



FULTON COUNTY

FULTON COUNTY, GEORGIA

OFFICE OF INTERNAL AUDIT

**GEORGIA SECURITY & IMMIGRATION
COMPLIANCE SITE VISIT REPORT**

**DEPARTMENT OF WATER RESOURCES
SCOTT & SONS HOLDINGS, LLC**

April 16, 2013

Table of Contents

	Page
Introduction	1
Background	1
Objective	1
Scope	1
Methodology	1
Finding & Recommendation	2
Follow-up	2
Summary	2

Introduction

The Georgia Security and Immigration Act (GSIA) was first introduced in the Georgia legislature in 2006. In 2009 the bill was further amended and codified when House Bill 2 was passed. The Official Code of Georgia (OCGA) lists the Georgia Immigration and Security Act and amendments under the following reference numbers; 13-10-90, 91, 50-36-1. According to the Georgia Security and Immigration Act (GSIA), all workers under public contracts should be verified by means of the Federal Government data base to determine if they are working legally in the United States. The E-Verify system is the primary data base used for citizenship verification.

Background

Fulton County Policy and Procedure Standard Number 100-28 was issued in January of 2010 in response to the requirements of the Georgia Security and Immigration Act. The formal policy pronouncement is the underlining basis of the Fulton County Government GSIA compliance programs.

The Fulton County's Department of Water Resources entered into a contract with Scott & Sons Holdings, LLC for the installation of approximately 9500 linear feet of 16 inch diameter ductile iron pipe (DIP) transmission water main and appurtenances along Crabapple Road in Roswell, GA. The work for this project began August of 2012 and it is estimated that work should be completed by May 29, 2013.

Objective

Our objective of the audit was to ensure that the contractor, Scott & Sons Holdings, LLC, was in compliance with the GSIA and related Fulton County policies and procedures.

Scope

The scope of our compliance testing covered the period from October 1, 2012 through December 31, 2012.

Methodology

The Internal Audit department scheduled a visit to the Crabapple Road Water Main Project in Roswell, GA to meet with the Department of Water Resources construction manager and the assistant supervisor from Scott & Sons Holdings for a site review. The assistant supervisor was asked to provide E-Verify documentation and files for each employee working on the site.

Our Finding and Recommendation is listed below:

Finding and Recommendation

Finding 1 – GSIA Contractor affidavits and Declaration of Employee-Number forms not readily available.

Based on the Official Code of Georgia Annotated (O.C.G.A 13-10-91), contractors must have a notarized Georgia Security & Immigration Contractor Affidavit and Agreement present. The affidavit from the contractor verifies that the contractor has registered with and is authorized to use the federal work authorization program. Also, the Declaration of Employee-Number Form should be completed. This form reflects the number of employees that are employed with the contractor's company.

When reviewing the necessary documentation to support E-Verification, both the GSIA Contractor affidavits and Declaration of Employee-Number Forms were not readily available in order to verify the contractor's compliance with OCGA and each worker's E-Verification eligibility.

Recommendation

In order to ensure that all E-Verify eligibility requirements are met, we recommend that the proper evidence based documentation should be kept on site and available for inspection.

Follow-up

Action was taken by the Department of Water Resources where both the project manager and the assistant supervisor with Scott & Sons Holdings have provided the necessary documentation to confirm E-Verification of the contractor's employees and subcontractors.

Conclusion

Since the one finding noted was cleared and the review of the E-Verify applications is in accordance with the Official Code of Georgia; we have verified that the documentation fully complied with the guidelines of the Georgia Security Immigration Compliance Act.