

**SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**

923



FROM: Auditor-Controller

SUBMITTAL DATE:
June 16, 2014

SUBJECT: Internal Audit Report 2013-004: Office of County Counsel, [District: All]; [\$0]

RECOMMENDED MOTION: That the Board of Supervisors:
1. Receive and file Internal Audit Report 2013-004: Office of County Counsel Report

BACKGROUND:

Summary

We have completed an audit of the Office of County Counsel to provide management and the Board of Supervisors with an independent assessment of internal controls over capital and non-capital assets, information security, records management, revenue and revolving fund. We conducted the audit during the period November 1, 2012 through May 30, 2013 for operations of July 1, 2010 through June 30, 2012.

(Continued on page 2)

Paul Angulo

Paul Angulo, CPA, MA
County Auditor-Controller

Departmental Concurrence

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost:	POLICY/CONSENT (per Exec. Office)
COST	\$ 0.0	\$ 0.0	\$ 0.0	\$ 0.0	Consent <input checked="" type="checkbox"/> Policy <input type="checkbox"/>
NET COUNTY COST	\$ 0.0	\$ 0.0	\$ 0.0	\$ 0.0	

SOURCE OF FUNDS: N/A	Budget Adjustment: No
	For Fiscal Year: n/a

C.E.O. RECOMMENDATION: APPROVE
BY: *Samuel Wong 7/15/14*
Samuel Wong
County Executive Office Signature

MINUTES OF THE BOARD OF SUPERVISORS

- A-30
- 4/5 Vote
- Positions Added
- Change Order

Prev. Agn. Ref.: | **District:** ALL | **Agenda Number:**

2-9

SUBMITTAL TO THE BOARD OF SUPERVISORS, COUNTY OF RIVERSIDE, STATE OF CALIFORNIA
FORM 11: County of Riverside Auditor-Controller's Office - Internal Audit Report 2013-004: Office of County Counsel, [District: All]; [\$0]

DATE: June 16, 2014

PAGE: Page 2 of 2

BACKGROUND:

Summary (continued)

Based upon the results of our audit, we identified opportunities for improvement in internal controls relating to the processes of information security, non-capital assets, records management, revenue and the revolving fund. We determined the Office of County Counsel had adequate controls in place over capital assets.

We will follow-up in one year to determine if actions were taken to correct the findings noted.

Impact on Citizens and Businesses

Provide an assessment of internal controls over the audited areas.

SUPPLEMENTAL:

Additional Fiscal Information

Not applicable

ATTACHMENTS:

A: County of Riverside Auditor-Controller's Office - Internal Audit Report 2013-004

Internal Audit Report 2013-004

Office of County Counsel

Report Date: June 16, 2014



**Office of Paul Angulo, CPA, MA
County of Riverside Auditor-Controller
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AUDITOR-CONTROLLER

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ACC | AUDITOR
CONTROLLER
COUNTY OF RIVERSIDE

Paul Angulo, CPA, MA
AUDITOR-CONTROLLER

June 16, 2014

Pamela Walls, County Counsel
Office of County Counsel
3960 Orange Street
Riverside, CA 92501

Subject: Internal Audit Report 2013-004: Office of County Counsel

Dear Ms. Walls:

We have completed an audit of the Office of County Counsel to provide management and the Board of Supervisors with an independent assessment of the department's internal controls over capital and non-capital assets, information security, records management, revenue and the revolving fund. The audit covered the period July 1, 2010 through June 30, 2012.

We conducted our audit in accordance with the International Standards for the Professional Practice of Internal Auditing. These standards require we plan and perform the audit to obtain sufficient, reliable, relevant and useful information to provide reasonable assurance that our objective as described above is achieved. An internal audit includes the systematic analysis of information to evaluate and improve the effectiveness of internal controls. We believe this audit provides a reasonable basis for our conclusion.

Internal controls are processes designed to provide management reasonable assurance of achieving efficiency of operations, compliance with laws and regulations, and reliability of financial information. Management is responsible for establishing and maintaining adequate internal controls; our responsibility is to assess the adequacy of internal controls.

Based upon the results of our audit, we identified opportunities for improvement of internal controls relating to the processes of information security, non-capital assets, records management, revenue and revolving fund. We determined County Counsel has adequate internal controls over capital assets.

As requested, in accordance with paragraph IIC of the Board of Supervisors Resolution 83-338, management responded to each reported condition and recommendation contained in our report. Management's responses are included in the report. We will follow-up in one year to verify that management implemented the corrective actions.

We thank the Office of County Counsel management and staff for their cooperation; their assistance contributed significantly to the successful completion of this audit.

Internal Audit Report 2013-004: Office of County Counsel

Paul Angulo, CPA, MA
County Auditor-Controller

Mark W. Cousineau

By: Mark Cousineau, CPA, CIA, CFE
Chief Internal Auditor

cc: Board of Supervisors
Executive Office

Table of Contents

	Page
Executive Summary	4
 Results:	
Revolving Fund	5
Non-Capital Assets	7
Records Management	9
Revenue	11
Information Security	13
Capital Assets	16

Executive Summary

Overview

The Office of County Counsel is a full-service law office that handles civil matters for the County of Riverside. The office provides advisory and litigation support on issues of vital concern to the County and its residents such as health care, public safety, child welfare, land development, environmental protection, public finance, taxation and elections. During the audit, the office was staffed by 44 attorneys and 26 administrative support staff located in the downtown law building and three satellite offices. The office is comprised of five divisions: Litigation/General Government, Contracts/Public Works & Financing, Land Use/Code Enforcement, General Government and Juvenile Dependency.

The office's primary clients are the Board of Supervisors (BOS), County agencies, departments, commissions and officers. Under certain circumstances, legal services may be provided to other public entities within the County, including special and school districts. The office does not provide legal services to private citizens.

Audit Objective

Our audit objective is to provide management and the Board of Supervisors with an independent assessment of the department's internal controls over capital and non-capital assets, information security, records management, revenue and the revolving fund.

Audit Conclusion

Based upon the results of our audit, we identified opportunities for improvement of internal controls relating to the processes of information security, non-capital assets, record management, revenue and revolving fund. We determined County Counsel has adequate internal controls over capital assets.

Revolving Fund

Background

Revolving funds are established by the County department under the custodianship of a County officer for the use of official County business. The department has an authorized revolving fund of One Thousand Six Hundred Dollars (\$1,600.00). The fund is maintained in a checking account, and is primarily used to pay for miscellaneous and/or general office expenses, such as court documents. During the review period the department requested replenishment of the fund seven times averaging \$971.00 per request.

Auditor-Controller's Standard Practice Manual 302 *Reporting Procedures for Cash Overages and Shortages*, (SPM 302), requires departments to report all overages and shortages to the Auditor-Controller's Office (ACO) on a monthly basis.

Objective

Our audit objective is to provide management and the Board of Supervisors with an independent assessment of internal controls over the revolving fund.

Audit Methodology

To accomplish our objectives, we:

- Gained an understanding of the procedures over the revolving fund through interviews with key personnel of the department.
- Obtained an understanding of board policies, and applicable standards.
- Verified revolving fund reconciliations are performed.
- Reviewed the supporting documentation for a sample of transactions that were replenished.
- Verified adequate segregation of duties exists.

Finding 1: Timeliness in Reporting Cash Overages

Our review of the bank reconciliations for the months of August, September and October, 2012 disclosed that overages ranging from \$508.63 to \$558.63 were not reported to the ACO. According to the department accounting personnel the overage occurred during the month of August 2011. As a result, the funds held in the revolving fund checking account exceeded the authorized limit.

Government Code (GC) 29375 requires immediate deposit of the overage into the County's overage fund.

Internal Audit Report 2013-004: Office of County Counsel

Recommendation 1

Cash overages should be reported to ACO in accordance with ACO SPM 302, and immediately deposited into the County's cash overage fund.

Management's Response

"Concur. The Office of County Counsel concurs and will prepare reconciliations on a monthly basis to address this issue."

Actual/estimated Date of Corrective Action: **Immediately**

Non-Capital Assets

Background

Board of Supervisors' Policy H-26 *Non-capitalized Asset Management*, (H-26), provides guidance for the accountability of County property classified as non-capitalized assets. It requires departments to track walk-away assets (assets which are small, mobile, easily converted for personal use with acquisition costs from \$200 to \$4,999) using the county's Asset Management Module. At a minimum, departments will track all laptop computers, cellular phones, PDAs, and GPS receivers.

Departments may use another established system to ensure the accountability of non-fixed assets if the department's system has been reviewed and approved by the Auditor-Controller. No other system exemption applies.

The department maintains an inventory list of its printer equipment. It does not track walk-away assets using the county's Asset Management Module.

Objective

Our audit objective is to provide management and the Board of Supervisors with an independent assessment of internal controls over non-capital assets.

Audit Methodology

To accomplish our objectives, we:

- Obtained an understanding of board policies, and other applicable standards.
- Inquired if the department monitors minor properties, and determined how it tracks them.
- Ran a query on walk-away assets transactions for the last two fiscal years, and reviewed it against the department's inventory list of non-capital assets.
- Verified if these walk-away assets were currently utilized by the department or not.

Finding 2: Tracking Non-Capital Assets

Internal controls over non-capital assets need improvement. The department uses a listing (via word) and not the Asset Module for tracking non-capital assets. Additionally, RCIT maintains the inventory for computers and related equipment. A review of expenditure transactions for the last two fiscal years disclosed that the department purchased five Dell notebooks totaling \$8,400 on August 11, 2011. However, these notebooks were not included on the inventory list. We verified the existence of two of the five notebooks.

Internal Audit Report 2013-004: Office of County Counsel

Recommendation 2

The department should ensure that all non-capital assets are accounted for utilizing the Asset Module or an Auditor-Controller approved system.

Management's Response

"Concur. The Office of County Counsel does maintain an in-house inventory list of printers and laptops. Our department is small and it is very easy to keep track of our non-capital assets. If our current system is not agreeable with the Auditor-Controller's office, we will transfer these items into the PeopleSoft Asset Module."

Actual/estimated Date of Corrective Action: **July 1, 2014**

Records Management

Background

Board of Supervisors' Policy number A-43 *County Records Management and Archives Policy*, (A-43), requires County departments to follow guidelines for responsible recordkeeping established under this policy, and develop department policies and procedures in accordance with those guidelines. These retention requirements are recommended in order to reduce the costs for the storage and maintenance of records while ensuring that administrative, fiscal, legal and other recordkeeping responsibilities are met.

The Department follows A-43 for its records management, and has a Board approved Departmental Records Retention Schedule (DRSS). This schedule is written with general titles and descriptions rather than identifying specific individual documents or forms. Also, it indicates the length of time that listed records, regardless of media or format, must be retained by the department before disposition may be implemented. The department's DRSS includes reports such as assessment appeals, bail bond transaction files, California children and families' commission files, case files, hearing documents, opinions, etc.

Objective

Our audit objective is to provide management and the Board of Supervisors with an independent assessment of internal controls over record management.

Audit Methodology

To accomplish our objectives, we:

- Determined if the department has a written records management policy and who is responsible for records within the department.
- Determined if the department is following the general records retention policy schedule.
- Determined if the department has a Board approved DRSS.
- Reviewed the most recent requests for deletion or destruction of information.

Finding 3: Records Retention

The department retained files beyond the required retention period. Our review of the "Records Disposition Certificate" dated August 28, 2012 disclosed that files for Probate and Conservatorship cases were retained three years after the required retention period. The files which were closed in 2005 should have been destroyed in 2009 but instead were sent to Records Management & Archives Program (RMAP) Division in February 2012. Retaining materials beyond the required retention period incurs unnecessary costs and avoidable risk exposure.

Internal Audit Report 2013-004: Office of County Counsel

Recommendation 3

To reduce archive costs and limit liability exposure from discovery requests, files should be destroyed after their official retention period.

Management's Response

"Concur. The Office of County Counsel concurs. Due to a large amount of closed files that had been sent to storage, this was simply an oversight on our part."

Actual/estimated Date of Corrective Action: **Immediately**

Revenue

Background

Total revenue for the Department in fiscal years 2010-11 and 2011-12 amounted to \$2,006,040, and \$2,436,236, respectively. The majority (or 51%) of the Department's revenue is comprised of departmental legal services.

Auditor-Controller's Office (ACO) Standard Practice Manual 7 *Billing*, (SPM 7), provides uniform instructions for departments to bill for services or reimbursements. At a minimum, bills for services rendered should be created monthly. Reimbursement claims should be prepared by a schedule provided by the funding source no later than 10 days after the close of the period. Further, departments who have been approved to bill outside OASIS should record their outstanding receivables in the General Ledger at least monthly.

Total department's revenue for FYs 2010-12 amounted to \$4,442,276. Of these, we reviewed 29 journal entries totaling \$800,483 (or 18%).

Objective

Our audit objective is to provide management and the Board of Supervisors with an independent assessment of internal controls over revenue.

Audit Methodology

To accomplish our objectives, we:

- Obtained an understanding of board policies, and other applicable standards.
- Met with key personnel to obtain an understanding of the legal services collection process.
- Performed financial analytic review for the last three fiscal years.
- Sampled revenue transactions from fiscal years 2010-11 and 2011-12.

Finding 4: Tracking Conservatorship Fees

The department's collection effort over fees attributed to support of Public Guardian Conservatorship cases was not sufficient.

Our review of 45 cases totaling \$34,589 associated with conservatorship cases disclosed that fees were collected 11 to 524 days (or an average of 125 days) from the court order dates. This occurred because the department discontinued the bill tracking system, due to the lack of personnel. As a result, the department did not bill for their services monthly.

Internal Audit Report 2013-004: Office of County Counsel

Recommendation 4

Reestablish a bill tracking system that provides for monthly billing and follow-up.

Management's Response

"Concur. The Office of County Counsel reinstated our tracking system and also now provides monthly follows-up to the Public Guardian for outstanding court orders."

Actual/estimated Date of Corrective Action: **Completed**

Information Security

Background

County Counsel's information technology and security is administered by RCIT (Riverside County Information Technology) Administration, and Information Security divisions, respectively. The department's administrative assistant liaises with the RCIT Administrator. The department utilizes the following systems:

- PeopleSoft Financials: The County systems that allows users to update data in modules such as Accounts Payable, Accounts Receivable, General ledger, Purchasing, etc.;
- TussMan Time & Legal Billing System: This is a third-party legal billing and timekeeping software designed specifically for law firms. It provides tools, such as time entry, tracking clients' costs, and producing billing statements; and
- CompuLaw with PIMSYNC application: CompuLaw is third-party legal rules-processing calendar software. With PIMSYNC application, the department lawyers' events recorded in CompuLaw is sync or interfaced with the lawyers' County calendars.

Board of Supervisors' Policy A-58 *Riverside County Enterprise Information Systems Security*, (A-58), requires all Riverside County Departments to comply with County Information Security Office (CISO) Standards. CISO Standards require the protection of information from unauthorized use, modification, destruction, or disclosure as well as to ensure its authenticity, integrity, and availability. Board of Supervisor's Policy number A-50 *Electronic Media and Use Policy*, (A-50), establishes guidelines for proper use of all forms of electronic media. As used in this policy, "electronic media" includes, but is not necessarily limited to, the following: e-mail (electronic-mail), Internet use, voice-mail, video teleconferencing, fax, diskettes, storage media, bulletin boards, television, electronic subscription services, electronic documents, and any other forms of electronic communication.

County Counsel routinely collects and maintains information which is protected from public disclosure through various privacy and confidentiality statutes, and thus is not available under public information laws. Examples of private or confidential information are: passwords, Social Security Numbers (SSN); personal or family information; family names, age, personal or business partner financial and banking data (including credit cards numbers, bank routing numbers and bank account information), employee performance reviews, discipline reports and other personnel data, and information related to in-progress legal proceedings.

Further, BOS Policy A-58 through the County of Riverside Information Security Office Information Security Standard requires departments to have all users acknowledge in writing that they have received, read, and understood this policy. The responsible department information security officer shall also sign this written acknowledgment as the approval authority for granting the user access to County systems. Such written acknowledgment shall be retained in department files. Further, the "User Agreement" must be signed by all users prior to granting access to County systems.

Internal Audit Report 2013-004: Office of County Counsel

Objective

Our audit objective is to provide management and the Board of Supervisors with an independent assessment of internal controls over information security.

Audit Methodology

To accomplish our objectives, we:

- Conducted interviews and observed operating procedures of department personnel.
- Identified and reviewed laws, codes, and regulations, Board of Supervisors' ordinances, applicable policies, procedures and standards.
- Obtained and understood policies, procedures and standards regarding information security.
- Performed tests to ensure internal controls were adequate over security of information.
- Determined the nature of information stored by the department.

Finding 5: System Access of Separated Employees

The department's administrative personnel did not disable the system access of separated employees in a timely manner. Personnel indicated this occurred due to an oversight on their part. The department took an average of 1,001 days to delete/remove PeopleSoft financials and HRMS systems access for two employees whose employment with the department ended between March 2009 and August 2010. While PeopleSoft financials and HRMS systems access is limited to county networks, there is a potential for misuse of an account or information if unnecessary accounts are active.

Subsequent to the completion of the audit, the department disabled the systems access of these separated employees.

Recommendation 5

The department should ensure that they comply with County Information Technology Systems Standard by removing separated employees' accounts on the day of their separation from the department.

Management's Response

Concur. Although employees had been disabled from county access upon their separation from employment and were unable to access any County system, it was an oversight that they had not been disabled from PeopleSoft Financial and HRMS. When brought to our attention

Internal Audit Report 2013-004: Office of County Counsel

immediate action was taken. A checklist has been developed when employees leave to ensure this is captured.”

Actual/estimated Date of Corrective Action: **Completed**

Finding 6: Users' Acknowledgment

The department did not have three of their users acknowledge in writing that they have received, read, and understood BOS Policy A-58. According to the department's administrative personnel, these users were in place prior to the issuance of the policy. The Security/Workflow Access Request (Financials) documents indicate that the department's three (3) users were given access to County systems in February 2006, September 2007, and November 2009, respectively and as such should have completed the acknowledgement.

Subsequent to the completion of the audit the department provided documentation that the three individuals completed the required training acknowledgment.

Recommendation 6

The department should ensure that all users acknowledge in writing that they have received, read, and understood BOS Policy A-58.

Management's Response

“**Concur.** The Office of County Counsel agrees and all missing employees have been provided with copies of the policies for signatures to be added to their personnel files.”

Actual/estimated Date of Corrective Action: **Completed**

Capital Assets

Background

The Auditor-Controller's Standard Practice Manual 913 *Capitalization Thresholds*, (SPM 913), defines capital assets as fixed assets and intangible assets of significant value having a utility which extends beyond the current year that are broadly classified as land, infrastructure (or, long-lived assets), buildings and improvements, equipment, livestock, and intangible assets.

Capital assets include real property such as buildings, land, and land improvements, costing \$1 or more, as well as vehicles, machineries, and all equipment with a cost of \$5,000 or more. The cost of a capital asset includes all costs necessary to place the asset in service.

SPM 913 requires all real property and all capital assets to be recorded in the PeopleSoft Asset Management Module (Asset Module). In addition, all entities are encouraged to use the Asset Module to manage and maintain all non-capitalized assets. SPM 903, *Capital Asset Tags*, (SPM 903), requires capital assets be tagged or marked as County property to ensure identification for accountability. The department or agency should affix the property tag or assigned number in some other manner through engraving, inscribing, stenciling, etching, or painting the number on the item itself, or labeling the box in which it is kept.

The responsibility for processing capital assets and maintaining an accurate record of the assets primarily resides with the Department.

As of June 30, 2012, the County Counsel had a total of nine capital assets, which included printers/copiers and processors, with a recorded cost of \$68,289 recorded in the Asset Module.

Objective

Our audit objective is to provide management and the Board of Supervisors with an independent assessment of internal controls over capital assets.

Audit Methodology

To accomplish our objectives, we:

- Obtained an understanding of board policies, and other applicable standards.
- Met with key personnel to understand the process.
- Ran a query of the appropriation expenditures during the audit period, traced and agreed applicable purchases against the annual asset inventory certification as of June 30, 2012.

Based upon the results of our audit, internal controls over capital assets are adequate and effective.



MEMORANDUM

RIVERSIDE COUNTY COUNSEL

DATE: June 12, 2014

TO: Auditor-Controller
Internal Audit Division

FROM: Pamela J. Walls *PJW*
County Counsel

RE: Reply to Draft Internal Audit Report 2013-004: Office of County Counsel

Finding 1: Timeliness in Reporting Cash Overages

Our review of the bank reconciliations for the months of August, September and October, 2012 disclosed that overages ranging from \$508.63 to \$558.63 were not reported to the ACO. According to the department accounting personnel the overage occurred during the month of August 2011. As a result, the funds held in the revolving fund checking account exceeded the authorized limit.

Government Code (GC) 29375 requires immediate deposit of the overage into the County's overage fund.

Recommendation 1

Cash overages should be reported to ACO in accordance with ACO SPM 302, and immediately deposited into the County's cash overage fund.

a. **Management position concerning the recommendation:**

 X Concur Disagree

b. **Comments:**

The Office of County Counsel concurs and will prepare reconciliations on a monthly basis to address this issue.

c. **Actual/estimated Date of Corrective Action:** Immediately

(Comment, if necessary to clarify what action the timing refers to)

d. **Estimated cost to implement recommendation (If material)**

\$ 0

b. **Comments:**

The Office of County Counsel concurs. Due to a large amount of closed files that had been sent to storage, this was simply an oversight on our part.

c. **Actual/estimated Date of Corrective Action:** Immediately
(Comment, if necessary to clarify what action the timing refers to)

d. **Estimated cost to implement recommendation (If material)**

\$ 0

Finding 4: Tracking Conservatorship Fees

The department's collection effort over fees attributed to support of Public Guardian Conservatorship cases was not sufficient.

Our review of 45 cases totaling \$34,589 associated with conservatorship cases disclosed that fees were collected 11 to 524 days (or an average of 125 days) from the court order dates. This occurred because the department discontinued the bill tracking system, due to the lack of personnel. As a result, the department did not bill for their services monthly.

Recommendation 4

Reestablish a bill tracking system that provides for monthly billing and follow-up.

a. **Management position concerning the recommendation:**

X Concur _____ Disagree

b. **Comments:**

The Office of County Counsel reinstated our tracking system and also now provides monthly follows-up to the Public Guardian for outstanding court orders.

c. **Actual/estimated Date of Corrective Action:** Completed

(Comment, if necessary to clarify what action the timing refers to)

d. **Estimated cost to implement recommendation (If material)**

\$ 0

Finding 5: System Access of Separated Employees

The department's administrative personnel did not disable the system access of separated employees in a timely manner. Personnel indicated this occurred due to an oversight on their part. The department took an average of 1,001 days to delete/remove PeopleSoft financials and HRMS systems access for two employees whose employment with the department ended between March 2009 and August 2010. While PeopleSoft financials and HRMS systems access

is limited to county networks, there is a potential for misuse of an account or information if unnecessary accounts are active.

Subsequent to the completion of the audit, the department disabled the systems access of these separated employees.

Recommendation 5

The department should ensure that they comply with County Information Technology Systems Standard by removing separated employees' accounts on the day of their separation from the department.

a. **Management position concerning the recommendation:**

 X Concur Disagree

b. **Comments:**

Although employees had been disabled from county access upon their separation from employment and were unable to access any County system, it was an oversight that they had not been disabled from Peoplesoft Financial and HRMS. When brought to our attention immediate action was taken. A checklist has been developed when employees leave to ensure this is captured.

c. **Actual/estimated Date of Corrective Action:** Completed

(Comment, if necessary to clarify what action the timing refers to)

d. **Estimated cost to implement recommendation (if material)**

 \$ 0

Finding 6: Users' Acknowledgment

The department did not have three of their users acknowledge in writing that they have received, read, and understood BOS Policy A-58. According to the department's administrative personnel, these users were in place prior to the issuance of the policy. The Security/Workflow Access Request (Financials) documents indicate that the department's three (3) users were given access to County systems in February 2006, September 2007, and November 2009, respectively and as such should have completed the acknowledgement.

Subsequent to the completion of the audit the department provided documentation that the three individuals completed the required acknowledgment.

Recommendation 6

The department should ensure that all users acknowledge in writing that they have received, read, and understood BOS Policy A-58.

a. **Management position concerning the recommendation:**

 X Concur Disagree

b. Comments:

The Office of County Counsel agrees and all missing employees have been provided with copies of the policies for signatures to be added to their personnel files.

c. Actual/estimated Date of Corrective Action: Completed

(Comment, if necessary to clarify what action the timing refers to)

d. Estimated cost to implement recommendation (If material)

\$ 0