

REPORT ON INTERNAL CONTROL & COMPLIANCE

TO:

Honorable Pauline Medrano

Dallas County Treasurer

FROM:

Virginia A. Porter

Dallas County Auditor's Office

SUBJECT:

Review of Statutory Reporting and Compliance – FY2014

ISSUE DATE:

December 19, 2014

RELEASE DATE:

January 29, 2015

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 fiscal year ending September 30, 2014 during the term of the Honorable Joe Wells.

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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:

A partial list of review tests include:

- Performed unannounced cash counts
- Submitted Internal Control Questionnaire (ICQ) and evaluated responses
- Reviewed cash management procedures including activity related to deposits and disbursements
- Reviewed bank reconciliations
- Prepared aging schedule of Oracle Accounts Receivable
- 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 Bank of America Account Analysis for earnings credits and charges
- Reviewed Treasurer's Hot Check listing

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. 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 reducing banking costs and expediting the point at which funds are available. Bonds were sold in June 2013 with Treasurer named as paying agent.

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Credit card acceptance as payment method was significantly expanded in 2013 requiring approval of new banking/merchant agreements. Oracle 12 upgrade was completed in 2013, transitioning check printer processes to new servers. A major review of investment practices and system upgrade was initiated in 2014.

Disclosures

As of September 30, 2014, total Arbitrage Rebate liability was \$84,419 and total outstanding principal balance for Bonded Debt of \$111,350,000 (does not include premium on bonds).

FINDINGS

Cash Management

<u>Deposit/Receipting</u> – The Deposit Management (DMS) and County Wide Receipting (CWR) Systems are not designed for exception processing and require manual adjustments for unbalanced deposits, system failures, and encoding inter-reference; negatively impacting timing of adjustments completed by the Treasurer's office. Review of county checks held by Treasurer's office revealed minimal exceptions to prompt deposit requirements.

<u>Check Printing Process</u> –Review of county checks printed and associated control logs/files maintained by Treasurer's office revealed minimal exceptions.

<u>Bank Reconciliation</u> – Review of bank reconciliations for Funds 120, 124, 125, 205, 470, 501, 543 and 570 revealed unresolved and unidentified items. Treasurer's staff review daily activity in the clearing/pass thru accounts (Funds 608 thru 993) but have not documented their review in bank reconciliations.

Non-Sufficient Funds (NSF) Checks – Treasurer's Hot Check List balance dated September 30, 2014 is not reconciled to Oracle general ledger balance. Aging of receivable is 15.13 percent "less than 3 years", 37.28 percent "aged 3 – 7 years" and 47.59 percent "over 7 years."

<u>Accounts Receivable</u> – Accounts Receivable invoices outstanding more than 360 days as of September 30, 2014 totaled \$ 294,115.23 (20.9 percent of outstanding invoices) for the Institute of Forensic Science.

Investments

<u>Investment/Accounting</u> — Using manual tracking methods and without use of a sophisticated investment module, investments typically adhere to policy, incorporate the best interest rate and offset high banking fees. Rates remained low consistent with federal notes (established in 2008) as longer term investment options remained low. Premium callable dates and yields are not consistently denoted on quarterly reports. External audit report required by statute not presented to governing body. A project was initiated in 2014 to upgrade processing and accounting including implementation of a new system.

Federal Taxes

<u>Federal Taxes</u> - Review of quarterly Federal Tax Form 941 filed with IRS revealed minimal variances between amounts reported on Form 941, Oracle Remittance Report and amount remitted. Explanations or corrections are not consistently identified in the supporting documentation provided.

Image Cash Letter (ICL) Processing

ICL Processing –An ICL check batch processed on October 14, 2014 was submitted to the bank without 2nd verification and did not match the department's deposit 98. Reportedly one \$30 check identified by the encoding program as a duplicate was debited twice from the customer's account.

RECOMMENDATIONS

Cash Management

 $\underline{\text{Deposit/Receipting}}$ - Follow-up with corresponding department for any new batches pending more than five business days.

<u>Check Printing Process</u> – 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. Control forms/registers should be submitted to Commissioners Court with evidence of this review. Monitor security of stored image signature files. Maintain a log of check stock used and implement supervisory review and sign-off prior to release of payments.

<u>Bank Reconciliation</u> – Complete all bank reconciliations in timely manner including evidence of supervisory review. Reassign staff as necessary to perform critical core functions. Clear items outstanding greater than ninety (90) days. Review and update documented bank reconciliation procedures annually.

NSF Checks – Coordinate with the responsible (source) department to research and clear old outstanding items. Continue monitoring, management and improving technological methods of recovering or prosecuting cases of insufficient funds through cooperative efforts among participating departments.

<u>Accounts Receivable</u> - Work with the responsible department to develop high level corrective action plans, assignments, and periodic follow-up of outstanding receivables. Research old outstanding items and notify respective departments in writing.

Investment

<u>Investment/Accounting</u> — Complete 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. Full disclosures of security investment terms must be obtained in order to adequately monitor/evaluate the performance of the Investment Portfolio. Initiate periodic review of investment reports by the county's external independent auditor. Review and results of Investment Portfolio should be reported to Commissioners Court.

Federal Taxes

<u>Federal Taxes</u> – Review processes to calculate and report tax liability, updating written procedures as needed. Reconciliations of tax liability should identify variances, properly support any adjusted remittances and document when paid.

Current Findings / Observations, Recommendations, and Responses

Finding templates numbered 14-CT-01-01 thru 14-CT-01-06 are attached with management responses incorporated.

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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 and use of mitigating and control procedures to offset weak system integration. Ongoing emphasis must be placed on detailed 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: Darryl Martin Ryan Brown, OBE Joe Wells, former County Treasurer



Finding Number:

Date: Audit: 14-CT-01-01

November 12, 2014

County Treasurer FY 2014

Auditor(s) Assigned:

Auditor(s) Assigned:	ТВ
Finding:	Cash Management – Deposits/Receipting Review of Oracle Deposit Management System (DMS) pending deposits reports for FY2014 revealed: o 30 deposit batches remain outstanding without sufficient evidence to resolve and clear batches. The pending batches were created between August 20, 2001 and May 18, 2007. STATUS: Prior period items are under review by Treasurer's office. o 1 deposit batch created in FY2014 processed more than 5 days after the Batch Business Date. o 26 deposit batches created in FY2014 cancelled more than 5 days after the Batch Business Date.
	Review of County Wide Receipting (CWR) reports for FY2014 revealed: o 14 erroneous/duplicate batched processed in FY2013 STATUS: Prior period items are under review by Treasurer's office. o 15 erroneous/duplicate batches processed in FY2014
	Review of county checks held by Treasurer's office for pick up by other offices revealed sixteen checks were held 15 days or more. - Two were held for over 235 days based on cash count performed on February 27, 2014. Check issue dates were March 31, 2013 and April 04, 2013.
	Departmental responses to the Internal Control Questionnaire (ICQ) revealed the following: - Daily deposits slips are prepared by an individual with record keeping responsibilities. - Pending department deposits are not resolved in a timely manner.
	Risks identified during walkthrough of department's Acceptance of Deposits and Check Encoding process revealed: - All cash not counted in presence of source department personnel (R01) - Cash deposits are not immediately placed in the safe (R03)
	 Due to large volume of checks processed, the Treasurer's office is unable to process all checks before bank cutoff time. Currently, a second day is required for one staff to encode/verify all checks received from source departments. (R01) ICL Confirmation is not saved on Network drive/ location that is backed up. (R02)
	- Non Cash source deposits are verified when department personnel are not present. (R03)
Work paper	Ongoing review and observation of Dallas County Treasurer's office activity.
Reference:	FY 2014 - 4 th quarter - Workpapers 2H and 2I
(or other method by	FY 2014 Workpapers 2D
which finding was	Responses to Internal Control Questionnaire (ICQ) dated June 16, 2014
identified)	"Acceptance of Deposits" Internal Control Walkthrough on April 4, 2014 with Payments Coordinator and
	Cashier "Check Encoding" Internal Control Walkthrough on April 2, 2014 with Payment Coordinator and Cashier/Check Encoder
Condition:	Processes in place during audit period:
(Describe the current	Funds (cash, check, money order, electronic receipt) received from departments by Courier are
condition)	acknowledged with courier receipt, counted, encoded and batched by individual deposit form 98 with sequential receipting and tracking through DMS. Process involves hand off to different section depending on type of funds. A spreadsheet of cash type is prepared to generate bank deposit control totals. Out of balance form 98s are set aside. Additional steps implemented by Treasurer include: Supervisor completes daily review of DMS listing outstanding deposits Separate clear plastic bags for each deposit (cash and check in separate bags) submitted by courier or

Staff compares number of bags received to courier receipts and follows up as needed Staff creates deposit adjustments in Class to offset an overage or shortage when department's close outs are not complete. CWR deposits may be finalized and 'reset' by the Treasurer's staff with instances of

hand delivery



Two depo A number	dures should inc	lude verification	and deposit of funds parak automated controls.	ayable to th	on involving money. Cash the county with follow-up of
Two depo A number		t systems with we	eak automated controls.		
A number	G	•			
A number					
 All deposit form 98 variances of less than or equal to \$20 over/ short should be processed immediately, recorded to revenue account # 48010, and deposited at the bank. An email notification should be sent to the County Auditor and to the responsible department. All deposit form 98 variances more than \$20 over /short should be put on hold until the Auditor's office counts and verifies the deposit; the department should be contacted (as current procedure). Treasurer's office should initiate/expedite resolution and deposit any unbalanced deposit form 98 and notify County Auditor of items pending more than five business days. Old outstanding pending DMS batches and CWR transactions should be researched and cleared as soon as practical within the constraints of available resources. Treasurer's office should develop procedures to address county checks held for other department pick up. Treasurer's office should count all funds in the presence of source departmental personnel (mitigating control is the use of functioning cameras and second cashier verifying funds) and immediately place funds in the safe. Process for check encoding should be reviewed to enhance efficiencies which may include staff priority reallocations. Contact bank representative to clarify current Image Cash Letter Deposit deadlines and verification options. Consider meeting with Tax office staff to explore optimum processing opportunities for county operations. ICL Confirmation should be maintained electronically in a safe location that is backed up to prevent data loss. 					
County Treasu	rer				
		T			
∐ Agree		Respondent:	Callie Bartlett	Date:	01/14/2015
deposi - I do r proble Auditor Con Organizations over technolo	its to bank. The not know how ms nment: The upon (COSO) required by (principle 1)	Treasurer's Office depositing any understand the dated internal corresponding to support the	e is not staffed to manual inbalanced deposit For- introl framework release establish control activiti achievement of its obj	ally pre-veri rm 98 will of ed by the C ies (principle jectives. Su	ommittees of Sponsoring e 10) and general controls officient controls must be
	hand. All depose recorded to the Count the Count the Count and Treasurer notify Counting County as practical as practical to the County is funds in the Process for reallocation verification for county ICL Confilloss. County Treasurer deposed in the County Treasurer in the Process for reallocation for county is funds in the Process for reallocation for reallocation for county is funds in the Process for reallocation f	All deposit form 98 varial recorded to revenue accounts and verifies the de Treasurer's office should notify County Auditor of Old outstanding pending as practical within the corners office should up. Treasurer's office should control is the use of functifunds in the safe. Process for check encoding reallocations. Contact bar verification options. Cons for county operations. ICL Confirmation should loss. County Treasurer Agree Disagree For Check Encoding deposits to bank. The I do not know how problems Auditor Comment: The upon over technology (principle 1)	All deposit form 98 variances of less than or recorded to revenue account # 48010, and the County Auditor and to the responsible of All deposit form 98 variances more than \$2 counts and verifies the deposit; the department of Treasurer's office should initiate/expeditered notify County Auditor of items pending more old outstanding pending DMS batches and as practical within the constraints of availal treasurer's office should develop procedurup. Treasurer's office should count all funds in control is the use of functioning cameras are funds in the safe. Process for check encoding should be revier reallocations. Contact bank representative verification options. Consider meeting with for county operations. ICL Confirmation should be maintained electors. County Treasurer Agree Disagree Respondent: - For Check Encoding Process, RTLaw deposits to bank. The Treasurer's Officer I do not know how depositing any uproblems Auditor Comment: The updated internal conformations (COSO) requires organizations over technology (principle 11) to support the	All deposit form 98 variances of less than or equal to \$20 over/sh recorded to revenue account # 48010, and deposited at the bank. At the County Auditor and to the responsible department. All deposit form 98 variances more than \$20 over/short should be counts and verifies the deposit; the department should be counts and verifies the deposit; the department should be contacted. Treasurer's office should initiate/expedite resolution and deposit a notify County Auditor of items pending more than five business deposits. Old outstanding pending DMS batches and CWR transactions sho as practical within the constraints of available resources. Treasurer's office should develop procedures to address county chap. Treasurer's office should count all funds in the presence of source control is the use of functioning cameras and second cashier verify funds in the safe. Process for check encoding should be reviewed to enhance efficient reallocations. Contact bank representative to clarify current Image verification options. Consider meeting with Tax office staff to explor for county operations. ICL Confirmation should be maintained electronically in a safe local loss. County Treasurer Agree Disagree Respondent: Callie Bartlett For Check Encoding Process, RTLawrence does not allow for deposits to bank. The Treasurer's Office is not staffed to manual to not know how depositing any unbalanced deposit For problems Auditor Comment: The updated internal control framework released Organizations (COSO) requires organizations establish control activition over technology (principle 11) to support the achievement of its observed the safe part of the problems.	 All deposit form 98 variances of less than or equal to \$20 over/ short should be recorded to revenue account # 48010, and deposited at the bank. An email no the County Auditor and to the responsible department. All deposit form 98 variances more than \$20 over /short should be put on hole counts and verifies the deposit; the department should be contacted (as current Treasurer's office should initiate/expedite resolution and deposit any unbalance notify County Auditor of items pending more than five business days. Old outstanding pending DMS batches and CWR transactions should be reseat as practical within the constraints of available resources. Treasurer's office should develop procedures to address county checks held foup. Treasurer's office should count all funds in the presence of source departments control is the use of functioning cameras and second cashier verifying funds) a funds in the safe. Process for check encoding should be reviewed to enhance efficiencies which reallocations. Contact bank representative to clarify current Image Cash Letter verification options. Consider meeting with Tax office staff to explore optimur for county operations. ICL Confirmation should be maintained electronically in a safe location that is loss. County Treasurer Agree Disagree Respondent: Callie Bartlett Date: For Check Encoding Process, RTLawrence does not allow for a pre-ver deposits to bank. The Treasurer's Office is not staffed to manually pre-ver. I do not know how depositing any unbalanced deposit Form 98 will



	transactions including ca internal controls over the ensure transaction/file ac	eir manual and automated system	rections. Management must continually monitor ms identifying sufficient error checking routines to
Disposition:	Audit Report	Oral Comment	☐ Deleted From Consideration



Finding Number:

Date: Audit:

14-CT-01-02

November 12, 2014 County Treasurer FY 2014

Audit:	County Treasurer FY 2014
Auditor(s) Assigned:	TB
Finding:	Check Printing Process: Check Stock Review of check stock for FY2014 revealed check stock numbers were used out of sequence, sequencing errors were recorded in issue logs, and voided check not on void log consistently.
	 System Environment The check printing process was revised with Oracle 12 upgrade in June 2013. Signature files are bitmap stored on servers. Check templates designed for various funds are generally adequate except for
	funds 543 and 582. Using the fund 543 template requires Accounts Payable staff review and modify the batch file when the check stub detail exceeds 40 lines. Overflow lines are printed on check stock.
Work paper Reference: (or other method by which finding was identified)	Routine review of check stock log and check history FY2014 - Workpaper 4BD
Condition: (Describe the current condition)	Since June 2013, payment processors use 'enhanced templates' to create payment batches. After receiving an alert from the Auditor's office and approval of the Chief Cashier in the County Treasurer's office the checks are printed and payment batches are confirmed. Once the checks are printed the number of checks and amount is verified and logged on the check stock spreadsheet. The issuing department and Auditor's office are notified of printed checks and sent check register via email. The Register is printed and 3 copies are made to be placed with Cover Pages. The Cover Pages are time stamped and taken to the County Treasurer to be signed. In the absence of the County Treasurer, the Chief Deputy signs the registers. Once signed, the registers are taken to the Auditor's office to be reviewed, signed then forwarded to Commissioners' court.
Criteria: (Describe the optimal condition)	 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. Technology controls for signatures are evolving, at a minimum; signature bitmaps should be stored in a secure location only available during check printing.
Cause: (Describe the cause of the condition if possible) Effect: (Describe or quantify any adverse effects)	Lack of automated controls - clerical errors in maintaining check logs Multiple check templates in use which require manual intervention to produce overflow lines Increased risk of financial losses due to check printing errors and releasing of incorrect payment amounts - although mitigated by positive pay and manual logs. Manual processing effort and reviews due to printing overflow lists on check stock rather
Recommendation: (Describe corrective action)	 than plain paper Continue current procedures, 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. This should be evidenced on control form submitted to Commissioners Court. Work with IT to migrate templates for 543 and 582 to templates used by other special funds. Monitor security levels for bitmap signature files, improving as technology changes.



Responsible Department	County Treasurer				
or Organization:					
Management's Response:	Agree Disagree	Respondent:	Callie Bartlett	Date:	01/14/2015
Comments:				Date.	01/14/2015
Disposition:	Audit Report	Oral Co	omment Del	eted From Co	onsideration

Dallas County, Texas

County Auditor



Finding Number:
Date:
Audit:

14-CT-01-03

November 13, 2014 County Treasurer FY 2014

Audit:	County Treasurer FY 2014
Auditor Assigned	TB
Finding:	 Investments: Review of Dallas County Outstanding Fund Investments and financial information provided in monthly or quarterly investment reports revealed: Funds invested with short term rates Investment decisions appropriately consider cost of banking and cost of idle funds for current period. Basic financial information provided for securities is not reflected on the face of the report requiring "drill-down" through supporting documents:
	 Investments with call options are not disclosed and if applicable the nearest call date has not been disclosed "Number of Days" does not indicate if this includes days to nearest call date or maturity "Interest Rate" does not distinguish if for coupon pay rate, yield to nearest call date or yield to maturity or if premium paid or discounts are considered. Securities with variable rates are not indicated "Investment Amount" does not disclose that in some instances premium paid is included Frequency of interest payments are not disclosed Status: Project initiated in 2014 to upgrade processing and accounting, reportedly drill down documentation will be available once implementation is complete.
Work paper Reference:	Treasurer's deputies investing county funds are not requested, by the Treasurer's management to file financial disclosure statements. Dallas County Outstanding Fund Investment Report
(or other method by which finding was identified)	Dallas County Outstanding List (PrntMat) Workpaper 5BC
Condition: (Describe the current condition)	 All investments are made according to the Dallas County Investment Policy as approved on Commissioners Court No. 2013-1915 dated November 19, 2013 which provides at least annually, the County Treasurer review and revise 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 daily 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 are generally managed with Repurchase Agreements, TexPool and depository interest account. All investments made outside the depository require two signatures for transfer. County Treasurer submits quarterly investment report to Commissioners Court for filing. Policies are reviewed annually and any updates are codified through court order. Distribution for funds 205 (Debt Service) and 120 (General Fund), 433 (Tax Notes Series 2011) and 424 (Unlimited Tax Road Bonds Series 2000) are made according to budget and predetermined schedules whenever possible with calculated amount held at Treasury bank to offset fees. Investment practices developed for statutory reporting are prepared by County Treasurer's staff using Symphony software but are not incorporated in any Disaster Recovery Plan. However in 2014 a project was introduced to upgrade processing and accounting including implementation of a new investment system.
Criteria: (Describe the optimal	Dallas Count Code, Sec. 70-463 Investment strategy. (f) General strategy.



condition)

- 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 102 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.

Consistent with best practices in government and promulgated by GFOA for cash flow forecasts in Treasury Operations, the County Treasurer's office projections are developed and updated to determine:

- a) The dollar amount of the portfolio that needs to remain liquid to meet disbursement obligations within a six-month period (short-term)
- b) What dollar amount is required within the next 6 120 month period, and
- c) Whether there is a 'core' of funds available for longer-term investing.

Amortized cost method

The approach mandated for held-to-maturity securities; investments are reported at their cost with any premium or discount amortized over the life of the investment. Per accounting standards, revenue approach may be used for recording purchase of accrued interest by debiting interest revenue account.

Dallas County Code, 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:
 - 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. A statement indicating 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.

Government Code, Public Investment Act, Sec. 2256.005 (i) An investment officer of an entity who has a personal business relationship with a business organization offering to engage in an investment transaction with the entity shall file a statement disclosing that personal business interest. An investment officer who is related within the second degree by affinity or consanguinity, as determined under Chapter 573, to an individual seeking to sell an investment to the investment officer's entity shall file a statement disclosing that relationship. A statement



	OF		
required und	ler this subsection must be filed w	ith the Texas E	thics Commission

ion and the governing body of the entity. Government Code, Public Investment Act, Sec. 2256.023 (d) If an entity invests in other than money market mutual funds, investment pools or accounts offered by its depository bank in the form of certificates of deposit, or money market accounts or similar accounts, the reports prepared by the investment officers under this section shall be formally reviewed at least annually by an independent auditor, and the result of the review shall be reported to the governing body by that auditor. Dallas County Transparency Policy adopted on Court Order 2011-507, Sec X, provides: Elected officials or other employees who manage or who are otherwise responsible for the daily administration, implementation or monitoring of contracts, bids, and/or qualifications.... or property transaction are required to disclose the existence and source of any income generated outside of working for Dallas County that is received by that individual, their spouse, or any dependent. Dallas County Investment Policy annually adopted, for 2013 on Court Order 2012-1911, provides: • The county investment portfolio shall not exceed a weighted average maturity life of two years for the entire investment portfolio (Section III, General Strategy). • Should at any time the County Treasurer or deputies authorized to make investment transactions on behalf of the Dallas County Treasurer have a personal business relationship with a business organization offering to engage in an investment transaction with Dallas County shall file a Disclosing Statement with the Dallas County Treasurer (Section V). Cause: (Describe the Use of manual process and outdated software cause of the condition if possible) Additional analysis necessary in order to affirm posting for interest earned per statutory account. Effect: (Describe or quantify any adverse effects) Recommendation: Investment practice should reflect maximum security as well as maximum earnings. (Describe corrective Full disclosures of security investment terms must be obtained in order to adequately action) monitor/evaluate the performance of the Investment Portfolio. Continue to change processes to automate system tracking and improve analysis options. Treasurer's deputies investing county funds should file financial disclosures annually. Responsible Department County Treasurer or Organization: Management's Response: Agree Disagree Respondent: Daisy Duong Date: 01/12/2015 Disagree: We do provide documentation (attached together with trade tickets) including Comments: Investment with call options documentation provided (in Bloomberg). "Number of Days" is the Number of Days to Maturity. Documentation for Securities with variable interest rate is provided. Documentation for Frequency of interest rate payments is provided. Auditor Comment: Basic financial information provided for securities is not reflected on the face of the report. Investment report generated from the new automated tracking module should include sufficient details to identify and monitor investments. Audit Report Disposition: Oral Comment Deleted From Consideration

County Auditor



Dallas County, Texas

Finding Number:

Date:
Audit:

14-CT-01-04 November 13, 2014 County Treasurer FY 2014

Auditor(s) Assigned:

TB

Finding: Bank Reconciliation

- Variances between Book Balance and Adjusted Oracle Balance as of September 30, 2014 (according to Treasurers Recon Diff Report) included:
 - o Fund 120 General Fund \$28,348.40
 - o Fund 124 Jury Special Fund \$(1,620.49)
 - o Fund 125 Petit Jury Fund \$(373.00)
 - o Fund 205 Interests & Debt Retirement Fund \$76.29
 - o Fund 470 Law Library Fund \$(328.29)
 - o Fund 501 County Clerk Special Fund \$(10,154.51)
 - o Fund 543 Community Supervision & Corr. Restitution Fund \$5,062.33
 - o Fund 570 Housing Finance Corp. 1993 Refunding Fund \$(0.01)
- Variances between Treasurer's Recon Difference Report and Bank Recon Statements included:
 - o Fund 130 Election Special Fund \$119
 - o Fund 501 County Clerk Special Fund \$(.19)
- Treasurer's Recon Difference Report does not include Fund 608 thru Fund 993
- Bank Reconciliations for the following Funds have not been completed for the dates listed below.

Not Provided	Fund 777	Investment Pass Thru
6/30/2014	Fund 608	CC Delinquent Vendor Collections
6/30/2014	Fund 610	CSCD Credit Card Clearing Account
6/30/2014	Fund 625	TCDRS Wire
6/30/2014	Fund 822	Nationwide Retirement
6/30/2014	Fund 835	Public Funds Interest Bearing DDA
6/30/2014	Fund 900	Check Clearing
6/30/2014	Fund 993	DC E-Filing
7/31/2014	Fund 630	CC E-Pay
7/31/2014	Fund 669	CC Deposit Account
7/31/2014	Fund 671	CC Fee Payment Account
7/31/2014	Fund 672	CC Reverse Account
7/31/2014	Fund 764	Food Checks
7/31/2014	Fund 882	Wire Transfer Pass Thru
8/31/2014	Fund 670	CC Chargeback Account
9/30/2014	Fund 730	ICL - Tax Office Account

Treasurer's staff advises activity for these pass thru/clearing accounts is reviewed daily. These accounts are also omitted from the bank reconciliation certifications provided.

 Computers used for processing investments and banking are not isolated on the virtual network with no Internet access except that which is necessary to communicate with the bank sites.

Department's responses to the Internal Control Questionnaire (ICQ) revealed:

- Sufficient detail is not received for all external incoming wire transfers to allow appropriate recording of revenue.
- In the event of a hardware failure, bank processing can be switched to an alternative computer but no written procedure exists for switching to alternative computer.
- No procedures exist for handling errors related to outgoing transfers.
 The Chief Deputy or the County Treasurer do not review all outgoing transfers initiated by treasurer staff or appropriateness.



	- System logon weaknesses include: no records of all password/logon violations or any			
	attempts to work outside authorized functions, no requirement to change password/PIN			
	regularly/frequently, and no written procedures exist for reporting unauthorized messages at transmission time.			
Work paper Reference:	Review of County Treasurers Bank Reconciliation			
(or other method by	FY2014 - 4 th quarter - Workpaper 6A			
which finding was	Response to Treasurer's Internal Control Questionnaire (ICQ) dated 6/16/2014			
identified)	response to Treasurer's internal Control Questionnaire (ICQ) dated 6/16/2014			
Condition:	- All Dallas County checking accounts are covered by Positive Pay. A file of issued checks			
(Describe the current	is transmitted to the bank each day that checks are written. When the issued checks are			
condition)	presented for payment at the bank, they are compared electronically against the list of			
200	transmitted checks. The check-issue file sent to the bank contains the check number,			
Sec. 10. 10. 10. 10. 10. 10. 10. 10. 10. 10	account number, issue date, and dollar amount.			
12	- Procedurally, bank reconciliations are scheduled and researched timely. Management			
9	review of daily transactions and other compensating controls remained in place			
	- 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			
	- Departmental tracking and receipting is relied on for transfer of settled credit card			
	activity and revenue recognition.			
Criteria:	Per Local Government Code (LGC) § 113.008, the County Treasurer is responsible for bank			
(Describe the best practice.)	reconciliations. Financial controls require reconciliation of bank statements to include review,			
practice.)	research, and matching of reconciling items by account. Bank reconciliations are reviewed by			
	supervisors for accuracy and completion with reconciling items clearing periodically.			
4	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			
Cause:	Process documentation for changing technology in banking not updated.			
(Describe the cause of the	Incomplete monitoring of bank reconciliation to ensure all bank reconciliations completed			
condition if possible)	Incomplete monitoring to ensure timely follow-up/recognition of revenue/state costs received			
7.00	thru clearing accounts.			
Effect:	Potential loss of funds if processing/corrections are incomplete.			
(Describe or quantify any adverse effects)	Delayed recognition of revenue/state fees payable.			
adverse effects)	Risk of bank shortages or unrecovered funds. Risk of undetected bank errors			
	Additional potential cost for external reviews.			
Recommendation:	Continue emphasis on timely bank recons including evidence of supervisory review and			
(Describe corrective	clear all outstanding items over ninety (90) days.			
action)	 Update and review documented bank reconciliation procedures annually. 			
,	All funds held at the bank should be included in the Recon Diff Report.			
	Isolate the machines physically and logically from unsecured networks			
	Management should review control activities to mitigate risks identified in ICQ responses			
	especially in the IT environment in order to safeguard county assets and achieve			
	objectives.			
Responsible Department	County Treasurer			
or Organization:				
Management's Response:	☐ Agree ☐ Disagree Respondent: Gilda Gordon ☐ Date: 01/12/2015			
Comments:	Clearing accounts not in General Ledger (nothing to recon against).			
	Auditor Comment: The updated internal control framework released by the Committees of			
Form: Audit Finding				

County Auditor



Dallas County, Texas

	Sponsoring Organizations (COSO) requires organizations consider the potential for fraud in assessing risk (principle 8) and establish control activities (principle 10) to support the achievement of its objectives. Sufficient controls must be documented, present and functioning in order to fix accountability and mitigate risks related to financial transactions. Bank reconciliations and verification of transaction completeness are identified as important control activities which are enhanced by periodic supervisory review. Clearing account reconciliations should track pending transactions/corrections that result in an uncleared balance to promote timely accurate processing.
Disposition:	Audit Report Oral Comment Deleted From Consideration

Dallas County, Texas

County Auditor



Finding Number:

Date: Audit:

14-CT-01-05 November 13, 2014 County Treasurer FY 2014

Auditaria Aggiornada	County Treasurer FY 2014
Auditor(s) Assigned:	TB
Finding:	Non-sufficient Funds (NSF) Review of Treasurer's Hot Check List as of September 30, 2014 revealed the following: • The outstanding list does not reconcile to Oracle general ledger balance: • A variance of \$(6,334.31) between the list and the GL as of September 30, 2014. • Adjustments outstanding for waived fees, uncollectable amounts, posting errors. • Outstanding checks exist dating back to July 2000 • Review of NSF listing does not show evidence that cases are referred to DA consistently • Account aging indicates • 47.59% over 7 years old • 15.13% less than 3 years old
	Risks identified during walkthrough of department's Acceptance of Deposits and Check Encoding process revealed: Demand Letters are not verified before being sent to check writer. (R01) Accountant I assigned reconciliation duties and should not receipt payments. (R02) Return check data is manually entered into two different systems (Excel and Access database). The same source is used for each system. (R03) Treasurer's office does not log checks received through U.S. Mail (Except for Oracle AR Payments) (R04) Treasurer's bad check listing does not track NSF amount due or is not reviewed prior to receipting/distributing NSF funds collected. (R05)
Workpaper Reference:	Treasurer's Hot Check list dated September 30, 2014
(or other method by	Review of Hot Checks held in Treasurer's office
which finding was	FY2014 4 th quarter workpaper #6C
identified)	"Returned Checks NSF" Internal Control Walkthrough on April 1, 2014 with Accountant I
Condition: (Describe the current condition)	NSF checks are returned by the bank directly to the County Treasurer for accounting and routing to the appropriate department for collection. County Treasurer staff inter-references NSF debits reflected on the bank reports to checks deposited by Dallas County and updates the Treasurer's Hot Check listing (adding new NSF entries). County Treasurer's staff prepares a journal entry to GL Fund 170 (debit revenue account 48210 and credit cash) and forwards to the County Auditor for posting.
	A photo static copy of each check along with a Treasurer's office form is sent to the source department that originally receipted the check. Some departments delay returning the form in an attempt to collect the return item from the customer. The form asks for the name of the cashier who received the check, the date the check was received, and the telephone number of the cashier receiving the check. The department verifies the original receipt is recorded and assesses a NSF fee. The form is returned to the County Treasurer, who sends it and the check to the District Attorney for collection when conditions met.
	A completed compliant letter is submitted to the District Attorney's office for prosecution. NSF items that remain uncollected 90 days after submission of complaint letters to the DA are inconsistently reversed from the subsidiary system by the receiving (source) department; or, removed from the Hot Check listing. No consistent practice is established to reverse the hot check receivable entry when debt is re-established in the subsidiary system. NSF collections recorded to fund 170 using form 98's and associated hot check fees are verified before manual matching and removing entry from Hot Checks listing. 4
Criteria:	Local Government Code, § 118.141 to 118.144 authorizes the County Treasurer to collect
(Describe the optimal	fees for returned checks, stop payment orders, and copies of certain records.
condition)	
	Local Government Code, § 114.026 to 114.044 makes the Treasurer responsible for reporting
Form: Audit Finding	The residue of the recording to the responsibility of the responsi



	on all monies received and disbursed.				
	Local Government Code, § 113.063 indicates that claims and report on claims should be given to the County Treasurer.				
	Dallas County Recommended Accounting Policies for Returned Checks dated October 20, 2004 include: verification that returned check debits reflected on the bank reports reconcile to checks deposited by Dallas County; updates to the Hot Checks listing, preparation of journal entries to establish receivables; submission of a completed complaint letter and original returned check to the District Attorney for prosecution; and monitoring of collection efforts and charge backs.				
	For delayed collection of NSF's items, the Treasurer or DA should provide sufficient data to the source department for recording the payment to the subsidiary system. For receivables not previously reversed from the subsidiary system by the source department, the funds are deposited to Fund 170 to clear the existing receivable.				
Cause: (Describe the cause of the condition if possible)	Inconsistent updates and monitoring of the outstanding Hot Check List				
Effect: (Describe or quantify any adverse effects)	Potential for overstatement of revenues and errors in subsidiary systems. Funds remitted to State of Texas and/or entities for uncollected NSF checks.				
Recommendation: (Describe corrective	 Update staff training materials with Dallas County Recommend Accounting Policies on Returned Checks. 				
action)	 Coordinate with source department to reconcile and reverse original revenue or collection posting. 				
	 Provide NSF documentation and complaint, timely, to the District Attorney. Verify funds cleared bank before any refund/disbursements is processed. 				
	Review District Attorney cases on Odyssey Hot Check system to determine proper				
	 allocation to Fund 170 and Fund 120. Review demand letter for accuracy prior to sending to check writer (supervisor should) 				
	review considering supporting documentation and initial).				
	verified, import updates into the Access database. Files should be backed up at least three				
	generations to avoid data loss.				
8	 Consider logging/scanning checks when the mail is opened. Review NSF amount due prior to receipting/distributing NSF funds collected. 				
Responsible Department	Treasurer's Office				
or Organization:					
Management's Response:	Agree Disagree Respondent: Gilda Gordon Date: 01/14/2015				
Comments:	In response to risk identified during walk through Treasurer's staff comment: (R01) Demand letters are verified by Tracy.				
	(R02) Accountant I does not receipts payments.				
÷	(R04) CWR has ability to track receipts				
	In response to recommendations Treasurer's staff comment:				
	Depts. are notified when checks are returned NSF				
	Treasurer's Office doesn't refund payment. The department does. Treasurer's Office has no way to determine proper allocation.				
	Record created from bank transmittal.				
	Personnel not available to log/scan checks				
	Review of NSF amount due prior to receipting/distributing NSF funds is done				
	Auditor Comment: The updated internal control framework released by the Committees of				
	Sponsoring Organizations (COSO) requires organizations establish control activities				
	(principle 10) and general controls over technology (principle 11) to support the achievement				

County Auditor



Dallas County, Texas

	of its objectives. Sufficient controls must be documented, present and functioning in order to fix accountability and mitigate risks related to financial transactions, cash, cash items and related corrections. Management must continually monitor internal controls over manual and automated systems.	
Disposition:	Audit Report Oral Comment Deleted From Consideration	

Dallas County, Texas

County Auditor



Finding Number:

Date:

14-CT-01-06 November 13, 2014

Audit:

County Treasurer FY 2014

Audit:	County Treasurer FY 2014
Auditor(s) Assigned:	TB
Finding:	 Accounts Receivable – Greater than 90 days Accounts Receivable invoices outstanding more than 360 days: September 30, 2014 totaled \$ 294,115.23 (20.9 percent of outstanding invoices) for Institute of Forensic Science (IFS) A monthly claims report was not filed timely with the County Clerk in accordance with LGC 114.061 during FY2014. Response: Per Treasurer's office, it is filed annually. Risks identified during Accounts Receivable internal control walkthrough revealed:
	 Access to the deposit bag containing the daily receipts is not controlled. Although the department has a lock with one key the bag is often left unlocked. (R01) Oracle AR payment may not be applied to proper invoice/account. (R02) Receivables outstanding more than 180 days or more than \$1,000 are not referred for collection by District Attorney or third party collector.
Work paper Reference: (or other method by which finding was identified)	Oracle Accounts Receivable Aging reports dated September 30, 2014 Workpaper 7AB, or FY 2014 4 th Qtr Workpaper 7D for FY 2014 Year-end information Conversation with Treasurer's office "Accounts Receivable" Internal Control Walkthrough on March 25 & 27, 2014 with System Accountant, Payments Coordinator, and Cashier III/Mail Processor.
Condition: (Describe the current condition)	 Oracle system configuration vests county wide processing controls with the Treasurer to match and clear all transactions. Accounts Receivable set-up is not consistent for department users (IFS and Road & Bridge Districts) causing potential for error in matching correct customer account to the appropriate department. Monthly/periodic deadlines for clearing internal invoices are not enforced. Payments for invoices are received by the Dallas County Treasurer's office and recorded to Oracle AR. The Treasurer's office notifies IFS monthly of invoices that are 60 days or more past due. IFS administrator/staff perform limited collection duties as time permits including research of unapplied or misapplied payments. List of debts due to the County under LGC 154.045 and 113.902 was last updated July 11, 2013. Claim report (LGC 114.061) is not filed monthly with the County Clerk's office. County Treasurer and IFS address correction of past billing/receipting errors, as time allows,
Criteria: (Describe the optimal condition)	In accordance with Local Government Code, § 113.902, 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. In accordance with Local Government Code, § 113.063, each officer who collects a fine, penalty, forfeiture, judgment, tax, other indebtedness, or payment obligation owed to the county shall keep a descriptive list of those claims. In accordance with Local Government Code, § 114.061 (a) At the end of each month, the county treasurer shall file in the office of the county clerk a claims report that shows the total amount of claims registered by the county treasurer during the month. The treasurer shall report each class of claims separately.
	In accordance with Local Government Code, § 154.045 (a) In this section, "debt" includes delinquent taxes, fines, fees, and indebtedness arising from written agreements with the county. The term includes delinquent property taxes whether reduced to judgment or not. (b)

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	If a notice of indebtedness has been filed with the county auditor or county treasurer evidencing the indebtedness of a person to the state, the county, or a salary fund, a warrant may not be drawn on a county fund in favor of the person, or an agent or assignee of the person, until: (1) the county treasurer, or the county auditor in a county without a county treasurer, notifies in writing the person owing the debt that the debt is outstanding; and (2) the debt is paid. (c) A county may apply any funds the county owes a person to the outstanding balance of debt for which notice is made under Subsection (b)(1), if the notice includes a statement that the amount owed by the county to the person may be applied to reduce the outstanding debt. (d) A county may include a notice in its forms, bonds, or other agreements stating that the county may offset payments to a person in accordance with this section. In accordance with Commissioner Court Order No. 2000-039, Phase II of the Memorandum of Understanding for Projects and Accounts Receivable Responsibilities, dated January 4, 2000: County Treasurer is assigned supervisory responsibility over Oracle accounts receivable. County Treasurer will notify user departments of invoices that are 60 days overdue and forward a copy to the county auditor.
	 User departments will be responsible for collecting overdue invoices.
	Past due statements should be sent no less than monthly with account holds placed on non-responsive vendors. Uncollectible accounts over \$1,000 should be referred to the District Attorney – Civil Division or a third party collector.
Cause:	Inconsistent written procedures for handling past due accounts and lack of consistent charge-
(Describe the cause of the	off mechanism.
condition if possible)	Insufficient staff for follow-up.
	Complexity of system configured for centralized vs. decentralized control limits special
	configuration for a department.
Effect:	Delayed revenue recognition and/or accurate account receivable posting.
(Describe or quantify any	Missed recovery of outstanding debt to County
adverse effects)	Increased likelihood of uncollectible receivables
Recommendation:	The County Treasurer, together with IFS and Road & Bridge Districts, should develop
(Describe corrective	procedures for handling past due accounts and internal receivables that include:
action)	 Developing high level corrective action plan, assignments, and periodic follow-up of outstanding receivables, jointly.
	Researching old outstanding items and notification to respective departments in writing.
	Pursuing recovery of outstanding receivables through Civil District Attorney or outside
	collections.
	Updating list of debts due to the County under LGC 154.045 and 113.902 on a monthly having Engage that represent the county under LGC 154.045 and 113.902 on a monthly having Engage that represent the county under LGC 154.045 and 113.902 on a monthly having Engage that represent the county under LGC 154.045 and 113.902 on a monthly having Engage that represent the county under LGC 154.045 and 113.902 on a monthly having Engage that represent the county under LGC 154.045 and 113.902 on a monthly having Engage that represent the county under LGC 154.045 and 113.902 on a monthly having Engage that represent the county under LGC 154.045 and 113.902 on a monthly having Engage that the county under LGC 154.045 and 113.902 on a monthly having Engage that the county under LGC 154.045 and 113.902 on a monthly having Engage that the county under LGC 154.045 and 113.902 on a monthly having Engage that the county under LGC 154.045 and 113.902 on a monthly having Engage that the county under LGC 154.045 and 113.902 on a monthly having Engage that the county under LGC 154.045 and 113.902 on a monthly having Engage that the county under LGC 154.045 and 113.902 on a monthly having Engage that the county under LGC 154.045 and 113.902 on a monthly have the county the county under LGC 154.045 and 113.902 on a monthly have the county the county the county under LGC 154.045 and 113.902 on a monthly have the county th
	basis. Ensure that procedures are in place to monitor debt and direct prosecution for the recovery of the debt.
	Filing monthly claim report with the County Clerk's office.
	Implementing controls over bag where receipts are stored.
Responsible Department	County Treasurer
or Organization:	Road & Bridge Districts
or organization.	Institute of Forensic Science
Management's Response:	☐ Agree ☐ Disagree Respondent: Gilda Gordon Date: 01/14/2015
Comments:	Departments creating receivables should be responsible for collecting receivables. The
	Treasurer's office receipts payments.
N 1	Auditor Comment: LGC 113.902 vests recovery of debt with County Treasurer
Disposition:	Audit Report Oral Comment Deleted From Consideration