

# OFFICE OF AUDITS & ADVISORY SERVICES

## FUEL CARD AND FOB MANAGEMENT CONTROLS

### *FINAL REPORT*



Chief of Audits: [Juan R. Perez](#)

Audit Manager: [Franco Lopez, CIA, CPA, CISA, CISSP](#)

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JUAN R. PEREZ  
CHIEF OF AUDITS

September 22, 2025

TO: Marisa Barrie, Director  
Department of Public Works

FROM: Juan R. Perez  
Chief of Audits

**FINAL REPORT: FUEL CARD AND FOB MANAGEMENT CONTROLS AUDIT**

Enclosed is our report on the Fuel Card and Fob Management Controls Audit. We have reviewed your response to our recommendations and have attached it to the audit report.

The actions taken and/or planned, in general, are responsive to the recommendations in the report. As required under Board of Supervisors Policy B-44, we respectfully request that you provide quarterly status reports on the implementation progress of the recommendations. You or your designee will receive email notifications when these quarterly updates are due, and these notifications will continue until all actions have been implemented.

If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ  
Chief of Audits

AUD:CJE:nb

Enclosure

c: Dahvia Lynch, Deputy Chief Administrative Officer, Land Use and Environment Group  
Jennifer Lawson, Chief Operations Officer, Land Use and Environment Group  
Joan Bracci, Chief Financial Officer  
Tracy Drager, Auditor and Controller  
Aimee Leighton, Group Finance Director, Land Use and Environment Group



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JUAN R. PEREZ  
CHIEF OF AUDITS

September 22, 2025

TO: Jeff Collins, Director  
San Diego County Fire

FROM: Juan R. Perez  
Chief of Audits

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Enclosure

c: Andrew Strong, Deputy Chief Administrative Officer, Public Safety Group  
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JUAN R. PEREZ  
CHIEF OF AUDITS

September 22, 2025

TO: Marko Medved, Director  
Department of General Services

FROM: Juan R. Perez  
Chief of Audits

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If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ  
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c: Brian Albright, Deputy Chief Administrative Officer, Finance and General Government Group  
Carrie Hoff, Chief Operations Office, Finance and General Government Group  
Joan Bracci, Chief Financial Officer  
Tracy Drager, Auditor and Controller  
Judy Ying, Group Finance Director, Finance and General Government Group

## About the Office of Audits & Advisory Services

The mission of the Auditor and Controller's Office of Audits & Advisory Services (OAAS) is to provide independent, objective assurance and consulting services designed to add value and improve the County of San Diego's operations. OAAS helps the County accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

## Audit Authority

OAAS derives its authority to conduct audits of County departments and programs primarily from the County Charter, County Administrative Code, Board of Supervisors Policy Manual, and California Government Code.

## Statement of Auditing Standards

This audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing prescribed by the Institute of Internal Auditors as required by California Government Code, Section 1236.



# AUDIT OBJECTIVE & SCOPE

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The Office of Audits & Advisory Services (OAAS) completed an audit of the Fuel Card and Fob Management Controls. The objective of the audit was to assess the design and operating effectiveness of the fuel card and fob management controls.

The scope of the audit included an assessment of the design and operating effectiveness of the fuel card and fob management controls. The following departments were selected for audit testing: Sheriff's Department, District Attorney's Office (DA), Department of Public Works (DPW), County Fire, and Agriculture, Weights & Measures (AWM).

## AUDIT RESULTS

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Within the scope of the audit, OAAS determined the design and operating effectiveness of the fuel card and fob management controls need improvement. The following findings outline the key issues identified during the audit.

### Finding I: Fuel Card Assignment and Usage Practices Not Aligned with County Policy

During interviews with the County Fire Vehicle Coordinator and testing of Commercial Fuel Card usage, OAAS identified several areas of noncompliance and internal control weaknesses:

- All 152 Commercial Fuel Cards issued to County Fire are assigned to the County Fire Vehicle Coordinator.
- A single Personal Identification Number (PIN) is used across all County Fire Fuel Cards.

These practices were implemented because non-County personnel (Cal Fire employees) primarily use these cards, and each vehicle has multiple drivers who may require access to the same fuel card. However, this practice is not consistent with Administrative Manual 0050-01-11, which requires fuel cards to be assigned only to County employees and may not be issued to temporary employees, volunteers, or student workers.

Additionally, Administrative Manual 0050-01-11 requires Department Vehicle Coordinators to review and reconcile fuel transactions and investigate questionable charges. However, by assigning all cards to the Vehicle Coordinator, proper segregation of duties is not maintained, thereby increasing the risk of misuse or undetected errors.

The Commercial Fuel Credit Card Rules of Use and Statement of Understanding (which each cardholder must sign before receiving a card) explicitly state that cardholders may not allow others to use their assigned card.

OAAS also reviewed the Cooperative Fire Programs Fire Protection Reimbursement Agreement, Exhibit D: Additional Provisions. This agreement states that the local agency assumes full responsibility for liabilities under California Vehicle Code Sections 17000 and 17001. It further

outlines that state employees operating local agency-owned vehicles are considered employees of the local agency, except where the local agency would have no duty to indemnify the state as covered by Exhibit C, Section 6.

Overall, County Fire's current fuel card management practices do not align with the requirements outlined in Administrative Manual 0050-01-11 or the Commercial Fuel Credit Card Rules of Use. The assignment of all cards to a single individual and the use of a shared PIN reduce accountability and may limit the department's ability to effectively monitor and investigate fuel transactions. This arrangement increases the risk of errors or unauthorized use and would benefit from strengthened internal controls to ensure compliance and improve oversight.

## RECOMMENDATION:

County Fire should work with the Department of General Services (DGS) to strengthen compliance with fuel card policies and enhance internal controls by taking the following actions:

1. **Obtain Signed Acknowledgments:** Ensure that all Cal Fire personnel sign the Commercial Fuel Credit Card Rules of Use and Statement of Understanding to acknowledge their responsibilities and agreement to comply with established policies.
2. **Reassign Fuel Cards for Accountability:** Reassign existing Commercial Fuel Cards across Cal Fire Division Chiefs to improve accountability and better align with the intended cardholder-based assignment model.
3. **Decentralize PIN Management:** Designate Cal Fire Battalion Chiefs to manage and update the PINs associated with their respective fuel cards to support secure access.
4. **Document Policy Exceptions:** Update the Commercial Fuel Credit Card Rules of Use and Administrative Manual 0050-01-11 to include a documented exception permitting Cal Fire personnel to use Commercial Fuel Cards for fueling County Fire vehicles.
5. **Enhance Monitoring Through Analytics:** Evaluate the feasibility of using data analytics or reporting tools to assist the County Fire Vehicle Coordinator in monitoring and reviewing fuel card transactions more efficiently and effectively.

## Finding II:

### Fuel Fob Inventory, Documentation, and Configuration Controls Require Strengthening

During the audit testing of fuel fob management, OAAS identified several control weaknesses related to fuel fob assignment, inventory tracking, and system configuration. Among the five departments selected for testing, only DPW was unable to account for the majority of its assigned fuel fobs. Specifically:

- Out of a judgmental sample of 30 fuel fobs from a total population of 228 assigned to DPW, the department was unable to verify the physical possession of 27 fuel fobs at the time of audit testing.



- For 6 of the 27 unverified fobs, support documentation was provided. However, excessive wear rendered their identification numbers illegible, preventing OAAS from conclusively matching them to the corresponding assigned records.
- For the remaining 21 unverified fobs, no supporting documentation was provided. This included two fobs that were reportedly stored with vehicles undergoing maintenance at a third-party repair facility, but which could not be physically verified.

In addition to the inventory and documentation issues, OAAS identified fuel fobs that were misconfigured in the M5 system. Out of a population of 1,784 fuel fobs at the time of testing, a judgmental sample of 30 were selected for testing. Of those, 18 fobs were found to not be configured to prompt the cardholder for vehicle mileage at County fueling stations.

At the time of testing, the County's Fuel Fob Policy was still in draft status, and no finalized procedures were in place to guide departments and DGS in the consistent management and oversight of fuel fobs. DGS acknowledged that the configuration issues identified were the result of data entry errors, and that no formal validation process exists to ensure the accuracy of fuel fob data entered into the system.

Fuel fobs not in the possession of the assigned department, coupled with the lack of reliable documentation and configuration controls, increase the risk of inappropriate or unauthorized fuel transactions. Additionally, the absence of a finalized Fuel Fob Policy limits accountability and hinders the ability to enforce standardized controls across departments.

## RECOMMENDATION:

To strengthen internal controls over fuel fob management and reduce the risk of unauthorized fuel transactions, DPW should work with DGS to:

1. Conduct a comprehensive physical inventory of all assigned fuel fobs to verify current possession and ensure alignment with the M5 Fleet Management System.
2. Deactivate fuel fobs that are no longer needed or cannot be accounted for.

Additionally, DGS should:

1. Finalize and adopt the County Fuel Fob Policy, ensuring it includes clear guidance on fuel fob usage, configuration standards, assignment protocols, and responsibilities for oversight/monitoring.
2. Communicate Fuel Fob policy to departments, provide training, and monitor for compliance.
3. Ensure individually assigned fuel fobs are configured to prompt for vehicle mileage at the pump.
4. Implement a data validation process within DGS to verify the accuracy of fuel fob configurations entered into M5 and periodically review system settings to detect and correct data entry errors.

5. Evaluate physically labeling or etching fuel fobs with durable, legible identifiers to ensure long-term traceability during inventory checks in addition to, or as a replacement for, the brass tags with vehicle identification numbers currently provided by DGS and affixed to vehicle keychains.

## Finding III: Fuel Card Documentation, Review, and Record Keeping Needs Improvement

Audit testing identified several deficiencies in documentation practices, transaction review processes, and recordkeeping procedures related to the County's Fuel Card Program. These control weaknesses increase the risk of noncompliance, unauthorized use, and ineffective oversight. Specific issues noted include:

- **Incomplete Retention of Receipts and Usage Logs:** Out of the five departments included in audit testing, two departments do not require or collect fuel receipts and usage logs from fuel card holders. Two additional departments were inconsistent in collecting and retaining these documents, resulting in insufficient transaction documentation.
- **Lack of Transaction Review Records:** None of the departments tested retained evidence of Departmental Vehicle Coordinator reviews of monthly fuel card transactions. Three of the five departments confirmed that formal transaction reviews are not being conducted. Instead, they rely on DGS to flag improper transactions, which limits departmental accountability.
- **Lack of Coordinator Training on Detecting Questionable Charges:** Four of the five Departmental Vehicle Coordinators interviewed indicated they had not received any training on how to identify or investigate questionable charges. The fifth coordinator confirmed limited training had been provided but noted it lacked specificity related to fraud detection.
- **Active Fuel Cards Assigned to Separated Employees:** Out of a population of 941 active commercial fuel cards, a judgmental sample of 31 cardholders was selected for review. The audit identified four individuals across two departments who were no longer employed by the County at the time of testing. For two of these individuals, separation occurred in March 2024; however, their fuel cards remained active until October 2024. Although the remaining two cards were deactivated within the same month as separation, the presence of active fuel cards assigned to separated employees increases the risk of unauthorized use and deficiencies in the card deactivation and employee offboarding processes.
- **Use of Fuel Cards for Non-Fuel Purchases:** Inappropriate use of fuel cards for non-fuel transactions was identified in two of the five departments sampled:
  - Within the Sheriff's Department, testing of a judgmental sample of 34 transactions from a total population of approximately 16,500 identified four car wash transactions and one purchase of diesel exhaust fluid.
  - Within the County Fire Department, testing of a judgmental sample of 27 transactions from a total population of approximately 1,900 identified two car wash transactions and four purchases related to oil or miscellaneous items.

The issues noted appear to be due to training deficiencies with Departmental Vehicle Coordinators having not been adequately trained or unaware of their roles and responsibilities as detailed in the Administrative Manual 0050-01-11 including:

- Monitoring cardholder documentation submissions by the 10th of each month and reconciling fuel receipts, usage logs, and billing statements by the 15th for the previous month.
- Investigating questionable charges and reporting any misuse or fraud to the DGS Fleet Manager.
- Completing the Request for Cancellation of Commercial Fuel Credit Card form and forwarding it to the DGS Fleet Manager/designee within three working days.

Additionally, fuel card holders were unclear or unaware of their roles and responsibilities including:

- Adhering to Fuel Card usage requirements outlined in Commercial Fuel Credit Card Rules of Use and Statement of Understanding, and obtaining and retaining Fuel Credit Card receipts for each transaction.
- Completing the Commercial Fuel Credit Card Usage Log monthly and submitting a completed transaction log with all receipts for transactions by the 6th day of each month to the Vehicle Coordinator.

## RECOMMENDATION:

To strengthen internal controls, improve compliance, and enhance oversight of the County's Fuel Card Program, it is recommended that the DGS work closely with all departments to implement the following corrective actions:

1. **Establish Formal Training for Departmental Vehicle Coordinators:** Develop and implement a training program for newly designated Departmental Vehicle Coordinators and provide periodic refresher training for current coordinators. The training should ensure a clear understanding of their roles and responsibilities as defined in Administrative Manual 0050-01-11.
2. **Assess and Address Non-Fuel Transactions:** Conduct a review of fuel card transactions to identify instances of non-fuel purchases. Based on the results, assess whether additional clarification or updates are needed within the Commercial Fuel Credit Card Rules of Use and Statement of Understanding.
3. **Automate Alerts:** Explore implementing automated alerts or exception reporting for unusual fuel card transactions, such as out-of-area purchases, repeated use in a short time span, or purchases outside of standard fuel categories.

## Finding IV:

### Administrative Manual Out of Date w/Current Practices

OAAS determined that Administrative Manual 0050-01-11: Commercial Fuel Credit Card Policy is outdated and does not accurately reflect the current roles, responsibilities, and procedures followed by the DGS, Departmental Vehicle Coordinators, and fuel cardholders.

The policy states that:

- **Quarterly Review Procedures:** Under the Roles and Responsibilities section states that the DGS Fleet Manager or designee is responsible for conducting quarterly reviews of fuel card purchases and accounting records submitted by departments. However, in practice, departments are not submitting accounting records to DGS. Instead, monthly fuel card statements are sent directly to DGS, which reviews them for questionable charges before forwarding them to Departmental Vehicle Coordinators.
- **Fuel Card Usage Limitations:** Under the Fuel Card Assignment and Use policy, Fuel Card usage is limited to County-owned vehicles. However, testing identified five out-of-state fuel purchases made for rental vehicles used on County business. The testing was from a sample of 11 transactions within a total population of 121 transactions.

Administrative Manual 0050-01-11: Commercial Fuel Credit Card Policy, originally issued in 2012, may no longer provide sufficient or accurate guidance for managing the fuel card program in its current operational context. An outdated policy can result in confusion, inconsistent practices, and reduced accountability among departments and program stakeholders. The lack of clarity, particularly regarding the refueling of rental vehicles, underscores the need to revise and update the policy to reflect current procedures and address operational realities.

## RECOMMENDATION:

DGS should coordinate with the Finance and General Government Group Office to address policy gaps and ensure alignment with current operational practices. Specifically, DGS should:

1. **Review and Update Administrative Manual 0050-01-11:** Conduct a comprehensive review of Administrative Manual 0050-01-11 to determine whether it should be updated to reflect current roles, responsibilities, and procedures related to the fuel card program. If the manual is no longer relevant or effective, a sunset review should be performed, and a new policy developed that aligns with current operational needs and control expectations.
2. **Clarify Fuel Card Use for Rental Vehicles:** Assess whether existing policies and procedures provide adequate guidance on the appropriate use of fuel cards for refueling rental vehicles used during official County business. If gaps are identified, DGS should collaborate with relevant stakeholders to establish clear protocols and incorporate them into County policy or supplemental guidance.

# BACKGROUND

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County Administrative Code Section 398.10 and Chief Administrative Office (CAO) Administrative Manual Policy 005-01-10 delegate the Director of DGS as responsible for comprehensive management of all County vehicles. Board of Supervisor Policy H-10 restricts the use of county vehicles to official business only and County Administrative Policy 005-02-06 is the guidance for personal assignment and home storage of County vehicles.

The County Fleet is comprised of over 4,400 vehicles and mobile equipment (vehicles). Vehicles are defined as motorized and self-propelled, on-and-off highway vehicles, maintenance equipment and related towed equipment such as trailers and trailer-mounted power units. DGS is responsible for the administration of the Fleet Internal Service Fund (ISF) and the overall management of all County vehicles, including acquisition, disposal, inventory, regulatory compliance, maintenance and fueling.

DGS provides fuel resources to support the County's vehicle fleet. An internal infrastructure of fuel sites strategically located throughout San Diego County is the preferred fueling method for County-owned vehicles. In specific situations, the purchase of fuel from other government agencies where there is an established County/Agency fuel agreement may be a more efficient and cost-effective method.

There are three approved options available to fuel County vehicles:

1. **County Fuel Site:** Fleet provides an internal infrastructure of fuel sites strategically located throughout San Diego County which is the preferred fueling option for County vehicles.
2. **Other Government Agency:** Fleet has established County/Agency fuel agreements with other government agencies. Drivers are encouraged to utilize these fueling resources when operating outside of the availability of a County owned fuel site. Contact department Vehicle Coordinator for instructions.
3. **Commercial Fuel Card:** When a vehicle is operated outside the availability of a County or other government agency fuel site the Commercial Fuel Credit Card provides an accepted, effective and convenient fueling option.

At County Fuel Sites there are three methods for obtaining fuel:

1. **Fuel System Access Device:** a fuel fob or Wireless Automated Fueling (WAF) device used to authorize vehicle fueling at County Fuel Sites.
2. **Manager's Fuel System Bypass Code:** a numeric code used to override the Fuel Focus System to allow vehicle fueling in the case of a missing or non-operational fuel system access device.
3. **One Time Fueling:** random numeric code created by FMIS to authorize one-time vehicle fueling in case of missing or non-operational fuel system access device.

The Fuel Card Program was established to provide County vehicle drivers with a commercially accepted, effective and convenient method to acquire fuel when a vehicle is operated outside the availability of County-owned or other government agency fuel locations, or in emergencies.

County departments have specific roles and responsibilities related to vehicles. The Appointing Authority is responsible for compliance with the Fleet Manual and designation of a Vehicle Coordinator to act as representative for Fleet related matters.

The Vehicle Coordinator serves as the primary point of contact to interact with and communicate with Fleet staff on vehicle-related matters. Through this two-way communication Fleet staff better understand the department's vehicle needs.

Fleet Management Information System (FMIS) – a comprehensive automated database that serves as the system of record for all County vehicle maintenance, fuel, and asset management activities, also known as Asset Works M5. M5 provides easy data access for DGS' clients through the Client View functionality. Client Views are securable by department, thus allowing DGS to comply with County security policy and ensure its clients that their data is not accessible by another department.

Fuel usage is tracked with M5 by vehicle unit number and usage is available monthly for each department. Departments are encouraged to actively monitor fuel consumption on a regular basis. Departments receive monthly fuel billing reports. Reports are also available from the Fleet Department upon request.

## METHODOLOGY

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OAAS performed the audit using the following methods:

- Interviewed County stakeholders including DGS Fleet and Department Vehicle Coordinators.
- Reviewed the Fleet Manual, Administrative Manual 0050-01-11 and other guidance provided by DGS to understand County policies, requirements, and processes.
- Assessed the design and operating effectiveness of the fuel card and fob management controls by verifying:
  - The accuracy of fuel transaction records and ensuring fuel cards are used exclusively for authorized fuel purchases.
  - Purchases are made by authorized users or for assigned vehicles/equipment, and that fuel fob inventory is properly managed, including tracking of lost, stolen, dormant, or damaged fobs.
  - Access controls to the M5 system for appropriateness.
  - Whether DGS, department vehicle coordinators, and fuel card holders are fulfilling their roles and responsibilities as outlined in Administrative Manual 0050-01-11.
  - Commercial fuel cards and master fuel fobs assigned to separated employees were promptly deactivated and that no transactions occurred post-separation.

**DEPARTMENT'S RESPONSE**  
(DEPARTMENT OF PUBLIC WORKS)



**PUBLIC WORKS**

**MARISA K. BARRIE, PE**  
DIRECTOR

5510 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CALIFORNIA 92123-1237  
(858) 694-2212

**KATHRYN A. STEWART, PE**  
ASSISTANT DIRECTOR

August 29, 2025

TO: Juan R. Perez  
Chief of Audits

**DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: FUEL CARD AND FOB  
MANAGEMENT CONTROLS AUDIT**

**Finding II:** Fuel Fob Inventory, Documentation, and Configuration Controls Require Strengthening

**OAAS Recommendation:** To strengthen internal controls over fuel fob management and reduce the risk of unauthorized fuel transactions, DPW should work with DGS to:

1. Conduct a comprehensive physical inventory of all assigned fuel fobs to verify current possession and ensure alignment with the M5 Fleet Management System.
2. Deactivate fuel fobs that are no longer needed or cannot be accounted for.

**Action Plan:** DPW agrees with the audit recommendations and is taking the following steps to address the findings.

1. DPW has worked with DGS to identify FOBs with missing ID numbers. ID numbers have been written on FOBs using a marker.
2. DPW has been made aware that cross-sharing fuel fobs is not authorized to align with M5 fuel usage reporting.
3. DPW is working with DGS to deactivate FOBs that are unused or unaccounted for.
4. DPW is assigning a single Master Fuel FOB to the supervisor at each road station as needed.

**Planned Completion Date:** September 30, 2025

**Contact Information for Implementation:** James Gamboa, DPW Program Coordinator



Mr. Perez  
August 29, 2025  
Page 2

If you have any questions or need additional information, please contact James Gamboa  
DPW Program Coordinator, at (619) 643-2717.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Barrie", with a stylized flourish at the end.

MARISA K. BARRIE, PE, Director  
Department of Public Works

**DEPARTMENT'S RESPONSE**  
(SAN DIEGO COUNTY FIRE)



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**MARC REGIER**  
ASSISTANT DIRECTOR  
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September 17, 2025

TO: Juan R. Perez  
Chief of Audits, Auditor & Controller

FROM: Jeff Collins  
Director, San Diego County Fire

**DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: FUEL CARD AND FOB MANAGEMENT CONTROLS AUDIT**

**Finding I: Fuel Card Assignment and Usage Practices Not Aligned with County Policy**

**OAAS Recommendation:** County Fire should work with the Department of General Services (DGS) to strengthen compliance with fuel card policies and enhance internal controls by taking the following actions:

1. **Obtain Signed Acknowledgments:** Ensure that all Cal Fire personnel sign the Commercial Fuel Credit Card Rules of Use and Statement of Understanding to acknowledge their responsibilities and agreement to comply with established policies.
2. **Reassign Fuel Cards for Accountability:** Reassign existing Commercial Fuel Cards across Cal Fire Division Chiefs to improve accountability and better align with the intended cardholder-based assignment model.
3. **Decentralize PIN Management:** Designate Cal Fire Battalion Chiefs to manage and update the PINs associated with their respective fuel cards to support secure access.
4. **Document Policy Exceptions:** Update the Commercial Fuel Credit Card Rules of Use and Administrative Manual 0050-01-11 to include a documented exception permitting Cal Fire personnel to use Commercial Fuel Cards for fueling County Fire vehicles.
5. **Enhance Monitoring Through Analytics:** Evaluate the feasibility of using data analytics or reporting tools to assist the County Fire Vehicle Coordinator

**Action Plan:** County Fire partially agrees with the findings and recommendations listed above. County Fire believes that the existing Administrative Manual 0050-01-11 is

outdated and does not meet the needs of today's County Departments, and that the business practices of the user groups have expanded and are far different than when the policy was first developed. Specifically, County Fire currently issues fuel cards to a vehicle, not an individual. Although this practice is not currently supported by the administrative manual, it better allows the department to track and utilize our fuel cards and is consistent with CAL FIRE policy. There are approximately 433 Engineers or Fire Captains currently assigned to the San Diego Unit. It is very common for any of these individuals to be stationed at a particular fire station on a particular apparatus in one section of the county on a given day, and another fire station and apparatus the following day. Given the interchangeable nature of fire staff, it is not practical to issue fuel cards to each of these individuals.

Additionally, County apparatus leave the County regularly on "strike team assignments." While deployed, County apparatus may have the need for diesel exhaust fluid or engine oil, all things that are sold and provided at fueling stations. Although the Commercial Fuel credit card will allow these purchases, the current administrative manual does not allow these types of purchases to be made. Diesel exhaust fluid was not a product that was available when the current administrative manual was written, yet it is a key item necessary for County Fire apparatus to run and perform safely.

However, to improve accountability regarding the use of fuel cards within the existing policy County Fire will implement several changes:

- obtain signed acknowledgement from all operators of County Fire apparatus of the Commercial Fuel Credit Card Rules of Use and Statement of Understanding by utilizing the existing online training and operations management system Vector Solutions.
- Reassign existing fuel cards to management positions throughout San Diego Unit to improve accountability and better align with the existing policy.
- County Fire will explore regionalizing the PINs associated with fuel cards by assigning a single PIN number to fuel cards within each Battalion of the San Diego Unit.
- DGS is responsible for updating the policy to allow Cal Fire personnel to use commercial fuel cards for county vehicles. County Fire supports DGS updating this policy.
- County Fire will utilize administrative assistance to increase monitoring of fuel card usage to improve accountability.

**Planned Completion Date:** December 2025

**Contact Information for Implementation:** Robert Spanbauer, Chief of Management Services, County Fire

**Finding II: Fuel Fob Inventory, Documentation, and Configuration Controls Require Strengthening**

**OAAS Recommendation:** To strengthen controls over fuel fob management and reduce the risk of unauthorized fuel transactions, DPW should work with DGS to:

1. Conduct a comprehensive physical inventory of all assigned fuel fobs to verify current possession and ensure alignment with the M5 Fleet Management System.
2. Deactivate fuel fobs that are no longer needed or cannot be accounted for.

Additionally, DGS should:

1. Finalize and adopt the County Fuel Fob Policy, ensuring it includes clear guidance on fuel fob usage, configuration standards, assignment protocols, and responsibilities for oversight/monitoring.
2. Communicate Fuel Fob policy to departments, provide training, and monitor for compliance.
3. Ensure individually assigned fuel fobs are configured to prompt for vehicle mileage at the pump.
4. Implement a data validation process within DGS to verify the accuracy of fuel fob configurations entered into M5 and periodically review system settings to detect and correct data entry errors.
5. Evaluate physically labeling or etching fuel fobs with durable, legible identifiers to ensure long-term traceability during inventory checks in addition to, or as a replacement for, the brass tags with vehicle identification numbers currently provided by DGS and affixed to vehicle keychains.

**Action Plan:** County Fire acknowledges that DGS is responsible for adopting the County Fuel Fob Policy. County Fire will continue to work with DGS to ensure that we operate within the means of the policies and procedures set forth in the administrative manual.

**Planned Completion Date:** October 2025

**Contact Information for Implementation:** Robert Spanbauer, Chief of Management Services, County Fire

**Finding III: Fuel Card Documentation, Review, and Record Keeping Needs Improvement**

**OAAS Recommendation:** To strengthen internal controls, improve compliance, and enhance oversight of the County's Fuel Card Program, it is recommended that the DGS work closely with all departments to implement the following corrective actions:

- 1. Establish Formal Training for Departmental Vehicle Coordinators:** Develop and implement a training program for newly designated Departmental Vehicle Coordinators and provide periodic refresher training for current coordinators. The training should ensure a clear understanding of their roles and responsibilities as defined in Administrative Manual 0050-01-11.
- 2. Assess and Address Non-Fuel Transactions:** Conduct a review of fuel card transactions to identify instances of non-fuel purchases. Based on the results, assess whether additional clarification or updates are needed within the Commercial Fuel Credit Card Rules of Use and Statement of Understanding.
- 3. Automate Alerts:** Explore implementing automated alerts or exception reporting for unusual fuel card transactions, such as out-of-area purchases, repeated use in a short time span, or purchases outside of standard fuel categories.

**Action Plan:** County Fire acknowledges that formal training for vehicle coordinators is the responsibility of DGS. County Fire supports additional training for departmental vehicle coordinators, the use of fuel cards, and for a better understanding of the roles and responsibilities of vehicle coordinators. County Fire will implement additional lines of audit review to meet the commercial fuel credit card rules of use and Statement of Understanding. County Fire welcomes the opportunity to work with DGS to implement additional methods to receive timely alerts to catch any unusual fuel card transactions.

**Planned Completion Date:** October 2025

**Contact Information for Implementation:** Robert Spanbauer, Chief of Management Services, County Fire

#### **Finding IV: Administrative Manual Out of Date w/ Current Practices**

**OAAS Recommendation:** DGS should coordinate with the Finance and General Government Group Office to address policy gaps and ensure alignment with current operational practices. Specifically, DGS should:

- 1. Review and Update Administrative Manual 0050-01-11:** Conduct a comprehensive review of Administrative Manual 0050-01-11 to determine whether it should be updated to reflect current roles, responsibilities, and procedures related to the fuel card program. If the manual is no longer relevant or effective, a sunset review should be performed, and a new policy developed that aligns with current operational needs and control expectations.
- 2. Clarify Fuel Card Use for Rental Vehicles:** Assess whether existing policies and procedures provide adequate guidance on the appropriate use of fuel cards for refueling rental vehicles used during official County business. If gaps are identified, DGS should collaborate with relevant stakeholders to establish clear protocols and incorporate them into County policy or supplemental guidance.

**Action Plan:** County Fire supports DGS updating the existing Administrative Manual 0050-01-11 so that it can better meet the needs of today's user groups. County Fire also supports the addition of verbiage to allow fuel cards to be used for rental vehicles.

**Planned Completion Date:** October 2025

**Contact Information for Implementation:** Robert Spanbauer, Chief of Management Services, County Fire

If you have any questions, please contact me at (619) 339-0283.



Jeff Collins  
Director, County Fire

JC:rs

**DEPARTMENT'S RESPONSE**  
(DEPARTMENT OF GENERAL SERVICES)





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NICOLE J. ALEJANDRE  
ASSISTANT DIRECTOR

August 15, 2025

TO: JUAN R. PEREZ, Chief of Audits  
Auditor & Controller

FROM: MARKO MEDVED, PE, CEM, Director  
General Services

DEPARTMENT RESPONSE TO AUDIT A24-021 RECOMMENDATIONS: FUEL CARD AND FOB  
MANAGEMENT CONTROLS

**Finding I: Fuel Card Assignment and Usage Practices Not Aligned with County Policy**

**OAAS Recommendation:** County Fire should work with the Department of General Services (DGS) to strengthen compliance with fuel card policies and enhance internal controls by taking the following actions:

1. **Obtain Signed Acknowledgments:** Ensure that all Cal Fire personnel sign the Commercial Fuel Credit Card Rules of Use and Statement of Understanding to acknowledge their responsibilities and agreement to comply with established policies.
2. **Reassign Fuel Cards for Accountability:** Reassign existing Commercial Fuel Cards across Cal Fire Division Chiefs to improve accountability and better align with the intended cardholder-based assignment model.
3. **Decentralize PIN Management:** Designate Cal Fire Battalion Chiefs to manage and update the PINs associated with their respective fuel cards to support secure access.
4. **Document Policy Exceptions:** Update the Commercial Fuel Credit Card Rules of Use and Administrative Manual 0050-01-11 to include a documented exception permitting Cal Fire personnel to use Commercial Fuel Cards for fueling County Fire vehicles.
5. **Enhance Monitoring Through Analytics:** Evaluate the feasibility of using data analytics or reporting tools to assist the County Fire Vehicle Coordinator in monitoring and reviewing fuel card transactions more efficiently and effectively.

**Action Plan:** DGS agrees to assist County Fire as needed with implementing OAAS recommendations 1, 2, and 3. DGS also agrees to update the Commercial Fuel Card Credit Card Rules of Use and Administrative Manual 0050-01-11 in recommendation 4. Lastly, DGS agrees to recommendation 5 to engage the Analytics Advisory Team (Office of Audits) and review the analytics available to determine if any of these enhance monitoring related to this finding. If available analytics do not enhance monitoring, DGS would like to close out this recommendation.

**Planned Completion Date: 2/15/26**

**Contact Information for Implementation:** David L. Fernandez; [david.fernandez@sdcountry.ca.gov](mailto:david.fernandez@sdcountry.ca.gov)

## **Finding II: Fuel Fob Inventory, Documentation, and Configuration Controls Require Strengthening**

### **OAAS Recommendation (for DGS):**

1. Finalize and adopt the County Fuel Fob Policy, ensuring it includes clear guidance on fuel fob usage, configuration standards, assignment protocols, and responsibilities for oversight/monitoring.
2. Communicate Fuel Fob policy to departments, provide training, and monitor for compliance.
3. Ensure individually assigned fuel fobs are configured to prompt for vehicle mileage at the pump.
4. Implement a data validation process within DGS to verify the accuracy of fuel fob configurations entered into M5 and periodically review system settings to detect and correct data entry errors.
5. Evaluate physically labeling or etching fuel fobs with durable, legible identifiers to ensure long-term traceability during inventory checks in addition to, or as a replacement for, the brass tags with vehicle identification numbers currently provided by DGS and affixed to vehicle keychains.

**Action Plan:** Recommendation 1 was completed with the publication of CAO Administrative Manual [policy](#) 0050-01-16, *Fuel Fob Program*, on 2/1/25, including a Statement of Understanding. DGS communicated the addition of the new policy shortly after publication to all departmental Vehicle Coordinators, as well as provided training which can be found at [Fleet Services Division](#). DGS is now in the monitoring stage of this recommendation.

DGS agrees to implement recommendations 3 and 4.

Regarding recommendation 5, DGS provides a brass tag with the vehicle number on the key chain so end users understand that the vehicle key and the fuel fob belong with that vehicle. Fobs come with identification initially, but over time the identification becomes worn out. DGS believes the simplest way to address this is for the fuel fob to remain on the vehicle key chain, along with the associated brass tag, for the life of the vehicle.

In summary, DGS requests to close out recommendations 1, 2, and 5, and agrees to implement recommendations 3 and 4.

**Planned Completion Date: 2/15/26**

**Contact Information for Implementation:** David L. Fernandez; [david.fernandez@sdcountry.ca.gov](mailto:david.fernandez@sdcountry.ca.gov)

## **Finding III: Fuel Card Documentation, Review, and Record Keeping Needs Improvement**

**OAAS Recommendation:** To strengthen internal controls, improve compliance, and enhance oversight of the County's Fuel Card Program, it is recommended that the DGS work closely with all departments to implement the following corrective actions:

1. **Establish Formal Training for Departmental Vehicle Coordinators:** Develop and implement a training program for newly designated Departmental Vehicle Coordinators and provide periodic refresher training for current coordinators. The training should ensure a clear understanding of their roles and responsibilities as defined in Administrative Manual 0050-01-11.
2. **Assess and Address Non-Fuel Transactions:** Conduct a review of fuel card transactions to identify instances of non-fuel purchases. Based on the results, assess whether additional clarification or updates are needed within the Commercial Fuel Credit Card Rules of Use and Statement of Understanding.
3. **Automate Alerts:** Explore implementing automated alerts or exception reporting for unusual fuel card transactions, such as out-of-area purchases, repeated use in a short time span, or purchases outside of standard fuel categories.

**Action Plan:** DGS agrees to implement recommendation 1. Recommendation 2 was completed by pre-identifying non-fuel card transactions monthly and sharing that information with departmental Vehicle Coordinators. Lastly, DGS agrees to recommendation 3 and will engage the Analytics Advisory Team (Office of Audits) and review the analytics available to determine if any of these can be used to enhance already existing automated fraud protection alerts provided by our fuel vendor. If available analytics do not enhance these existing fraud protection alerts, DGS requests closing this recommendation.

In summary, DGS agrees to implement recommendations 1 and 3, and requests recommendation 2 be closed.

**Planned Completion Date:** 2/15/26

**Contact Information for Implementation:** David L. Fernandez; david.fernandez@sdcounty.ca.gov

#### **Finding IV: Administrative Manual Out of Date w/Current Practices**

**OAAS Recommendation:** DGS should coordinate with the Finance and General Government Group Office to address policy gaps and ensure alignment with current operational practices. Specifically, DGS should:

1. **Review and Update Administrative Manual 0050-01-11:** Conduct a comprehensive review of Administrative Manual 0050-01-11 to determine whether it should be updated to reflect current roles, responsibilities, and procedures related to the fuel card program. If the manual is no longer relevant or effective, a sunset review should be performed, and a new policy developed that aligns with current operational needs and control expectations.
2. **Clarify Fuel Card Use for Rental Vehicles:** Assess whether existing policies and procedures provide adequate guidance on the appropriate use of fuel cards for refueling rental vehicles used during official County business. If gaps are identified, DGS should collaborate with relevant stakeholders to establish clear protocols and incorporate them into County policy or supplemental guidance.

**Action Plan:** DGS agrees to recommendation 1. Regarding recommendation 2, DGS will determine in its review of Administrative Manual 0050-01-11 if additional language is needed to clarify appropriate use of fuel cards in relation to fueling rental vehicles. In summary, DGS agrees to accomplish both recommendations.

**Planned Completion Date:** 2/15/26

**Contact Information for Implementation: David L. Fernandez; [david.fernandez@sdcounty.ca.gov](mailto:david.fernandez@sdcounty.ca.gov)**

If you have any questions, please contact David L. Fernandez at (619) 417-0672.

**Marko Medved** Digitally signed by Marko Medved  
Date: 2025.08.20 11:13:22 -0700

MARKO MEDVED, PE, CEM  
Director