



**DALLAS COUNTY
COUNTY AUDITOR**

REPORT ON INTERNAL CONTROL & COMPLIANCE

TO: Honorable Joe Wells
Dallas County Treasurer

FROM: Virginia A. Porter *Virginia A. Porter*
County Auditor

SUBJECT: Review of Statutory Reporting and Compliance – FY2010

ISSUE DATE: January 17, 2012

RELEASE DATE: February 24, 2012

SCOPE

As part of ongoing reviews of County Departments and compliance with statutory regulations, we have reviewed financial records and statutory compliance within the County Treasurer Department for the period ending September 30, 2010.

REVIEW PROCEDURES

Standard review processes were applied to data from the department in order to evaluate internal controls and reporting accuracy within the department. A random sampling of total activity was selected for certain procedures, while others were reviewed in their entirety. Transactions were evaluated based on risk, dollar value of transactions, volume of transactions and noted internal control weaknesses. Review steps included, but were not limited to, the following:

- Reviewed cash management procedures including activity related to deposits and disbursements
- Reviewed clearing account activity
- Reviewed bank reconciliations
- Review of collateral holdings and safekeeping receipts
- Reviewed investment activity for compliance with county policy and state statutes
- Examined bond registers and traced entries to payment records
- Assessed compliance with V.T.C.A., L.G.C., § 113 and 114
- Reviewed new technology initiatives and associated processes
- Reviewed Bank of America Account Analysis for earnings credits and charges

General

The First Texas Legislature created the Dallas County Treasurer's office in 1846. Honorable Joe Wells was first elected as the 33rd Dallas County Treasurer to serve a four year term beginning January 1, 2007. Interest earnings remained low consistent with low federal rates established in 2008 as longer term investments matured and new investment options remained low. On March 27, 2009, the County Treasurer began electronically transmitting an image cash letter (ICL) to the depository bank in order to clear check or money orders received by the various Dallas County departments/offices. The ICL process reduces banking costs and expedites the point at which funds are available.

New/Continuing Initiatives

- Pay Mode (ACH) was implemented expanding e-commerce options. Electronic payments rather than hard copy check payments are processed to pay vendor invoices and employee reimbursements. Savings occur through reduced check handling/processing costs and reduced outstanding checks and corresponding staff time to complete bank reconciliations.
- A new juror system was implemented in late FY 2009 by Jury Services. Several manual processes have been automated resulting in increased juror payment efficiency and cost savings to the County. Certain manual controls have been implemented to assure accurate interfaces.
- Treasurer's office reviews delinquent tax files and remits debt due notice to current vendors. The program has resulted in increased collections.
- Countywide Receipting including point of sale functionality was partially implemented in FY 2010, expanding electronic deposit options to multiple offices.

Disclosures

As of September 30, 2010, total Arbitrage Rebate liability was \$1,138,313 and total outstanding Bonded Debt was \$151,065,325 which includes a \$29,035,325 interest balance and \$122,030,000 principal balance.

FINDINGS

Cash Management

Deposits / Clearing Accounts – Clearing accounts are established to expedite transfer and reconciliation efforts. Several delays in transferring/processing from clearing accounts were noted, no evidence of follow-up was noted. Insufficient details received for external incoming wire transfer resulting in instances of transfers to incorrect revenue / fund accounts. Worksheets are used to track and monitor credit card settled funds, refunds, and chargeback activity and periodically follow-up with departments for clearing.

Bank Reconciliation – Positive pay and Filters and Blocks are used on all Dallas County accounts except jury and imprest/food funds.

Bank Contract – Banking charges applied against available earnings credit included anticipated overdraft charges due to investment maturities and unexpected FDIC assessment fees. The courier services contract was transferred to Bank of America. Reconciling items dating back to 2006 on the Credit Card fee Account - #671, remain unresolved.

Payroll Overpayments / Year 2000 Payroll Advances – Limited collection process for employee overpayments resulting from the employing department's failure to timely submit termination notices.

Investments

Investment/Accounting – Using manual tracking methods and without use of a sophisticated investment module, investments typically adhere to policy and incorporate the best interest rate. Limited staff is available for an extensive review before committing / investing funds for a longer period of time when using a significantly manual process. Rates remained low consistent with federal notes (established in 2008) as longer term investment options remained low.

Technology

The County Treasurer continually seeks technology enhancements associated with processing initiatives. Current issues/challenges include workarounds and manual controls due to system limitations:

Document Express System – Incomplete review of business application control registers/files to both total number of checks printed and the total amount. Instances of check stock numbers used out of sequence.

Other Systems/Applications – Major systems/applications under review include the Countywide Receipting (CWR) System (incomplete rollout), Jury System (lacks checks writing controls), and secured personal computers (PCs) for Bank Transfers and PCI (Payment Card Industry) (limited options).

Bonded Debt

Defeased Bonds – No entries were made to record receipt of funds from the escrow agent to County Treasurer (as the paying agent) and no audit trails exists for disbursing the funds for the retirement of the defeased bonds.

RECOMMENDATIONS

Cash Management

Deposits / Clearing Accounts – Coordinate with departments to provide sufficient details to clear funds to the appropriate account in a timely manner. Continue research and follow-up to clear pending credit card transactions through department's revenue recognition and/or revenue reversal for previously initiated refunds or chargebacks.

Bank Reconciliation - Obtain the Positive Pay Verification and ACH Block and Filters feature for all accounts and continue to monitor accounts to prevent unauthorized transactions. Review options to automate/link process steps for all types of disbursements.

Bank Contract – Request a refund or credit from the depository bank for the questioned FDIC assessments. Monitor bank accounts balances daily to avoid overdrawing bank accounts. Review monthly account analysis statements for charges against earnings credit. Monitor and evaluate all bank contracted services annually to make sure pass-on costs are justified.

Payroll Overpayments / Year 2000 Payroll Advances – Turn delinquent accounts over to the Dallas County District Attorney's office for collection.

Investments

Investment/Accounting – Consider installation of an automated tracking module to vet and track investments, continue to invest funds for maximum security and maximized earnings of invested funds, manage terms to reduce significant long term investments during current historically low rates. Investment decisions should include TexPool, overnight and other short term investment options when competitive yields are below repo rates.

Technology

Document Express System – Continue to compare and reconcile check processing registers for each fund to business application control registers/files for both total number of checks printed and the total amount. Maintain a log of check stock used and implement supervisory review and sign-off prior to release of payments.

Other Systems/Applications – Continue to implement new/updated secured systems/processes to enhance processing initiatives and resolve system errors on jury check errors. Work with IT Services reviewing a PCI compliance audit to upgrade security for all credit card transactions and processes for compliance with industry standards.

Bonded Debt

Defeased Bonds – All funds received should be properly receipted and recorded through Oracle Financials. Obtain 3rd party verification annually affirming outstanding liability and outstanding escrow fund balances by issue.

Other

Contracts – Annual review of fees and costs associated with banking and credit card collections should be continued. Strategic planning should include review of existing contracts and new/proposed technology in order to provide most efficient services for the County. The courier contract should be amended to include a financial penalty for misrouted / unsatisfactory delivery of services.

SUMMARY

This report is intended for the information and use of the Treasurer's office. While we have reviewed internal controls and financial records, this review will not necessarily disclose all matters of material weakness. It is the responsibility of the department to establish and maintain effective internal control over compliance with the requirements of laws, regulations, and contracts applicable to the Treasurer's office.

County Treasurer's office is high risk due to the amount and volume of transactions processed but incorporates mitigating and effective control procedures. Ongoing emphasis must be placed on detail reconciliations, processes timing and effective automation. Our review was conducted on a test basis and was not designed to identify all deficiencies in internal control. Adherence to and follow-through with recommendations should strengthen internal controls and compliance with Dallas County's policies and procedures.

Cc: Commissioners Court
Honorable Judge Martin Lowy, LADJ



Finding Number: 10-CT-01-01
Date: May 18, 2011
Audit: County Treasurer FY 2010
Auditor(s) Assigned: JT, TB

<p>Finding:</p>	<p>Cash management/clearing accounts:</p> <ul style="list-style-type: none"> Review of clearing accounts revealed that established accounts are currently used to process county transactions with a minimum of reconciliation effort on some accounts. Several delays in transferring / processing from the clearing accounts were noted. Follow-up action regarding other office's delay between wire/ACH date and submitting the associated deposit 98 to the Treasurer were not evidenced. Review of bank activity revealed various instances of wire transfers received without sufficient details to initially denote correct revenue/funds accounts. Transfer errors from '882' occur infrequently with discrepancies in part due to daily clearing of the '882' account without sufficient deposit information. Review of the credit card chargeback account revealed continuation of daily monitoring by Treasurer staff with notifications sent to departments requesting deducted items be cleared. Follow-up email notifications are sent by Treasurer's management when departments are non-responsive. <p>Status: Several items remain pending departmental action to resolve.</p>
<p>Work paper Reference: (or other method by which finding was identified)</p>	<p>Clearing Accounts Analysis, review of bank statements, and review of account reconciliation. Current clearing accounts include: 882 - wires with daily clearance 671 - credit card fee pay accounts with monthly clearance 670 - credit card charge backs with monthly clearance 669 - credit card settlement account with two day clearance 630 - County Clerk E-Pay with variable clearance 993 - District Clerk E-Pay with variable clearance 1900 - Check Clearing</p>
<p>Condition: (Describe the current condition)</p>	<p>Established clearing accounts temporarily accumulate funds that will be transferred to another account as determined by the County Treasurer</p> <ul style="list-style-type: none"> County Treasurer's Office receives and verifies deposit bags with spreadsheets received from county departments. Bags received are distributed to cashiers, who record on the spreadsheet the amount and type of payment each bag contains. The first cashier then opens the bag, clocks-in the 98, and places the bags containing checks in the designated box for supervisory staff review. The supervisor initials the deposit containing only checks and passes the deposit to the encoder for processing. The cash is verified by the first cashier, who also completes and signs the lower portion of the 98, generates and signs receipt, and places the bag on the back counter to be re-verified and signed by the second cashier. After the second verification, the tapes are wrapped around the cash and sealed inside of the bag, the 98's are placed in their designated area and the bag is placed in the safe. The second cashier then gives the completed spreadsheet to the Chief Cashier for entry into the County Treasurer's spreadsheet for daily deposits received For most accounting, minor exceptions were noted in clearing accounts through timely transfers to the appropriate account using data provided by department on deposit form 98. For credit card settlement, Treasury staff completes a reconciliation worksheet using receipt data from Cyber source, bank activities, and deposit forms 98. Movement of funds from various clearing accounts (excluding 882) is initiated by Treasury staff based on deposit form 98s submitted by departments. Incoming wire transfers lacking accounting details are consistently recorded to a designated account for unknown receipts with instances of outgoing transfer errors noted. These are resolved thru additional research by staff as time permits.
<p>Criteria: (Describe the optimal condition)</p>	<p>Best practice for clearing accounts includes timely review/reconciliation/clearing consistently in accordance with LGC § 113. The County Treasurer, as chief custodian of county funds, shall keep in a designated depository and shall account for all money belonging to the county. Per Sec.113.021 (b) The County Treasurer shall deposit the money in the county depository</p>



	<p>in a special fund to the credit of the officer who collected the money. Coordination with the appropriate department, to resolve exceptions.</p> <p>Procedures fixing holder department responsibilities for clearing accounts should be documented to promote timely receipt of funds and presentation of deposits identifying correct GL codes in accordance with LGC 113.022(a) & .023(a). Procedures emphasize requirement to provide sufficient support to tie deposit to bank transaction detail. Banking contract provide centralized control / responsibility for resolving deposit questions with County Treasurer</p> <p>All direct deposit forms are completed and processed by office of County Treasurer</p> <p>Monitor clearing account balances to advise holder of processing delays</p> <p>Reconciliation is reviewed by supervisor for accuracy and completion.</p>
Cause: (Describe the cause of the condition if possible)	<p>Non-integrated financial systems for e-commerce and accompanying manual worksheets.</p> <p>Limited research on incoming deposits into the 882 account which lack accounting details.</p>
Effect: (Describe or quantify any adverse effects)	<p>Delayed revenue recognition, reporting variances for GL and State reporting, and high level reviews and manual processing.</p>
Recommendation: (Describe corrective action)	<p>Cash management/clearing accounts recommendations include:</p> <ul style="list-style-type: none"> • Enhance/upgrade process for receipt and tracking with departments to provide sufficient accounting detail and timely submission of deposit form 98s to support documentation for expected incoming wire transfers. • Establish procedures fixing holder department responsibilities for clearing accounts to promote timely receipt of funds and submission of deposits identifying correct GL codes in accordance with LGC 113.022(a) & .023(a). Procedures emphasize requirement to provide sufficient support to tie deposit to bank transaction detail. • All clearing accounts should be monitored daily to ensure that balances are cleared to correct accounts and funds. • Emphasize periodic review by supervisory personnel of all pending items. • Work with the bank to expand use of "transit routing information" enhancing identification of incoming wire/ACH.
Responsible Department or Organization:	<p>Treasurer's Office</p>
Management's Response:	<p><input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree Respondent: Honorable Joe Wells Date: 2-9-12</p>
Comments:	<p>Clearing accounts are monitored but only the departments know what incoming amounts are for. Limited space is available for data entry by the sender.</p>
Disposition:	<p><input checked="" type="checkbox"/> Audit Report <input type="checkbox"/> Oral Comment <input type="checkbox"/> Deleted From Consideration</p>



Finding Number: 10-CT-01-02
Date: May 20, 2011
Audit: County Treasurer FY 2010
Auditor(s) Assigned: JK, TB

Finding:	<p>Check Printing Process: The purchased application used to print checks accepts batch processing from multiple business applications and lacks automated controls to prevent duplicate printing, check sequence skips, or file alteration, including the purging of active files. Signature files required for the various officials are encrypted for secured storage. Periodic validation is requested regarding the level of security.</p> <ul style="list-style-type: none"> • Check stock numbers were used out of sequence and errors in recoding sequences to issued logs were noted. • The production system lacks a test environment and reliance is placed on compensating controls <ul style="list-style-type: none"> ○ Addition of new or enhanced features cannot be vetted outside the live environment ○ Testing performed in the production system requires some reconfiguration as well as purging test transactions and restoring configuration could lead to increased risk of production data corruption
Work paper Reference: (or other method by which finding was identified)	Routine review of check stock log and check history
Condition: (Describe the current condition)	Data files are imported from various business application systems by clerical staff based on notice from the business owners entering key fields for the specific applications include Oracle Payroll, Election Payroll, Jury checks and Oracle Accounts Payable. Batch print jobs are then generated for the fund/date requested, and passed to the check writer for import. Limited control verification options within the system include number of checks, check numbering sequence, and total register amount and number of check stock used. Mitigating controls include maintenance of processing calendars and checklists. Additionally supervisory level verification of the limited control testing is evidenced.
Criteria: (Describe the optimal condition)	<ul style="list-style-type: none"> • Operational practices and review steps relevant to application interfaces should include procedural controls that provide reasonable assurance that no duplicate checks are generated / printed and bank account coding information is correct. • Information processing controls should be developed and monitored to help ensure that checks generated through computerized applications are valid, properly authorized, and completely and accurately processed. Information processing controls should include the use of record counts, batching techniques, control totals, or some other type of logging. (Balancing of source documents to input processing). • According to LGC 113.041, the County Treasurer shall disburse money belonging to the county. • According to LGC 113.008, the County Treasurer is responsible for bank reconciliations.
Cause: (Describe the cause of the condition if possible)	High-risk environment caused by limited controls configured in the 3 rd party system and inconsistent application of mitigation controls.
Effect: (Describe or quantify any adverse effects)	Increased risk of financial losses due to check printing errors and releasing of incorrect payment amounts. Reconciliation variances G/L Bank
Recommendation: (Describe corrective action)	<ul style="list-style-type: none"> • Prior to releasing checks, log, compare, and reconcile check registers for each fund to business application control registers/files for total number of checks printed, total number of check stock used and the total amount • Create/Develop a system confirmation indicating "no change" or listing exceptions regarding interfaced data from business applications files. • Consider options to test controls for 3rd party programs that lack a test environment.
Responsible Department or Organization:	County Treasurer
Management's Response:	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree Respondent: Honorable Joe Wells 2-15-12
Comments:	Checks can only be reprinted with the approval of authorized personnel. We agree that there is no test environment in Document Express, however, the IP address, the control name and password within Document Express is different for moving files from test, development or production into Document Express. If the wrong control data is entered, the software can't process the file as the database must match the control data in the software (name, address, password)
Disposition:	<input checked="" type="checkbox"/> Audit Report <input type="checkbox"/> Oral Comment <input type="checkbox"/> Deleted From Consideration



Finding Number: 10-CT-01-03
Date: February 10, 2011
Audit: County Treasurer FY10
Auditor Assigned: JK

<p>Finding:</p>	<p>Cash Management/Deposits:</p> <ul style="list-style-type: none"> • Instances of check and wire deposits posted to the wrong revenue account and with delays • Partial implementation of Countywide Receipting (CWR) system to replace the Deposit Management System (DMS) • Processing controls implemented as compensating controls for functional issues addressed during implementation. <p>Status: Service pack upgrade pending update by IT Services</p>
<p>Work paper Reference: (or other method by which finding was identified)</p>	<p><u>1. Deposit Posting Errors</u></p> <ul style="list-style-type: none"> • A wire deposit for \$17,112.00 (98# 223547) received by the Treasurer's office on August 20, 2010 was not processed until September 2, 2010 • A wire deposit for \$4,899.00 (98# 223545) received by the Treasurer's office on August 23, 2010 was not processed until September 2, 2010 • A check dated July 22, 2010 for \$158,750.01 from Dept of Family & Protective Services for Title IV-E deposited in error to revenue code 47536, instead of 47530 • A wire deposit dated June 24 2010 for \$46,805.94 from state Attorney General for Title IV-D deposited in error to revenue code 47536, instead of 47537 • A wire deposit dated March 10, 2010 for \$63,106.14 from the Texas Attorney General for Title IV-D deposited in error to revenue code 46626, instead of 47536 <p><u>2. CWR Implementation</u></p> <ul style="list-style-type: none"> • DMS interfaces and CWR journals created daily dual reconciliations • Receipt transactions inconsistently created for each payer. The split (two payment types on one receipt) payment feature in Class was turned off to support the business processes of the County Treasurer requiring departments to create multiple receipts. • IT programmer change of general terminal 1070-01 resulted in data corruption and failure to assign receipts to a CSS batch.
<p>Condition: (Describe the current condition)</p>	<ul style="list-style-type: none"> • Incoming wire transfers lacking accounting details are consistently recorded to a designated account for unknown receipts. Outgoing transfer errors were noted which requires additional staff time and research. • Treasurer staff completes a credit card reconciliation worksheet using receipt data from Cyber source, bank activities, and deposit form 98s. Treasurer staff receives and compare credit card settlement notices and deposits then process related departmental deposits. • Treasurer staff can create deposit adjustments in Class to offset an overage or shortage when departments do not close out properly. CWR deposits are finalized and 'reset' by the Treasurer staff with instances of incorrect accounting and second deposits created and pushed to the General Ledger leaving invalid deposits in Class. (Class GL is not utilized therefore any required corrections must be made at transaction level.) • Implementation of a new procedure for the monthly tax spread in February 2010 which incorporates escrow deposits and journal vouchers (JV) rather than check issuance through Fund 486. Documentation of new procedure is underway.
<p>Criteria: (Describe the optimal condition)</p>	<p>Best practice for cash management – Concept and Practices:</p> <ol style="list-style-type: none"> (a) Cash mobilization – Get cash as fast as you can. (b) Controlled disbursement – Release the cash at the last possible moment (c) The investment program—Do something worthwhile with the cash in the meantime. <p>Best practice for the deposit of funds includes the accurate and timely processing of form 98's from departments in accordance with LGC § 113.022.</p> <p>Departments process receipts and payments in an organized and efficient manner including Treasurer staff coordination with the appropriate department to resolve exceptions.</p>
<p>Cause: (Describe the cause of the condition if possible)</p>	<p>Limited research options on incoming deposits which lack accounting details. Non-integrated financial systems for e-commerce and accompanying manual worksheets. Procedural changes for newly implemented systems</p>



Effect: (Describe or quantify any adverse effects)	Delayed revenue recognition, reporting variances for GL and State reporting, and high level reviews and manual processing. Additional staff time to process transactions. CWR reports contain invalid data.				
Recommendation: (Describe corrective action)	<p><u>Deposit Posting Errors</u></p> <ul style="list-style-type: none"> • Coordinate with departments to provide sufficient accounting detail and timely submission of Form 98 to clear funds to the appropriate account in a timely manner. • Enhance/upgrade process for receipt and tracking departmental support documentation for expected incoming wire transfers. • Emphasize periodic review by supervisory personnel of all pending items. • Work with the bank to expand use of "transit routing information" enhancing identification of incoming wire/ACH. <p><u>CWR Implementation</u></p> <ul style="list-style-type: none"> • At a minimum, CWR receipt procedures should provide: <ul style="list-style-type: none"> ○ Sufficient description to identify service provided. ○ Wire / ACH transaction postings include the bank reference number (for each payment) in the wire number field. ○ Check postings include the check number field populated with the 12 rightmost digits. Each individual check should be posted whenever possible. ○ Money Order postings (entered as checks) include letters "MO" followed by the 10 rightmost digits of the money order number in the check number field. ○ A separate CWR receipt is created for each payer. Multiple payments received from same entity can be processed as one transaction provided each payment is detailed by amount and instrument number in the field designated for payment information. • Written procedures should be developed and staff properly trained. Supervisory staff should periodically review receipt postings to ensure adherence to the prescribed procedures. • Identify and implement 'deposit reversal' functionality so erroneous deposits can be processed and removed from pending lists. • Change management documentation should be signed-off by the County Treasurer and County Auditor prior to IT Services implementation of system changes and/or setup. 				
Responsible Department or Organization:	County Treasurer				
Management's Response:	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	Respondent:	Honorable Joe Wells	Date: 2-15-12
Comments:	Time restraints limit per item handling time available per incoming wire and ACH transfers.				
Disposition:	<input checked="" type="checkbox"/> Audit Report	<input type="checkbox"/> Oral Comment	<input type="checkbox"/> Deleted From Consideration		



Finding Number: 10-CT-01-04
Date: July 22, 2011
Audit: County Treasurer FY 2010
Auditor(s) Assigned: JK, TB

<p>Finding:</p>	<p>Bank Reconciliation</p> <ul style="list-style-type: none"> • All Dallas County accounts are protected by positive pay, filters, and blocks with the exception of the jury and imprest / food funds. Forged Fund 467 checks were discovered and stopped due to Positive Pay. • Various old reconciling items dating back to 2006 on Credit Card Fee Account - #671. • Positive Pay file transfer set up error resulted in rejection of payroll check payments by bank without notification to appropriate staff in November 2010.
<p>Work paper Reference: (or other method by which finding was identified)</p>	<p>Bank contract effective 2005 – 2009, as extended through June 2011 Bank of America Routine review of County Treasurer’s operations Credit Card Monthly Merchant Statement Review of Treasurer’s bank reconciliation and auditor’s proof of cash</p>
<p>Condition: (Describe the current condition)</p>	<p>All Dallas County checking accounts except jury are covered by Positive Pay. A file of issued checks is transmitted to the bank each day that checks are written. When the issued checks are presented for payment at the bank, they are compared electronically against the list of transmitted checks. The check-issue file sent to the bank contains the check number, account number, issue date, and dollar amount. Prior to November 2010, bank notification of rejects presented by telephone. Back up plans for notice on County holidays was not established.</p> <p>Bank reconciliations are consistently completed / researched according to schedule. Correction / reissue of payroll checks rejected due to November 2010 positive pay failure were not fully researched by inter-reference to outstanding check register.</p> <p>ACH Blocks & Filters are used to block all ACH debits and/or credits from posting to the County’s account(s) and ACH Filters are used to set various criteria to authorize certain ACH debits and/or credits and to post to the County’s accounts while excluding others.</p> <p>Effective June 19, 2009, bank processes were updated to allow Tax Assessor-Collector to accept card or electronic funds transfer payments as required by statute.</p>
<p>Criteria: (Describe the best practice.)</p>	<p>Per Local Government Code (LGC) § 113.008, the County Treasurer is responsible for bank reconciliations. Financial controls require reconciliation of bank statements to include review, research, and matching of reconciling items by account. Bank reconciliations are reviewed by supervisors for accuracy and completion with reconciling items clearing, periodically.</p> <p>Best practices require banking controls to be in place to prevent unauthorized access and improper withdrawals of funds. Control measures include the use of Positive Pay files of checks issued, ACH filters and ACH blocks. Other safeguards include dual authorization for electronic fund transfers. Extra care and follow up should be performed when system failures or new processes occur. The outstanding check register should be reviewed for unexpected checks / activity.</p> <p>LGC § 132.007 provides for a county to charge a reasonable fee for providing access, collecting payments, or providing services authorized by this section over the Internet. LGC § 132.002 provides for a county to collect and retain a fee for processing payments by credit card. LGC § 132.003 provides for a county to set a processing fee that is reasonably related to the expense incurred in processing the payment by credit card; however, a flat fee may not exceed \$5 per payment transaction or at a rate that may not exceed 5% of the fee/court cost being paid. LGC § 130.045 provides that if a Tax Assessor-Collector accepts credit cards, the Tax Assessor-Collector may establish a reasonable fee for processing the payment, but not to</p>



	exceed 5% of the fee or tax. Tax Code § 31.06. MEDIUM OF PAYMENT. (a) Except as provided by Section 31.061, taxes are payable only as provided by this section. A collector shall accept United States currency or a check or money order in payment of taxes and shall accept payment by credit card or electronic funds transfer (c) If a tax is paid by credit card, the collector may collect a fee for processing the payment. The collector shall set the fee in an amount that is reasonably related to the expense incurred by the collector or taxing unit in processing the payment by credit card, not to exceed five percent of the amount of taxes and any penalties or interest being paid. The fee is in addition to the amount of taxes, penalties, or interest.		
Cause: (Describe the cause of the condition if possible)	<ul style="list-style-type: none"> • Dallas County has retained responsibility for data collection by managing web services in-house and contracting with Bank of America for routine banking services. • Limited review procedures designed to save staff time in performance of daily activities 		
Effect: (Describe or quantify any adverse effects)	Potential loss of funds if corrections are incomplete. Risk of bank shortages or unrecovered funds.		
Recommendation: (Describe corrective action)	Update and review documented bank reconciliations procedures annually. Procedures should include at a minimum: <ul style="list-style-type: none"> • Activate/monitor ACH blocks filters and positive pay (add features to jury and imprest food accounts). • Review/follow-up on anomalies for checks not cleared from payroll account • All bank reconciliations should include evidence of supervisory review and should clear all outstanding items over ninety (90) days 		
Responsible Department or Organization:	County Treasurer		
Management's Response:	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	Respondent: Honorable Joe Wells Date: 2-15-12
Comments:	HHS food account (Fund 764) is on Positive Pay. We are currently working with IT Services to implement Positive Pay on Jury Funds.		
Disposition:	<input checked="" type="checkbox"/> Audit Report	<input type="checkbox"/> Oral Comment	<input type="checkbox"/> Deleted From Consideration



Finding Number: 10-CT-01-05a
 Date: October 26, 2010
 Audit: County Treasurer FY 10
 Auditor(s) Assigned: JK

Finding:	Bank Contract: Overdraft Interest Charge <ul style="list-style-type: none"> Various bank accounts reflect overdrafts on daily bank balance reports. (Mispostings are occasionally noted on investment worksheets – without automated controls to timely detect differences bank overdrafts may occur.) Status: Total Funds Roundup (TFR) structure has been setup to allow Fund 120 to Fund overdrafts in Fund 1900. <ul style="list-style-type: none"> Collected overdraft interest charges totaling \$198,704 were applied against available banking reserves for the fiscal year ended September 30, 2010.
Work paper Reference: (or other method by which finding was identified)	Bank contract effective 2005 – 2009, as extended through June 2011 Bank of America Account Analysis Statements, and detailed analysis of earnings credit calculation worksheet.
Condition: (Describe the current condition)	A daily review of available funds using electronic bank data and expected next day controlled disbursements is performed prior to confirming daily investment purchases. <ol style="list-style-type: none"> Collected funds summarized for deposit: cash, checks, wires and credit cards Bank reports listing funds available, disbursed and maturing investments Lotus worksheets are prepared for expected outflows and to estimate new investment Investable funds are debited from various funds/bank accounts/transferred to 882 (wire transfer account) and wired to brokers upon purchase of investments. Brokers are approved annually through investment policy. A misposting on the investment worksheet or an unexpected disbursement noted after the investment purchase may result in bank overdraft. Bank contract provides for overdrafts either costed through available credits or by bank charges.
Criteria: (Describe the optimal condition)	Dallas County investment policy, which in part things states: <i>"Dallas County's investment strategy for General Operating Funds shall be made to ensure that anticipated cash flows are matched with adequate investment liquidity"</i> Bank of America Depository Contract, which states in part: <i>"The Depository Bank shall serve as a Repository of funds for Dallas County, and as a source of Dallas County investments... Depository Bank will allow Dallas County a Daylight Overdraft Limit of \$250,000,000.00 per Banking day for all Dallas County accounts... Earnings Credits so determined and accrued or some other mutually agreed upon instrument, shall be applied, to the extent available, to reimburse or pay as allowed by law for incurred expense... Other services may also be paid from excess Earnings Credits which shall include... any and all other related Depository Bank services and upgrades or enhancements to the operations and services of Dallas County."</i>
Cause: (Describe the cause of the condition if possible)	<ul style="list-style-type: none"> Fluctuating balances for accounts without controlled disbursements. Limited review procedures designed to prevent overdrafts due to investments.
Effect: (Describe or quantify any adverse effects)	<ul style="list-style-type: none"> Assessment of overdraft charges by the depository bank offset with available bank credits and increase deficit, offsets actual interest earned for invested funds
Recommendation: (Describe corrective action)	<ul style="list-style-type: none"> Monitor bank accounts balances to avoid overdrawing bank accounts. Develop cash management tools to project future cash flow requirements of various funds before making investment decisions. Whenever possible recalculate to confirm the optimum daily investment purchases.
Responsible Department or Organization:	County Treasurer
Management's Response:	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree Respondent: Honorable Joe Wells Date: 2-15-12
Comments:	Paymode is being used for fund to fund transfers to avoid overdrafts.
Disposition:	<input checked="" type="checkbox"/> Audit Report <input type="checkbox"/> Oral Comment <input type="checkbox"/> Deleted From Consideration



Finding Number: 10-CT-01-05 b
Date: May 11, 2011
Audit: County Treasurer FY10
Auditor(s) Assigned: JK

Finding:	<p>Bank Contract: FDIC Insurance</p> <ul style="list-style-type: none"> FDIC assessments totaling \$159,940 were applied against available banking reserve for the fiscal year ended September 30, 2010, although per Dallas County depository contract, there shall be no fee for FDIC insurance (see page 25 under attachment A, "Depository Bank Fee Schedule"). <p>Status: Bank of America partially reversed banking reserve assessments before the contract ended June 2011.</p>		
Work paper Reference: (or other method by which finding was identified)	Bank contract effective 2005 – 2009, as extended through June 2011 Bank of America Account Analysis Statements, and detailed analysis of earnings credit calculation worksheet.		
Condition: (Describe the current condition)	Bank of America calculates the amount to collateralize using the following formula: Total Deposit + Accrued Interest – Total noninterest bearing deposits = Collateral Required. However, since FDIC insurance is covering 100% of the non-interest bearing deposits, there is no longer a need to pledge collateral for funds on non-interest bearing accounts.		
Criteria: (Describe the optimal condition)	<p>AMOUNT OF COLLATERAL</p> <p>Per Government Code Sec.2257.022. (a) Except as provided by Subsection (b), the total value of eligible security to secure a deposit of public funds must be in an amount not less than the amount of the deposit of public funds:</p> <ol style="list-style-type: none"> increased by the amount of any accrued interest; and reduced to the extent that the United States or an instrumentality of the United States insures the deposit. <p>Bank of America Depository Contract, which states in part: <i>"The Depository Bank shall serve as a Repository of funds for Dallas County, and as a source of Dallas County investments...Depository Bank will allow Dallas County a Daylight Overdraft Limit of \$250,000,000.00 per Banking day for all Dallas County accounts...Earnings Credits so determined and accrued or some other mutually agreed upon instrument, shall be applied, to the extent available, to reimburse or pay as allowed by law for incurred expense...Other services may also be paid from excess Earnings Credits which shall include...any and all other related Depository Bank services and upgrades or enhancements to the operations and services of Dallas County."</i></p>		
Cause: (Describe the cause of the condition if possible)	Banking rule changes on FDIC insurance not assessable under Dallas County depository contract were incorrectly assessed on monthly account analysis statements.		
Effect: (Describe or quantify any adverse effects)	Reduction in available banking reserve. Potential for future year's deficit in banking reserve balance.		
Recommendation: (Describe corrective action)	<ul style="list-style-type: none"> Monitor monthly account analysis on a regular basis and notify depository bank of charges not in compliance with approved fee schedule. Request depository bank refund or credit \$116,201 against banking reserve. 		
Responsible Department or Organization:	County Treasurer		
Management's Response:	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	Respondent: Honorable Joe Wells Date: 2-15-12
Comments:	FDIC refund was processed back to earnings credit. There was a balance at the end of the contract which went back to the bank.		
Disposition:	<input checked="" type="checkbox"/> Audit Report	<input type="checkbox"/> Oral Comment	<input type="checkbox"/> Deleted From Consideration



Finding Number: 10-CT-01-05c
Date: July 28, 2011
Audit: County Treasurer FY 10
Auditor(s) Assigned: JK, TB

Finding:	Bank Contract: Miscellaneous o Bank contract was extended for an additional two year period. A new four year depository contract was awarded to Bank of America in May 2011. o Courier services contract was transferred to the depository bank during the fiscal year under review			
Lack of control over Work paper Reference: (or other method by which finding was identified)	Bank contract effective 2005 – 2009, as extended through June 2011 Bank of America Account Analysis Statements, and detailed analysis of earnings credit calculation worksheet.			
Condition: (Describe the current condition)	As per Dallas County Commissioners Court Order 2009-550 dated March 24, 2009, the original bank contract was amended (Amendment # 3) to include: <ol style="list-style-type: none"> 1. Extending the 2005-2009 bank contract for an additional two year period ending June 7, 2011. 2. Bank of America agreed to provide armored transport service to the County with the same cost as the bank pays for the armored car service without surcharge or administrative fee. 3. This amendment incorporates the Merchant Services Agreement and all related provisions into the Depository Contract. 4. Dallas County Financial Review Committee selected BOA for the new depository Bank for a four year term beginning June 8, 2011 and ending June 7, 2015 based on cost of services, and focus on revenue. Bank contract establishes fees, bank charges, and other related costs to be charged to available earnings credits.			
Criteria: (Describe the optimal condition)	Local Government Code section 116.021(a) allows the Depository Bank contract to be renewed for an additional two years under the terms negotiated by the Commissioners Court. DEPOSITORY AND SUBDEPOSITORY CONTRACTS. (a) The commissioners court of a county shall select by the process provided by this subchapter or by Subchapter C, Chapter 262, one or more banks in the county and enter a contract with each selected bank for the deposit of the county's public funds. The county shall contract with a bank under this section for a two-year or four-year contract term. On expiration of a contract under this section, the contract may be renewed for two years under terms negotiated by the commissioners court.			
Cause: (Describe the cause of the condition if possible)	N / A			
Effect: (Describe or quantify any adverse effects)	<ul style="list-style-type: none"> • Assessment of various charges and fees by the depository bank are offset with available banking reserves or result in an increased deficit. • Lack of control over terms and conditions on the armored transport contract. 			
Recommendation: (Describe corrective action)	<ul style="list-style-type: none"> • Continue to evaluate need for financial services and options for service delivery (courier, Bloomberg, ATMs etc.) • Investigate options and costs to expand e-processing through the depository. 			
Responsible Department or Organization:	County Treasurer			
Management's Response:	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	Respondent: Honorable Joe Wells	Date: 2-15-12
Comments:				
Disposition:	<input checked="" type="checkbox"/> Audit Report	<input type="checkbox"/> Oral Comment	<input type="checkbox"/> Deleted From Consideration	



Finding Number: 10-CT-01-06
Date: July 19, 2011
Audit: County Treasurer FY 10
Auditor(s) Assigned: JK, TB

<p>Finding:</p>	<p>Investment/Accounting Review of various investments revealed:</p> <ul style="list-style-type: none"> • Materially all investments produced expected market returns, however review processes for committing / investing funds for longer periods of time are limited. Low rate, long term commitments include: • \$9,022,230.00 was invested in Federal Agency coupon Bonds for 216 days with yield to maturity of only 0.24% when same day short term rate was 0.14% • \$20,071,100.00 was invested in Federal Agency coupon Bonds for 257 days with yield to maturity of only 0.26% when same day short term rate was 0.14% • \$238,793.30 was invested in Federal Agency coupon Bonds for 938 day with yield to maturity of only 0.20% when same day short term rate was 0.21%
<p>Work paper Reference:</p>	<p>Trading tickets, Purchase documentation and daily investments journal prepared by Treasurer Monthly Treasurer's report</p>
<p>Condition:</p>	<p>All investments are made according to the Dallas County Investment Policy as approved on Commissioners Court No. 2009-2087 dated November 10, 2009 which provides: At least annually, the County Treasurer reviews and revises the list of qualified brokers authorized to engage in investment transactions with Dallas County. The list is submitted through the Dallas County Financial Review Committee for approval by Commissioners Court. The County Treasurer solicits bids either in writing or electronically, for investments from no less than three contracted brokers/banks for each investment period (generally two years). The selection is made based on the projected cash requirements as well as the target of weighted average maturity life of the total portfolio held at or below the required two year limit Requisite funds for short term requirements generally defined as Repurchase Agreements, TexPool and depository interest account. All investments outside depository require two signatures. Per Treasurer's annual report, Dallas County earned \$4,746,296.47 for FY 2010. As of September 30, 2010, total outstanding investments were \$379,674,542.04 County Treasurer submits quarterly investment report to Commissioners Court for filing.</p>
<p>Criteria:</p>	<p>Per Dallas County code / investments policy: Sec. 70-474. - Investment reporting and auditing. (a) Not less than quarterly the county treasurer shall prepare and submit to the commissioners court a written report of the county's investment transactions for the preceding reporting period, in addition to other information that may be required by the county. The report shall contain:</p> <ol style="list-style-type: none"> 1. A detail of the investment position of the county on the date of the report. 2. A summary statement of each pooled fund group that states the beginning market value for the reporting period, additions and changes to the market value during the period, and the ending market value for the period. 3. The book value and market value of each separately invested asset at the beginning and end of the reporting period by the type of asset and fund type invested. 4. The maturity date of each separately invested asset that has a maturity date. 5. The account or fund or pooled group fund of the county from which each individual investment was acquired. 6. Compliance of the county investment portfolio as it relates to the investment strategy expressed in section 70-463, as well as other relevant provisions of this article. <p>Sec. 70-463. - Investment strategy. (f) General strategy.</p>



	<ol style="list-style-type: none"> 1. The county's investment portfolio shall consist of a variety of securities which may include any or all of the authorized investments listed in section 70-267. 2. It shall be the general practice of the county to utilize an investment strategy based on section 70-262, which also defines yield objectives, as well as V.T.C.A., Government Code § 2256.006, and shall participate in a daily auction of funds for investment through contracted financial brokers and/or banks to the highest and best bidder or invest funds directly with the depository bank and expect that all related collateral confirmations thereto be confirmed and received within the required time frames. The county shall in general be conservative in its investment programs consistent with section 70-268 as administered by a qualified, capable investment staff in the county treasurer's office. All investments shall be collateralized at a minimum of 103 percent of par value. 3. It is the county's intent to hold purchased securities to the stated maturity date and to have invested in such a manner to insure both the safety and liquidity of such transaction. In the event, however, the need arises to sell securities before the stated maturity date, said securities shall be analyzed to determine the appropriate time to liquidate said securities and minimize any potential real or book value loss to the county. 4. The county investment portfolio shall not exceed a weighted average maturity life of two years for the entire investment portfolio.
Cause:	Current economic condition prevailing in the U.S. economy. Limited staff for extensive review before committing / investing funds for a longer period of time using significantly manual process.
Effect:	Low investment earnings and revenue from available invested funds.
Recommendation:	<ul style="list-style-type: none"> • Continue practice of investing for maximum security as well as maximizing earnings. • Consider overnight and other short term investments when competitive yields offered by brokers are below repo rate. • Consider installation of automated system to vet and track investments.
Responsible Department or Organization:	County Treasurer
Management's Response:	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree Respondent: Honorable Joe Wells Date: 2-15-12
Comments:	We are hopeful that the Oracle upgrade will include Oracle Treasury which would automate some processes.
Disposition:	<input checked="" type="checkbox"/> Audit Report <input type="checkbox"/> Oral Comment <input type="checkbox"/> Deleted From Consideration



Finding Number: 10-CT-01-07
Date: May 19, 2011
Audit: County Treasurer FY10
Auditor(s) Assigned: JT, TB

Finding:	Payroll Overpayments Collection processes for employee overpayments are limited. <ul style="list-style-type: none"> • These outstanding receivables have not been collected nor turned over to a collection agency (however, DA notice letters are sent). • The outstanding balance for payroll overpayments is \$189,827 as of September 30, 2010. 		
Work paper Reference: (or other method by which finding was identified)	Review of Payroll Overpayments Analysis and supporting work papers. Oracle General Ledger, Fiscal Year -2010 Accounts Receivable Analysis		
Condition: (Describe the current condition)	<ul style="list-style-type: none"> • Notice of overpayment is provided to County Treasurer for follow up by County Auditor. Employee overpayments occur when: a) departments fail to properly notify payroll or Human Resources of employee termination prior to the release of check and b) medical insurance is not stopped for the terminations or c) failure of employee on leave to pay billed insurance premiums. As a result benefit compensation is paid to employees beyond their county employment. Information is submitted to the DA by County Treasurer for standard notice letters on debt due. • Tax avoiders are discovered through automated comparison of property tax receivables (recorded on ACT), Oracle vendor pay files and ongoing analysis. Delinquent notice letters are sent to vendors. 		
Criteria: (Describe the best practice)	According to § 114.026 (2) of the Local Government Code, the County Treasurer shall report all debts due to the County to the County Commissioners each term. According to § 113.902 of the Local Government Code, the County Treasurer shall direct prosecution for the recovery of any debt owed to the county, as provided by law, and shall supervise the collection of the debt. Best practices include development of a demand letter to encourage reimbursement from terminated employees or vendors with overpayments. Collection of receivables should be pursued through a collection agency and/or prosecution by the District Attorney.		
Cause: (Describe the cause of the condition if possible)	Use of manual system Lack of integration		
Effect: (Describe or quantify any adverse effects)	Loss of County funds for non-collection, although issuance of W-2s and IRS reporting the distribution includes actual payments.		
Recommendation: (Describe corrective action)	<ul style="list-style-type: none"> • Procedures should be developed and implemented to collect outstanding payroll overpayments from terminated employees, who have not responded to County Treasurer's demand letter. • All unpaid accounts should be turned over to the Dallas County District Attorney's office 30 days after mailing the demand letter for collection and follow up. 		
Responsible Department or Organization:	County Treasurer		
Management's Response:	<input checked="" type="checkbox"/> Agree	<input type="checkbox"/> Disagree	Respondent: Honorable Joe Wells
Comments:	We send a letter and refer to the DA after 30 days.		
Disposition:	<input checked="" type="checkbox"/> Audit Report	<input type="checkbox"/> Oral Comment	<input type="checkbox"/> Deleted From Consideration



Finding Number: 10-CT-01-08
Date: 12-May-2011
Audit: County Treasurer FY 10
Auditor(s) Assigned: JK

Finding:	Defeased Bonds:					
	<ul style="list-style-type: none"> Internal control weakness exists in the receipt and disbursement of funds for retirement of outstanding defeased bonds. No entries were made to record receipt of funds from the escrow agent to County Treasurer (as the paying agent) and no audit trails exists for disbursing the funds for the retirement of the defeased bonds. 					
Work paper Reference:	Review of financial records, Oracle General Ledger and CAFR Review and inspection of Bond Register					
Condition:	Transaction details of receipt of funds from escrow agents for the outstanding defeased bonds were received in the Dallas County wire transfer account No. 882 with Bank of America. Payments for matured bonds made to Cede& Co, New York were wired out from wire transfer account No. 882 without County Auditor or Commissioners Court verification. County Treasurer staff make a notation in the bond register indicating the date and amount of the defeased bonds that were paid off.					
Criteria:	All funds received, should be properly receipted and recorded to the financial records in accordance with LGC 113.002. All disbursements should be recorded timely and properly with complete audit trail in accordance with LGC 113.041.					
Cause:	N / A					
Effect:	Lack of secondary or audit review.					
Recommendation:	<ul style="list-style-type: none"> All funds received should be properly receipted and recorded with sufficient back up provided to Financial Audit to update appropriate records. All disbursements should be processed through Accounts Payable with appropriate backup and audit trails submitted together with the corresponding request for payment. Obtain 3rd party verification annually affirming outstanding liability and outstanding escrow fund balances by issue. 					
Responsible Department or Organization:	County Treasurer					
Management's Response:	<input type="checkbox"/> Agree	<input checked="" type="checkbox"/> Disagree	Respondent:	Honorable Joe Wells	Date:	2-15-12
Comments:	The funds do not belong to Dallas County. The time to move the funds is only a few hours. Recommendation – Future escrow agreements should specify the escrow agent should disburse the Funds directly to Depository Trust Company.					
Disposition:	<input checked="" type="checkbox"/> Audit Report		<input type="checkbox"/> Oral Comment		<input type="checkbox"/> Deleted From Consideration	



Finding Number: 10-CT-01-09
Date: August 3, 2011
Audit: County Treasurer FY 2010
Auditor(s) Assigned: JK,

Finding:	Technology: The County Treasurer continually seeks technology enhancements associated with processing initiatives. Major IT systems under review include: <ol style="list-style-type: none"> 1. CWR – Countywide Receipting System 2. Juror System 3. Secured PCs for bank transfers 4. PCI (Payment Card Industry) standards Implementation of new systems and processes include workarounds and manual controls.
Work paper Reference: (or other method by which finding was identified)	Routine review of operations of Treasurer’s office Security initiatives done by IT and Auditor
Condition: (Describe the current condition)	Treasurer’s office continues to implement the CWR system only limited by IT ability to support; efforts are expended to migrate all users from DMS to CWR. CWR involves a)receipting for banking and b)account code distribution Work around procedures were designed for control of check printing interfaced data from jury system. The new juror system continues to have check errors and other system issues. October 1, 2009 fifteen jury checks were canceled because authorized partial donations were not deducted. Updated versions of JMS and eJuror are being implemented. Treasury is preparing to implement a new merchant services agreement and may transition to a new electronic payment acceptance provider. An RFP is being evaluated by financial team from other offices and PCI review has been contracted with an external vendor.
Criteria: (Describe the optimal condition)	Per Local Government Code sec.113.003, RECEIPT OF MONEY BY COUNTY TREASURER. The county treasurer shall receive all money belonging to the county from whatever source it may be derived. <ul style="list-style-type: none"> • Operational practices and review steps relevant to various application interfaces should include procedural and system controls that provide reasonable assurance that no duplicate or unauthorized transactions are generated or approved by the Treasurer. • Information processing controls should be developed and monitored to help ensure that all new computerized applications produce valid, reliable, properly authorized, and complete and accurate data. • Department should implement and follow agreed upon processes in receipting and processing deposits in CWR. • Credit card acceptance systems processes and procedures must comply with the new PCI DSS standard before the end of the current calendar year.
Cause: (Describe the cause of the condition if possible)	High-risk environment caused by limited controls configured in the 3 rd party systems and inconsistent application of mitigating controls.
Effect: (Describe or quantify any adverse effects)	Increased risk of financial losses due to systems errors and lack of mitigating business processes and procedures.
Recommendation: (Describe corrective action)	<ul style="list-style-type: none"> • Continue to implement systems to enhance processing initiatives and continue to work with IT Services to resolve system errors on jury check errors. • Work with IT Services / outside vendor to perform a PCI compliance audit to make sure that all credit card transactions and processes are in compliance with payment card industry standards. • Establish proper separation of duties with limited roles and secured PCs for banking transactions. • Develop procedures for newly implemented systems. Provide training updates to staff as necessary to ensure system controls are maintained and risks are mitigated.
Responsible Department or Organization:	County Treasurer
Management’s Response:	<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree Respondent: Honorable Joe Wells 2-15-12
Comments:	We do have secured PCs for banking transactions.
Disposition:	<input checked="" type="checkbox"/> Audit Report <input type="checkbox"/> Oral Comment <input type="checkbox"/> Deleted From Consideration