



FINAL REPORT FOR  
**CITY OF STOCKTON**  
INTERNAL CONTROLS TESTING: CASH HANDLING OVERVIEW

September 27, 2016

Prepared by:

**Moss Adams LLP**

3121 West March Lane  
Suite 100  
Stockton, CA 95219  
(209) 955-6100

**MOSS ADAMS<sub>LLP</sub>**

Certified Public Accountants | Business Consultants

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## I. OVERVIEW

### A. BACKGROUND

Moss Adams, as the contracted internal auditor for the City of Stockton (the City), tested the internal controls related to cash handling at selected City departments. The review took place between December 2015 and May 2016 and focused on testing the operating effectiveness of key controls over the City's cash handling processes at various departments and locations.

In June 2014, Moss Adams issued a report on the design of revenue and cash handling controls. This 2016 cash handling report represents a more in-depth review of cash handling controls, including the City's remediation efforts for the findings in the June 2014 report related to cash handling.

The testing of internal controls for operating effectiveness was completed under the consultancy standards of the American Institute of Certified Public Accountants (AICPA). As such, this work was not an audit of internal controls that resulted in a formal opinion or other form of assurance. The specific methods used for testing controls over cash handling are presented in the *Scope and Methodology* section.

### B. SCOPE AND METHODOLOGY

The scope of our review was the City's current overall cash handling process and practices. However, we selected specific City departments and locations using a risk-based approach that considered a variety of factors, including the average deposit amount, the average number of days before deposit, and other relevant observations such as the results of cash counts and open audit findings.

The methodology that Moss Adams followed to apply a risk-based approach to the scope of work included interviews with personnel involved in managing cash handling and revenue transactions within the Administrative Services Department (ASD) and a sample of City departments/divisions. The departments selected for testing were as follows:

- Administrative Services Department (1 location)
- Community Services (3 locations)
- Police Department (3 locations)
- Community Development Department (1 location)

To test the controls we performed the following three activities:

1. Gathered and reviewed relevant documentation including:
  - City of Stockton Cash Handling Policies and Procedures



- Departmental, Division, or Location-Specific Cash Handling Policies and Procedures
  - City of Stockton Cash Handling Training Materials
  - City of Stockton Cash Handling Training Attendance Records
  - Average Deposit Report by Location and Age
  - Change fund balance and custodian of record by location
  - Petty cash fund balance and custodian of record by location
2. Performed unannounced cash counts that included the following elements:
- On-site observation of physical access and security over cash assets
  - Assessment of compliance with Citywide cash handling policies and procedures and cash handling training materials, including the following:
    - Reporting overages and shortages
    - Check acceptance
    - Credit card acceptance
    - Counterfeit examination
  - Comparison of cash drawer contents to recorded transactions
  - Comparison of petty cash balance to petty cash records and documentation
  - Comparison of change fund balance to transaction records
  - Analysis of prepared deposit including comparison to receipts, transaction records, and Citywide cash handling policies
  - Observation of mail payment processing (if applicable)
3. Inquired about the following cash handling activities with key personnel at departments during site visits, as well as with ASD Revenue Services personnel regarding Citywide elements:
- Citywide, departmental, and location-specific practices and relevant policies and procedures
  - Training
  - Segregation of duties
  - System controls and access
  - Monitoring by management

In certain locations, we judgmentally adjusted our methodology to accommodate specific business practices or circumstances encountered during unannounced site visits.

## C. SUMMARY

The City has made progress in designing and implementing internal controls related to cash handling since the enterprise internal control review issued on August 19, 2013 and subsequent cash handling report on June 9, 2014. For example, we found that the Community Development Department is demonstrating significantly stronger cash handling practices. In addition, certain departments have developed and implemented the recommended written cash handling procedures. Moreover, we found no exceptions in control design in some of the areas we tested, such as credit card payments and reconciliation with transactions recorded.

The results of our testing also revealed opportunities for the City of Stockton and its departments to further improve their cash handling practices. In particular, we observed opportunities for improvement in the following areas:

- Citywide cash handling policies and procedures
- Ongoing monitoring of cash handling by management
- Check acceptance practices
- Timely delivery of deposits to ASD
- Physical security and restricted access to cash assets
- Mail payment processing
- Adequate segregation of duties over key cash handling functions

The overall conclusion of this review is that the City should continue its work to design and implement strong internal control activities, as well as continue ongoing monitoring to assess and ensure the effectiveness of these controls. Such work should be considered a priority and completed in phases over the next 12 months, as City resources are made available.

Moss Adams would like to thank the staff of the Administrative Services, Community Services, Police, and Community Development Departments for their cooperation and assistance during our review.

## D. RESULTS

There were no exceptions in control design in three areas we tested. They included:

1. Credit Card Payments
  - All credit card payments inspected complied with the City's requirements including signatures or use of PIN pad and no record of cash back.
2. Reconciliation with Transactions Recorded
  - All transactions inspected reconciled to the revenue records.

### 3. Overages and Shortages

- In the one instance where we found of an overage, reporting was in compliance with the City's required process.

The overall results for each control element are provided below by department, as well citywide common controls.

#### Summary of On-Site Results by Location

Control Element	ASD (1)	Community Services (1)	Community Services (2)	Community Services (3)	Police (1)	Police (2)	Police (3)	Community Development (1)
Physical Security and Access to Cash Assets	✓	X	X	X	✓	X	X	X
Accurate Cash Counts	✓	X	X	✓	✓	✓	✓	✓
Credit Card Payments	✓	✓	✓	✓	N/A	N/A	✓	✓
Check Acceptance Requirements	X	N/A	X	X	N/A	X	X	X
Counterfeit Inspection Requirements	✓	✓	✓	X	N/A	✓	✓	✓
Reconciliation with Transactions	✓	✓	✓	✓	✓	✓	✓	✓
Overages and Shortages	✓	N/A	N/A	✓	N/A	N/A	N/A	N/A



### Summary of Citywide Common Controls

Control Element	Citywide Results
Training	X
Petty Cash Administration	X
Change Fund Administration	X
Deposit Preparation	X
Segregation of Duties and Individual Accountability	X
Monitoring Cash Handling by Management	X
System Controls and Access	X
Policies and Procedures	X
Mail Payment Processing	X

Legend	
✓ No exceptions noted	X Opportunity for improvement

## II. OPPORTUNITIES FOR IMPROVEMENT

### A. PHYSICAL SECURITY AND ACCESS TO CASH ASSETS

1. **Finding: Several departments lacked adequate physical security and restricted access to cash assets.** Physical security of cash assets helps protect the City from theft or other misappropriation of assets. In some departments, employees left safes, cash drawers, and doors to restricted areas unlocked during business hours. At some locations, too many employees knew the safe combination or the combination had not recently been changed. Additionally, in some departments, undeposited cash was not stored securely during the business day or overnight.

**Recommendations:**

- Within Citywide policies and procedures, outline requirements for physical security at all locations that collect cash, as well as document minimum requirements and best practices. Include the following:
  - Restrict access to safes such as locating them in remote areas with locking doors.
  - Limit the number of personnel with safe combinations.
  - Change the combination to safes that have not been changed recently and maintain schedule to ensure that combination is changed periodically and after all changes in personnel.
  - Require safes to be kept locked when not in use and utilize the drop safe feature whenever it exists.
  - Define acceptable locations for storage of undeposited cash during the business day and overnight.
  - Install and require locking cash drawers.
- Additionally, certain locations should consider implementing the following improvements:
  - For certain locations, that handle large volumes of check payments, explore the ability to process secure payments online or consider the adoption of a lockbox or check encoder to facilitate remote check deposits or alternatives that will decrease the time between receiving payment and processing applications.
  - Certain locations require improved security compliance such as locking all doors to the employee area and locking the safe when not in use.



2. **Finding: Not all Departments provided adequate physical security for staff members.** City employees who handle cash should have adequate physical protection and take safety measures to provide sufficient security to them and the cash they collect. We observed weaknesses in the physical barriers between staff members and customers at four sites, such as the absence of protective glass at counters or adequate counter heights. Additionally, two sites did not have panic buttons, and one had a panic button system that may not be functional. Also, some locations lacked security cameras.

**Recommendations:**

- The City should assess the adequacy of physical barriers between employees and customers at all cash handling locations. At all locations where there are weaknesses in the physical barriers between employees and customers, redesign cash handling locations through planned remodels or when implementing office relocations.
- Within Citywide policies and procedures, outline elements of physical security and access restrictions for all locations that collect cash as well as document minimum restrictions and best practices. Include the following:
  - Establish minimum counter height to provide protection to employees handling cash.
  - Restrict access to employee areas through appropriate means such as keyed locks, keypads, or proximity cards.
- Define recommended practices including:
  - Bullet-proof glass at counter
  - Cameras at counter
  - Cameras over safe or vault, depending on value assets stored
- The City should install and routinely test panic buttons for employee safety. Work with the Police Department to resolve instances where responses to panic buttons have been delayed. For any location where panic buttons cannot be installed, establish alternate emergency procedure.

**B. ACCURATE CASH COUNTS**

3. **Finding: Not all cash counts performed were accurate in total and/or currency type.** Cash counts are designed to provide assurance of accuracy and establish accountability. Although the process for reporting and signing off on cash counts is appropriate, we found two instances where the cash counts were not accurate in either total or currency type and the secondary reviewer did not detect the error. Moreover, we found that a surprise cash count could not be performed at library locations due to system limitations.

**Recommendations:**

- Train staff on the importance of recording and verifying the accuracy of all remittance information including total by currency type as well as grand total in accordance with City policy.
- ASD's Revenue Services should track all instances where errors are identified in either total and/or currency type. Deposit preparers and secondary reviewers should be referred to additional cash handling training or disciplinary action for repeated errors.
- Additionally, the Library Division, in collaboration with IT, should explore capabilities within the Library's system to allow real-time cash counts, modify the default payment type, and develop the ability to report receipts by payment type.

**C. CHECK ACCEPTANCE REQUIREMENTS**

4. **Finding: Not all of the check payments consistently complied with date requirements per policy.** According to the City's cash handling policy, one of the requirements for accepting checks as payment is the current date of payment. The policy states: "Checks must have a current date." Additionally, the policy states: "Post-dated checks (checks with a future date) are not to be accepted."

At all of the locations where we inspected checks, we found checks that were not dated with the current date. While most of these dates were close to the date they were accepted and processed, some checks had dates as much as 68 days from the day they were processed.

This strict requirement technically does not allow staff to accept checks that do not have the current date for reasonable reasons such as they were mistakenly misdated with the prior day's date or were sent by mail and dated the day they were written. However, based on reasonable business practices, it is likely advantageous for the City to accept checks in many of these situations.

Meanwhile, checks that should be rejected for the incorrect date are also being accepted. Checks that are written with dates in the past pose an increased risk of having non-sufficient funds available and becoming uncollectible revenue for the City. Moreover, in instances where deposits were delayed in submission, the issue of check aging is compounded.

This is not a matter simply of non-compliance, but rather different interpretations of policy language. For example, the Revenue Services Division noted that the policy does not explicitly state that the City cannot accept checks that have a prior date. Instead, the Revenue Services Division accepts checks with past dates as long as they adhere to the bank's stale date check standards.

**Recommendations:**

- Adjust citywide cash handling policies and training materials to consider reasonable check dating guidelines for checks presented in person or by mail. Increase emphasis on rejecting checks outside of these parameters.
- Establish process for evaluating check acceptance exceptions including the required approvals.
- Increase monitoring efforts of check acceptance by incorporating this into the supervisor's sign-off and add it to the periodic tests performed by ASD's Revenue Services.
- For departments that handle large volumes of check payments consider using a check encoder to facilitate remote check deposits or alternatives that will decrease the time between receiving payment and processing applications.

5. **Finding: Not all check payments consistently complied with the payable name requirements per policy.** According to the City's cash handling policy, one of the requirements for accepting checks is the payable name to "City of Stockton." During our review, we found checks were written to a variety of different names. For example, nearly half of the checks inspected in one location were written payable to names other than the City of Stockton. This issue is significant considering the volume of checks received for the alarm permit program. Any checks not written as payable to the City are more likely to be returned by the bank, thereby increasing the chance of the revenue going uncollected.

**Recommendations:**

- Reemphasize importance of verifying the "Payable To" name on checks for all staff with cash handling responsibilities.
- Verify that all outgoing City bills clearly state that customers must make payments payable to the City of Stockton.
- Establish process for evaluating check acceptance exceptions including implementing required approvals.

6. **Finding: Not all checks were consistently endorsed immediately upon acceptance.** According to the City's cash handling policy, checks received for payment should be restrictively endorsed immediately upon receipt. A restrictive endorsement typically includes the disclaimer, "for deposit only," and does not allow the person depositing the check to receive cash back. Applying a restrictive endorsement immediately upon receipt provides the City greater protection against the City's cash from being misappropriated. We observed two locations that did not immediately endorse checks upon receipt. One of these locations receives a large volume of checks, creating a significant risk.

**Recommendations:**

- Redistribute citywide cash handling policy to staff members to remind them of requirement to restrictively endorse all checks immediately upon receipt. If necessary, obtain additional endorsement stamps to facilitate improved compliance.
- Provide additional endorsement stamps to locations that lack backup stamps or that handle a high volume of checks.
- Improve management's monitoring of endorsement practices by incorporating this review into supervisor's sign-off of deposits.

**D. COUNTERFEIT REQUIREMENTS**

7. **Finding: The requirements regarding the inspection of counterfeit bills are not well-defined.** According to the City of Stockton's Cash Handling training materials, bills must be checked for evidence of counterfeit, using a counterfeit detector pen or black light device, but the denomination that must be inspected is not specified. In the absence of specificity, we found that departments vary in the denominations that they state they are testing. Without a clear and specific requirement, the City of Stockton faces an increased risk of accepting counterfeit currency and uncollectable revenue. At least one department lacked the necessary tools to perform counterfeit bill tests.

**Recommendations:**

- Update the City's cash handling policies and procedures to specify the denominations that must be checked for counterfeit.
- Consider a sporadic ongoing monitoring effort or incentive to promote consistent counterfeit detection efforts.
- Identify whether all cash handling locations have counterfeit detection pens and/or black light detection tools and provide these tools to locations that lack them and direct relevant staff to use them.

**E. DEPOSIT PREPARATION**

8. **Finding: Not all deposits are transferred to ASD's Revenue Services in a timely manner.** According to the City's cash handling training information, deposits must be submitted to ASD within one business day. While most of the deposits we reviewed were prepared in a timely manner and remitted to ASD within one business day, we found that one location we visited transports deposits to ASD two times a week. Therefore, revenue collected could go undeposited for up to 5 days before it is picked up and transported to ASD. Similarly, we inspected a deposit that ASD received from another location 8 days after it was prepared.

The data we reviewed regarding the timeliness of deposit submissions for departments and divisions indicate delays in deposits. The longer cash receipts are not in the custody of the bank, the more susceptible these cash receipts are to misappropriation.

**Recommendations:**

- Redistribute the City's cash handling policy and training guidance to remind staff of the importance of timely deposits.
- Compile a list of the deposit schedule Citywide for all remote cash handling locations.
- In collaboration with ASD, identify locations with delays in their deposits and address obstacles in submitting deposits in a timely manner.

**F. TRAINING**

9. **Finding: Not all cash handling locations are in compliance with the City's cash handling training requirement.** According to the City's Administrative Directive regarding cash handling, every employee, volunteer, vendor, or other person assigned cash handling duties must attend the City's cash handling training. During our fieldwork, we observed instances of employees handling cash who had not attended the City's training. Three locations we visited had staff members handling or accessing cash who had not completed the training. The City's current cash handling policy does not specify the time within which employees need to complete training after assuming cash handling responsibilities.

Without providing cash handling training to all employees performing cash handling duties, the City risks weaknesses in cash handling controls. In particular, employees may not be fully aware of the standards to which they and other employees should adhere. Without appropriate training, employees are unable to identify and protect themselves and the City from fraud, waste, and abuse.

**Recommendation:**

- Redistribute City's cash handling policy to locations where cash is handled and reiterate the importance of cash handling training for all individuals who perform these duties including part-time employees and staff who are filling in for other employees.
- Modify current policy language to clarify the timing within which cash handling training must be attended after employment or assuming cash handling responsibilities.
- Increase monitoring of cash handling training attendance records to ensure ongoing compliance.

## G. PETTY CASH ADMINISTRATION

- 10. Finding: Not all locations' petty cash funds match the City's records of petty cash funds.** We observed discrepancies between the City's petty cash fund records and the petty cash funds at three locations. At one location we found one petty cash fund that was missing from the City's records. In another location, we observed no petty cash fund present at the location despite the City's records showing a petty cash fund present. At another location, the amount of the petty cash fund did not match the amount or the custodian in the City's records. Without ongoing monitoring and up-to-date recordkeeping of petty cash funds, there is a greater risk of fraud, waste, and abuse.

### Recommendations:

- Increase ongoing oversight over petty cash funds, including periodic cash counts, to ensure the appropriate use and authorization of all petty cash funds.
- Strengthen process for overseeing petty cash funds to effectively monitor all petty cash funds and determine any that are no longer in active use.
- Update the City's petty cash policies and procedures to incorporate stronger controls or recommend best practices. Consider including elements from department policies over petty cash, such as the Police Department.
- ASD's Revenue Services should work with departments to coordinate the return of unused petty cash funds and reconcile the discrepancies we identified between fund amounts and custodians as well as missing fund accounts.

## H. CHANGE FUND ADMINISTRATION

- 11. Finding: Not all locations' change funds match the City's records of change funds.** On our site visits, we found several discrepancies between the City's records of change funds amounts and custodians with those we observed on-site. In two locations, we found multiple change funds that did not match the City's records. For example, at one location, we found a change fund that was no longer being used, and another that was intended for a location that was closed for the season. Moreover, without formal documentation retained with change funds, it is difficult to determine when and how change funds were formally established by the City or if they are maintained informally. If change funds are not counted and verified on a regular basis, cash could go missing without management's knowledge—either through human error, theft, or fraud.

### Recommendations:

- Increase ongoing oversight over change funds and monitor remote cash handling locations to ensure the appropriate use and authorization of all change funds.
- Advise departments to maintain the memos authorizing each change fund in its respective bag to avoid uncertainty.

- Strengthen the process for overseeing change funds to be robust enough to effectively monitor all change funds and determine any that are no longer in active use.
- In collaboration between ASD's Revenue Services and the departments, coordinate return of unused change funds and reconcile discrepancies between fund amounts and custodians, as well as missing change funds.
- Update the City's change fund policy to address how change funds should be stored in various circumstances, such locations with seasonal operations, and when they should be returned.

## I. SEGREGATION OF DUTIES AND INDIVIDUAL ACCOUNTABILITY

12. **Finding: Cash handling duties are not appropriately segregated.** Some departments have implemented appropriate segregation of duties to ensure internal controls. However, other departments demonstrated weaknesses in segregation of duties, particularly regarding mail payment processing and fee or payment adjustments. Without appropriate segregation of duties, there is an increased risk of errors or misappropriation of funds.

### Recommendations:

- Obtain and tailor a segregation of duties list/matrix based on readily available best practice guidance. For example, address assignment of responsibilities for billing versus receiving revenue, performing transactions versus adjusting fees or charges and voiding transactions, as well as opening mail payments versus processing mail payments.
- Establish list of possible mitigating controls to employ when limited personnel are available to properly segregate duties.
- See recommendations for Mail Payment Processing and System Control and Access.

13. **Finding: Individual accountability for cash handling is not in place.** During our fieldwork we observed weaknesses in controls that help to ensure accountability for each individual involved in cash handling. Specifically, at three locations we observed staff members sharing cash drawers. When the cash received is co-mingled, it is difficult to determine the individual who was responsible if cash is short or does not reconcile. Additionally, there are no mitigating controls in place such as performing cash counts between shift changes. For example, at one location, we could not determine which of the four employees who handled cash throughout the day was responsible for the inaccurate payment information in the deposit we counted.



**Recommendations:**

- Update Citywide cash handling policies and procedures to establish minimum standards for individual accountability related to cash handling.
- Implement individual cash drawers wherever possible. Where shared drawers continue to be used, develop a simple form, and require that each individual count the cash drawer contents at the end of each shift and have a secondary individual verify and sign.

**J. MONITORING CASH HANDLING BY MANAGEMENT**

14. **Finding: The City lacks standards regarding the departments' responsibilities for monitoring of cash handling and revenue collection.** In particular, the City's cash handling policies and procedures do not address minimum standards and expectations for monitoring cash handling and revenue collection. As a result, departments vary significantly in the extent, type, or frequency of monitoring activities and weaknesses in this process exist. We observed these variations and weaknesses in monitoring activities. For example, revenue monitoring activities are not being performed particularly for the revenue collected at remote locations. Therefore, no one is assigned the responsibility for comparing the on-site revenue collection to recorded revenue information to monitor and detect variances in on-site collection. Additionally, we observed that fee waivers are not currently monitored within the system used by one division. These weaknesses in monitoring present opportunities for fraud and limit employee accountability to uphold City policies.

**Recommendations:**

- In conjunction with other recommended changes to the cash handling policies, update the City's cash handling policies and procedures to establish minimum standards and expectations for monitoring cash handling and revenue collection.
- Assign roles and responsibilities for monitoring cash handling and revenue collection, particularly at remote locations. Once these expectations are established, they should be documented in department-specific policies and procedures.
- Remind staff of the existing policy regarding the waiving of fees. On-site managers should be required to perform fee waiving monitoring and department managers should periodically verify compliance.

**K. SYSTEM CONTROLS AND ACCESS**

15. **Finding: Not all systems used by City departments have adequate system controls or appropriately restrict access.** In addition, the City's policies and procedures do not address system control and access, such as limiting certain functions like fee updates and voids. Depending on departments' system configurations, employees may be able to



perform certain activities without the involvement or approval of supervisors. For example, the system used by one division does not include individual user accounts, making it impossible to determine who performed transactions. Because there are not individual roles in the system, any user can cancel or waive fees, presenting an opportunity for embezzlement. Similarly, in another system although staff members have individual accounts, any user can adjust fees. Currently, users have to adjust fees in order to charge the current fee rate as the fees in the system are outdated.

**Recommendations:**

- Update citywide cash handling and revenue policies and procedures to establish minimum requirements for system access and control. For example, best practices in system access and control should include:
  - Restrict access to required staff.
  - Limit user access to certain functions including fee adjustment, void, and transaction deletion.
  - Implement additional controls around rate and fee updates including data entry and approval process.
- Additionally, the following locations should consider implementing the following improvements:
  - Departments with system weaknesses should collaborate with IT to determine if individual usernames can be implemented in the current system. If not, departments should implement mitigating controls to monitor activity by locations and investigate fluctuations in fee waivers. In the long-term, departments should explore the possibility of transitioning to an alternative system.
  - Departments with identified system weaknesses should review all of the fees currently loaded into the system and update all fees accordingly. Departments, in collaboration with IT, should explore the ability to limit the override function to certain employees only. Until access restrictions can be effectively implemented, departments should implement a process to monitor overrides and voids on an ongoing basis at each location, as well as centrally.

**L. POLICIES AND PROCEDURES**

16. **Finding: The City's cash handling policies and procedures are not up-to-date or comprehensive.** The City's cash handling policies do not adequately address issues such as counterfeit bill inspection, check acceptance, mail payment processing, or best practices in segregation of duties between certain functions such as cash handling and

billing. The policies also do not set forth minimum requirements for system control and access or revenue and cash handling monitoring by management.

**Recommendation:**

- As part of the ongoing Policy Improvement Initiative, revise and update the City's cash handling policies and procedures to update existing elements and incorporate additional elements.

17. **Finding: Not all departments, particularly those with specialized operations or unique practices, have developed or maintain their own documented practices in their own policies, procedures, or other written guidance.** Some departments have not developed their own policies and procedures, despite having unique practices that would not be addressed within Citywide guidance. This guidance is required for staff to understand expectations regarding processes and ensure compliance with the Department's expectations. For example, some locations have location-specific practices and procedures that are not documented. Without documentation, the chance of non-compliance increases.

**Recommendation:**

- Departments with unique operations or practices should develop and maintain location-specific procedures, particularly those that relate to cash handling and maintaining internal controls.

**M. MAIL PAYMENT PROCESSING**

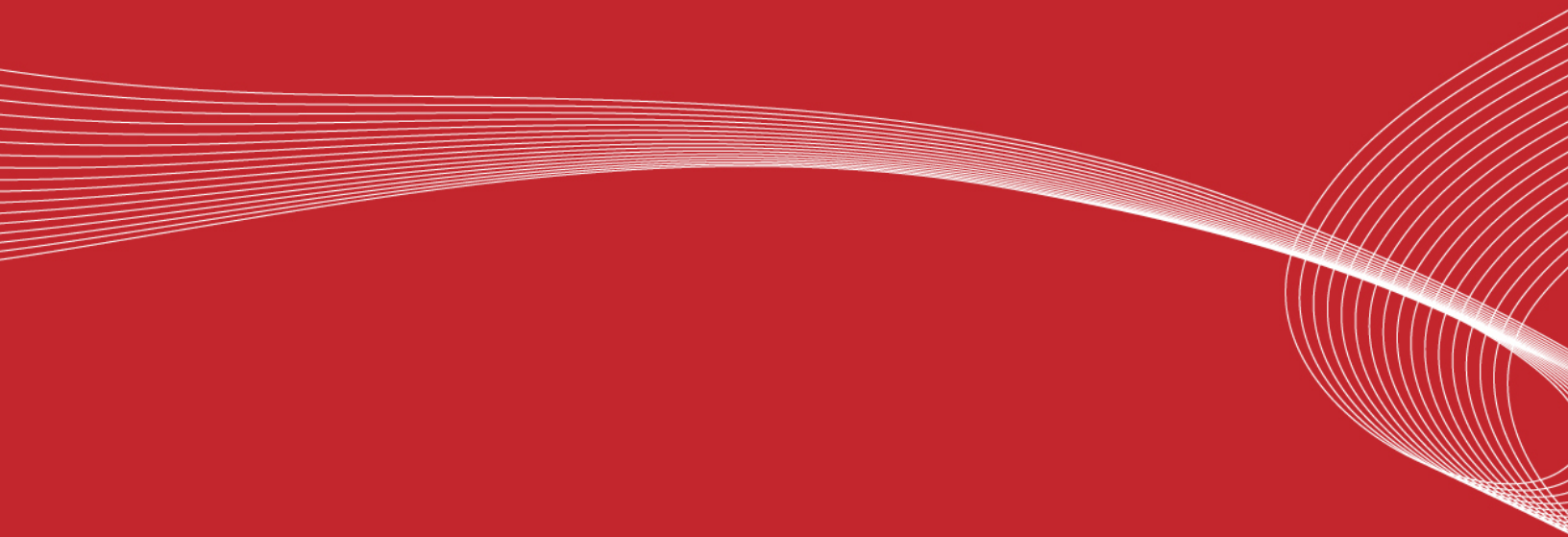
18. **Finding: Control weaknesses exist in departments' mail payment processing and the City has not established standardized practices for processing mail payments.** The City's policies and procedures lack guidance about how payments should be processed, leaving departments to manage this process themselves. During our observation, we found that five locations did not log mail payments received. Additionally, some locations co-mingled payments received by mail and in person. For example, at one location, the payments received by mail are not documented in a mail log and batches are co-mingled with mail payments and those received in person. Moreover, some locations do not have adequate segregation of duties between the individuals involved in processing mail payments. The individuals who open mail payments may also process payments. Failure to document the receipt of mail payments, maintain separate mail payment batches, and inadequately segregate duties all increase the risk of loss, theft, or fraud.

**Recommendations:**

- Document and recommend implementation of best practices for mail payment processing to include appropriate segregation of duties, logging mail received, and processing mail payments in separate batches.



- Update cash handling policies and procedures to include required controls over mail payments such as:
  - Maintaining mail logs of mail payments
  - Preparing mail payments in separate batches
- Reassign the responsibility for processing mail payments to individuals who are not involved in processing deposits in their departments.



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