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



ITEM: 2.10 (ID # 23243) MEETING DATE: Tuesday, October 17, 2023

FROM : AUDITOR CONTROLLER:

SUBJECT: AUDITOR-CONTROLLER: Internal Audit Report 2024-307: Riverside County Department of Waste Resources, Follow-up Audit, All Districts. [\$0]

RECOMMENDED MOTION: That the Board of Supervisors:

1. Receive and file Internal Audit Report 2024-307: Riverside County Department of Waste Resources, Follow-up Audit.

ACTION:Consent



MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Perez, seconded by Supervisor Spiegel and duly carried by unanimous vote, IT WAS ORDERED that the above matter is received and filed as recommended.

Ayes:	Jeffries, Spiegel, Washington, Perez and Gutierrez
Nays:	None
Absent:	None
Date:	October 17, 2023
XC:	Auditor Controller, Waste

Kimberly A. Rector Cler A Board Deputy

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

FINANCIAL DATA	Current Fisca	l Year:	Next Fisca	l Year:	Total Cost:	Ongoing Cost	t
COST	\$	0.0	\$	0.0	\$ 0.0	\$	0.0
NET COUNTY COST	\$	0.0	\$	0.0	\$ 0.0	\$	0.0
SOURCE OF FUNDS	Budget Adjus	Budget Adjustment: No					
					For Fiscal Yea	ar: N/A	

C.E.O. RECOMMENDATION:

BACKGROUND:

<u>Summary</u>

We completed a follow-up audit of the Riverside County Department of Waste Resources. Our audit was limited to reviewing actions taken as of June 21, 2023, to correct findings noted in our original audit report 2022-012 dated March 1, 2022. The original audit report contained two recommendations, all of which required implementation to help correct the reported findings.

Based on the results of our audit, we found that of the two recommendations:

- One of the recommendations was implemented.
- One of the recommendations was not implemented.

For an in-depth understanding of the original audit, please refer to Internal Audit Report 2022-012 included as an attachment to this follow-up audit report or it can also be found at <u>https://auditorcontroller.org/divisions/internal-audit/reports.</u>

Impact on Citizens and Businesses

Provide an assessment of internal controls over the audited areas.

SUPPLEMENTAL: Additional Fiscal Information Not applicable

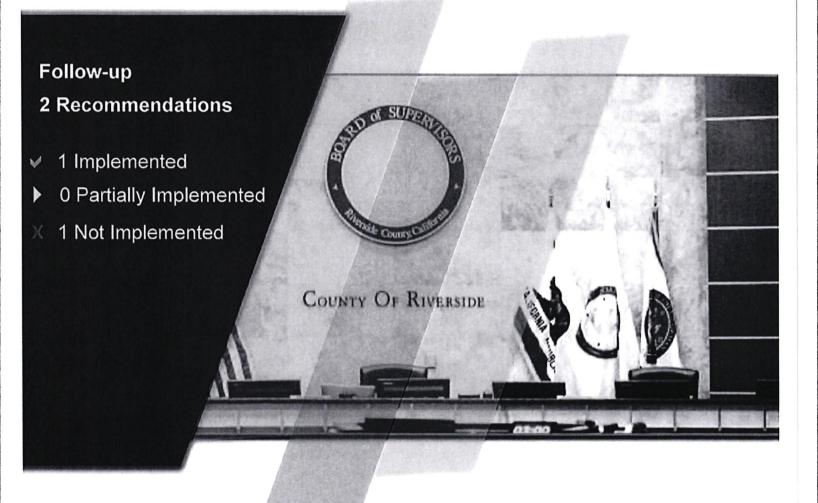
ATTACHMENTS:

A: Riverside County Auditor-Controller - Internal Audit Report 2024-307: Riverside County Department of Waste Resources, Follow-up Audit.

Office of Ben J. Benoit Riverside County Auditor-Controller

4080 Lemon Street, 11th Floor Riverside, CA 92501 (951) 955-3800

Internal Audit Report 2024-307



Riverside County Department of Waste Resources, Follow-up Audit

October 17, 2023



COUNTY OF RIVERSIDE OFFICE OF THE AUDITOR-CONTROLLER

County Administrative Center 4080 Lemon Street, 11th Floor P.O. Box 1326 Riverside, CA 92502-1326 (951) 955-3800 Fax (951) 955-3802



Ben J. Benoit County Auditor-Controller

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

October 17, 2023

Hans Kernkamp General Manager-Chief Engineer Riverside County Department of Waste Resources 14310 Frederick St. Moreno Valley, CA 92552

Subject: Internal Audit Report 2024-307: Riverside County Department of Waste Resources, Follow-up Audit

Dear Mr. Kernkamp:

We completed the follow-up audit of Riverside County Department of Waste Resources. Our audit was limited to reviewing actions taken as of June 21, 2023, to help correct the findings noted in our original audit report 2022-012 dated March 1, 2022.

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 reasonable assurance that our objective, as described in the preceding paragraph, is achieved. Additionally, the standards require that we conduct the audit to provide sufficient, reliable, and relevant evidence to achieve the audit objectives. We believe the audit provides a reasonable basis for our conclusion.

The original audit report contained two recommendations, all of which required implementation to help correct the reported findings. Based on the results of our audit, we found that of the two recommendations:

- One of the recommendations was implemented.
- One of the recommendations was not implemented.



Summary of the conditions from the original audit and the results of our review on the status of the implementation of the recommendations are provided in this report. For an in-depth understanding of the original audit, please refer to Internal Audit Report 2022-012 included as "Attachment A" of this audit report along with your department status letter as "Attachment B." You can also find the original audit report at https://auditorcontroller.org/divisions/internal-audit/reports.

We thank you and your staff for the help and cooperation. The assistance provided contributed significantly to the successful completion of this audit.

Ben J. Bonnio

Ben J. Benoit Riverside County Auditor-Controller

By: René Casillas, CPA, CRMA Deputy Auditor-Controller

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



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A. Internal Audit Report 2022-012

B. Status of Findings as Reported by Riverside County Department of Waste Resources on June 22, 2023.



Landfill Payment Collection Process

Finding 1: Review and Approval of Voided Transactions

"One hundred percent (82 out of 82) of the voided transactions sampled, were not approved in real time by designated personnel and segregation of duties were not in place for voided transactions. Standard Practice Manual 1001, Internal Controls, states, 'Authorization and approval: Transactions are authorized by a person assigned approval authority.' It further states, 'Segregation of duties: Duties are divided or segregated so that no one person has complete control over a key function or authority.' Waste Resources relies on employee knowledge and judgement to void transactions. Waste Resources, *Gate Fee Program Guide* does not state procedures for voided transactions to be approved and reviewed by authorized personnel. Gate Services Assistants initiating a transaction should not be able to void its own transaction. If one individual has responsibility for more than one of these duties it weakens the internal controls meant to prevent and monitor against cash misappropriation and loss of revenue."

Recommendation 1.1

"Ensure voided transactions are reviewed and approved by designated personnel."

Current Status 1.1: Not Implemented

Thirty of the 30 (100%) voided transactions selected for review were not reviewed and approved by designated personnel in real time. The 30 voided transactions sampled were reviewed during the ticket audit process (performed at a minimum of once a week), after the voids have been performed, and lacked evidence of approval by designated personnel. We recommend that all voided transactions are reviewed and approved by designated personnel within 24 hours and evidence of review and approval are documented including signature and date.

Management's Response

"On-site real time review of voided transactions is not feasible to due remote geographic landfill locations and limited supervisory staff. Beginning October 1, 2023, site staff shall be responsible to email copies of voided transactions to Gate Fee Supervisory staff for review at the end of their shift. Gate Fee Supervisory staff shall be



responsible to reconcile voided transactions and document review and approval and/or initiate investigation into validity of reason for void within one workday of receipt."

Recommendation 1.2

"Update *Gate Fee Program Guide* for processing voids to including supervisory approval of all voided transactions."

Current Status 1.2: Implemented

Attachment A

Internal Audit Report 2022-012

Riverside County Department of Waste Resources Audit

Report Date: March 1, 2022



Office of Paul Angulo, CPA, MA Riverside County Auditor-Controller 4080 Lemon Street, 11th Floor Riverside, CA 92509 (951) 955-3800

www.auditorcontroller.org



COUNTY OF RIVERSIDE OFFICE OF THE AUDITOR-CONTROLLER

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Paul Angulo, CPA, MA Riverside County Auditor-Controller

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

March 1, 2022

Hans Kernkamp General Manager-Chief Engineer Riverside County Department of Waste Resources 14310 Frederick Street Moreno Valley, CA 92553

Subject: Internal Audit Report 2022-012: Riverside County Department of Waste Resources Audit

Dear Mr. Kernkamp:

In accordance with Board of Supervisors Resolution 83-338, we audited the Department of Waste Resources to provide management and the Board of Supervisors with an independent assessment of internal controls over landfill payment collection process and purchasing process.

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.

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, management responded to each reported condition and recommendation contained in our report. Management's responses are included in the report. We will follow-up to verify that management implemented the corrective actions.

Paul Angulo, CPA, MA Riverside County Auditor-Controller

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By: René Casillas, CPA, CRMA Chief Internal Auditor

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



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Executive Summary

Overview

The Riverside County Department of Waste Resources (Waste Resources) is tasked with the protection of the general public's health and welfare by landfilling non-hazardous waste. The department manages five landfills and has a contract agreement for an additional private landfill. In addition to landfill management, the department provides different services that include recycling, illegal dumping clean up, hazardous waste collection, and graffiti abatement.

Waste Resources has a recommended budget of \$136.7 million for FY 2021-22 and 291 authorized positions. *County of Riverside, Fiscal Year* 2021-22 *Adopted Budget Volume* 1, 337.

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 landfill payment collection process and purchasing process. 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 August 25, 2021, through October 27, 2021, for operations from July 1, 2019, through October 27, 2021. Following a risk-based approach, our scope initially included the following:

- Department Loans Process
- Hauler Agreements
- Landfill Payment Collection Process
- Purchasing Process
- Write offs/Bad Debts Process

Through inquiry, observations, and limited examination of relevant documentation, it was determined through a risk assessment of department loans process, hauler agreements, and write offs of the bad debts process, that the risk exposure to Waste Resources associated with these business processes are well mitigated with internal



controls and are functioning as designed. Therefore, we focused our audit scope to internal controls over landfill payment collection processes and purchasing processes.

Audit Highlights

Summary of Existing Conditions

• Voided transactions are not approved in real time by designated personnel and segregation of duties were not present for transactions. By having appropriate review and approval for voided transactions it reduces the risk for misappropriation, loss of revenue, and protects the employee from scrutiny.

Summary of Improvement Opportunities

- Ensure voided transactions are reviewed and approved by designated personnel.
- Update the Gate Fee Program Guide for processing voids to including supervisory approval of all voided transactions.

Audit Conclusion

Based upon the results of our audit, we identified opportunities for improvement of internal controls relating to landfill payment collection process. However, we determined Waste Recourses' internal controls over purchasing process provide reasonable assurance that its objectives relating to these areas will be achieved. Reasonable assurance recognizes internal controls have inherent limitations, including costs, mistakes, and intentional efforts to bypass internal controls.



Landfill Payment Collection Process

Background

Waste Resources operates five landfills throughout Riverside County with an additional private landfill operated through an agreement with a private company. The department generates revenue for operations through gate fees for dumping waste in the landfills.

Gate fees are collected by the Gate Services Assistants (GSA) as customers enter the landfills. Gate fees are collected in four of the landfills and are assessed in accordance with the County of Riverside Board approved rates. Scale tickets are issued to each customer which captures the charge per ton, the type of refuse and location where the refuse originated. The GSAs collect cash, process credit/debit card transactions or customer account number information for deferred accounts. The Oasis Landfill is on a Permit Card system. Customers must complete an application for purchase of a Residential or Commercial Permit Card to use the landfill.

Each transaction processed by the GSAs are verified by office staff daily. Additionally, the office staff reconciles the daily bank deposits and sales cash collected. Reports are issued to capture the revenue collected, tonnage by site, refuse type, number of tickets, and type of customers.

Objective

To determine the existence and adequacy of internal controls over landfill dumping payment collection process.

Audit Methodology

To accomplish these objectives, we:

• Obtained an understanding of county ordinances and applicable standards.

• Conducted interviews and performed walk-throughs with Waste Resources personnel.

• Conducted on-site visits and observations for three landfills.



• Selected a sample of voided transactions for two landfills.

• Reviewed appropriate levels of management reviews and approvals for voided transactions.

Finding 1: Review and Approval of Voided Transactions

One hundred percent (82 out of 82) of the voided transactions sampled, were not approved in real time by designated personnel and segregation of duties were not in place for voided transactions. Standard Practice Manual 1001, Internal Controls, states, "Authorization and approval: Transactions are authorized by a person assigned approval authority." It further states, "Segregation of duties: Duties are divided or segregated so that no one person has complete control over a key function or authority." Waste Resources relies on employee knowledge and judgement to void transactions. Waste Resources, *Gate Fee Program Guide* does not state procedures for voided transactions to be approved and reviewed by authorized personnel. Gate Services Assistants initiating a transaction should not be able to void its own transaction. If one individual has responsibility for more than one of these duties it weakens the internal controls meant to prevent and monitor against cash misappropriation and loss of revenue.

Recommendation 1.1

Ensure voided transactions are reviewed and approved by designated personnel.

Management's Response

"Partially Concur. Every landfill transaction, including voided transactions, are reviewed and reconciled by Department accounting staff. Every day's landfill tickets are delivered to Gate Fee accounting staff who review every transaction for accuracy and adherence to procedure.

If the Gate Services Assistant (GSA) finds an error on a transaction while the customer is still at the window, they are allowed to void the transaction and rerun it to correct the mistake by performing the following steps:

• Run a replacement ticket, if applicable.



• Void the ticket in TIDES (Tonnage Information Data Entry System), which is where all transactions are processed, noting the reason and replacement ticket number, if applicable.

• Refund or collect additional monies due from the customer as applicable.

• Give the customer the Customer Copy of the voided transaction confirmation.

• Document the reason for the void and the replacement ticket number on the original ticket.

• Staple the Department Copy of the voided transaction confirmation to the original voided ticket.

• Write the voided transaction number on the Fee Collection Daily Report.

• Place any voided transactions on top of the ticket packet so that they are immediately visible to office staff.

• If the customer has already left the pay window, or for any reason the GSA does not have all three triplicate copies of the original voided ticket, the GSA must contact the oncall Sr. GSA, Gate Fee Program Supervisor, or Program Coordinator for approval prior to voiding the ticket. If unable to reach the aforementioned staff, the GSA must leave a voice mail or email explaining the reason why a void, replacement, or refund was necessary and why the GSA does not have all three copies (customer lost it, blew away, etc.)

Once the daily tickets are received in the office, all tickets, including cash, credit/ debit card, and deferred accounts are reconciled by transaction number, dollar amount, and quantity. Each GSA's cash deposits are verified to their safe deposit receipts and their total cash transactions as shown on their Transaction Detail Report. Credit/debit transactions are compared to the merchant reports and must match the total in the Gate Fee database. Department accounts must match the GSA's account transaction totals in Gate Fee. Because all tickets are sequentially numbered, during the audit of the day's tickets, accounting staff are able to determine if there are any missing tickets. The audit process also includes review of each voided transaction to confirm voided tickets were validated (reason for void noted on ticket and in the system), replaced by another transaction, or resulted in a credit. Upon completion, the audit/reconciliation process is



reviewed by program management and/or supervisory staff before finalizing in the Gate Fee System.

Although the Department of Waste Resources acknowledges that voided transactions are not approved in real time by supervisory personnel, voided transactions/ ticket errors are investigated for cause and responsible staff are held accountable and subject to discipline if the void/ error is due to negligence and/ or results in financial loss exceeding monthly tolerances or performance measures for that employee defined as follows:

• GSA shall have an average error ratio not greater than 0.1% (\$1.00 in \$1,000.00) per month.

• GSA shall process all customer transactions with an average ticket error ratio not greater than 0.2% (two tickets in 1,000) per month."

Actual/estimated Date of Corrective Action: N/A

Recommendation 1.2

Update *Gate Fee Program Guide* for processing voids to including supervisory approval of all voided transactions.

Management's Response

"Concur, The Gate Fee Program Guide was updated on January 5, 2022 to document the process step that was inadvertently omitted in the current version that includes Program Management/Supervisory staff review of voided transactions that occurs when daily tickets are reviewed."

Actual/estimated Date of Corrective Action: January 5, 2022



Purchasing Process

Background

Riverside County Purchasing and Fleet Services Department is responsible for implementing policies and procedures set forth in the Riverside County *Purchasing Policy Manual* (September 1, 2016). 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 summary of delegation of purchasing authority.

Table A: Summary of Delegation of Purchasing Authority

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

Purchasing authority limitations will vary depending on whether purchases are made against county contracted vendors and non-county contracted vendors. "County staff may be granted low value purchase authority upon successful completion of required training. Low value purchase authority 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 PeopleSoft contracts" (*Purchasing Manual, September 2016*).

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.



Objective

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To verify the existence and adequacy of controls over department expenditures.

Audit Methodology

To accomplish these objectives, we:

- Obtained an understanding of county procurements policies and procedures.
- Interviewed key personnel regarding procurement expenditure processes.

• Obtained a listing of all expenditures for Waste Resources during the review period of the audit to analyze and identify split purchase orders.

• Obtained a listing of all Waste Resources staff 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: None Noted

Based upon the results of our audit, we determined internal controls over purchasing processes provide reasonable assurance that its objective related to this area will be achieved.

Attachment B



Hans W. Kernkamp, General Manager-Chief Engineer

The following are the current status of the reported findings and planned corrective actions contained in Internal Audit Report 2022-012: Riverside County Department of Waste Resources Audit.

Hans Kernkamp

Digitally signed by Hans Kernkamp Date: 2023.06.21 16:14:23 -07'00'

Authorized Signature

Date

Finding 1: Review and Approval of Voided Transactions

One hundred percent (82 out of 82) of the voided transactions sampled, were not approved in real time by designated personnel and segregation of duties were not in place for voided transactions. Standard Practice Manual 1001, Internal Controls, states, "Authorization and approval: Transactions are authorized by a person assigned approval authority." It further states, "Segregation of duties: Duties are divided or segregated so that no one person has complete control over a key function or authority." Waste Resources relies on employee knowledge and judgement to void transactions. Waste Resources, Gate Fee Program Guide does not state procedures for voided transactions to be approved and reviewed by authorized personnel. Gate Services Assistants initiating a transaction should not be able to void its own transaction. If one individual has responsibility for more than one of these duties it weakens the internal controls meant to prevent and monitor against cash misappropriation and loss of revenue.

Current Status

Reported Finding Corrected? X Yes No

The Gate Fee Program Guide was updated to clarify void procedures and minor revisions have been made since then as noted by highlighted text below. All voided transactions are reviewed/signed off by a supervisor during the ticket audit process.

Recommendation 1.1

Ensure voided transactions are reviewed and approved by designated personnel.

Management Reply

"Partially Concur. Every landfill transaction, including voided transactions, are reviewed, and reconciled by Department accounting staff. Every day's landfill tickets are delivered to Gate Fee accounting staff who review every transaction for accuracy and adherence to procedure.

If the Gate Services Assistant (GSA) finds an error on a transaction while the customer is still at the window, they are allowed to void the transaction and rerun it to correct the mistake by performing the following steps:



Hans W. Kernkamp, General Manager-Chief Engineer

• Run a replacement ticket, if applicable.

• Void the ticket in TIDES (Tonnage Information Data Entry System), which is where all transactions are processed, noting the reason and replacement ticket number, if applicable.

• Refund or collect additional monies due from the customer as applicable.

Give the customer the Customer Copy of the voided transaction confirmation.

• Document the reason for the void and the replacement ticket number, if applicable, on the original ticket.

• Staple the Department Copy of the voided transaction confirmation to the original voided ticket.

• Write the voided transaction number on the <u>Gate Fee Daily Report (old version</u> Fee Collection Daily Report).

• Place any voided transactions on top of the ticket packet so that they are immediately visible to office staff.

• If the customer has already left the pay window, or for any reason the GSA does not have all three triplicate-copies of the original voided ticket, the GSA must contact the on-call Sr. GSA, Gate Fee Program Supervisor, or Program Coordinator for approval prior to voiding the ticket. If unable to reach the aforementioned staff, the GSA must leave a voice mail or email explaining the reason why a void, replacement, or refund was necessary and why the GSA does not have all three copies (customer lost it, blew away, etc.)

Once the daily tickets are received in the office, all tickets, including cash, credit/-debit card, and deferred accounts are reconciled by transaction number, dollar amount, and quantity. Each GSA's cash deposits are verified to their safe deposit receipts and their total cash transactions as shown on their Transaction Detail Report. Credit/debit transactions are compared to the merchant reports and must match the total in the Gate Fee database. Department accounts must match the GSA's account transaction totals in Gate Fee. Because all tickets are sequentially numbered, during the audit of the day's tickets, accounting staff are able to determine if there are any missing tickets. The audit process also includes review of each voided transaction to confirm voided tickets were validated (reason for void noted on ticket and in the system), replaced by another transaction, or resulted in a <u>credit/refund</u>. Upon completion, the audit/reconciliation process is reviewed by program management and/or supervisory staff before finalizing in the Gate Fee System.

Although the Department of Waste Resources acknowledges that voided transactions are not approved in real time by supervisory personnel, voided transactions/ ticket errors are investigated for cause and responsible staff are held accountable and subject to discipline if the void/ error is due to negligence and/ or results in financial loss exceeding monthly tolerances or performance measures for that employee defined as follows:



Hans W. Kernkamp, General Manager-Chief Engineer

• GSA shall have an average error ratio not greater than 0.1% (\$1.00 in \$1,000.00) per month.

• GSA shall process all customer transactions with an average ticket error ratio not greater than 0.2% (two tickets in 1,000) per month."

Actual/estimated Date of Corrective Action: N/A

Recommendation 1.2

Update *Gate Fee Program Guide* for processing voids to including supervisory approval of all voided transactions.

Management Reply

"**Concur**, The Gate Fee Program Guide was updated on January 5, 2022 to document the process step that was inadvertently omitted in the current version that includes Program Management/Supervisory staff review of voided transactions that occurs when daily tickets are reviewed."

Actual/estimated Date of Corrective Action: January 5, 2022

Current Status

Corrective Action: X Fully Implemented Partially Implemented Not

Not Implemented

Description of the corrective action taken (or pending action and estimated date of completion for planned corrective action that is partially or not implemented).

The Gate Fee Program Guide was updated to clarify void procedures and minor revisions have been made since then as noted by highlighted text below. All voided transactions are reviewed/signed off by a supervisor during the ticket audit process.