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: August 2010

We analyzed 10,415 vendor invoices paid in July 2010 amounting to about $340 million and found 99.99% of the invoices were paid only once.

Of the $340 million vendor invoices, we identified 1 potential duplicate payment made to vendors for $786.

To date we have identified $949,668 in duplicate vendor payments, of which $904,864 has been recovered.

RISK BASED AUDITING


2009 Association of Certified Fraud Examiners’ Hubbard Award to Dr. Hughes for the Most Outstanding Article of the Year

2008 Association of Local Government Auditors’ Bronze Website Award

2005 Institute of Internal Auditors’ Award for Recognition of Commitment to Professional Excellence, Quality, and Outreach
Independence  Objectivity  Integrity

Internal Audit Department


Providing Facts and Perspectives Countywide

RISK BASED AUDITING

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OC Fraud Hotline (714) 834-3608
Transmittal Letter
Audit No. 1041-B August 31, 2010

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 August 2010 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 $904,864.

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
Letter from Director Peter Hughes

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
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Foreperson, Grand Jury
Darlene J. Bloom, Clerk of the Board of Supervisors
Results of Continuous Auditing Using CAATS:
Auditor-Controller, Human Resources, & County Procurement Office
Duplicate Vendor Payments and Other Routines
Audit No. 1041-B

For the Month:
August 2010

Table of Contents

Transmittal Letter i

OC Internal Auditor’s Report 1

OBJECTIVES 1
BACKGROUND 2
SCOPE 2
RESULTS 3

DETAILED RESULTS

1. Duplicate Payments (Objective #1) 4
2. Employee Vendor Match (Objective #2) 5
3. OC Working Retiree/Extra Help Hours (Objective #3) 5
4. Payroll Direct Deposits (Objective #4) 6
Audit Highlight
We analyzed 10,415 vendor invoices paid in July 2010 amounting to about $340 million and found 99.99% of the invoices were only paid once. Of the $340 million vendor invoices, we identified one (1) potential duplicate payment made to vendors for $786.

To date we have identified $949,668 in duplicate vendor payments, of which $904,864 has been recovered.

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 currently 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 10-11. 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.
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 August 2010. Our analysis included a review of the following data:

1. **Duplicate Payments**: 10,415 vendor invoices totaling $340,297,300 for potential duplicate payments.

2. **Employee Vendor Match**: 49,324 employee and 12,322 vendor addresses and phone numbers at 6/30/10 for potential conflicts of interest. This routine is performed on a quarterly basis; therefore, it was not performed in July 2010. Our next analysis will be performed at 9/30/10.

3. **OC Working Retiree/Extra Help Hours**: County working retiree/extra help hours worked during FY 10/11 for individuals exceeding annual limits of 960 or 720 hours, as mandated by Government Code Sections 31680.6 and 31641.04.

4. **Payroll Direct Deposits**: 36,733 payroll direct deposit transactions processed for pay periods #14 (6/18/10 – 7/1/10) and #15 (7/2/10 – 7/15/10) for suspicious direct deposit activity.
RESULTS

For the month of August 2010, we found the following:

- **Objective #1 - Duplicate Payments:**
  We identified one (1) duplicate payment made to vendors for $786 or .0002% of the $340 million of vendor invoices processed during July 2010.

  **Value-added Information**
  Based on the to-date recoveries of $904,864 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 99 monthly performance reports for the CAATs.

- **Objective #2 – Employee Vendor Match:**
  At quarter-end 3/31/10, we identified 1 employee/vendor match that was included in our May report and submitted to Human Resources Department (HRD) for further evaluation. As of August 27, 2010, HRD determined that this employee/vendor match was not a conflict. All potential employee/vendor matches identified to date have been researched and resolved to HRD’s satisfaction.

- **Objective #3 – OC Working Retiree/Extra Help Hours:**
  As of 8/25/10, no working retirees exceeded the annual limits of 960 or 720 hours for FY 10/11, as mandated by Government Code Sections 31680.6 and 31641.04.

- **Objective #4 – Payroll Direct Deposits:**
  Analysis performed with no findings noted.

See the Detailed Results section for further information.
Detailed Results

1. Duplicate Payments (Objective #1)
   We used a CAAT routine to identify potential duplicate payments made to vendors during July 2010.

   A. Results
   We identified one (1) duplicate payment for $786 or .0002% of the $340 million of vendor invoices processed during July 2010. The Auditor-Controller continues to investigate all duplicate payments and is pursuing collection. Currently, the County has a recovery rate of about 95% 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:

<table>
<thead>
<tr>
<th>CAAT Report</th>
<th>Total</th>
<th>Not Duplicates</th>
<th>Recovered</th>
<th>In Process</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#’s</td>
<td>$’s</td>
<td>#’s</td>
<td>$’s</td>
</tr>
<tr>
<td>2002</td>
<td>103</td>
<td>$99,980</td>
<td>19</td>
<td>$10,334</td>
</tr>
<tr>
<td>2003</td>
<td>50</td>
<td>$33,306</td>
<td>7</td>
<td>$10,175</td>
</tr>
<tr>
<td>2004</td>
<td>33</td>
<td>$105,779</td>
<td>7</td>
<td>$2,990</td>
</tr>
<tr>
<td>2005</td>
<td>67</td>
<td>$80,162</td>
<td>2</td>
<td>$668</td>
</tr>
<tr>
<td>2006</td>
<td>75</td>
<td>$347,008</td>
<td>16</td>
<td>$33,720</td>
</tr>
<tr>
<td>2007</td>
<td>93</td>
<td>$99,999</td>
<td>12</td>
<td>$8,411</td>
</tr>
<tr>
<td>2008</td>
<td>70</td>
<td>$77,712</td>
<td>11</td>
<td>$6,794</td>
</tr>
<tr>
<td>2009</td>
<td>100</td>
<td>$155,529</td>
<td>10</td>
<td>$30,173</td>
</tr>
<tr>
<td>January 2010</td>
<td>0</td>
<td>$0</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>February 2010</td>
<td>6</td>
<td>$42,827</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>March 2010</td>
<td>0</td>
<td>$0</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>April 2010</td>
<td>1</td>
<td>$1,140</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>May 2010</td>
<td>9</td>
<td>$2,665</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>June 2010</td>
<td>8</td>
<td>$11,746</td>
<td>3</td>
<td>$6,660</td>
</tr>
<tr>
<td>July 2010</td>
<td>6</td>
<td>$954</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>August 2010</td>
<td>1</td>
<td>$786</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>TOTAL</td>
<td>622</td>
<td>$1,059,593</td>
<td>87</td>
<td>$109,925</td>
</tr>
</tbody>
</table>

   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 August 2010, 10,415 invoices for $340,297,300 were added to this data sub-set representing July 2010 transactions. Currently, the data sub-set includes 1,080,453 invoices totaling $11,495,358,005.

   The total data file from which the sub-set is derived includes 3,183,648 records totaling $23,579,135,773. For FY 09-10, established vendor payments were about $2.2 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:**
3/31/10: We performed an analysis of employee and vendor addresses and phone numbers at 3/31/10. We identified 1 employee-vendor match included in our May 2010 report.

6/30/10: We performed an analysis of employee and vendor addresses and phone numbers at 6/30/10. We identified no employee-vendor matches as noted in our July 2010 report.

Our results have been provided to the Human Resources Department (HRD) for their evaluation as to whether any employee vendor conflicts exist in the matches identified. As HRD’s reviews are completed for each quarter, that quarter’s status will be removed from the below table.

Status as of August 27, 2010:

<table>
<thead>
<tr>
<th>Quarter-End</th>
<th>CAAT Report Month</th>
<th>Matches Submitted to HR</th>
<th>Not a Valid Match</th>
<th>In Progress</th>
<th>No Conflict - Potential HR Policy Issue Resolved to HR’s Satisfaction</th>
<th>Conflict – Issue Resolved to HR’s Satisfaction</th>
</tr>
</thead>
<tbody>
<tr>
<td>3/31/10</td>
<td>May 2010</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>6/30/10</td>
<td>July 2010</td>
<td>0</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
</tr>
</tbody>
</table>

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).

**Status:**
The Government Code Section 31680.6 and 31641.04 mandated limits are per fiscal year and we perform this review monthly. To date in FY 10-11, there have been approximately 79 OC working retirees; non-County working retirees are excluded from these totals (e.g. Superior Court, OCERS, LAFCO, etc.). As of August 25, 2010, no individuals have exceeded the annual limits for FY 10-11.
For FY 10-11, OC working retiree/extra-help data as of August 25, 2010 is:

<table>
<thead>
<tr>
<th>Department</th>
<th>No. of OC Working Retirees</th>
<th>Total FY Hours to Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sheriff-Coroner</td>
<td>57</td>
<td>6,112</td>
</tr>
<tr>
<td>District Attorney</td>
<td>8</td>
<td>1,157</td>
</tr>
<tr>
<td>Health Care Agency</td>
<td>8</td>
<td>885</td>
</tr>
<tr>
<td>Auditor-Controller</td>
<td>1</td>
<td>231</td>
</tr>
<tr>
<td>Assessor</td>
<td>2</td>
<td>201</td>
</tr>
<tr>
<td>OC Public Works</td>
<td>2</td>
<td>149</td>
</tr>
<tr>
<td>County Counsel</td>
<td>1</td>
<td>135</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>79</strong></td>
<td><strong>8,870</strong></td>
</tr>
</tbody>
</table>

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 09-10, direct deposits for regular payroll were about $1.3 billion.

   **Results:**
   This CAAT was applied in August 2010 with no significant findings.

   **Attachments:**
   Details of Duplicate Payments provided to the Auditor-Controller/Claims & Disbursing Section, dated 8/26/10.