Duplicate Vendor Payments: We analyzed 13,679 vendor invoices paid in October 2011 amounting to about $175 million and found 100% of the invoices were paid only once. Of the $175 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-E
Report Date: November 23, 2011
Internal Audit Department


Providing Facts and Perspectives Countywide

RISK BASED AUDITING

Dr. Peter Hughes
Director
Ph.D., MBA, CPA, CCEP, CITP, CIA, CFE, CFF
Certified Compliance & Ethics Professional (CCEP)
Certified Information Technology Professional (CITP)
Certified Internal Auditor (CIA)
Certified Fraud Examiner (CFE)
Certified in Financial Forensics (CFF)
E-mail: peter.hughes@iad.ocgov.com

Eli Littner
Deputy Director
CPA, CIA, CFE, CFS, CISA
Certified Fraud Specialist (CFS)
Certified Information Systems Auditor (CISA)

Michael J. Goodwin
Senior Audit Manager
CPA, CIA

Alan Marcum
Senior Audit Manager
MBA, CPA, CIA, CFE

Autumn McKinney
Senior Audit Manager
CPA, CIA, CISA, CGFM
Certified Government Financial Manager (CGFM)

Hall of Finance & Records

12 Civic Center Plaza, Room 232
Santa Ana, CA  92701

Phone: (714) 834-5475                  Fax: (714) 834-2880

To access and view audit reports or obtain additional information about the OC Internal Audit Department, visit our website: www.ocgov.com/audit

OC Fraud Hotline (714) 834-3608
Letter from Director Peter Hughes

Transmittal Letter

Audit No. 1139-E  November 23, 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 November 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 Aquin, 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

The Internal Audit Department is an independent audit function reporting directly to the Orange County Board of Supervisors.
Results of Continuous Auditing Using CAATS: Auditor-Controller, Human Resources, & County Procurement Office Duplicate Vendor Payments and Other Routines Audit No. 1139-E

For the Month:
November 2011

Transmittal Letter i

OC Internal Auditor’s Report 1

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5. In-Home Supportive Services (Objective #5) 6
Audit No. 1139-E

November 23, 2011

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

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.

Audit Highlight

We analyzed 13,679 vendor invoices paid in October 2011 amounting to about $175 million and found 100% of the invoices were only paid once.

Of the $175 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.
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 November 2011. Our analysis included a review of the following data:

1. **Duplicate Payments:** 13,679 vendor invoices totaling $174,688,052 for potential duplicate payments.

2. **Employee Vendor Match:** This routine is performed on a quarterly basis; therefore, it was not performed in October 2011. The next analysis will be performed at 12/31/11.

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.

4. **Payroll Direct Deposits:** 35,966 payroll direct deposit transactions processed for pay periods #21 (9/23/11 – 10/6/11) and #22 (10/7/11 – 10/20/11) 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 November 2011, we found the following:

- **Objective #1 - Duplicate Payments:**
  We identified no duplicate payments made to vendors of the $175 million of vendor invoices processed during October 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 114 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 12/31/11.

- **Objective #3 – OC Working Retiree/Extra Help Hours:**
  As of 11/3/11, 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. The updated status of the 92 matches is:

    - 21 were resolved in a prior analysis performed by SSA.
    - 53 were determined to have no conflict with County employment by HRD.
    - 14 are being referred to the DA’s Fraud Unit for further review as more research is needed to determine any potential fraud.
    - 4 are undergoing review by SSA.

  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 October 2011.

A. Results
We identified no potential duplicate payments of the $175 million of vendor invoices processed during October 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:

<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>2010</td>
<td>40</td>
<td>$84,059</td>
<td>7</td>
<td>$8,050</td>
</tr>
<tr>
<td>January 2011</td>
<td>10</td>
<td>$2,049</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>February 2011</td>
<td>0</td>
<td>$0</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>March 2011</td>
<td>1</td>
<td>$2,702</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>April 2011</td>
<td>4</td>
<td>$2,435</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>May 2011</td>
<td>2</td>
<td>$399</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>June 2011</td>
<td>0</td>
<td>$0</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>July 2011</td>
<td>1</td>
<td>$428</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>August 2011</td>
<td>3</td>
<td>$443</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>September 2011</td>
<td>0</td>
<td>$0</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>October 2011</td>
<td>0</td>
<td>$0</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>November 2011</td>
<td>0</td>
<td>$0</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>TOTAL</td>
<td>652</td>
<td>$1,091,990</td>
<td>91</td>
<td>$111,315</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 November 2011, 13,679 invoices for $174,688,052 were added to this data sub-set representing October 2011 transactions. Currently, the data sub-set includes 919,506 invoices totaling $9,568,561,256. The total data file from which the sub-set is derived includes 2,166,117 records totaling $21,365,548,509.

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 12/31/11.

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 11/3/11, there were 98 OC working retirees with hours; non-County working retirees are excluded from these totals (e.g. Superior Court, OCERS, LAFCO, etc.). As of 11/3/11, no OC working retiree exceeded the annual limits.

   For FY 11-12, as of 11/3/11, OC working retiree/extra-help data 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>63</td>
<td>18,436</td>
</tr>
<tr>
<td>District Attorney</td>
<td>12</td>
<td>3,694</td>
</tr>
<tr>
<td>Health Care Agency</td>
<td>11</td>
<td>3,228</td>
</tr>
<tr>
<td>Assessor</td>
<td>7</td>
<td>1,376</td>
</tr>
<tr>
<td>OC Public Works</td>
<td>2</td>
<td>747</td>
</tr>
<tr>
<td>County Counsel</td>
<td>1</td>
<td>373</td>
</tr>
<tr>
<td>Treasurer-Tax Collector</td>
<td>1</td>
<td>179</td>
</tr>
<tr>
<td>Human Resources</td>
<td>1</td>
<td>112</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>98</strong></td>
<td><strong>28,145</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 10-11, direct deposits for regular payroll were about $1.3 billion.

   **Results:**
   This CAAT was applied in November 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 current summary of the review in progress and results below.
**Detailed Results**

**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.

   ![](table.png)

   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:

   ![](table2.png)

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. **Multiple IHSS Providers with the Same Address:** 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.

<table>
<thead>
<tr>
<th># of Providers at Same Address</th>
<th># of Instances</th>
<th>Potential Range of Clients (Records) per Provider</th>
<th>SSA Disposition</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>1</td>
<td>2 to 6 each</td>
<td>No Conflict Exists</td>
</tr>
<tr>
<td>4</td>
<td>3</td>
<td>1 to 2 each</td>
<td>Conflict – Issue Resolved to SSA’s Satisfaction</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td><strong>4</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>29</td>
<td>1 to 2 each</td>
<td>No Follow-Up Planned</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>33</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Attachments:**
Details of Duplicate Payments provided to the Auditor-Controller/Claims & Disbursing Section, dated 11/3/11.