

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



**ITEM: 2.18
(ID # 19527)**

MEETING DATE:
Tuesday, July 12, 2022

FROM : AUDITOR CONTROLLER:

SUBJECT: AUDITOR-CONTROLLER: Internal Audit Report 2022-018: Riverside County Sheriff-Coroner Department Audit, [District: All]; [\$0]

RECOMMENDED MOTION: That the Board of Supervisors:

1. Receive and file Internal Audit Report 2022-018: Riverside County Sheriff-Coroner Department Audit.

ACTION:Consent

Tanya Harris
Tanya Harris, Assistant Auditor Controller 7/1/2022

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Jeffries, seconded by Supervisor Hewitt and duly carried, IT WAS ORDERED that the above matter is received and filed as recommended.

Ayes: Jeffries, Washington and Hewitt
Nays: Spiegel
Absent: Perez
Date: July 12, 2022
xc: Auditor, Sheriff

Kecia R. Harper
Clerk of the Board
By: *Kecia R. Harper*
Deputy

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

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	\$ 0	\$ 0	\$ 0	\$ 0
NET COUNTY COST	\$ 0	\$ 0	\$ 0	\$ 0
SOURCE OF FUNDS: N/A			Budget Adjustment:	No
			For Fiscal Year:	N/A

C.E.O. RECOMMENDATION: Approve.

BACKGROUND:

Summary

In accordance with Board of Supervisors Resolution 83-338, we audited of the Riverside County Sheriff-Coroner Department to provide management and the Board of Supervisors with an independent assessment of internal controls over cash accounts held outside of the Treasury, complaint process, inventory management – armory room, software access rights, and purchasing processes.

Our conclusion and details of our audit are documented in the body of this audit report.

Please refer to the audit report for the results of the audit.

Impact on Residents and Businesses

Provide an assessment of internal controls over the audited areas.

SUPPLEMENTAL:

Additional Fiscal Information

Not applicable.

ATTACHMENTS:

A: Riverside County Auditor-Controller’s Office - Internal Audit Report 2022-018: Riverside County Sheriff-Coroner Department Audit

Internal Audit Report 2022-018

**Riverside County Sheriff-Coroner
Department Audit**

Report Date: July 12, 2022



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ACO | **AUDITOR
CONTROLLER
COUNTY OF RIVERSIDE**

**Paul Angulo, CPA, MA
Riverside County Auditor-Controller**

**Tanya S. Harris, DPA, CPA
Assistant Auditor-Controller**

July 12, 2022

Sheriff Bianco
Sheriff-Coroner
Riverside County Sheriff-Coroner Department
4095 Lemon St, 2nd Floor
Riverside, CA 92501

**Subject: Internal Audit Report 2022-018: Riverside County Sheriff-Coroner
Department Audit**

Dear Sheriff Bianco:

In accordance with Board of Supervisors Resolution 83-338, we audited the Riverside County Sheriff-Coroner Department to provide management and the Board of Supervisors with an independent assessment of internal controls over cash accounts held outside of the Treasury, complaint process, inventory management - armory room, software access rights, and purchasing processes.

We conducted our audit in accordance with the International Standards for the Professional Practice of Internal Auditing. These standards require that 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 and non-financial information. Management is responsible for establishing and maintaining adequate internal controls. Our responsibility is to evaluate the internal controls.

Internal Audit Report 2022-018: Riverside County Sheriff-Coroner Department Audit

Our conclusion and details of our audit are documented in the body of this audit report. As requested, in accordance with paragraph III.C of the Board of Supervisors Resolution 83-338, we asked management to provide a response to our audit findings and recommendations. However, a response was not submitted and therefore not included in this report. We will follow-up to verify that management implemented the corrective actions.

Paul Angulo, CPA, MA
Riverside County Auditor-Controller



By: René Casillas, CPA, CRMA
Chief Internal Auditor

cc: Board of Supervisors
Jeff A. Van Wagenen, Jr., County Executive Officer
Dave Rogers, Chief Administrative Officer
Grand Jury

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Internal Audit Report 2022-018: Riverside County Sheriff-Coroner Department Audit

Executive Summary

Overview

Riverside County Sheriff-Coroner Department (Sheriff Department) is responsible for providing “24/7 uniformed response to calls for service from the public in the unincorporated county areas” as well as “operate a countywide jail system that serves all local agencies, provide court security and service of court processes and orders and to perform Coroner – Public Administrator functions pursuant to California law.” To provide these services, the Sheriff Department budget is \$898 million and there are 4,970 authorized positions (*County of Riverside, Fiscal Year 2021-22, Adopted Budget, Volume 1, 273-274*).

Audit Objective

Our objective is to provide management and the Board of Supervisors with an independent assessment about the adequacy and effectiveness of internal controls over cash accounts held outside of the Treasury, complaint process, inventory management – armory room, software access rights, and purchasing processes. Internal controls are processes designed to provide management reasonable assurance of achieving efficiency of operations, compliance with laws and regulations, and reliability of financial and non-financial information. Reasonable assurance recognizes internal controls have inherent limitations, including cost, mistakes, and intentional efforts to bypass internal controls.

Audit Scope and Methodology

We conducted the audit from January 21, 2022, through June 9, 2022, for operations from July 1, 2020, through May 25, 2022. Following a risk-based approach, our scope included the following:

- Cash Accounts Held Outside of the Treasury
- Complaint Process
- Inventory Management – Armory Room
- Software Access Rights
- Purchasing Processes

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Audit Highlights

Summary of Existing Conditions

The risk areas the current processes are unable to mitigate are the following:

- Opening and closing of bank accounts held outside of the Treasury has been delegated to individual station or bureau captains. Some of these are opened without prior authorization or knowledge by the Administrative Services Division. Having a decentralized process to manage the approval, opening, and closing of bank accounts increases the risk of asset misappropriation.
- Cash account reconciliations are not being performed timely and reconciliations performed lack audit documentation showing the preparer, review, and approval. Additionally, the department does not have a formal policy in place to guide their personnel on how to properly manage these accounts. Lack of controls over these bank accounts leave the department susceptible to misuse or misappropriation.
- Items maintained in their armory inventory are not being reported to the Auditor-Controller's Office during the year end reporting process. The accounting and reporting guidelines are not followed and financial records and reporting obligations are non-compliant.
- Armory Room inventory did not always match the item quantities listed in the internal count sheets. An inventory system that tracks inventory in real time creates an efficient manner to account for inventory.
- Key inventory management functions over ammunition and firearms did not have adequate segregation of duties. This increases the risk of inaccurate inventory listings and misappropriation of items.
- Terminated employees' access rights to critical systems linked to active directory were not disabled timely. When an account is not closed immediately after employment has ended, there is a security risk to the information maintained in the systems used by the department.
- Critical systems not linked to active directory and requiring manual deactivation were not deactivated after employee separated from department. When an account is not deactivated upon separation, the credentials for the individual remain active and usable. If an unauthorized individual were to obtain a terminated employee's credentials, there is a security risk to the data stored within the system.

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- Split purchases were identified in multiple purchase orders. Splitting purchase orders circumvents requisitions and approving controls put in place to ensure compliance with county purchasing policies and mitigates risks of inappropriate purchasing practices.

Summary of Improvement Opportunities

The major improvement opportunities are in the following areas:

- Establish a centralized procedure which requires individual stations or bureaus to request the opening or closing of bank accounts from centralized accounting.
- Ensure there are adequate segregation of duties over the opening and closing of accounts held outside of the Treasury
- Develop policies and procedures that ensure bank reconciliations for the accounts held outside of the Treasury are adequately reviewed and approved to maintain compliance with the Standard Practice Manual 1001, *Internal Control*.
- Ensure staff is adequately trained and adhering to the process that ensures bank reconciliations for the accounts held outside of the Treasury are adequately reviewed and approved to maintain compliance with the Standard Practice Manual 1001, *Internal Control*.
- Use an inventory management system such as Service Now, that tracks, maintains, and updates inventory counts in real time to ensure that counts are accurate and facilitate the year-end reporting processes in accordance with Standard Practice Manual 801, *Inventory of Materials and Supplies*.
- Ensure physical inventory counts are periodically conducted and documentation of the counts, their review, and approval is maintained.
- Ensure there are adequate segregation of duties for handling, tracking, and recording inventory items or develop compensating controls to monitor inventory items.
- Ensure the department is disabling active directory accounts on the day of an employee's termination or transfer from the department as required by County of Riverside Information Security Standard v1.0, Section 4.1, *Account and Access Management*.

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- Establish policies and procedures for the immediate disabling of user access rights for terminated or transferred employee in accordance with County of Riverside Information Security Standard v1.0, Section 4.1, *Account and Access Management*.
- Implement a process/procedure to ensure that systems that are not linked to active directory have a completed manual deactivation and verification that the individual no longer appears on an active user listing.
- Develop a process to maintain compliance with purchasing authority limitations set forth in the Riverside County *Purchasing Policy Manual*.
- Ensure personnel with purchasing responsibilities are trained on the Riverside County *Purchasing Policy Manual* and track their completion.

Audit Conclusion

We are not able to provide results on one of the five areas included in our audit scope. The Sheriff Department denied us the ability to evaluate the internal controls over the complaint processes against their own internal procedures with their refusal to provide us any information. Our objective was not only to validate department personnel are following policies and procedures, but also validate the department is achieving the objectives of the policies and reporting some of these complaints as intended in the transparency section of the Sheriff's website.

We were able to identify opportunities for improvement of internal controls relating to cash accounts held outside of the Treasury, inventory management - armory room, software access rights, and purchasing processes.

Cash Accounts Held Outside of the Treasury

Background

The Sheriff Department holds 41 bank accounts outside of the Riverside County Treasury. The purpose of these accounts is for various reasons which include bail and fines, CDs, civil monies, community services, corrections special events, emergency funds, estate funds, evidence, explorer post, gang task force, homeless outreach, indigent transportation, inmate trust funds, money market, and unclaimed money. Each account is maintained by the individual station/bureau. The amount within these accounts varies.

Standard Practice Manual 607, *To Establish and Maintain Checking Accounts Outside the County Treasury*, states that it is the responsibility of the "assigned trustor to each bank account ...[to] ensure compliance with the policies and procedures, [perform] timely reconciliations of bank accounts, [ensure] adequate segregation of duties regarding the administration of the account, [monitor] the continued need or appropriate structure for such accounts, and [determine] other oversight requirements as appropriate".

Objective

To verify the existence and adequacy of controls over Sheriff Department bank accounts held outside of the Treasury.

Audit Methodology

To accomplish these objectives, we:

- Obtained an understanding of departmental processes and procedures.
- Interviewed key personnel and obtained an overview of the bank accounts held outside of the Treasury.
- Obtained a listing of all accounts held outside of the Treasury from the department and compared to the list of accounts from Auditor-Controller's Office.
- Selected a sample of 5 bank accounts and obtained bank reconciliations for review months.

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- Analyzed the review, approval, and reconciliation process for the accounts selected.

Finding 1: Department Oversight of Accounts Held Outside of the Treasury

Individual stations and bureaus have the authority to open bank accounts held outside of the Treasury without prior knowledge and approval of the Administrative Services Division. The Administrative Services Division is reliant on self-reporting of the individual stations or bureaus to report any accounts that have been opened or closed during the year. This reporting does not occur immediately to the division and at times happens until the end of the fiscal year. This leads to inadequate oversight since consistent performance and review of bank reconciliations and oversight of bank account activity is not ensured. California Government Code 13401 (a)(1) states, "active oversight processes, including regular and ongoing monitoring processes, for the prevention and early detection of ... errors in program administration are vital to public confidence and the appropriate and efficient use of public resources." Standard Practice Manual 1001, *Internal Controls*, states, "duties are divided or segregated so that no one person has complete control over a key function or activity." The department has delegated the authority of the opening and closing of accounts to each individual station or bureau captain. Implementing adequate oversight with internal controls and a centralized approval process to open bank accounts held outside the Treasury, can help mitigate the risk of asset misappropriation.

Recommendation 1.1

Establish a procedure centralizing at the Administrative Services Division the approval, opening, and closing of all bank accounts.

Recommendation 1.2

Ensure there are adequate segregation of duties over the opening and closing of accounts held outside of the Treasury.

Finding 2: Effective Internal Controls

Based on our review of the bank accounts held outside of the Treasury, we identified the following:

- The Sheriff Department does not currently have policies and procedures in place over the management of bank accounts held outside the Treasury.

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- Eight (53%) out of 15 bank accounts reviewed were missing the following key elements:
 - Two bank accounts reviewed were not reconciled timely. One had a delay of 69 days and the other had a delay of 90 days.
 - Six reconciliations lacked the signature and date of when it was prepared and/or when it was reviewed. For three of the six, we were unable to determine the timeliness of the reconciliation completion.

Standard Practice Manual 1001, *Internal Control* states that, to maintain an effective system of internal control, "well-documented policies and procedures are established and maintained to promote employee understanding of job duties, provide day-to-day guidance to staff and help ensure continuity during employee absences or turnover." SPM 1001, *Internal Control* also states, "records are routinely examined and reconciled to determine that transactions were properly processed." Additionally, Standard Practice Manual 607, *To Establish and Maintain Checking Accounts Outside the County Treasury* states that it is the responsibility of the "assigned trustor to each bank account ...[to] ensure compliance with the policies and procedures [and perform] timely reconciliations of bank accounts..." The department does not have formal policies and procedures for managing bank accounts held outside of the Treasury. Adequate internal controls reduce the risk of errors, misappropriation of assets, and acts of unauthorized activities.

Recommendation 2.1

Develop policies and procedures that ensure bank reconciliations for the accounts held outside of the Treasury are adequately reviewed and approved to maintain compliance with the Standard Practice Manual 1001, *Internal Control*.

Recommendation 2.2

Ensure staff is adequately trained and adhere to the process that ensures bank reconciliations for the accounts held outside of the Treasury are adequately reviewed and approved to maintain compliance with the Standard Practice Manual 1001, *Internal Control*.

Inventory Management - Armory Room

Background

Perpetual inventory is an accounting method of maintaining up to date inventory records that accurately reflect the level of goods on hand. The ability to accurately count physical inventory is only one factor that must be considered in improving the reliability of inventory records. Physical inventory counts are critical in verifying that inventory exists, and that on-hand balances agree with records. Inaccurate and unreliable inventory information impairs the county's ability to (1) know the quantity, location, condition, and value of assets it owns, (2) safeguard its assets from physical deterioration, theft, loss, or mismanagement, (3) prevent unnecessary storage and maintenance costs or purchase of assets already on hand, and (4) determine the full costs of government programs that use these assets.

The inventory process has three primary areas where duties must be segregated: physical counting of assets, recording of transactions, and approval of transactions. Management must ensure that the normal job activities of the person performing the physical count do not include custodial activities such as receiving, shipping, and storing physical assets. Personnel recording transactions that affect the on-hand quantities should not be responsible for the physical custody of the inventory or approval of adjustments.

A fundamental element of internal control is the segregation of certain key duties. The basic idea underlying segregation of duties is that no employee or group of employees have complete control over a key function or activity. In general, the principal incompatible duties to be segregated are:

- Custody of assets
- Authorization or approval of related transactions affecting those assets
- Recording or reporting of related transactions

Objective

To verify the existence and adequacy of internal controls over Sheriff Department's inventories held in armory rooms.

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Audit Methodology

To accomplish these objectives, we:

- Obtained and documented all relevant policies and procedures over armory room inventory maintenance.
- Interviewed Sheriff Department management and obtained an overview of armory room inventory operations.
- Obtained an inventory listing of ammunition and firearms and selected a sample of items to count and observe ensuring items are adequately tracked, counted, and safeguarded.
- Reviewed supporting documentation for accuracy and segregation of duties.

Finding 3: Armory Room Internal Controls

Based on our review of the armory rooms for three Sheriff Department locations, we identified the following:

- Reporting requirements of inventory to the Auditor-Controller's Office through the year-end reporting process are not being followed as established under Standard Practice Manual 801, *Inventory of Materials and Supplies*.
- Twenty (67%) out of 30 items reviewed did not have any supporting documentation or an auditable trail to support the last time the items were counted or if those counts were reviewed and approved by a supervisor.
- Inventory items at one of the three locations are maintained on an excel spreadsheet and are updated when items are received or pulled. This spreadsheet is maintained solely by one staff member who is responsible for receiving items, pulling, and updating.
- Four (80%) out of the five inventory items that were counted at one of the locations did not reconcile to the counts in the internal spreadsheet maintained by personnel.
- One (3%) out of 30 items sampled were not found and no record was maintained to determine the whereabouts of the item.

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Standard Practice Manual 801, *Inventory of Materials and Supplies* states, departments are to “maintain segregation of duties, establish written [policies and] procedures, provide adequate supervision, [perform physical] counts, determine [the] frequency of counts, and ensure the completeness [and] evaluate the results of the counts.” The policy also requires approvals for any adjustments and year-end reporting responsibilities. The department does not have a process in place to adhere to Standard Practice Manual 801, *Inventory of Materials and Supplies*. This prevents the Sheriff Department from adequately assessing needs when planning, preparing, and strategizing for future inventory purchases, and increases the risk of inaccuracies, theft of items, and misuse of county resources.

Recommendation 3.1

Use an inventory management system such as Service Now, that tracks, maintains, and updates inventory counts in real time to ensure that counts are accurate and facilitate the year-end reporting processes in accordance with Standard Practice Manual 801, *Inventory of Materials and Supplies*.

Recommendation 3.2

Ensure physical inventory counts are periodically conducted and documentation of the counts, their review, and approval is maintained.

Recommendation 3.3

Ensure there are adequate segregation of duties for handling, tracking, and recording inventory items or develop compensating controls to monitor inventory items.

Software Access Rights

Background

System access controls within information systems ensure proper confidentiality, integrity, and availability to the data stored within the system. Authentication is a control which confirms a user's identity to provide access to a systems sensitive information. Sensitive information is any information that must be protected from unauthorized access to maintain the information security of an organization or an individual. Authentication is often achieved by using login credentials such as a username and password. Authentication relies on the presumption that the user is authorized to use the system and that only the user knows the login credentials to gain access.

Active directory is a directory service which allows the Sheriff Department Information Systems (Information Systems) to manage permissions and access to network resources, and linked data applications utilized by the department. When a user ends employment with the department, an email is sent to an end of service email group. One of the recipients of the email group is the Technical Service Bureau who is responsible for disabling active directory which removes permissions and network access through the creation of help desk tickets. These help desk tickets contain workflow tasks such as disabling e-mail accounts, active directory, data/application systems access, badge access, reclaiming software licenses, and reclaiming any equipment that may have been issued to an employee. A help desk ticket is not closed until all tasks within have been completed by Information Systems personnel.

If a system is not linked to active directory, the system access must manually be removed to ensure the account is disabled.

Objective

To verify the existence and adequacy of internal controls over access for critical information systems used by Sheriff Department.

Audit Methodology

To accomplish these objectives, we:

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- Obtained an understanding of County of Riverside Information Security Standard v1.0.
- Interviewed key personnel regarding the department's employee access termination processes.
- Obtained a listing of Sheriff Department staff.
- Performed testing on 23 sampled Sheriff Department employees terminated within the period of the audit.
- Obtained a listing of all critical Sheriff Department software systems and selected a sample of systems to test.
- Obtained a listing of active users for the systems selected.
- Verified access to systems were disabled.

Finding 4: Timely Termination of Access Rights to Data Applications

Twenty (87%) out of 23 terminated employees did not have their access rights terminated or disabled within 24 hours of ending employment with the Sheriff Department. The average time lapsed to disable active directory accounts was 13 days with the longest time lapsed being 99 days and the shortest being one day. Additionally, two (9%) out of 23 terminated employees reviewed still had access after employment ended as of the time of testing (May 2022). County of Riverside Information Security Standard v1.0, Section 4.1, *Account and Access Management*, states, "Accounts for terminated or transferred employees shall be disabled or removed on the day of termination or transfer." Sheriff Department does not have written policies and procedures that detail the process and requirements for deactivating user accounts when employees end employment with the department. When an account is not closed immediately after employment has ended, there is a security risk to the information maintained in the systems used by the department. Given the sensitivity of the information Sheriff Department maintains in their systems, safeguarding sensitive information needs to be of high priority.

Recommendation 4.1

Ensure the department is disabling active directory accounts on the day of an employee's termination or transfer from the department as required by County of Riverside Information Security Standard v1.0, Section 4.1, *Account and Access Management*.

Internal Audit Report 2022-018: Riverside County Sheriff-Coroner Department Audit

Recommendation 4.2

Establish policies and procedures for the immediate disabling of user access rights for terminated or transferred employee in accordance with County of Riverside Information Security Standard v1.0, Section 4.1, *Account and Access Management*.

Finding 5: Access to Systems

We identified 12 (100%) of out of 12 terminated employees continued to have access to systems not linked to active directory. An application that is not linked must be manually deactivated. A policy and process is currently not in place to ensure this manual step is occurring. Standard Practice Manual 1001, *Internal Controls*, identifies the need for “well-documented policies and procedures ... [to provide guidance to staff on the day-to-day duties]. When access to a system not linked to active directory is not manually deactivated, the credentials for the individual remain active and usable. For information systems that hold sensitive information, access credentials should be disabled upon termination to mitigate any risk associated with the information maintained in these systems.

Recommendation 5

Implement a process/procedure to ensure that systems that are not linked to active directory have a completed manual deactivation and verification that the individual no longer appears on an active user listing.

Purchasing Processes

Background

Riverside County Purchasing and Fleet Services Department is responsible for implementing policies and procedures set forth in the Riverside County *Purchasing Policy Manual* (December 31, 2021). The Director of Purchasing is the Purchasing Agent for Riverside County and can delegate his/her authority to Riverside County staff with limitations that vary depending on the level of authority granted. See Table A for a purchasing authority delegation summary:

Table A: Purchasing Authority Delegation Summary

Position	Purchase Order Authority	PO's Against PeopleSoft Contracts
Low Value Purchase Authority (LVPA)	\$5,000 per day per vendor	\$25,000 per day per vendor
Buyer I	\$25,000 per day per vendor	\$100,000 per day per vendor
Buyer II	\$50,000 per day per vendor	\$100,000 per day per vendor

Purchasing authority limitations will vary depending on whether purchases are made against county contracted vendors and non-county contracted vendors. The *Purchasing Policy Manual* states, "County staff may be granted LVPA upon successful completion of LVPO training. LVPA allows departmental staff the ability to issue purchase orders up to the amount of \$5,000 per day per vendor and issues purchase orders up the dollar value of \$25,000 against existing RivCoPro or PeopleSoft contracts."

Expenditures of \$5,000 or greater, require county departments to obtain a minimum of three written quotes from potential vendors to ensure the best use of taxpayer dollars. The *Purchasing Policy Manual* describes the splitting of purchase orders as follows, "Deliberate attempts to split orders, where the purpose is keeping total cost of each order down below bid limits, and failure to combine orders when practical for the best interest of the county in order to circumvent the limitations, is prohibited and may result in disciplinary actions reduced or suspended purchasing authority."

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Objective

To verify the existence and adequacy of internal controls over Sheriff Department's purchasing processes.

Audit Methodology

To accomplish these objectives, we:

- Obtained an understanding of county procurement policies and procedures.
- Interviewed key personnel regarding procurement processes.
- Obtained a listing of all purchase orders for Sheriff Department.
- Obtained a listing of all Sheriff Department personnel with delegated purchasing authority.
- Analyzed department expenditure data for the audit period to identify instances of split purchase orders at the \$5,000 and \$25,000 limitations.

Finding 6: Purchase Orders

Thirty-three of 3,347 purchase orders, totaling \$5.89M, were split and circumvented low value purchase authority limitations of \$25,000 per day per vendor for expenditures against contracted vendors. Additionally, seven of 8,902 purchase orders, totaling \$407,598, were split and circumvented low value purchase authority limitations of \$5,000 per day per vendor for expenditures against non-contracted vendors. The *Purchasing Policy Manual* states, "low value purchase authority allows departmental staff the ability to issue LVPOs up to the amount of \$5,000 per day per vendor and issues purchase orders up to the dollar value of \$25,000 against existing PeopleSoft Contracts." The *Purchasing Policy Manual* further states, "attempts to split orders, where the purpose is keeping total cost of each order down below bid limits, and failure to combine orders when practical for the best interest of the County in order to circumvent the limitations, is prohibited." The splitting of purchase orders circumvents requisitions and approving internal controls put in place to ensure compliance with county purchasing policies and mitigates risks of inappropriate purchasing practices. The splitting of purchase orders also circumvents the formal bid requirements designed to ensure the best use of taxpayer dollars.

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Recommendation 6.1

Develop a process to maintain compliance with purchasing authority limitations set forth in the Riverside County *Purchasing Policy Manual*.

Recommendation 6.2

Ensure personnel with purchasing responsibilities are trained on the Riverside County *Purchasing Policy Manual*.