

Summit County Executive Office
Department of Finance and Budget
Procurement Card Program
Annual Audit Report
For the Twelve Months Ended November 30, 2013

Prepared For:

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Approved by Audit Committee
March 24, 2014



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Summit County Executive Office
Department of Finance and Budget
Procurement Card Program Audit Report
For the Twelve Months Ended November 2013

TABLE OF CONTENTS

GENERAL BACKGROUND.....	3
AUDIT OBJECTIVES, METHODOLOGY, AND SCOPE	4
DETAILED COMMENTS	6

Summit County Executive Office
Department of Finance and Budget
Procurement Card Program Audit Report
For the Twelve Months Ended November 30, 2013

GENERAL BACKGROUND

Section 301.29 of the Ohio revised Code (ORC) permits counties to use procurement cards and defines under what conditions they may be used. Chapter 198 of the Summit County Codified Ordinances grants authority of the use of procurement cards by employees of Summit County. The policies and definitions defined under Chapter 198 are incorporated in a policy and procedures document created by the Department of Finance and Budget. Chapters 198.02 through 198.04 defines aggregate spending limits on procurement cards, permissible goods and services which may be purchased using the cards, and procedures to be followed in the event a card is misused.

Summit County's Procurement Card Program is designed to allow County employees to make purchases in a manner that reduces paperwork and processing time. The program is an alternative to the traditional purchasing process and can significantly reduce the number of purchase orders and payments processed. It is designed primarily for the purchase of tangible materials, equipment, supplies, and approved services that cost less than \$3,000. Use of the card is meant to simplify and streamline the acquisition process and lower overall transaction costs. The program introduces an electronic invoicing payment process that will significantly streamline the way payments are made by the County.

All cardholders have limits that are defined by the Program Participant and County Program Administrator and are enforced at the point of purchase by Visa. Limitations are established for spending amounts per transaction, monthly spending limits and number of transactions that can be made per day. Several controls concerning classes of merchants are also placed upon the card. In addition, U.S. Bank provides transactional reporting designed to detect irregularities in cardholder usage. Cardholders are also subject to routine and random audits by the County's Department of Internal Audit.

The Procurement Card Program is currently utilized by the following twenty-six departments/agencies:

- Prosecutor's Office
- Building Standards
- Sheriff's Office
- Health District
- Fiscal Office
- County Council
- Engineer's Office
- Clerk of Courts
- Common Pleas Court
- Domestic Relations Court
- Juvenile Court
- Probate Court
- Developmental Disabilities Board
- Human Resource Commission
- Summit County Law Library
- Veterans Service Commission
- Internal Audit Department
- Executive Office Purchasing Department
- Executive Office Division of Public Safety
- Executive Office Communications Department
- Executive Office Department of Community and Economic Development
- Executive Office Department of Job and Family Services

Summit County Executive Office
Department of Finance and Budget
Procurement Card Program Annual Audit Report
For the Twelve Months Ended November 30, 2013

- Executive Office Department of Administrative Services
- Executive Office Emergency Management Agency
- Executive Office Human Resource Department
- Executive Office Department of Environmental Services

AUDIT OBJECTIVES, METHODOLOGY, AND SCOPE

The primary focus of this review was to provide the Summit County Executive's Office Department of Finance and Budget with reasonable assurance, based on the testing performed, on the adequacy of the system of management control currently in effect for the audit areas. Management controls include the processes for planning, organizing, directing, and controlling program operations, including systems for measuring, reporting, and monitoring performance. Management is responsible for establishing and maintaining effective controls that, in general, include the plan of organization, as well as methods, and procedures to ensure that goals are met. Specific audit objectives include evaluating the policies, procedures, and internal controls related to the Summit County Procurement Card Program.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Based on the results of our review, we prepared specific issues and recommendations for improvement that were discussed with management. These recommendations, as well as management's unaltered written response, can be found in the following sections of this report.

Disclaimer:

We recognize that the Internal Audit Department (IAD) is a participant in the Procurement Card Program, and therefore is unable to audit its own procurement card use and maintain objectivity. Based on this fact, IAD Procurement Card use is excluded from testing and review.

Specific Objectives:

1. To review policies and procedures and ensure that they are reasonable and in accordance with the O.R.C. §301.29 and Summit County Codified Ordinance Chapter 198.
2. To review the internal control structure of procurement card administration for reasonableness.
3. To review the reconciliation process for reasonableness and accuracy.

Scope:

An overview and evaluation of the existing policies, processes, procedures, contracts and internal control structure utilized by the department/agency from 12/1/12 through 11/30/13.

Summit County Executive's Office - Department of Finance and Budget
Procurement Card Program Audit Report
For the Year Ended December 31, 2011

The following were the major audit steps performed:

OBJECTIVE 1 – TO REVIEW POLICIES AND PROCEDURES AND ENSURE THEY ARE REASONABLE AND IN ACCORDANCE WITH THE O.R.C. AND CODIFIED ORDINANCES.

1. Obtain and review the current policies and procedures to ensure they are reasonable and in accordance with both the Codified Ordinance and O.R.C.
2. Perform testing to verify that each procurement cardholder has a signed County Procurement Card Program Cardholder Acknowledgement form and a Cardholder Application form on file.
3. Meet with the appropriate personnel to obtain an understanding of the current department processes and procedures. Compare those existing processes to the policies and procedures manual for consistency, noting all exceptions. Verify that all departments have departmental procedures on file.
4. Obtain the department's Record Retention Schedule (RC-2) and review for completeness with regard to procurement card documents.
5. Investigate discrepancies and summarize results. Make recommendations where appropriate.

OBJECTIVE 2 – TO REVIEW THE INTERNAL CONTROL STRUCTURE OF PROCUREMENT CARD ADMINISTRATION

1. List personnel to be interviewed, the respective interview dates and documentation obtained to gain an understanding of the specific functions and duties for the area of responsibility of the interviewee. (i.e., Mission Statements, Department Procedures, etc.). Document the interview utilizing the questionnaire.
2. Obtain and review a listing of cardholders and a listing of user IDs from U.S. Bank. Confirm all employees on both listings are active per Banner. Review permissions assigned to users in the U.S. Bank system to ensure that permissions are reasonable. Compare the listing of cardholders to the listing of user IDs with coordinator privileges to ensure that duties are appropriately segregated (e.g., there are no cardholders with coordinator capabilities).
3. Obtain a current MCC code listing from U.S. Bank showing eligible and ineligible transactions. Review for reasonableness.
4. Obtain a listing of spending limits for all approved cardholders. Review to ensure spending limits are reasonable and in compliance with those established in the policies and procedures.
5. Obtain a listing of transactions from the U.S. Bank system to perform detailed testing.
6. Obtain a listing of monthly payments made to U.S. Bank (broken down by account code, purchase order number, etc.). Choose a sample for testing and indicate the sampling technique used. For each payment selected, obtain the corresponding monthly bank statement and perform detailed testing.
7. Investigate discrepancies and summarize results. Make recommendations where appropriate.

OBJECTIVE 3 – TO REVIEW THE RECONCILIATION PROCESS FOR REASONABLENESS AND ACCURACY.

1. Meet with the appropriate personnel to gain an understanding of the control environment.
2. Select a sample of month end reconciliations and review for accuracy.
3. Investigate discrepancies and summarize results. Make recommendations where appropriate.

Summit County Executive's Office - Department of Finance and Budget
Procurement Card Program Audit Report
For the Twelve Months Ended November 30, 2013

DETAILED COMMENTS

I. Policies & Procedures

The *Summit County, Ohio Procurement Card Program Policy and Procedures*, revised and effective 3/20/13, and the Pre-Authorization Signature form was obtained from the County intranet site to gain an understanding of the policies and procedures currently in place and the form used to establish blanket approval authorization. Upon discussions with the Program Administrator, it was noted that only minimal changes had been made to the policy and procedure manual since the 2012 Procurement Card Audit. Therefore, IAD performed the following procedures to verify that no material changes had been made to the policy and procedure manual, Codified Ordinances, or O.R.C. since IAD's previous review.

The cardholder listing from the 2012 P-Card audit was compared to a current listing of cardholders in order to create a complete listing to include any new cardholders that joined the procurement card program since the 2012 audit. IAD then tested to verify that all new cardholders had a cardholder application and a policy and procedure sign-off on file in accordance with the Procurement Card Program Policy and Procedures manual, section III.C.

A listing of all of the current departments that participate in the procurement card program was obtained and compared to the policy and procedure manual testing from the 2012 P-Card audit to verify that all new departments participating in the program submitted their P-Card policy and procedure manual for review in accordance with the Procurement Card Program Policy and Procedures manual, section III.A.

The Records Retention Schedules (RC-2) for the Department of Finance and Budget and the Fiscal Office were obtained and reviewed for completeness with regard to procurement card documents.

No issues noted.

II. Internal Controls

Interviews were conducted with the Procurement Card Program Administrator of the Department of Finance and Budget and the Support Services Administrator of the Fiscal Office Accounting Department to gain an understanding of the procurement card program, processes, and control environment.

A cardholder and user ID listing generated from the U.S. Bank system was obtained and filtered for active cards. All active cardholders were reviewed to confirm that they were active employees per Banner. The U.S. Bank user ID listing was filtered for users with high level permissions and reviewed for reasonableness.

A listing of cardholders who have program coordinator or program administrator privileges was generated from the cardholder listing and user ID listing, and reviewed to verify that a proper segregation of duties existed. A listing of MCC codes generated from the U.S. Bank system was obtained and reviewed to determine the reasonableness of eligible/ineligible transactions. The cardholder listing was filtered to determine the cardholder's limits and reviewed for reasonableness and compliance.

The Declined Transaction listing was obtained and reviewed for any declined transactions to confirm that transaction limit controls are functioning properly. To further test transaction limit controls, the following detailed testing was performed:

- The number of transactions per day did not exceed established limits,
- The total amount per transaction did not exceed established limits,
- The total amount per day did not exceed established limits,

Summit County Executive Office
Department of Finance and Budget
Procurement Card Program Audit Report
For the Twelve Months Ended November 30, 2013

- Transactions with blocked MCC codes were declined,
- Users who gave final approval for each transaction are authorized to approve transactions.

A Banner report of payments made to U.S. Bank in 2013 was generated and a sample of three (3) months was judgmentally selected for one hundred percent (100%) detail testing. An additional sample of three (3) months was judgmentally selected for detail testing of one hundred (100) transactions each, based on the allocation of procurement cards by department. Furthermore, monthly U.S. Bank statements corresponding to these payments were obtained to perform the following detailed testing:

- Sales tax was exempted from all purchases,
- There was appropriate supporting documentation (receipts, order forms, etc.),
- The purchase was reasonable,
- The purchase was properly recorded,
- Proper management approval was recorded on the transaction log and/or the employee has an approved blanket approval form on file.

The following issues were noted:

General Recommendation:

Upon review of the U.S. Bank User IDs, IAD noted two (2) out of seventy-nine (79) instances where an employee had unreasonable access due to a duplicate user ID. IAD recommends that the Department of Finance and Budget implement procedures to verify cardholders have reasonable access and do not have duplicate user IDs. This will help to ensure access to the U.S. Bank site is limited to active, authorized employees.

1. Issue:

Upon detailed testing of procurement card transactions, IAD noted seventy-six (76) out of one thousand two hundred nine (1,209) instances where a pre-approval was not obtained for the transaction.

Recommendation:

IAD recommends that the Department of Finance and Budget require that all department cardholders obtain proper pre-approval for transactions and record this pre-approval appropriately. This will help to ensure that all cardholders are in compliance with the Summit County, Ohio Procurement Card Program Policy and Procedures manual.

Management Action Plan:

Under the County P Card Policy all department cardholders are to obtain proper pre-approval for all transactions. The Departmental coordinators are responsible for ensuring that this occurs. We have notified the coordinators that had issues with pre-approval and reminded them of their responsibility to follow the County's policy. Additionally they were provided the Cardholder Pre-approved Spending and Transaction Limit Form. We will continue to monitor this process and continue to provide coordinators with the Cardholder Pre-approved Spending and Transaction Limit Form as new cardholders are added to departments.

III. Reconciliation

The Procurement Card Program Policy and Procedures manual was reviewed and interviews were conducted with the Program Administrator and Support Services Administrator, to gain an understanding of the month-end reconciliation

Summit County Executive Office
Department of Finance and Budget
Procurement Card Program Audit Report
For the Twelve Months Ended November 30, 2013

process. A sample of six U.S. Bank statements was selected and tested to determine if the aggregate amount of the transactions agreed to the procurement card payment that was made in Banner.

No issues noted.