluated based on current conditions to, at a minimum, comply with the Ohio EPA's requirement that streets be swept twice per year.¹¹ This evaluation should include reassessing route length, frequency and coverage based upon available personnel, incorporate seasonal challenges into route planning and time estimates, and periodically review routes to ensure program consistency and efficiency.

Recommendation 8: Management should conduct a comprehensive evaluation of street sweeping routes to establish alignment with current staffing levels, operational demands, and seasonal conditions.

Department Response: Agree. DPS understands that routes should be evaluated annually to reflect operational effectiveness, staffing resources, equipment capabilities, seasonal considerations, and OEPA requirements. A comprehensive route assessment is being conducted to optimize routes and improve service delivery. Implementation by FY 2028. Responsible party is Deputy Director.

The Sweeper Daily Checklists are not always complete.

ASCEOs are required to complete "Sweeper Daily Checklists," which summarize the work performed each day and any issues encountered. Complete and accurate checklists are essential for program oversight. IA sampled 123 checklists and found 70 (57%) checklists were incomplete. Key details missing from the forms include start and end time, mileage, dump times, and whether the route was completed. Incomplete forms reduce the reliability of operational

¹¹ Ohio EPA Permit OHQ000004/OHQ000005

data and limit management's ability to monitor productivity, verify route completion, and identify operational issues in a timely manner.

Recommendation 9: Ensure the Sweeper Daily Checklists are completed.

Department Response: Agree. DPS has reinforced expectations regarding completion of daily checklists, created new daily worksheets, and established additional supervisory review and accountability measures to ensure records are completed, accurate, and submitted in a timely manner. The Operations Supervisor will be responsible for reviewing all checklists and daily worksheets. Immediate implementation. Responsible parties include ROW Supervisor and Operations Supervisor.

The pre- and post- inspection worksheets used by ASCEOs are not tailored to street sweeping machinery.

ASCEOs are required to complete pre-trip and post-trip inspection logs to ensure vehicles are in safe operating condition and to identify maintenance needs promptly. However, the current logs are designed for single-axle trucks and are not suited to the complexity of street sweepers. Unlike standard trucks, sweepers include specialized components such as brooms, vacuums, and hoppers. To ensure reliable performance, reduce breakdowns, and control long-term maintenance costs, inspection logs should be tailored to each specific type of equipment.

Recommendation 10: Update pre- and post- inspection worksheets and tailor them specifically to street sweeping machinery, including the cleaning of equipment.

Department Response: Agree. DPW will create inspection forms that reflect the specialized operating components of street-sweeping equipment, including broom systems, hoppers, vacuum systems, regenerative air systems, and cleaning requirements. The Operations Supervisor will be responsible for reviewing all worksheets. Immediate implementation. Responsible party is Right-of-Way Supervisor.

There are discrepancies in the lane miles reported.

DPS requires all ASCEOs to track miles on the Sweeper Daily Checklist. The forms are submitted to the SAC, who reviews and signs off on them. The forms are then forwarded to the NOD clerk typist, who compiles the data daily. Additionally, a DPS accountant aggregates the data on a monthly basis which is then reported annually both internally and externally. IA tested the data by evaluating 8 weeks of daily summaries and comparing the miles swept to the clerk's spreadsheet and the numbers reported by the accountant to determine accuracy. IA specifically noted that miles were overstated by the accountant in two of the eight weeks reviewed. See table 2 below for a summary of the results.

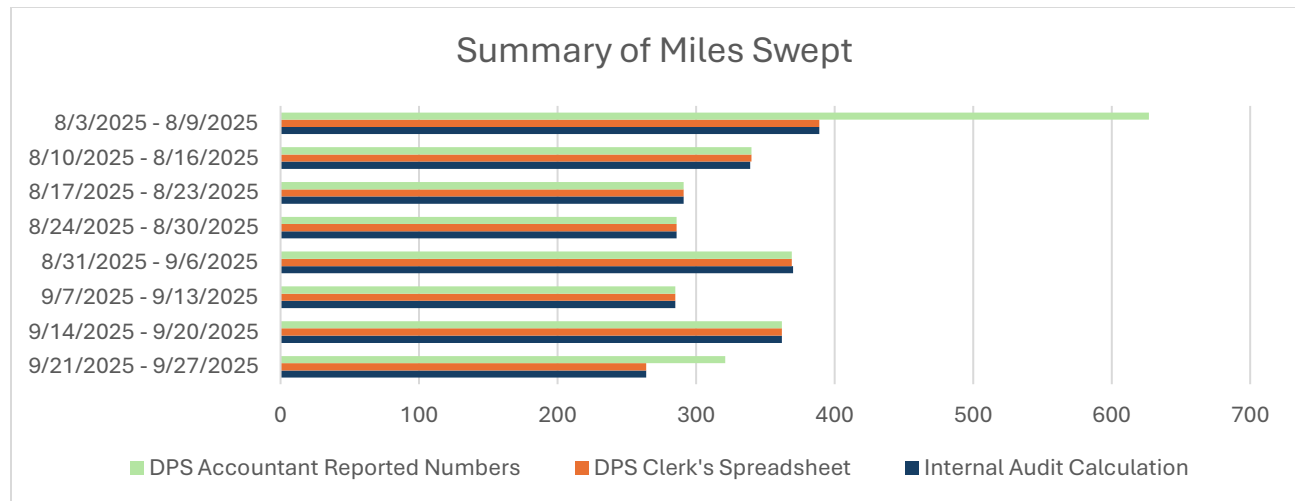


Table 2: Summary of Miles Swept

Recommendation 11: Establish a formal reconciliation process whereby recorded daily checklists are routinely compared to totals maintained by the accountant, with discrepancies investigated and resolved timely.

Department Response: Agree. DPS will establish a weekly documented reconciliation process to compare daily operational records, supervisory reports, and monthly reporting totals. Any identified discrepancies will be reviewed and resolved before submission of external performance reports. Immediate implementation. Responsible parties include NOD Assistant Superintendent and Right-of-Way Operations Supervisor.

The street sweeping schedule is not sufficiently detailed online.

A publicly posted street sweeping schedule is important to foster transparency with community members and improve operational efficiency. Currently, residents can look up their addresses on the Cincinnati Neighborhood Service Schedule¹² and locate the date of their next scheduled cleaning. However, if the address falls within a neighborhood swept by the contractor, this information is unavailable. As a result, there is a risk that residents are unaware of scheduled sweeping activities, leading to vehicles remaining parked along curb lines during operations. This reduces the effectiveness of street sweeping, contributes to incomplete route coverage, and limits DPS's ability to maximize operational efficiency.

Recommendation 12: DPS should work to digitize the schedule and publish it on the City's website.

Department Response: Agree. DPS supports increasing transparency in street-sweeping operations. Improve the coordination report with the DPS PIO and the City's PIO. implementation plan by July 2028. Responsible parties include DPS PIO, Deputy Director and NOD Superintendent.

¹² <https://cagismaps.hamilton-co.org/cincinnatiServices/ServiceSchedules/>

III. Conclusion

Street sweeping plays a critical role in keeping Cincinnati's streets, air, and water clean. The audit revealed several opportunities for improvement of street sweeping operations.

Overall, IA found that to strengthen internal controls, the following recommendations should be incorporated: develop and implement a strategic plan with defined goals for street sweeping operations; ensure that the CMC and all contractual terms are enforced; and conduct a comprehensive evaluation of street sweeping routes. Implementing these recommendations will ensure that proper internal controls have been established to ensure efficiency, effectiveness, and accountability over the street sweeping program.

IV. Department of Public Services Response

The Department of Public Services (DPS) appreciates the street-sweeping audit report by Lauren Sundaraajan, Ann Herzner, and Steven Adamson and values the opportunity to review and respond to the findings in the draft document. DPS understands that street sweeping is an essential component of the City's environmental responsibilities, stormwater management program, and neighborhood quality-of-life initiatives. We are committed to strengthening our oversight, improving documentation, enhancing operational efficiencies, and most importantly, ensuring continued compliance with contractual requirements.

Recommendation 1: Develop and implement a strategic plan with defined goals for street sweeping operations.

Department Response: Agree. Neighborhood Operations Division (NOD) will develop a formal Street Sweeping Strategic Plan that establishes goals, performance measures, route coverage expectations, regulatory compliance objectives, and operational standards reporting. The plan will include measurable performance indicators and provide a framework for annual review and adjustments will be made based on staffing levels, equipment availability, and operational priorities. This process will be implemented by April 5, 2027. Responsible party is Deputy Director.

Recommendation 2: Establish street sweeping policies and procedures for management and staff.

Department Response: Agree. Neighborhood Operations Division (NOD) will create and implement Standard Operating Procedures (SOPS) governing street sweeping operations. The SOPs will address route completion requirements, equipment maintenance, documentation standards, debris disposal procedures, missed-routes, supervisory review requirements, and compliance with OEPA documentation requirements. Complete by FY 2028. Responsible party is Deputy Director.

Recommendation 3: Ensure the SAC is properly trained, require the SAC to perform and document route reviews, and establish interim oversight of the SAC until they are fully proficient.

Department Response: Agree. DPS has implemented additional oversight measures and will establish a formal training program for NOD supervisors responsible for street-sweeping operations. The Department is currently working with a vendor to optimize sweeping routes, implement telematics for hydraulic tracking for sweeping verifications to support data collection, and include supervisory documentation requirements in this program. Complete by FY 2028. Responsible parties include Deputy Director, NOD Superintendent and Right-of-Way Operations Supervisor.

Recommendation 4: Enforce the Cincinnati Municipal Code.

Department Response: Agree in Principle. DPS agrees that compliance and enforcement tools can improve operational effectiveness. However, implementation will require coordination among Parking Enforcement and other stakeholders to evaluate operational impacts, staffing requirements, public communication, and enforcement authority. As a result, the lack of public

awareness of parking restrictions reduces the efficiency of street-sweeping operations. DPS will analyze the comprehensive review and develop recommendations regarding enforcement strategies. Complete by FY2028. Responsible party is Deputy Director.

Recommendation 5: DPS management should analyze the results of the pilot program and determine if installing permanent street signage citywide is appropriate. The existing signage should be updated or removed based on the results of the analysis.

Department Response: Agree. DPS is currently conducting an inventory of the condition and effectiveness of existing citywide signage and locations, and determining whether updating, expanding, or removing street-sweeping signage is appropriate. DPS is proactively attending the Community Council Meetings to discuss signage concerns. Completion by April 2027. Responsible parties include NOD Superintendent and Right-of-Way Operations Supervisor.

Recommendation 6: Ensure that all contractual terms are being enforced.

Department Response: Agree. DPS will implement compliance enforcement of contract administration procedures to ensure all required documentation is submitted and reviewed before invoice approval. Monitoring of the contract will include monthly meetings with the contractor for performance verification and contractor compliance review, including GPS reports and daily hydraulic broom reports. Immediate implementation with full documentation enforcement by October 31, 2026. Responsible parties include Deputy Director and NOD Superintendent.

Recommendation 7: Management should determine a method to improve system efficiency to meet the needs of the program.

Department Response: Agree. DPS will implement telematics and piloting route monitoring technologies to improve operational visibility, reporting capabilities, route verification, and performance tracking. Implementation by FY 2028. Responsible party is Deputy Director.

Recommendation 8: Management should conduct a comprehensive evaluation of street sweeping routes to establish alignment with current staffing levels, operational demands, and seasonal conditions.

Department Response: Agree. DPS understands that routes should be evaluated annually to reflect operational effectiveness, staffing resources, equipment capabilities, seasonal considerations, and OEPA requirements. A comprehensive route assessment is being conducted to optimize routes and improve service delivery. Implementation by FY 2028. Responsible party is Deputy Director.

Recommendation 9: Ensure the Sweeper Daily Checklists are completed.

Department Response: Agree. DPS has reinforced expectations regarding completion of daily checklists, created new daily worksheets, and established additional supervisory review and accountability measures to ensure records are completed, accurate, and submitted in a timely

manner. The Operations Supervisor will be responsible for reviewing all checklists and daily worksheets. Immediate implementation. Responsible parties include ROW Supervisor and Operations Supervisor.

Recommendation 10: Update pre- and post- inspection worksheets and tailor them specifically to street sweeping machinery, including the cleaning of equipment.

Department Response: Agree. DPW will create inspection forms that reflect the specialized operating components of street-sweeping equipment, including broom systems, hoppers, vacuum systems, regenerative air systems, and cleaning requirements. The Operations Supervisor will be responsible for reviewing all worksheets. Immediate implementation. Responsible party is Right-of-Way Operations Supervisor.

Recommendation 11: Establish a formal reconciliation process whereby recorded daily checklists are routinely compared to totals maintained by the accountant, with discrepancies investigated and resolved timely.

Department Response: Agree. DPS will establish a weekly documented reconciliation process to compare daily operational records, supervisory reports, and monthly reporting totals. Any identified discrepancies will be reviewed and resolved before submission of external performance reports. Immediate implementation. Responsible parties include NOD Assistant Superintendent and Right-of-Way Operations Supervisor.

Recommendation 12: DPS should work to digitize the schedule and publish it on the City's website.

Department Response: Agree. DPS supports increasing transparency in street-sweeping operations. Improve the coordination report with the DPS PIO and the City's PIO. implementation plan by July 2028. Responsible parties include DPS PIO, Deputy Director and NOD Superintendent.

DPS appreciates the audit team's review and recognizes the value of continuous improvement to the NOD street sweeping program. The department has made significant investments and remains committed to providing efficient, accountable, and environmentally responsible services. DPS will use the audit recommendations as a roadmap to strengthen program administration, performance monitoring, and long-term operational effectiveness.