



**CALIFORNIA**  
**High-Speed Rail Authority**

# Valley Fever Mitigation and Oversight Audit

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October 2016

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## EXECUTIVE SUMMARY

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The California High-Speed Rail Authority's (Authority) Audit Office has completed a review of the Authority Valley Fever mitigation and oversight procedures developed to address potential exposures. The engagement included a review of the contracts and associated documents for Construction Packages 1 and 2-3. In addition, it included reviewing Valley Fever mitigation and oversight procedures of the five active construction sites for Construction Package 1, and one demolition site for Construction Package 2-3 in March 2016. The purpose of the audit was to review processes in place within the Authority's Program Delivery-Construction Branch.

The specific objectives were to:

1. Identify the roles and responsibilities of each entity as outlined in the California High-Speed Train System Construction Safety and Security Program.
2. Determine if the Design-Build Contractors have complied with the General Provisions of the contract specific to Valley Fever.
3. Determine if Project and Construction Management Contractors oversight complies with required mitigation measure commitments.

The Audits Office did not identify any internal control weaknesses related to Valley Fever mitigation and oversight, that is, the processes and procedures developed are being implemented as measures to protect worker health. Specifically,

1. The California High Speed Train System Construction Safety and Security Management Plans were reviewed and the roles and responsibilities of each entity have been identified and entities are currently meeting outlined roles and responsibilities.
2. A review and test of the Design-Build Contractors' developed process was conducted and each Design-Builder is currently complying with the General Provisions of the contract specific to Valley Fever.
3. A review and test of the Project and Construction Management Contractors oversight shows it complies with required mitigation measures commitments.

## BACKGROUND

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According to the California Department of Public Health Valley Fever (coccidioidomycosis) is an illness that is caused by a fungus that lives in the soil and dirt. It can infect the lungs and cause flu-like symptoms or severe illness. Valley Fever infection can occur year-round. In California, it has been reported from most counties, but especially from San Joaquin (Central) Valley. Anyone who lives in, works in, or visits a place with Valley Fever can be infected; even young and healthy people can get Valley Fever. People who disturb dirt or soil when playing or working (e.g., construction, farming, or military work) in the Central Valley may be at risk of infection. People can get sick by breathing in a form of the Valley Fever fungus called spores. Spores are too small to be seen. However, they can get into the air with dust when it is windy or when dirt is disturbed. However, about 60% of infected people will not get sick. .

The Authority has the ultimate authority and responsibility for implementation of the Safety and Security Management Plan for the project as outlined in the executed Design-Build contracts. The Design-Build Contractor is responsible for ensuring safety at all work sites, including activities of subcontractors. The Contractors are required to develop a Site Specific Security Plan for each work-site, which shall address field work-related threats/vulnerabilities and mitigation measures.

(Authority has included contract language in each executed construction package contract HSR 13-06 (CP 1) and HSR 13-57 (CP 2-3) related to dust and wind-blown debris. The Valley Fever specific language was included through Mitigation Monitoring and Enforcement Program Amendments executed September 2015, and incorporated into the construction package contract language.

The General Provisions of each executed Design-Build contract require that the Design-Build Contractor comply with the Clean Air Act and Valley Fever Mitigation and Training. In addition, each Design-Build Contractor is required to provide the San Joaquin Valley Air Pollution Control District with a Dust Control Plan, which complies with the State of California Dust Control requirements. The plan must be approved or conditionally approved prior to the start of any construction activities. Each Design-Build Contractor is required to ensure all employees are informed and educated on Valley Fever symptoms, preventative guidelines and mitigating exposure when possible.

The Project and Construction Management Contractor team is responsible for oversight of the construction, including the safety aspects related to field activities. The Project and Construction Management Contractor team inspects all construction sites regularly to ensure the Design-Builder is complying with safety and security requirements. The Project and Construction Management Contractor team also provides the Design-Builder with any updates received or identified by the Authority on Valley Fever. The informational and educational material is provided to the Design-Build Contractor, so training is current and remains relevant to employees.

## AUDIT SCOPE AND METHODOLOGY

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The scope of the engagement was limited to the Valley Fever mitigation and oversight procedures of the contracts and associated documents and five active construction sites for Construction Package 1, and one demolition site for Construction Package 2-3.

The specific objectives were to:

1. Identify the roles and responsibilities of each entity as outlined in the California High-Speed Train System Construction Safety and Security Program.
2. Determine if the Design-Build Contractors have complied with the General Provisions of the contract specific to Valley Fever.
3. Determine if Project and Construction Management Contractors oversight compliance with required mitigation measure commitments.

The audit included examining applicable policies and procedures developed, and preventative measures implemented by the Design-Build Contractors for Construction Packages 1 and 2-3 (CP 1) and (CP 2-3), respectively, to mitigate the exposure of Valley Fever to individuals who could potentially be exposed through construction activities, as well as the Project and Construction Management Contractors oversight of the mitigation measure commitments.

The following procedures were performed:

- Identify and interview each entity's key personnel involved in overseeing the Safety and Security program specifically related to Dust Control, Valley Fever, and Wind-Blown Debris and Valley Fever Mitigation, and Mitigation Monitoring and Enforcement Program.
- Review the General Provisions in executed contracts HSR 13-06 (CP1), HSR 13-57 (CP 2-3) for Dust Control, Valley Fever Mitigation, and Mitigation Monitoring and Enforcement Program provisions.
- Review the executed Site Specific Health and Safety Plan from each Design-Build Contractor addressing Dust Control and Valley Fever Mitigation and Oversight.
- Gather evidence of compliance with Site Specific Health and Safety Plan, including but not limited to training material and handouts provided to employees addressing Dust Control and Valley Fever.
- Determine if Design-Build Contractors' Dust Control and Valley Fever Mitigation and Oversight procedures meet required provisions of the California Environmental Protection Agency, San Joaquin Valley Air Pollution Control District and the Clean Air Act.
- Review the executed Project and Construction Manager Contract Management Manuals for CP 1 and CP 2-3 to identify the responsibilities related to Dust Control, Valley Fever Mitigation and Oversight, and Mitigation Monitoring and Enforcement Program Amendments.
- Gather evidence, not limited to construction inspection reports, pictures, and any additional documentation, to determine compliance with the Dust Control Plan, Valley Fever Mitigation and Oversight, and Mitigation Monitoring and Enforcement Program Amendments.

The audit took place in Sacramento and Central Valley locations, as applicable. Except as noted, our audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing issued by the Institute of Internal Auditors. However, the Authority's Audit Office has not undergone a peer review due to the recent formation of the Audit Office and lack of body of work to be reviewed. Until a peer review is performed, we cannot cite that we are in compliance with the International Standards for the Professional Practice of Internal Auditing.

## RESULTS

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The Audits Office did not identify any internal control weaknesses related to Valley Fever mitigation and oversight, that is, the processes and procedures developed are being implemented as measures to protect worker health. Specifically,

1. The California High Speed Train System Construction Safety and Security Management Plans were reviewed and the roles and responsibilities of each entity were identified and entities are currently meeting outlined roles and responsibilities.
2. A review and test of the Design-Build Contractors developed process was conducted and each Design-Builder Contractor is currently complying with the General Provisions of their contract.
3. A review and test of Project and Construction Management Contractors oversight demonstrated compliance with required mitigation measures commitments