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RESULTS OF CONTINUOUS AUDITING USING CAATS:

AUDITOR-CONTROLLER, HUMAN RESOURCES, & COUNTY PROCUREMENT OFFICE

AUDIT FOR DUPLICATE VENDOR PAYMENTS AND OTHER PERIODIC ROUTINES

(Cited as a Best Practice by the Institute of Internal Auditors)

For the Month: September 2011

Duplicate Vendor Payments: We analyzed 13,383 vendor invoices paid in August 2011 amounting to about \$234 million and found 100% of the invoices were paid only once. Of the \$234 million vendor invoices, no potential duplicate payments were identified.

To date we have identified \$980,675 in duplicate vendor payments, of which \$954,858 has been recovered.

AUDIT NO: 1139-C REPORT DATE: SEPTEMBER 22, 2011

Director: Dr. Peter Hughes, MBA, CPA, CIA Deputy Director: Eli Littner, CPA, CIA, CISA Senior Audit Manager: Autumn McKinney, CPA, CIA, CISA Audit Manager: Carol Swe, CPA, CIA, CISA

RISK BASED AUDITING



GAO & IIA Peer Review Compliant - 2001, 2004, 2007, 2010

AICPA American Institute of Certified Public Accountants Award to Dr. Peter Hughes as 2010 Outstanding CPA of the Year for Local Government

GRC (Government, Risk & Compliance) Group 2010 Award to IAD as MVP in Risk Management



2009 Association of Certified Fraud Examiners' Hubbard Award to Dr. Peter Hughes for the Most Outstanding Article of the Year – Ethics Pays

2008 Association of Local Government Auditors' Bronze Website Award

200

2005 Institute of Internal Auditors' Award to IAD for Recognition of Commitment to Professional Excellence, Quality, and Outreach Independence

Objectivity

CInternal Audit Department

GAO & IIA Peer Review Compliant - 2001, 2004, 2007, 2010

Providing Facts and Perspectives Countywide

RISK BASED AUDITING

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| | Certified Information Technology Professional (CITP) |
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| Eli Littner | CPA, CIA, CFE, CFS, CISA | | |
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| Deputy Director | Certified Fraud Specialist (CFS) | | |
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To access and view audit reports or obtain additional information about the OC Internal Audit Department, visit our website: <u>www.ocgov.com/audit</u>



OC Fraud Hotline (714) 834-3608

Letter from Director Peter Hughes



Transmittal Letter



Audit No. 1139-C September 22, 2011

- TO: David Sundstrom, Auditor-Controller Carl Crown, Director, Human Resources Department Ronald C. Vienna, County Purchasing Agent County Procurement Office
- **SUBJECT:** Results of Continuous Auditing Using CAATS: Auditor-Controller, Human Resources, & County Procurement Office – Duplicate Vendor Payments & Other Routines

We have completed the September 2011 report of Results of Continuous Auditing Using CAATS (Computer-Assisted Audit Techniques). The final report is attached for your information. Recoveries to date from duplicate vendor payments are **\$954,858**.

Each month I submit an **Audit Status Report** to the Board of Supervisors (BOS) where I detail any material and significant audit issues released in reports during the prior month and the implementation status of audit recommendations as disclosed by our Follow-Up Audits. Accordingly, the results of this audit will be included in a future status report to the BOS.

As always, the Internal Audit Department is available to partner with your staff so that they can successfully implement or mitigate difficult audit recommendations. Please feel free to call me should you wish to discuss any aspect of our audit report.

We appreciate the courtesy and cooperation extended to us by the personnel of your offices. If we can be of further assistance, please contact me or Eli Littner, Deputy Director at (714) 834-5899, or Autumn McKinney, Senior Audit Manager at (714) 834-6106.

Respectfully Submitted,

Dr. Peter Hughes, CPA, Director Internal Audit Department

Attachment



Distribution Pursuant to Audit Oversight Committee Procedure No. 1:

Members, Board of Supervisors Members, Audit Oversight Committee Thomas G. Mauk, County Executive Officer Jan Grimes, Director, Auditor-Controller/Central Accounting Operations Victoria Ross, Senior Manager, Auditor-Controller/Claims & Disbursing Section Bill Malohn, A-C/Information Technology/CAPS G/L System Support Terri Bruner, Assistant Director, Human Resources/Administration Bob Leys, Assistant Director, Human Resources/Services and Support Rosie Santiesteban, Admin. Manager II, Human Resources/Administration Laurence McCabe, Admin. Manager II, Human Resources Michael Riley, Director, Social Services Agency Wendy Aguin, Division Director, SSA/Adult Services and Assistance Programs Division Carol Mitchell, Deputy Director, SSA/Adult Services Julie Loats, Administrative Manager II, SSA/Adult Services Program Support Foreperson, Grand Jury Darlene J. Bloom, Clerk of the Board of Supervisors

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Audit No. 1139-C

September 22, 2011

TO:

David Sundstrom, Auditor-Controller Carl Crown, Director, Human Resources Department Ronald C. Vienna, County Purchasing Agent, County Procurement Office

Audit Highlight

We analyzed 13,383 vendor invoices paid in August 2011 amounting to about \$234 million and found 100% of the invoices were only paid once.

Of the \$234 million vendor invoices, no potential duplicate payments were identified.

To date we have identified **\$980,675** in duplicate vendor payments, of which **\$954,858** has been recovered.

- FROM: Dr. Peter Hughes, CPA, Director Internal Audit Department
- SUBJECT: Results of Continuous Auditing Using CAATS: Auditor-Controller, Human Resources, & County Procurement Office – Duplicate Vendor Payments and Other Routines

OBJECTIVES

Each month, the Internal Audit Department conducts a variety of continuous auditing of vendor payment and payroll activity utilizing Computer-Assisted Audit Techniques (known by the acronym CAAT). Our objectives are to analyze selected vendor payment and payroll data to identify:

- 1. **Duplicate Payments:** Duplicate payments made to vendors. This CAAT is performed monthly.
- 2. **Employee Vendor Match:** Employees that bought goods or issued contracts to themselves or a related vendor. This CAAT is performed quarterly.
- 3. **OC Working Retiree/Extra Help Hours:** County retirees working as extra help in excess of mandated hour limits of 960 or 720 hours for FY 11-12. The mandated limits required by Government Code Sections 31680.6 and 31641.04 are per fiscal year and this CAAT is performed monthly and annually.
- 4. **Payroll Direct Deposits:** Multiple employee paychecks directly deposited to the same bank account which could be an indicator of inappropriate payments. This CAAT is performed monthly.
- 5. **In-Home Supportive Services:** Active County employees providing In-Home Supportive Services (IHSS) to determine whether conflicts of interest exist. This CAAT routine is being performed as a special request from the Board of Supervisors via HRD.

OC Internal Auditor's Report



BACKGROUND

Continuous auditing is a change to the traditional audit approach of periodic reviews of a sample of transactions to ongoing audit testing of 100 percent of transactions. Continuous auditing provides efficient and timely testing of transactions and/or controls to allow immediate notification and remediation by management. An important component of continuous auditing is the development of models for the ongoing (continuous) review of transactions at, or close to, the point at which they occur.

As a supplement to traditional audits performed, Internal Audit performs continuous auditing of selected vendor payment and payroll activities utilizing Computer Assisted Audit Techniques (CAATs).

CAATs are automated queries applied to large amounts of electronic data searching for specified characteristics. We use a proprietary, best practices and industry recognized software product to help us in this process.

CAATs differ from our traditional audits in that CAATs can query **100%** of a data universe whereas the traditional audits typically test but a **sample** of transactions from the population.

Resulting exceptions or findings are forwarded to the appropriate department for validation and/or resolution. Depending on the department's review, the exceptions may or may not be a finding.

Often there is additional data needed to validate the exception that is only known at the department level. We also partner with the departments to identify internal control enhancements with the purpose of preventing future occurrences of the type of findings identified by the CAATs.

We are keeping the details of our process and the vulnerabilities identified to a general discussion because of the risks associated with disclosing specific details of our financial and accounting processes.

SCOPE

This report details the CAAT work we performed in September 2011. Our analysis included a review of the following data:

- 1. **Duplicate Payments:** 13,383 vendor invoices totaling \$234,042,275 for potential duplicate payments.
- 2. **Employee Vendor Match:** This routine is performed on a quarterly basis; therefore, it was not performed in August 2011. The next analysis will be performed at 9/30/11.
- 3. OC Working Retiree/Extra Help Hours: County working retiree/extra help hours worked during FY 11/12 for individuals exceeding annual limits of 960 or 720 hours, as mandated by Government Code Sections 31680.6 and 31641.04.
- Payroll Direct Deposits: 36,157 payroll direct deposit transactions processed for pay periods #16 (7/15/11 - 7/28/11) and #17 (7/29/11 - 8/11/11) for suspicious direct deposit activity.
- 5. **In-Home Supportive Services:** As of 5/31/11, 15,850 unique IHSS providers and, as of 6/30/11, 38,772 employee records (active and inactive) for potential matches with County employees.



RESULTS

For the month of September 2011, we found the following:

Objective #1 - Duplicate Payments:

We identified no duplicate payments made to vendors of the **\$234 million** of vendor invoices processed during August 2011.

Value-added Information

Based on the to-date recoveries of **\$954,858** from the duplicate vendor payment routine, these computer assisted routines have paid for themselves and are returning monies to the County that may otherwise be lost. To date, we have issued 112 monthly performance reports for the CAATs.

Objective #2 – Employee Vendor Match:

This routine is performed on a quarterly basis. All potential employee/vendor matches identified to date have been researched and resolved to HRD's satisfaction. Our next analysis will be performed at 9/30/11.

Objective #3 – OC Working Retiree/Extra Help Hours:

As of 8/25/11, no working retirees exceeded the annual limits of 960 or 720 hours for FY 11/12, as mandated by Government Code Sections 31680.6 and 31641.04.

Objective #4 – Payroll Direct Deposits:

Analysis performed with no findings noted.

Objective #5 – In Home Supportive Services:

As reported in our August 2011 CAAT report (1139-B), we identified 92 active County employees who are also IHSS providers. Of the 92 matches, 21 were resolved in a prior analysis performed by SSA and 14 were determined to have no conflict with County employment by HRD. The remaining 57 are undergoing review by SSA.

See the Detailed Results section for further information.



1. Duplicate Payments (Objective #1)

We used a CAAT routine to identify potential duplicate payments made to vendors during August 2011.

A. Results

We identified no potential duplicate payments of the \$234 million of vendor invoices processed during August 2011. The Auditor-Controller continues to investigate all duplicate payments and is pursuing collection. Currently, the County has a recovery rate of about **97%** on these duplicate payments that have been identified since the inception of the CAAT routines.

The table below summarizes the duplicate payment activity to date:

| | | Total | Not Duplicates | | Recovered | | In Process | |
|----------------|-----|-------------|----------------|-----------|-----------|-----------|------------|----------|
| CAAT Report | #'s | \$'s | #'s | \$'s | #'s | \$'s | #'s | \$'s |
| 2002 | 103 | \$99,980 | 19 | \$10,334 | 80 | \$87,808 | 4 | \$1,838 |
| 2003 | 50 | \$33,306 | 7 | \$10,175 | 39 | \$21,020 | 4 | \$2,111 |
| 2004 | 33 | \$105,779 | 7 | \$2,990 | 24 | \$101,460 | 2 | \$1,329 |
| 2005 | 67 | \$80,162 | 2 | \$668 | 64 | \$78,472 | 1 | \$1,022 |
| 2006 | 75 | \$347,008 | 16 | \$33,720 | 54 | \$310,019 | 5 | \$3,269 |
| 2007 | 93 | \$99,999 | 12 | \$8,411 | 78 | \$90,920 | 3 | \$668 |
| 2008 | 70 | \$77,712 | 11 | \$6,794 | 56 | \$68,575 | 3 | \$2,343 |
| 2009 | 100 | \$155,529 | 10 | \$30,173 | 90 | \$125,356 | 0 | \$0 |
| 2010 | 40 | \$84,059 | 7 | \$8,050 | 28 | \$63,643 | 5 | \$12,366 |
| January 2011 | 10 | \$2,049 | 0 | \$0 | 10 | \$2,049 | 0 | \$0 |
| February 2011 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 0 | \$0 |
| March 2011 | 1 | \$2,702 | 0 | \$0 | 1 | \$2,702 | 0 | \$0 |
| April 2011 | 4 | \$2,435 | 0 | \$0 | 4 | \$2,435 | 0 | \$0 |
| May 2011 | 2 | \$399 | 0 | \$0 | 2 | \$399 | 0 | \$0 |
| June 2011 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 0 | \$0 |
| July 2011 | 1 | \$428 | 0 | \$0 | 0 | \$0 | 1 | \$428 |
| August 2011 | 3 | \$443 | 0 | \$0 | 0 | \$0 | 3 | \$443 |
| September 2011 | 0 | \$0 | 0 | \$0 | 0 | \$0 | 0 | \$0 |
| TOTAL | 652 | \$1,091,990 | 91 | \$111,315 | 530 | \$954,858 | 31 | \$25,817 |

B. Background

This CAAT routine concentrates on a sub-set of vendor invoices paid by the County that possesses certain common attributes. The sub-set excludes one-time payments (such as election worker pay, jury duty pay, etc.) as well as recurring payments (periodic payments to the same payee for the same amount such as welfare, family support, etc.).

During the month of September 2011, 13,383 invoices for \$234,042,275 were added to this data sub-set representing August 2011 transactions. Currently, the data sub-set includes 893,025 invoices totaling \$9,231,240,332. To better manage our data file of paid invoices, we purged 1,507,352 invoice payments totaling \$8,505,605,698 that were issued prior to January 1, 2007. We periodically purge old records from our data file to maintain efficiency of the CAAT routine. The total data file from which the sub-set is derived includes 2,112,705 records totaling \$20,831,104,200.

For FY 10-11, established vendor payments were about \$2.4 billion.

Our prior research has indicated that the duplicate payments are typically caused by a compounded human clerical error.



2. Employee Vendor Match (Objective #2)

We used a CAAT routine to identify employees that share a similar address or phone number as a vendor. This may identify employees buying goods or issuing contracts to themselves or a related vendor. This routine is performed quarterly.

Status:

All potential employee/vendor matches identified to date have been researched and resolved to HRD's satisfaction. Our next analysis will be performed at 9/30/11.

3. OC Working Retiree/Extra Help Hours (Objective #3)

We performed an analysis of working retiree hours to identify retirees working as extra help in excess of Government Code Sections 31680.6 and 31641.04 mandated limits.

Our criteria are 960 hours (maximum allowed for regular retirees) or 720 hours (maximum for early retirees) during the fiscal year (FY) 2011-2012.

Status:

The Government Code Section 31680.6 and 31641.04 mandated limits are per fiscal year and we perform this review monthly. As of 8/25/11, there were 92 OC working retirees with hours; non-County working retirees are excluded from these totals (e.g. Superior Court, OCERS, LAFCO, etc.). As of 8/25/11, no OC working retiree exceeded the annual limits.

| Department | No. of OC Working Retirees | Total FY Hours to Date |
|--------------------|----------------------------------|------------------------------|
| | | |
| Sheriff-Coroner | 60 | 8,224 |
| Health Care Agency | 11 | 1,385 |
| District Attorney | 11 | 1,306 |
| Assessor | 6 | 461 |
| OC Public Works | 2 | 292 |
| County Counsel | 1 | 158 |
| Human Resources | 1 | 112 |
| Total | 92 | 11,938 |

For FY 11-12, as of 8/25/11, OC working retiree/extra-help data is:

4. Payroll Direct Deposits (Objective #4)

We used a CAAT to identify multiple employee paychecks directly deposited to the same bank account in the same pay period. We review results to determine there has been no irregular direct deposit activity. For FY 10-11, direct deposits for regular payroll were about \$1.3 billion.

Results:

This CAAT was applied in September 2011 with no significant findings.



5. In-Home Supportive Services (Objective #5)

IHSS Program Background:

In-Home Supportive Services (IHSS) is a program administered by Social Services Agency (SSA) that provides domestic and personal care services to allow disabled and elderly individuals to live safely at home. Eligibility requirements include income and asset limits. For FY 10-11, the approximate number of clients served monthly was 20,000+: 1,600+ (age 1-18), 5,100+ (age 19-64) and 13,300+ (age 65+). IHSS program costs for provider wages (the largest portion of program expenses) are about \$135 million annually for Orange County clients. In general, the funding formula for the program (i.e. provider wages and administrative costs) is approximately 50% Federal, 35% State and 15% County. This is a mandated program. Providers are hired directly by the eligible clients and are compensated a flat \$9.30 per hour.

Data Analysis Background:

The Board of Supervisors (BOS) requested the Human Resources Department (HRD) and SSA to obtain information of County employees also providing IHSS services and review for potential conflicts of interest or abuse. To assist them, HRD requested Internal Audit's assistance to perform data analysis.

The goal of our analysis is to identify active County employees who are also providing IHSS services in Orange County as of June 30, 2011. Our results will be provided to SSA who will further research the IHSS services provided (nature of work performed and hours worked) by County employees. SSA will then provide the service information to HRD for their review to determine whether the IHSS work conflicts with County employment.

Unless there is a conflict of interest, nothing in County or IHSS program policy prohibits a County employee from also serving as an IHSS provider. An example of a conflict is performing IHSS services while on County time or using their County position to improperly influence eligibility or payment of IHSS services. There are appropriate reasons or instances when a County employee will be a provider of IHSS services, such as caring for an eligible disabled or elderly person during non-County work hours.

We received the IHSS data from SSA on June 22, 2011 and the employee data from Auditor-Controller/CAPS+ on June 30, 2011 and July 18, 2011. There are **15,850** unique IHSS providers (as of about 5/31/11) and **38,772** employee records (active and inactive employees as of 6/30/11).

It is important to note that the 15,850 IHSS providers have been "authorized" to provide services, but may not be currently providing services (i.e. they are inactive).

Status:

Our results were submitted to SSA in August 2011 for further evaluation. SSA's review is currently in progress. See summary of the review in progress and results below.



Results:

Below is a summary of the results currently being reviewed by SSA. (Full results were reported in the August 2011 Monthly Continuous Auditing Using CAATS Report #1139-B.)

1. <u>County Employees - IHSS Providers</u>:

We identified 92 active County employees who are IHSS providers. Of the County employee providers, 31 are SSA employees. We also identified that the highest number of clients (recipients of services) an individual employee has is two (2). In most instances, each County employee has one (1) client. See tables below.

| | Active Employees (including on leave) |
|----------------|--|
| County – Other | 61 |
| Departments | |
| SSA | 31 |
| Total County | 92 |

| Potential Number of Clients | Active Employees (including on leave) |
|--------------------------------------|--|
| 2 | 11 |
| 1 | 81 |
| Total | 92 |

Our results were provided to SSA on August 8, 2011 for their further research to determine the nature of IHSS services provided and hours worked by County employees. SSA will then provide this service information to HRD for their review and determination of whether the IHSS work conflicts with County employment. SSA's review is currently in progress. Key milestones are presented below:

| | | | | | | HRD | Disposition | |
|--|--------------------------------|--|---------------------------------|------------------------------|--------------------------|-----|-------------|---|
| Description | Matches Submitted to SSA | Matches Resolved in a Prior Analysis Performed by SSA | SSA Review In Progress | HRD Review In Progress | No Conflict Exists | | | Potential Fraud – Referred to DA's Fraud Unit |
| Active County Employees Also IHSS Providers | 92 | 21 | 57 | | 14 | | | |

2. Additional Potential Conflicts or Anomalies that SSA Should Research Further:

When reviewing the IHSS provider data, we performed some additional data analysis (beyond the Board of Supervisors' original request) using the original IHSS data provided by SSA. This information should be reviewed by SSA to determine whether any of the below "potential" conflicts or anomalies should be investigated further by SSA. Our results were provided to SSA on August 8, 2011 for their further review. SSA's review is currently in progress.

a. Potential Conflict with SSA Employee Duties:

We identified 49 active SSA employees sharing the same address with an IHSS provider (the SSA employee is not the provider). **Please note that the IHSS client hires the provider, not SSA.**



Because clients and providers may often be related (i.e. family members), the instance of a provider sharing an address with an employee could also *potentially* be an instance of a client related to an employee.

According to SSA, clients are to disclose if they live with or have a relationship with someone who is involved with a County program. SSA is currently revising its provider orientation to inform providers they must also disclose similar relationships. When this disclosure is made, SSA monitors by putting the case into a confidential caseload. SSA should review these 49 instances to determine whether the case was self-disclosed and put into the confidential caseload. If not, SSA should review those exceptions to determine whether the employee was in a position to influence the awarding or monitoring of services for IHSS clients using these providers.

| | | SSA Disposition | | | | |
|--|---|--|---|--|--|--|
| SSA Employees | IHSS Provider Shares Address with SSA Employee | Included in Confidential Caseload (i.e. Self- Disclosed) | Not a Confidential Case & Not a Conflict | Conflict - Issue Resolved to SSA's Satisfaction | | |
| Active Employees (including on leave) | 49 | | | | | |

b. <u>Multiple IHSS Providers with the Same Address</u>: We identified the following instances of IHSS providers who are sharing the same address with three or more providers. Because of the nature of the provider data as described above, some providers listed may be "inactive" (not currently providing services). It may be appropriate for multiple providers to share the same address (such as multiple family members providing services to a relative). SSA should consider reviewing those instances where there are a high number of providers (such as 4 or 5) with the same address to determine whether any potential inappropriate activity or abuse of the IHSS program exists.

| | | | SSA Dis | position | |
|---|-------------------|---|-----------------------|---|--|
| # of Providers at Same Address | # of Instances | Potential Range of Clients (Records) per Provider | No Conflict Exists | Conflict – Issue Resolved to SSA's Satisfaction | |
| 5 | 1 | 2 to 6 each | | | |
| 4 | 3 | 1 to 2 each | | | |
| Subtotal | 4 | | | | |
| 3 | 29 | 1 to 2 each | No Follow-Up Planned | | |
| Total | 33 | | | | |

Attachments:

Details of Duplicate Payments provided to the Auditor-Controller/Claims & Disbursing Section, dated 9/9/11.