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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: October 2011

Duplicate Vendor Payments: We analyzed 12,802 vendor invoices paid in September 2011 amounting to about \$163 million and found 100% of the invoices were paid only once. Of the \$163 million vendor invoices, no potential duplicate payments were identified.

To date we have identified \$980,675 in duplicate vendor payments, of which \$966,160 or 99% has been recovered.

AUDIT NO: 1139-D REPORT DATE: OCTOBER 28, 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

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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OC Fraud Hotline (714) 834-3608

Letter from Director Peter Hughes



Transmittal Letter



Audit No. 1139-D October 28, 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 October 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 **\$966,160**.

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-D

October 28, 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 12,802 vendor invoices paid in September 2011 amounting to about \$163 million and found 100% of the invoices were only paid once.

Of the \$163 million vendor invoices, no potential duplicate payments were identified.

To date we have identified **\$980,675** in duplicate vendor payments, of which **\$966,160** 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 October 2011. Our analysis included a review of the following data:

- 1. **Duplicate Payments:** 12,802 vendor invoices totaling \$162,632,872 for potential duplicate payments.
- 2. **Employee Vendor Match:** 38,958 employee and 14,933 vendor addresses and phone numbers at 9/30/11 for potential matches.
- 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: 54,036 payroll direct deposit transactions processed for pay periods #18 (8/12/11 - 8/25/11), #19 (8/26/11 - 9/8/11) and #20 (9/9/11 - 9/22/11) 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 October 2011, we found the following:

Objective #1 - Duplicate Payments:

We identified no duplicate payments made to vendors of the **\$163 million** of vendor invoices processed during September 2011.

Value-added Information

Based on the to-date recoveries of **\$966,160** 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 113 monthly performance reports for the CAATs.

Objective #2 – Employee Vendor Match:

This routine is performed on a quarterly basis. At 9/30/11, no potential employee-vendor conflicts were identified in the employee-vendor matches we reviewed.

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

As of 10/6/11, 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 44 were determined to have no conflict with County employment by HRD. The remaining 27 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 September 2011.

A. Results

We identified no potential duplicate payments of the \$163 million of vendor invoices processed during September 2011. The Auditor-Controller continues to investigate all duplicate payments and is pursuing collection. Currently, the County has a recovery rate of about **99%** 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	29	\$74,517	4	\$1,492
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	1	\$428	0	\$0
August 2011	3	\$443	0	\$0	0	\$0	3	\$443
September 2011	0	\$0	0	\$0	0	\$0	0	\$0
October 2011	0	\$0	0	\$0	0	\$0	0	\$0
TOTAL	652	\$1,091,990	91	\$111,315	532	\$966,160	29	\$14,515

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 October 2011, 12,802 invoices for \$162,632,872 were added to this data sub-set representing September 2011 transactions. Currently, the data sub-set includes 905,827 invoices totaling \$9,393,873,204. The total data file from which the sub-set is derived includes 2,139,281 records totaling \$21,114,476,075.

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:

We performed an analysis of employee and vendor addresses and phone numbers at quarter-end September 30, 2011. No potential employee-vendor conflicts were identified in the employee-vendor matches we reviewed. Our next analysis will be performed at quarter-end December 31, 2011.

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 10/6/11, there were 95 OC working retirees with hours; non-County working retirees are excluded from these totals (e.g. Superior Court, OCERS, LAFCO, etc.). As of 10/6/11, no OC working retiree exceeded the annual limits.

Department	No. of OC Working Retirees	Total FY Hours to Date
Sheriff-Coroner	61	14,275
Health Care Agency	11	2,420
District Attorney	12	2,719
Assessor	6	950
OC Public Works	2	541
County Counsel	1	269
Human Resources	1	112
Treasurer-Tax Collector	1	111
Total	95	21,397

For FY 11-12, as of 10/6/11, 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 October 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. County Employees - IHSS Providers:

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		Conflict – Issue Resolved to HRD's Satisfaction	Potential Fraud – Referred to DA's Fraud Unit
Active County Employees Also IHSS Providers	92	21	27		44			

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. When this disclosure is made, SSA monitors by putting the case into a confidential caseload by client.

While performing research on these 49 instances, SSA identified an opportunity to strengthen its processes for *potential* relationships between SSA employees and "providers." According to SSA, it revised the IHSS "provider" orientation to inform providers they must disclose relationships with SSA employees. Additionally, SSA is creating a new confidential caseload for providers (similar to client confidential caseload) and is enhancing written policies and procedures in this area.

SSA reviewed these 49 instances and determined <u>no conflicts existed</u>. Only 3 of the 49 SSA employees were part of the IHSS Division and were appropriately known and identified in the client confidential caseload. The 46 remaining SSA employees were not employees of IHSS and did not have a role in approving or monitoring the client's benefits. Below are the details:

		SSA Disposition No Conflict Existed			
SSA Employees	IHSS Provider Shares Address with SSA Employee	Already Included in "Client" Confidential Caseload	Added to Newly Created "Provider" Confidential Caseload		
Active Employees (including on leave)	49	19	49		

As SSA has completed its research of the above 49 items, this item (2.a.) will be removed from next month's CAAT report.

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 to review those instances where there are four and five providers with the same address to determine whether any potential inappropriate activity or abuse of the IHSS program exists. Due to limited resources and the need to prioritize, these items have not yet been worked on by SSA.

			SSA Disposition		
# 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 10/6/11.