

DATE: May 3, 2023
AGENDA ITEM: 6b
SUBJECT: Fraud Risk Assessment FY23 Marian
PREPARED BY: Florence, Chief Financial Officer

BACKGROUND:

Wasatch Front Regional Council, along with all other Utah local governments, is required by the Utah State Auditor to conduct a Fraud Risk Assessment and present it to our board by the end of each fiscal year. This assessment is a self-scored questionnaire designed to evaluate existing policies, procedures, and personnel to determine a risk level to the entity for potential fraud. The score an entity receives, on the basis of this assessment, does not indicate fraud actually exists or doesn't exist within the organization.

The best approach to reducing the risk of fraud is a combination of (1) a commitment to and a culture of ethical conduct within the organization that starts with a tone set by leadership, and (2) the development of and adherence to adequate policies that are governed by these high ethical standards. Therefore, of utmost importance at WFRC is the support of the Executive Director and the members of the Budget Committee in establishing and maintaining such culture and policies.

Beginning in 2017 and as recently as January of this year, WFRC went through an extensive review and update of all our accounting, administrative and personnel policies. As part of the update we included the best practices as defined by the Utah State Auditor's Office. The policies were reviewed by team members within the State Auditor's Office, WFRC's external independent auditors, outside legal counsel, some of our partner agencies, and of course WFRC staff and Budget Committee. These updated policies were adopted by the full WFRC Council. WFRC's Accounting, Administrative and Personnel Policies incorporate statements of ethical behavior as defined in the Utah Public Officers' and Employees' Ethics Act (Title 67, Chapter 16) and employees are trained on what is expected of them in this regard. The policies also reflect all other applicable state and federal laws and regulations.

In 2020 and 2021 the Fraud Risk Assessment presented to the Council gave WFRC a score of 355 which put the agency in a "low risk" category. In 2022, WFRC's score increased to 365 or "very low risk" with the hiring of Marian Florence, who holds CGFM certification. Included in this packet is the internally scored Fraud Risk Assessment Questionnaire from the Utah State Auditor's Office for FY23. **Overall WFRC remains in the "very low risk" category with a score of 365.** Following is a line-by-line explanation of how the questionnaire was scored.

1. WFRC received the highest score possible on the issue of **separation of duties**, which the State Auditor identifies as the single most important policy to reduce the risk of fraud, and we agree. Although we are a small organization with a small staff we have ensured that those who have custody of assets are not the same as those who account for assets.

2. WFRC received the highest score possible on the list of **written policies** due to the extensive review and regular update of our policies.
3. In March of 2022 WFRC hired a new Chief Financial Officer. The new CFO, though not a licensed or certified CPA, is a **Certified Government Financial Manager (CGFM)**. WFRC accounting staff regularly consults with its external auditors on accounting and internal control matters as they arise.
4. Each January WFRC employees are required to sign a disclosure of potential conflicts of interest and an **Ethical Behavior** Pledge. These completed forms are on file.
5. Many of WFRC's board members complete **Fraud Risk training** through their primary public body, e.g., a city or county, and not through WFRC. It is recommended that board members view the Utah State Auditor's online training every four years.
6. The CFO and Accounting Specialist have both received at least 40 hours of **financial training** each year.
7. WFRC's personnel policy states that any employee who suspects or knows of any fraud, waste or abuse of resources must report such to any member of the Area Coordinator team, senior management, or the external independent auditor. WFRC has established an email **fraud "hotline"** for any person that knows of or suspects fraud to report such. Further, any person making such a report is subject to whistleblower protections.
8. WFRC policies ensure that **internal auditing** is ongoing, and our Accounting and Administrative Policies formalize the controls in place. Our annual external audit examines internal controls.
9. The Council's Budget Committee acts as its **audit committee**. Each year they meet with the external independent auditor and discuss the results of the audit and any recommendations that arise from it. Certain members of the Budget Committee are interviewed individually by the independent audit team and asked to provide their input and perspective on the Council's financial statements, policies, procedures and accounting staff.

EXHIBITS:

Fraud Risk Assessment

CONTACT INFORMATION:

Marian Florence (801) 949-9576, mflorence@wfrc.org
Andrew Gruber (801) 824-0055, agruber@wfrc.org



Fraud Risk Assessment

INSTRUCTIONS:

- Reference the *Fraud Risk Assessment Implementation Guide* to determine which of the following recommended measures have been implemented.
- Indicate successful implementation by marking “Yes” on each of the questions in the table. Partial points may not be earned on any individual question.
- Total the points of the questions marked “Yes” and enter the total on the “Total Points Earned” line.
- Based on the points earned, circle/highlight the risk level on the “Risk Level” line.
- Enter on the lines indicated the entity name, fiscal year for which the Fraud Risk Assessment was completed, and date the Fraud Risk Assessment was completed.
- Print CAO and CFO names on the lines indicated, then have the CAO and CFO provide required signatures on the lines indicated.

Fraud Risk Assessment

Continued

*Total Points Earned: 365 /395 *Risk Level: Very Low Low Moderate High Very High
> 355 316-355 276-315 200-275 < 200

	Yes	Pts
1. Does the entity have adequate basic separation of duties or mitigating controls as outlined in the attached Basic Separation of Duties Questionnaire?	x	200
2. Does the entity have governing body adopted written policies in the following areas:		
a. Conflict of interest?	x	5
b. Procurement?	x	5
c. Ethical behavior?	x	5
d. Reporting fraud and abuse?	x	5
e. Travel?	x	5
f. Credit/Purchasing cards (where applicable)?	x	5
g. Personal use of entity assets?	x	5
h. IT and computer security?	x	5
i. Cash receipting and deposits?	x	5
3. Does the entity have a licensed or certified (CPA, CGFM, CMA, CIA, CFE, CGAP, CPFO) expert as part of its management team?	x	20
a. Do any members of the management team have at least a bachelor's degree in accounting?		10
4. Are employees and elected officials required to annually commit in writing to abide by a statement of ethical behavior?	x	20
5. Have all governing body members completed entity specific (District Board Member Training for local/special service districts & interlocal entities, Introductory Training for Municipal Officials for cities & towns, etc.) online training (training.auditor.utah.gov) within four years of term appointment/election date?		20
6. Regardless of license or formal education, does at least one member of the management team receive at least 40 hours of formal training related to accounting, budgeting, or other financial areas each year?	x	20
7. Does the entity have or promote a fraud hotline?	x	20
8. Does the entity have a formal internal audit function?	x	20
9. Does the entity have a formal audit committee?	x	20

*Entity Name: Wasatch Front Regional Council

*Completed for Fiscal Year Ending: June 30, 2023 *Completion Date: May 3, 2023

*CAO Name: Andrew Gruber *CFO Name: Marian Florence

*CAO Signature:  *CFO Signature: 

*Required

Basic Separation of Duties

See the following page for instructions and definitions.

	Yes	No	MC*	N/A
1. Does the entity have a board chair, clerk, and treasurer who are three separate people?	X			
2. Are all the people who are able to receive cash or check payments different from all of the people who are able to make general ledger entries?	X			
3. Are all the people who are able to collect cash or check payments different from all the people who are able to adjust customer accounts? If no customer accounts, check "N/A".	X			
4. Are all the people who have access to blank checks different from those who are authorized signers?	X			
5. Does someone other than the clerk and treasurer reconcile all bank accounts OR are original bank statements reviewed by a person other than the clerk to detect unauthorized disbursements?	X			
6. Does someone other than the clerk review periodic reports of all general ledger accounts to identify unauthorized payments recorded in those accounts?	X			
7. Are original credit/purchase card statements received directly from the card company by someone other than the card holder? If no credit/purchase cards, check "N/A".	X			
8. Does someone other than the credit/purchase card holder ensure that all card purchases are supported with receipts or other supporting documentation? If no credit/purchase cards, check "N/A".	X			
9. Does someone who is not a subordinate of the credit/purchase card holder review all card purchases for appropriateness (including the chief administrative officer and board members if they have a card)? If no credit/purchase cards, check "N/A".	X			
10. Does the person who authorizes payment for goods or services, who is not the clerk, verify the receipt of goods or services?	X			
11. Does someone authorize payroll payments who is separate from the person who prepares payroll payments? If no W-2 employees, check "N/A".	X			
12. Does someone review all payroll payments who is separate from the person who prepares payroll payments? If no W-2 employees, check "N/A".	X			

* MC = Mitigating Control

Basic Separation of Duties

Continued

Instructions: Answer questions 1-12 on the Basic Separation of Duties Questionnaire using the definitions provided below.

☺ If all of the questions were answered “Yes” or “No” with mitigating controls (“MC”) in place, or “N/A,” the entity has achieved adequate basic separation of duties. Question 1 of the Fraud Risk Assessment Questionnaire will be answered “Yes.” 200 points will be awarded for question 1 of the Fraud Risk Assessment Questionnaire.

☹ If any of the questions were answered “No,” and mitigating controls are not in place, the entity has not achieved adequate basic separation of duties. Question 1 of the Fraud Risk Assessment Questionnaire will remain blank. 0 points will be awarded for question 1 of the Fraud Risk Assessment Questionnaire.

Definitions:

Board Chair is the elected or appointed chairperson of an entity’s governing body, e.g. Mayor, Commissioner, Councilmember or Trustee. The official title will vary depending on the entity type and form of government.

Clerk is the bookkeeper for the entity, e.g. Controller, Accountant, Auditor or Finance Director. Though the title for this position may vary, they validate payment requests, ensure compliance with policy and budgetary restrictions, prepare checks, and record all financial transactions.

Chief Administrative Officer (CAO) is the person who directs the day-to-day operations of the entity. The CAO of most cities and towns is the mayor, except where the city has a city manager. The CAO of most local and special districts is the board chair, except where the district has an appointed director. In school districts, the CAO is the superintendent. In counties, the CAO is the commission or council chair, except where there is an elected or appointed manager or executive.

General Ledger is a general term for accounting books. A general ledger contains all financial transactions of an organization and may include sub-ledgers that are more detailed. A general ledger may be electronic or paper based. Financial records such as invoices, purchase orders, or depreciation schedules are not part of the general ledger, but rather support the transaction in the general ledger.

Mitigating Controls are systems or procedures that effectively mitigate a risk in lieu of separation of duties.

Original Bank Statement means a document that has been received directly from the bank. Direct receipt of the document could mean having the statement 1) mailed to an address or PO Box separate from the entity’s place of business, 2) remain in an unopened envelope at the entity offices, or 3) electronically downloaded from the bank website by the intended recipient. The key risk is that a treasurer or clerk who is intending to conceal an unauthorized transaction may be able to physically or electronically alter the statement before the independent reviewer sees it.

Treasurer is the custodian of all cash accounts and is responsible for overseeing the receipt of all payments made to the entity. A treasurer is always an authorized signer of all entity checks and is responsible for ensuring cash balances are adequate to cover all payments issued by the entity.