Minutes of Buncombe County Audit Committee November 10, 2021 9:00 AM 200 College Street, Room 310

Members Present: Chairperson Kendra Ferguson, Commissioner Al Whitesides, Dr. Glenda Weinert, Danny

Yelton, and Larry Harris,

Members Absent: Commissioner Robert Pressley and Mike Knepshield

County Staff Present: Kelly Houston (Internal Auditor), Don Warn (Finance Director), Avril Pinder (County

Manager), Mark Goodwin (Chief Information Security Officer), Monica Stewart (Service

and Continuity Manager), and Michael Frue (Senior Attorney)

Others Present: N/A

The Audit Committee Chairperson, Kendra Ferguson, called the meeting to order at 9:01 AM.

Review and Approval of Meeting Minutes - Chairperson Kendra Ferguson

The August 3, 2021 meeting minutes were presented and reviewed. The September 16, 2021 memo was presented and reviewed. There were no revisions or discussion.

Commissioner Al Whitesides moved to approve the minutes as presented. Larry Harris seconded the motion. The motion passed unanimously.

New CISO and Cybersecurity Update - Mark Goodwin & Monica Stewart

Mark Goodwin introduced himself as the new Chief Information Security Officer for Buncombe County, providing information on his background as well as his observations for his first few weeks on the job. Mr. Goodwin stated his team will conduct internal assessments and looks forward to working with the Internal Audit Department on validating the assessments. He explained his team has a role both on the technical side and the policy side. Monica Stewart, the Service and Continuity Manager on the IT Security Team, introduced herself and experience.

[Chairperson Ferguson] At one time, the Audit Committee had an inventory of IT systems, but the number at that time was incomplete. Has that been completed?

[Mr. Goodwin] There are multiple inventories, such as equipment, equipment classification and IT systems and integrations. The next task is validating the inventory.

[Mr. Harris] Mr. Harris asked about encryption.

[Mr. Goodwin/Ms. Stewart] Both explained the differences in encryption levels.

[Chairperson Ferguson] The Audit Committee is interested in learning more about the IT risks of the County and feels the future reports will be helpful. She also asked about the IT Governance Committee.

[Mr. Goodwin] He explained that the IT Governance Committee (ITGC) is mostly budgetary and strategic now, but there are plans to incorporate IT risk into the process. He explained the IT Department's senior management structure.

[Ms. Stewart] She explained the GRC Manager role she occupies and the work with vendor risks and onboarding vendors she does.

[Mr. Goodwin] He explained that it is not a matter of when we get hit, it is how bad we get hit. He also discussed the strong partnerships within the State of North Carolina that are a benefit to NC governments.

Fiscal Year 2021 External Audit Update - Don Warn

The Finance Department is currently reviewing the financial statements. Due to the new federal funding this year, the federal government has not yet released the Compliance Supplement for that funding. Mr. Warn said the current expectation is that the Compliance Supplement might be released the week of Thanksgiving. CLA is on hold for further testing until the Compliance Supplement is released. To his knowledge, there are no issues or findings at this point. The Finance Department also had turnover that affected a key position for the external audit. The former Accounting and Reporting Manager resigned in July 2021; however, the Finance Department recently promoted Glenn Murray, who is currently the Disbursements Manager, to the Accounting and Reporting Manager role. Due to the delay in the release of the Compliance Supplement at the federal level, the audit contract will need to be amended to modify the due date until February 28, 2022.

Commissioner Al Whitesides made the motion to amend the audit contract with CLA to extend the due date to February 28, 2022. Larry Harris seconded the motion. The motion passed unanimously.

Internal Audit Director Recruitment Update - Chairperson Kendra Ferguson

Chairperson Ferguson reported to the Committee that there were a limited number of applicants in the second round of the job posting and that it is a difficult position to fill due to the specialized nature of the work. She would like to propose the topic for discussion of using a recruiting firm to assist in the search.

Mr. Warn presented initial information on potentially using a recruiting firm. He presented a draft RFP to the Audit Committee that could be used should the Committee decide to pursue the formal route. The RFP can be amended to what the Committee needs. County policy allows for services under \$90,000 to be an informal process (obtaining quotes from at least three providers), and it is expected that using a recruiting firm would be under the \$90,000 threshold. The informal process would also be more efficient.

Commissioner Whitesides inquired on if there are any local recruiting firms. Mr. Warn stated he knew of one and recommends choosing a firm that is specialized with the type of role the Committee is wishing to fill. County Manager Avril Pinder also mentioned that DHG has a search function, that she prefers the Committee use email instead of phone calls to obtain quotes, and for the Committee to also do reference checks on the potential firms.

Mr. Yelton asked about the going rate for using recruiting firms. Chairperson Ferguson stated that in the non-government industry, the average appears to be around 25% of the annual salary of the position being recruited. Mr. Frue stated that the County paid approximately \$20,000 to the recruiting firm when the County Manager was hired.

Chairperson Ferguson also stated that she would like the Internal Audit Director job to stay posted until a recruiting firm is retained and begins work on the recruitment process.

Dr. Glenda Weinert made the motion to go through the informal process of obtaining quotes via email, use the RFP template as a scope of work, for the Audit Subcommittee to the evaluate quotes, for the full Audit Committee to make a recommendation to County Management on which firm to use. Larry Harris seconded the motion. The motion passed unanimously.

Internal Audit Business Plan Update – Internal Auditor Kelly Houston

Ms. Houston explained that the original Business Plan was brought to the Committee for approval in December 2020. The Business Plan is each department's specific action items that tie up to the Countywide Strategic Plan. This year, the Office of Strategy and Innovation worked with each department to make sure what was set last year was still actionable. Overall, Internal Audit's goals and objectives are the same, but more tangible steps were added this year, especially regarding the Equity Goal. Throughout the year, staff have participated in more DEI trainings and workgroups and have learned more about building equity initiatives into the audit plan. The changes are minor but add depth to the Internal Audit Department's plan. While the changes are minor, the Committee should be aware of the changes, as the Business Plan impacts operations and budgetary decisions. The first three goals are related to building Internal Audit's foundation, assessing how Internal Audit is adding value to the organization and the Peer Review Process. The fourth goal is the Equity Initiatives, not only for staff understanding, but also adding an equity lens into audit work. The Association of Local Government Auditors

(ALGA) has recently published templates and guides that help Internal Audit Departments build the equity lens into audit services.

Dr. Glenda Weinert made a motion to approve the Strategic Business Plan as presented. Commissioner Al Whitesides seconded the motion. The motion passed unanimously.

Fiscal Year 2023 Internal Audit Department Budget Proposal – Internal Auditor Kelly Houston

Ms. Houston presented the Fiscal Year 2023 Internal Audit Department Budget proposal to the Committee for consideration and approval. The budget request is coming to the Committee earlier in the year than normal, due to the Budget Department's implementation of budget software. The following areas were highlighted from the presentation, which is attached in the minutes:

- Based on where the County has been in the past, it is Internal Audit's mission to be a model to other governments, not only in North Carolina, but also in the ALGA community. Other governments are looking to Buncombe County as a model, particularly in how the County has Internal Audit independent of management and the level of involvement and authority of the Audit Committee.
- The three areas of Internal Audit's work:
 - Audit Services
 - Nonaudit Services
 - Significant challenge for Buncombe County most Internal Audit's work is in the nonaudit services area, which will be a challenge for Peer Review.
 - o Administrative Work
- Internal Audit Vision and Organization Chart
 - o 3 Vacant Positions
 - Proposed Future Positions
 - This is still the vision for Internal Audit. For Internal Audit to demonstrate how much value it can add to the County, the Board of Commissioners, the Audit Committee and Management, resources are needed to be able to perform audit services, in addition to the nonaudit services and administrative work already performed.
- FY 2023 request totals \$ 552,165
 - o This figure is subject to change due to non-discretionary items that are budgeted at the county-level.
 - The audit software is budgeted in the IT Department.
 - The \$30,000 for a potential office move is recommended by the Budget Department. There is not a current update, but the Budget Department recommends planning for it in case it does happen.
 - The request is based on three positions. The IT Auditor position will be requested in a future fiscal year.
 - The only change that is being requested is to reclassify an Internal Auditor position, which will allow that position to supervise and train new staff, which will allow a Director to do strategic and visionary work for the Department.
 - [Chairperson Ferguson] The reclassification of this position has been requested for the past two years but not approved. This position is in the same role as the entry-level auditor, and therefore does not include training and supervision of the entry-level auditor.
 - [Dr. Weinert] What is the challenge with this reclassification?
 - [Chairperson Ferguson] The information the Committee has received is that it is pending the compensation study.
 - [Dr. Weinert] Dr. Weinert states several concerns as follows: There is a structure that is required to operate this department; it is not just us creating another layer. It is what is best practice and is required to protect the integrity of this department, and more importantly, the integrity of this County. I am fascinated that this continues to be a request, let alone neglected to the level that it appears to be neglected. In my mind, separate from the operations of this County, the oversight and integrity, which is what Internal Audit is charged with, is being neglected. We don't seem to be giving it the importance that it needs. It seems to be pushed back and pushed back and pushed back.

- [Mr. Harris] We had an unproductive time during the pandemic, and there was a decision to hold off on adding more staff until the software was implemented. In my assessment, not much got done for a year.
- [Mr. Frue] Part of the problem with the compensation study is that classifications across the County had gotten out of whack years ago for various reasons. The difficulty HR is having is reclassifying a position specific to a department without comparing it to other positions in the County. HR is close to completing that process.
- [Chairperson Ferguson] I am concerned that this is a larger issue across the county, from a retention and recruitment perspective.
- [Commissioner Whitesides] Let me provide a little bit of history. In 2016, there were no job descriptions except in Health and Human Services. The prior County Manager did things different. We have come a long way from a where we were. We have got to change and get up to date. And with the compensation study almost complete, we are in a good place to get there in the next six months to a year.
- [Chairperson Ferguson] Another concern is that the level of experience we need for the Internal Audit Director and the need to manage a team. However, the candidate is going to have to buildout a department, which is what this Director will have to do. Having someone with that level of experience to have to come in and do the day-to-day and train a brand-new person is not attractive.
- [Dr. Weinert] What concerns me the most is this may be the most important department in this County. [Commissioner Whitesides agrees.] It is frustrating where we have lost our one resource and our history she has basically done all of this. Now we are a point where a new Director is going to have to rebuild the most important department in the County that will not be functioning. That is critical. The frustrating part is that their job is very difficult. Investigations are not enjoyed or liked, but necessary. If you are doing your job, investigations are not problematic; they are affirming. And if there is a problem, the intent is to correct it and move forward. Not all problems are intentional. But at the end of the day, we must be intentional to ensure this department is allowed to do what it needs to do.
- [Chairperson Ferguson] All of this discussion is why Ms. Houston and I have drafted this budget request with the change to reclassify this position. And we may need to consider this reclassification sooner than the new budget year, so the new Director is not hindered in recruiting new staff. The Audit Committee makes the recommendation of the annual budget of the Internal Audit Department and then it goes through the County Management process. The Committee will need to stay updated on the process.
- [Chairperson Ferguson] I presented an Audit Committee update last week at the Board of Commissioners meeting and that has opened a level of communication with the Commissioners. That did include informing them about our vacancies.
- o Importance of staying independent and staying compliant with Yellow Book (*Government Auditing Standards*) is key to Internal Audit having the credibility and authority to add value to Buncombe County.
- o Peer Review is required every three years. We have not yet had our first Peer Review.
 - Internal Audit must start doing audit services.
 - The last audit was the evidence room audit when Sheriff Duncan was transitioning out of office.
- o [Mr. Goodwin] Is there external contract availability to get some audit services performed? Two years without an audit is risky.
 - [Chairperson Ferguson] The budget has been a constraint. I discourage using CLA due to that firm being the external auditor. However, that is something to consider if the search for a Director goes on much longer.
- o There was discussion regarding benchmarking with ALGA
 - We are behind the average in audit services hours
 - We are significantly above the average in nonaudit services hours and admin/indirect hours
 - We are behind in budget resources
 - The ALGA Benchmarking report is from 2018 COVID has delayed the 2-year update.

- o [Mr. Yelton] We've approved budgets in the past that got cut down before approved, but nonetheless, we have not spent all the money because we cannot find or keep the people. The biggest problem is finding people. I think Mark had a good idea to consider an outside contractor.
- O [Chairperson Ferguson] The amount would depend on what the target area is for an outside auditor, who could leverage the work Ms. Houston and the former Director did on the risk assessment. There have also been roadblocks to Internal Audit being able to complete their work in obtaining access and other things. That kind of environment is not going to change by hiring an outside auditor. And I know that is contributing to our turnover. That is an internal issue that must be addressed.

Larry Harris made a motion to accept the Fiscal Year 2023 budget request for the Internal Audit Department as presented. Dr. Glenda Weinert seconded the motion. The motion passed unanimously.

Internal Auditor Transition to New Role Discussion - Chairperson Kendra Ferguson

Chairperson Ferguson asked the IT Security team in attendance about Role-Based Provisioning (RBP) and the need for Ms. Houston to keep her auditor access as it currently is while she is covering Internal Audit duties until a Director is hired and trained. Mr. Goodwin explained that RBP is designed that a person has one job, and a person does not carry the duties of one job to the new jobs and wind up with access to things down the road they don't need. Ms. Stewart explained there have been instances where this has happened – where someone has had two roles – and if there is sufficient approval for that, that would be fine. There are quarterly access reviews of access. Commissioner Whitesides wants to be fair to Ms. Houston and the ask of her helping the Audit Committee should be time specific. A deadline will give the Committee a deadline to work towards. Mr. Goodwin asked if there are any segregation of duties conflicts. Ms. Houston explained that her current access is to enter her own timecard and to post transactions to the Internal Audit budget, but the access for the new position is not yet known. At the time that access is provided for the new role, Ms. Houston will work with IT Security to ensure that no segregation of duties conflicts exist.

Larry Harris made the motion for Kelly Houston to remain her current access as Internal Auditor until March 31, 2022 and reassess then if necessary. Danny Yelton seconded the motion. The motion passed unanimously.

Internal Audit Update - Chairperson Kendra Ferguson and Kelly Houston

Chairperson Ferguson shared that Internal Auditor Kelly Houston is moving to the Legal and Risk Department. In the interim, Ms. Houston will continue investigations, Audit Committee work, and other critical matters of Internal Audit. [Mr. Frue agreed with his understanding that there will be overlap in Ms. Houston's new role and her continuing to assist Internal Audit in critical functions.] Her concern is the appearance of Ms. Houston being under management's authority in the new role and losing the independence of investigations. It is important to get the Internal Audit Department staffed quickly. We also need to have good working relationships with management while allowing Internal Audit staff do what they are tasked to do and remain independent of management. A lot of departments don't understand what Internal Audit does. In addition, Internal Audit was tasked with things that Internal Audit should not be assigned by management. An example was Let's Talk responses – this task was assigned to Internal Audit at the start of the COVID and did not get taken from Internal Audit until after the former Director left (July 2021). Mr. Frue stated the Audit Committee could request to meet with the Board if they feel their concerns are not getting heard.

Dr. Glenda Weinert made a motion to change the December 7, 2021 Audit Committee time from 9:00 AM until 10:00 AM and request a meeting with the Board of Commissioners at 11:00 or 11:30 AM (or other time as proposed by the Board of Commissioners and/or Clerk to the Board). Danny Yelton seconded the motion. The motion passed unanimously.

Ms. Houston updated the Committee on the Internal Audit Department's activities since the last meeting. The report is attached to the minutes.

The main item to discuss is a change in a software implementation. The Committee has been hearing updates on the Conflict of Interest (COI) Disclosures system through Navex Global. This process started last Spring and was slightly delayed upon the former Director's resignation. The implementation kicked off in July 2021 and was nearing completion in late August. During discussions with management on the wording of the employee survey, it was decided by management to not use the

system and to instead build the process in the current ERP system, Workday. Internal Audit is working with Legal on if the contract can be canceled and what the financial impacts would be.

[Commissioner Whitesides] Why are we going to Workday?

[Ms. Houston] That was a management decision, as they prefer to do as much in Workday as possible.

[Chairperson Ferguson] How did the Navex Global project come about?

[Ms. Houston] The County Manager had requested Internal Audit come up with a way of tracking employee family relationships (this request was pre-COVID). During a meeting with Navex Global, they shared some new products, one of which being the COI Disclosures Module. It is a survey that is sent to all employees to disclose various COIs. The project was agreed upon in Spring 2021. Ms. Stewart also had a huge part of the implementation process, because Internal Audit and IT had to reconcile Active Directory and Workday employees.

[Chairperson Ferguson] So it is not just the cost of the contract, it is also the cost of lost staff hours and more staff hours developing the process in Workday.

Ms. Houston also sent a list of potential audit projects to the Committee and is attached to the minutes. The Committee also received copies of recently completed investigation reports. Investigation reports are not published online, and Internal Audit works with the Legal Department on what reports are subject to public record and which ones are not. Chairperson Ferguson asked the Committee to take the time to read the reports, as there are some repeat patterns in some of the reports.

Chairperson Ferguson also mentioned a concern about there is not a reporting method from HR to Internal Audit, which is stated as a requirement in the Personnel Ordinance. Her concern is Internal Audit having the authority to investigate HR processes, not other HR issues such as supervisor complaints. How does the Audit Committee know if HR has received complaints about HR processes? Mr. Frue stated that the language in the Personnel Ordinance needs to be clarified. He also stated that sometimes people do not have the best interests in mind and sometimes weaponize the information provided. Ms. Houston reiterated that there have been issues of recurring complaints, and that she tried to manage this with County Central communications and in-person meetings with the staff of the department, but that every report must be taken seriously.

Public Comment

There were no members of the public in attendance at the November 10, 2021 meeting.

Meeting Schedule Reminder for Calendar Year 2021

The following dates are for scheduled meetings of the Audit Committee for calendar year 2021:

• Tuesday, December 7, 2021 at 10:00 AM

Chairperson Ferguson advised the Committee to expect some additional meetings in the coming months as the Internal Audit Director position is recruited. A determination on meeting location will be made based on the status of the COVID pandemic and communicated to the Committee members, staff and public via email and public-facing website. Tentatively, future meetings are scheduled to be in-person based on current trends in the COVID pandemic. Each of these proposed meeting dates aligns with regularly scheduled meeting dates for the Board of Commissioners. If an Audit Committee meeting is needed outside of the adopted regular schedule, it will be advertised in accordance with special meeting requirements.

Adjournment

Commissioner Al Whitesides moved to adjourn the meeting. Larry Harris seconded the motion. The motion passed unanimously. The November 10, 2021 Audit Committee meeting was adjourned at 11:20 AM.

STRATEGIC BUSINESS PLAN FY 2022 Internal Audit Department

Kelly Houston, CIA, CGAP, CFE

Overview / Description of Services

THE BUNCOMBE COUNTY INTERNAL AUDIT DEPARTMENT SUPPORTS THE BUNCOMBE COUNTY BOARD OF COMMISSIONERS, COUNTY MANAGEMENT, THE EXTERNAL AUDIT COMMITTEE, AND RESIDENTS OF BUNCOMBE COUNTY IN ASSESSING ACCOUNTABILITY, TRANSPARENCY, AND CONTINUOUS IMPROVEMENT IN COUNTY OPERATIONS. THE DEPARTMENT SEEKS TO INDEPENDENTLY AND OBJECTIVELY ASSESS AND REPORT ON MANAGEMENT'S CONTROLS AND PERFORMANCE RELATED TO:

1) GOVERNANCE; 2) COMPLIANCE WITH APPLICABLE LAWS, REGULATIONS, POLICIES AND PROCEDURES; 3) ACCURACY OF DATA; 4) EFFICIENT AND EFFECTIVE USES OF RESOURCES FOR COUNTY SERVICES; 5) SECURITY OVER COUNTY RESOURCES AND RECORDS; 6) RISK IDENTIFICATION AND MANAGEMENT; AND 7) FRAUD, WASTE AND ABUSE PREVENTION AND DETECTION.

Mission Statement

DRIVEN BY THE HIGHEST PROFESSIONAL AND ETHICAL STANDARDS, THE INTERNAL AUDIT DEPARTMENT WILL PERFORM HIGH QUALITY WORK WITH COMPETENCE, INTEGRITY, OBJECTIVITY, AND INDEPENDENCE THAT PROVIDES ACCOUNTABILITY AND HELPS IMPROVE THE COUNTY'S OPERATIONS AND SERVICES.

	Operational Excellence						
Tier 1 Goal:	Tier 1 Goal: Foster an Internal Business Culture Focused on Continuous Improvement						
Tier 2 Goal: Ensigovernment aud	ure Buncombe County Internal Audit processes are designed and implemented to align with national liting standards						
Initiative 1	Finalize Internal Audit governance documents, policies and procedures to ensure consistency and compliance with Government Auditing Standards.						
Actions	 Ensure consistency in governance documents Separate audit and non-audit procedure manuals Identify and address any gaps or inconsistencies in the draft policies and procedures from national government auditing standards 						
Initiative 2	Complete the self-assessment process						
Actions	 Build the internal self-assessment process and document management system Use the Association of Local Government Auditors (ALGA) Peer Review Checklist to conduct a self-assessment Catalog any deficiencies 						
Initiative 3	Address any deficiencies discovered through the self-assessment process						
Actions	 Prioritize the listing of deficiencies Correct the deficiencies in order of importance or difficulty 						
Performance Measure	 Rating on Self-Assessment Peer Review Checklist with a pass rating of "Generally Conforms" by 2025 Data Source: ALGA Self-Assessment Peer Review Checklist Document provided by third party 						
	 Target: Complete Initiative 1 in Fiscal Year 2022 Complete Initiative 2 in Fiscal Year 2023 Complete Initiative 3 in Fiscal Year 2024 Pass rating of "Generally Conforms" by 2025 						
Collaborating partners	We expect to work with Information Technology on a technology solution for audit management, quality control, risk assessment, and documentation retention, which are all key components of a successful Peer Review. We also expect to work with the Audit Committee, Board of County Commissioners and County Management to ensure our governance documents are in compliance with national governmental auditing standards.						

Focus Area:	Operational Excellence						
Tier 1 Goal:	Fier 1 Goal: Foster an Internal Business Culture Focused on Continuous Improvement						
Tier 2 Goal: Ensure Buncombe County Internal Audit processes add value to Buncombe County's mission, goals, and objectives, and meets the expectations of Internal Audit's stakeholders							
Initiative 1	Complete annual risk assessment countywic controls, risk management, and governance	le to identify recurring or new risks and evaluate processes					
Actions Initiative 2	large, etc.)Compile the results into a risk-based sna	ne activities of the Internal Audit Department					
initiative 2	Conduct audits in accordance with the initia	tives as defined in Goal 1.					
Actions	operations	ures to deliver audit services esses that increase efficiency and effectiveness of ach audit to ensure compliance with Government					
Initiative 3	Formalize and assess how Internal Audit is r	neeting the expectations of stakeholders					
Actions	 Create and utilize a post-audit survey to be completed by the auditee Provide at least one formal Internal Audit update to the Audit Committee annually, and request feedback from the Committee based on the reporting of Internal Audit's results. Provide at least one formal Internal Audit update to the Buncombe County Board of Commissioners annually, and request feedback from the Board based on the reporting of Internal Audit's results. Provide at least one formal Internal Audit update to the County Manager annually, and request feedback from the County Manager based on the reporting of Internal Audit's results. 						
Performance Measure	 Percent stakeholder satisfaction with Internal Audit communications Data Source: Audit Committee Meeting Minutes Board of County Commissioners Meeting Minutes Survey reports Target: Average of 85% or higher by 2025 						
Collaborating partners	We expect to work with Information Technology on a technology solution for audit management, quality control, risk assessment, and documentation retention, which are all key components of an Internal Audit Department effectively and efficiently meeting the needs of stakeholders. We also expect to work with the Audit Committee, Board of County Commissioners and County Management to ensure Internal Audit is meeting the expectations of adding value.						

Focus Area: Operational Excellence Tier 1 Goal: Foster an Internal Business Culture Focused on Continuous Improvement						
	² 2 Goal: Ensure Buncombe County Internal Audit's ongoing compliance with national government auditing ndards, which will increase the Department's credibility and authority to add value to Buncombe County vernment					
Initiative 1	Request external peer review from the Association of Local Government Auditors (ALGA)					
Actions	 Complete the formal request Complete timeline and travel arrangements for the onsite work Send the Peer Review Team the required assessment documentation for completion before onsite work Secure workspace for the onsite external team 					
Initiative 2	Work collaboratively with the ALGA external peer review team while they are conducting onsite examination					
Actions	 Participate in interviews requested by external peer review team from ALGA Participate in working sessions with the external peer review team in reviewing Internal Audit's governance, audit management, and quality control procedures 					
Initiative 3	Respond to the ALGA external peer review team's report and distribute the findings as required					
Actions	 Review and respond to the ALGA external peer review team's findings Participate in exit conference with the ALGA external peer review team Issue final report to Audit Committee, Board of County Commissioners, Management, and publish on public-facing website Formalize plan for addressing any identified areas for improvement 					
Performance Measure	 Rating on Peer Review Report with an overall defined conformance rating of "Generally Conforms" by 2025 Data Source: ALGA Peer Review Report Third Party, Independent Peer Review Team 					
	Target: Complete 20% by 12/31/2023 Complete 40% by 12/31/2024 Complete 40% by 06/30/2025 Pass rating of "Generally Conforms" by 2025					
Collaborating partners	We expect to work with Information Technology in working on a technology solution for audit management, quality control, risk assessment, and documentation retention, which are all key components of a successful Peer Review. We also expect to work with Information Technology in order to secure access for the external peer review team to have the ability to review our audit management system and documents. In addition, we will need to work with County Management to secure a working space for the external peer review team when they are conducting onsite work. We expect to work with the Association of Local Government Auditors (ALGA) for external peer review services.					

Focus Area:							
Tier 1 Goal: Ensure Representative and Inclusive Practices are Reflected in Decision Making							
	Tier 2 Goal: Goal # 4: Increase awareness of equity issues through trainings, workgroups, and other initiatives for all Internal Audit staff						
Initiative 1	Collaboration with the Association of Local Government Auditors (ALGA) Committee on Diversity, Equity, and Inclusion						
Actions	 Attend trainings sponsored by the ALGA DEI Committee Participate in workgroups sponsored by the ALGA DEI Committee Review DEI Committee materials as distributed 						
Initiative 2	Collaboration with Buncombe County teams on equity						
Actions	 Attend County sponsored training opportunities on equity Participate in County workgroups to provide input from the Internal Audit perspective and align Internal Audit's procedures with the equity lens adopted by the County. 						
Initiative 3	Evaluate equity initiatives of the County and offer recommendations for improvements						
Actions	 Identify opportunities for the Internal Audit Department to add value to Buncombe County's goals of diversity, equity and inclusion Develop actionable equity inquiries based on training and workgroups from the County and audit profession Apply the equity inquiries into applicable audit services 						
Performance Measure	 Number of equity initiatives completed by the collective Internal Audit staff at least 10 total completed by 2025 Internal Spreadsheet Audit Management Software – Staff Qualifications 1 activity per year per Internal Audit staff member – FY2021 1 activity per year per Internal Audit staff member – FY2022 1 activity per year per Internal Audit staff member – FY2023 1 activity per year per Internal Audit staff member – FY2024 1 activity per year per Internal Audit staff member – FY2025 						
Collaborating partners	We expect to work with many Buncombe County departments on this Tier 2 goal. Equity is a woven thread that in the baseline of Buncombe County staff. As Internal Audit staff learn and participate, we expect to use the equity lens in our daily work, which includes all County departments.						



FY 2023 Budget Request

Presented by

Kelly Houston, CIA, CGAP, CFE
Internal Auditor





Internal Audit Mission and Goals

- Mission: Driven by the highest professional and ethical standards, the Internal Audit Department will perform high quality work with competence, integrity, objectivity, and independence that provides accountability and helps improve the County's operations and services.
- ✓ <u>Stakeholders:</u> Buncombe County residents, Buncombe County Board of Commissioners, Audit Committee, Buncombe County management, and other parties, such as external auditors.
- ✓ Goals Supporting Buncombe County's Strategic Plan:
 - Ensure Buncombe County Internal Audit processes are designed and implemented to align with national government auditing standards
 - Focus Area = Operational Excellence
 - Ensure Buncombe County Internal Audit processes add value to Buncombe County's mission, goals, and objectives, and meets the expectations of Internal Audit's stakeholders
 - ✓ Focus Area = Operational Excellence
 - ✓ Ensure Buncombe County Internal Audit's ongoing compliance with national government auditing standards, which will increase the Department's credibility and authority to add value to Buncombe County Government
 - ✓ Focus Area = Operational Excellence
 - ✓ Increase awareness of equity issues through trainings, workgroups, and other initiatives for all Internal Audit staff
 - ✓ Focus Area = Equity

Internal Audit Responsibilities

Audit Services

- A. Independently and objectively assess and report on management's controls and performance related to:
 - Governance
 - Compliance with applicable laws, regulations, policies and procedures
 - Accuracy of data
 - Efficient and effective uses of resources for County services
 - Security over County resources and records
 - Risk identification and management
 - Fraud, waste and abuse prevention and detection efforts
- B. Conducting audits in accordance with Government Auditing Standards, issued by the US Government Accountability Office
 - Planning
 - Fieldwork
 - Risk and Controls Testing
 - Reporting
- C. Performing Risk Assessments to maximize use of Internal Audit resources
- D. Quality Assurance and Improvement processes as required by Government Auditing Standards
- E. Reporting to stakeholders
- F. Follow-up audits
- G. Findings and issues tracking



Internal Audit Responsibilities

Nonaudit Services

Internal Audit must follow the guidelines established within Government Auditing Standards to ensure adequate independence in performing nonaudit services.

- A. Investigations, as required by the Buncombe County Personnel Ordinance
 - Employee Ethics Report Line
 - Let's Talk public reporting platform
 - Directly from employees or external parties
 - Partnership with Human Resources on personnel-related investigations
 - Support to County departments on internal investigations
- B. Support to external auditors or investigators as needed
- C. Process reviews
- D. Facilitated self-assessments for the COSO Internal Control Framework
- E. Trainings for all County staff (COSO, fraud awareness, etc.)
- F. Departmental support in an advisory capacity, including serving in a variety of County workgroups
- G. Departmental resources for reference on best practices
- H. Work on management's behalf
 - Monthly review of auto-approval transactions, in response to external audit findings
 - Other monitoring projects as needed, so long as independence is not impaired



Internal Audit Responsibilities

Administrative

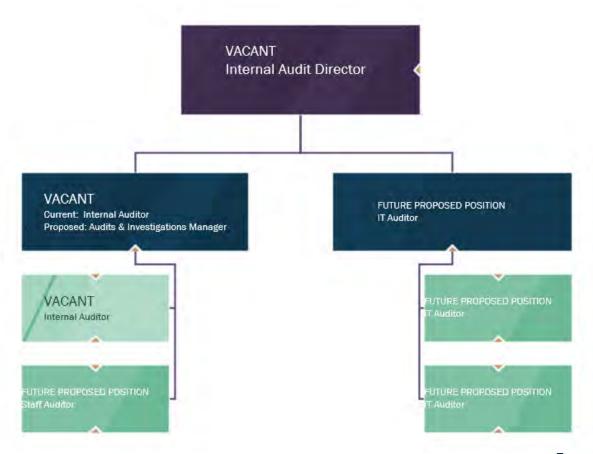
- A. Preparing and monitoring the budget of the Internal Audit Department
- B. Implementing and tracking the performance of the Internal Audit Business Plan
 - Alignment with the Buncombe County Strategic Plan
- C. Ongoing Continuing Professional Education, as required by *Government Auditing Standards*
- D. Support to the Audit Committee
 - Assistance in planning meetings, agendas, materials and securing meeting space
 - Preparing and publishing meeting minutes
 - Advertising meetings as required
- E. Participation in various management meetings throughout the County
- F. Software implementation and ongoing framework maintenance
- G. IT Needs Assessments and testing for auditor access
- H. Outreach efforts with other local government auditing professionals to improve the practice of local government internal auditing



Internal Audit Vision

Based on historical events occurring in Buncombe County, it is the desire of the Buncombe County Internal Audit Department to become a leader in North Carolina and in the ALGA Community — to set the tone for what Internal Audit in NC local government and peer communities must be to build & maintain the trust of residents.

- Utilize technology to do more with less
- Focus on the highest risks to the County
- Build an Internal Audit team covering various competencies to maximize Internal Audit coverage
- Be a leader that other local governments look to for guidance and direction on best practices







FY 2023 Budget Request and Budget History

	FY	/ 2023 Audit		FY 2022		FY 2022	FY 2021 Audit		FY 2021		FY 2020 Audit		FY 2020
		Committee	Audi	t Committee	Ma	anagement	Committee	M	lanagement		Committee	N	/lanagement
		Request		Approved	1	Approved	Approved		Approved		Approved		Approved
Salary	\$	285,211	\$	388,200	\$	224,844	\$ 306,855	\$	180,535	Ş	242,981	\$	176,730
Benefits	\$	134,019	\$	174,354	\$	107,212	\$ 150,448	\$	84,735	Ş	117,506	\$	81,770
Training	\$	12,150	\$	17,800	\$	12,800	\$ 11,980	\$	10,925	Ş	7,100	\$	4,500
Travel	\$	13,000	\$	21,100	\$	17,200	\$ 21,100	\$	14,735	Ş	2,935	\$	3,345
Office Supplies	\$	4,000	\$	5,000	\$	4,500	\$ 3,500	\$	3,500	Ş	2,000	\$	1,500
Meeting Supplies	\$	700	\$	700	\$	700	\$ -	\$	-	Ş	-	\$	-
Dues & Subscriptions	\$	4,300	\$	4,000	\$	3,500	\$ 3,200	\$	3,200	Ş	3,225	\$	1,125
Contracted Services	\$	61,000	\$	35,000	\$	72,124	\$ 50,000	\$	40,000	Ş	20,000	\$	20,000
Non-Discretionary: Insurance & Bonds	\$	2,125	\$	-	\$	2,125	\$ 610	\$	1,214	Ş	-	\$	-
Non-Discretionary: Telephone	\$	2,160	\$	2,880	\$	1,499	\$ 2,880	\$	1,400	Ş	1,980	\$	1,400
Local Mileage	\$	500	\$	1,000	\$	-	\$ 1,000	\$	-	Ş	-	\$	-
Education & Program Materials	\$	3,000	\$	3,000	\$	3,000	\$ 1,500	\$	1,500	Ş	-	\$	-
Software	\$	-	\$	70,000	\$	-	\$ 85,000	\$	-	Ş	-	\$	-
Office Move	\$	30,000	\$	23,700	\$	-	\$ -	\$	-	<u> </u>	-	\$	-
TOTALS	\$	552,165	\$	746,734	\$	449,504	\$ 638,073	\$	341,744	\$	397,727	\$	290,370
Variance (Management Approved					\$	(297,230)		\$	(296,329)			\$	(107,357)
Compared to Audit Committee Approved)		d)			\$	70,000							
					\$	(227,230)							
					\$701	K moved to IT Budget							1

FY 2023 Budget Request

Highlights:

- Currently have 3 positions All Vacant as of November 2021
 - Internal Audit Director
 - 2 Internal Auditors
- The IT Auditor was planned for request in FY 2023 but will be moved to a future fiscal year.
- Placeholder budget for potential move of Internal Audit Department office space

Why is the FY 2023 Budget Request less than the FY 2022 Budget Request?

- In FY 2022, Internal Audit has 2 staff and were asking for 2 additional staff.
- 06-30-2021, the Internal Audit Director resigned position unfilled as of 11-04-2021.
- 11-01-2021, the Internal Auditor announced she is moving to another County position.
- The IT Auditor position will be put on hold, as it is unrealistic to expect a department to go from zero staff to four staff in a short time.

Why Does Internal Audit Need Resources?

- Compliance with *Government Auditing Standards* increases the Internal Audit Department's credibility and authority to add value to Buncombe County Government and provides the assurance to external auditors that the work of the Internal Audit Department is independent and can be relied upon.
 - Requirement for Peer Review (an external audit by another organization of Internal Audit's compliance with Government Auditing Standards) = Every 3 Years
 - Buncombe County Internal Audit has not yet had its first Peer Review.

Challenges:

- Since the Internal Audit Department's creation, we have not had the resources needed to complete both audit services and nonaudit services.
- The limited resources prohibit the Internal Audit Department from auditing even the highest-risk areas. (See supplemental list of proposed audits)
- The limited resources hinder the Department's ability to meet the milestones of the Business Plan, which aligns with the County Strategic Plan.
- Maintaining the required independence in the nonaudit services asked of the Internal Audit Department is an
 ongoing challenge, but a requirement per Government Auditing Standards.



The Challenges In Detail

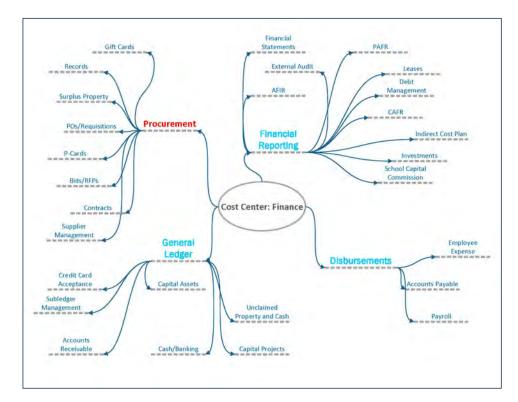
- Employee Ethics Report Line
 - Fiscal Year 2020 = 21 reports
 - Fiscal Year 2021 = 47 reports
 - Fiscal Year 2022 = 15 reports (as of 11-04-2021)
- Internal Investigations
 - Fiscal Year 2020 = 6 investigations
 - Fiscal Year 2021 = 7 investigations
 - Fiscal Year 2022 = 0 (as of 11-04-2021), 1 potential (pending further information)
- Let's Talk Monitoring
 - Fiscal Year 2020 = 1,103 reports
 - Fiscal Year 2021 = 1,053 reports
 - Fiscal Year 2022 = 232 reports (as of 11-04-2021)
- Departments are requesting audits
- Auto-Approvals of Elected and Appointed Officials
- Policy Review (advisory capacity)
- Participation in various management groups (Management Advisory Group, RACE for Equity Co-Design Team, etc.)
- See supplement list of proposed audits



The Challenges In Detail

- Government Auditing Standards
 - 5.15-5.16: Requirements: Human Resources
 - 5.17-5.20: Application Guidance: Human Resources
 - 8.16: Addressing audit risk
 - 8.31-8.32: Requirements: Assigning Auditors
- Current inventory of 242 County Departments and Divisions within those departments
 - 24 Additional Cost Centers not directly associated with one department/division
 - See "How is a Cost Center Narrowed Down to an Auditable Area" in next 2 slides
- Current inventory of 446 IT Systems, Integrations, Databases and Web Services identified by the IT Department
 - NOTE: The IT Department advised that this inventory is not yet complete.
- COSO Framework adopted in October 2017; Not Yet Implemented
- No formal Enterprise Risk Management process in which Internal Audit can leverage work from
- Adequate number of staff needed to perform adequate quality assurance and improvement processes as required by *Government Auditing Standards*, and as designed by default in the audit management software (Preparer, Detail Reviewer, and General Reviewer)

How is a Cost Center Narrowed Down to an Auditable Area?



Records

Surplus Property

POs/Requisitions

Procurement

Contracts

Supplier

Management

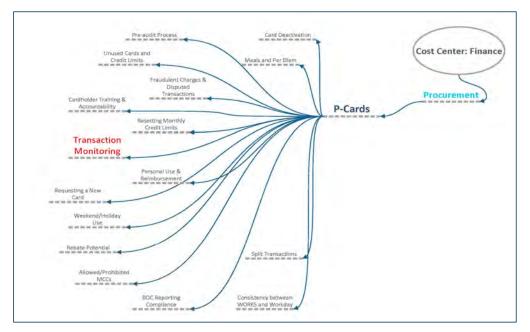
Anagement

Step 1: Define the major programs of a Cost Center

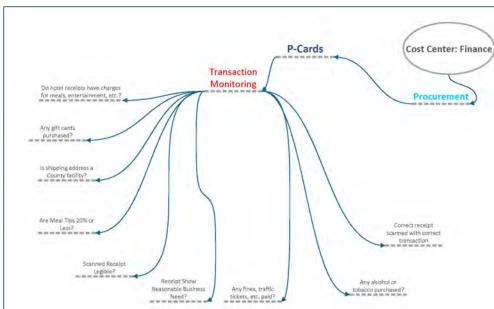
Step 2: Define the major functions of a program



How is a Cost Center Narrowed Down to an Auditable Area?



Step 3: Define the components of that function



Step 4: Define the audit objectives of that component. Audit objectives must be specific.

FY 2023 Budget Request

Operating Costs Explained

- Training & Travel
 - Based on the assumption that travel will resume in Fiscal Year 2023
 - Government Auditing Standards require that each audit staff, regardless of professional certifications, obtain at least 80 hours of CPE in every 2-year period, with 24 of those hours specific to government.
 - Staff with professional certifications may have additional CPE requirements.
 - Training & Travel costs calculated based on known conferences and trainings (ALGA annual conference, NC Fraud Conference, and COSO) as well as online trainings that are announced during the year, as applicable.
- Office Supplies
 - Based on estimate projected from prior expenditures of a 2-person staff
- Meeting Supplies
 - Supplies such as water, snacks, printed materials, and supplies needed for Audit Committee meetings, COSO trainings, Risk Assessment meetings, etc.
- Dues and Subscriptions
 - Memberships with applicable organizations such as the Institute of Internal Auditors (IIA), Association of Local Government Auditors
 (ALGA), and Association of Certified Fraud Examiners (ACFE)

FY 2023 Budget Request

Operating Costs Explained (Continued)

- Contracted Services
 - Navex Global Contract (Employee Ethics Report Line, COI Disclosures pending cancellation)
 - Planned expenditures for third-party support for implementation of the data analytics module
- Non-Discretionary Telephone
 - Cost of cell phone for staff, based on the expectation of in-the-field work
- Education & Program Materials
 - Cost of COSO training materials, other resources for training & assisting County departments
- Software is budgeted in the IT Budget
- Office Move
 - NOTE: The County is currently undergoing a space/facilities study. It is unknown at this time if Internal Audit will be moving offices or not. At the recommendation of the Budget Department, they advise to plan for this cost earlier on as a one-time expense, as it is easier to plan up front and not need it, than to ask for it late in the budget cycle.
 - This estimate is based on current pricing from Staples, with whom the County has a contract with.



FY 2023 Budget Request Benchmarking with ALGA

	Buncombe		
Statistic	County	ALGA	Variance
Average Number of Auditors	3	8	(5)
Average % of Audit Services Hours	5.91%	51%	-45.09%
Average % of Nonaudit Services Hours	43.57%	18%	25.57%
Average % of Admin/Indirect Hours	50.52%	32%	18.52%
Average Budget for IA with 3-5 Staff	\$522,165	\$833,883	(\$311,718)
Average % of IA Budget to Org Budget (3-5 staff)	0.10%	0.18%	-0.08%
Average Budget Per IA FTE (3-5 staff)	\$174,055	\$185,386	(\$11,331)



Department	Focus
Agriculture and Land Resources	Farm Equipment Rentals
Agriculture and Land Resources	Camp WILD Grant Compliance
Agriculture and Land Resources	Outreach Contests - Controls
Agriculture and Land Resources	Cost Share Programs Testing
Agriculture and Land Resources	Conservation Easements
Air Quality	Compliance Audit
Air Quality	Fees and Fines
Air Quality	Asbestos and Demolition Permits
Air Quality	Open Burning/Dust Complaints
Air Quality	Permitting Facilities
Budget	Lapsed Salary Review
Budget	Budget Amendment Testing
Budget	Line Item Transfer Testing
Clerk to the Board	Donated Property Process
	<u> </u>
Clerk to the Board	Testing BC Developed Software Systems
Clerk to the Board	Committees of the BOC Compliance
Communications & Public Engagement	Responsiveness to Residents
Communications & Public Engagement	Community Markets Testing and Effectiveness
Communications & Public Engagement	Equity in Services Offered
Compliance	HIPAA
Compliance	Password Policy
Countywide	Amazon Purchases (Potential for altered invoices)
Countywide	CJIS Compliance
Countywide	Grants Process - Monitoring BC as recipient
Countywide	Grants Process - Compliance with Grant Received
Countywide	Grants Process - Compliance with Grant Distributed
Countywide	Grants Process - Applying for Grants
Countywide	Grants Process - Reporting Grant Requirements
Countywide	Grants Process - Monitoring Subrecipients
Countywide	Access Controls Audit
Countywide	SSN Verification Process
Countywide	Reasonableness of Overtime
Countywide	Overtime in Public Safety
Countywide	Verifying Accuracy of Timecards/Approval Process
Countywide	Testing for misues of inclement weather paycode & overpayments
Countywide	Outsourced Contracts - Monitoring Process
Countywide	Outsourced Contracts - Meeting Compliance Requirements
Countywide	Debt Set Off Program
Countywide	Cash Handling and Deposits
Countywide	Cash and Revenue Reconciliation
Countywide	Economic Development Incentives & ROI
Countywide	Holiday Pay Consistency
Countywide	Control Environment - Employees Not Taking Leave Time
Countywide	Do individual departments complete risk assessments?
Countywide	Intergovernmental Shared Services - CJIS, 911
Countywide	Policy Compliance Audits (from library of BC Policies)
Countywide	Uniform and Shoe Purchases for Employees
Countywide	Employees Working Secondary Employment-Compliance to Personnel Ordinance
Countywide	Employees Working Secondary Employment - Ensuring on Own Time
Countywide	Employee Records in Multiple Systems
Countywide	Cobblestone - Contract Compliance

Focus
No Bid Contracts
Process of Monitoring for Potential Financial Interests of Employees with Supplied
Contract Approval Testing
Funding to Nonprofits
Monitoring Funding to Nonprofits
Funding to Nonprofits Reporting
Compliance with Fee Schedule
Fees for Services - Automated and Manual
Parking Services - Access, Monitoring Access
Late Fees/Fines Paid by Buncombe County
Public Records Law - Self-Deleting Message App Usage
Disaster and Continuity Plans - In Place and Practiced?
Disaster and Continuity Plans - Resources in Place to Implement?
Employee Travel Expenses on Days Off
Faulty PPE
Fire Departments
COVID-19 Expenditures Reasonable and in Compliance?
COVID-19 Pandemic Response Review
COVID-19 Information Sharing and Outreach
One Buncombe Fund Testing
COVID-19 Public Assistance Testing
Controlled Substances Used or Stored
Assessment of All Inventories in County Departments
Testing of individual inventories in County Departments
Other Assets Testing (in multiple departments)
Data Security
School Funding
Emergency Response Plan
Inventory of Contaminated Materials and Processes
Code of Ethics
Take Home Vehicles
Using County Assets/Time for Personal Gain
Strategic Plan Audits
CARES Act Testing
Fraud Potential in Assessing Penalties
Lease Agreements
Rental Income
Non-Discrimination Ordinance Compliance
Workday - Dashboards Integrity
Gift Card Usage
Liability Concerns & Planning
Staffing Adequacy
Use of Volunteers for County Services
Accessibility/ADA Compliance to County Buildings and Services
PCI Compliance
Credit Card Fees Countywide
Cost Allocation Plan
Budgeting for Indirect Costs in Enterprise Funds
Average Wages in Buncombe County
Accessibility for in-the-field workers
Threat Assessment Process

Department	Focus
Countywide	Benefits and Costs of Teleworking
Countywide	Motor Pool Use and Personal Vehicle Use
Countywide	Tying Economic Development Incentives to Multiple Strategic Goals
Countywide	Data Audit (Inventory, Who Has Access, What Used For, Sensitivity)
Countywide	File Solve Audit
Countywide	WNCHHS Contract
Countywide	RHA Contract
Countywide	Relationships with External Partners
Countywide	Records Management/Retention (Physical & Electronic)
Countywide	Physical Barriers to Operational Efficiency (EMS truck blocked by dumpster picku
Countywide	Employees Onsite at Residences
Election Services	Compliance
Election Services	Volunteer/Contract Worker Management
Election Services	Municipality Revenue
Election Services	Data Security (electronic & paper)
Emergency Services	Fire Marshal Citations
Emergency Services	Fire Marshal Inspections
Emergency Services	Ambulance Services Audit (Call to Collection)
Emergency Services	Ambulance Supplies and Medication
Emergency Services	Paramedic Hours
Emergency Services	EMS MC Audit
Emergency Services	State Revenue
Emergency Services	Disaster Preparedness & Vulnerable Populations
Emergency Services	PSAP Funds
Emergency Services	EMS Compliance Program
Emergency Services	Asset Life and Replacement
Emergency Services	TF2 Deployment Readiness and Reimbursement
Emergency Services	Partnerships with Other Agencies
Emergency Services	Public Safety Training Center Revenue
Emergency Services	Public Safety Training Center Regulatory Compliance
Emergency Services	Debt Collections Process
Emergency Services	Radio System End-of-Life
Emergency Services	Monitoring Staff for Mental Health and PTSD
Finance	Account Write Offs
Finance	Accounts Receivable - Subsidiary Ledgers Not on Financial Statements
Finance	Returned Checks
Finance	Procurement Bidding Process
Finance	Procurement PO Change Orders
Finance	Procurement Compliance to Federal and State Mandates
Finance	Procurement Cards - Inactive Card Liability
Finance	Procurement Cards - Transaction Tier Limits
	Procurement Cards - Transaction Her Limits Procurement Cards - Split Purchase Detection
Finance	Procurement Cards - Split Purchase Detection Procurement Cards - Training Compliance
Finance Finance	Procurement Cards - Training Compliance Procurement Cards - Employee Termination
Finance	Procurement Cards - Employee Termination Procurement Cards - Authorized/Unauthorized Use
	,
Finance	Procurement Cards - Documentation Compliance
Finance	Procurement Cards - New Card Requests
Finance	Surplus Property Sales
Finance	Surplus Property Donations
Finance	Retirement Systems Audit - Accuracy in Dates
Finance	Retirement Systems Audit - 1,000 Hour Rule

Department	Focus
Finance	Compliance with Withholding Orders
Finance	Vendor Discounts
Finance	Employee or Contractor Determination Process
Finance	Unclaimed Property Process and Compliance
Finance	Banking Accounts
Finance	Banking Controls
Finance	W4 Compliance & Verification
Finance	IT Purchases on P-Cards and Through A/P (Have IT Approval?)
Finance	Workday - Test Invoices
Finance	Workday - Test Journal Entries
Finance	Workday - Test Ad Hoc Payments
Finance	Workday - Test Annual Leave Sells
Finance	Workday - Test Banking/Wire Transfer Controls
Finance	Workday - Accounts Receivable - Retiree Insurance
Finance	Workday - Expense Report Testing
Finance	Workday - Validating Data of Custom Reports
Finance	Employee Reimbursements - P-Cards, A/P
Finance	Mileage Reimbursements
Finance	Workday - Banking Information Changes for Payees
Finance	Workday - Automatic Pay Outs of Accrued Leave
Finance	Per Diem Returns if Travel Does Not Occur
Finance	Capital Assets Testing
Finance	Capital Projects Testing Capital Projects Testing
	Receivables Collection
Finance	
Finance	Payables Payment Subsidiant Lodgers Reconsiliations
Finance	Subsidiary Ledgers Reconciliations
Finance	Sales Tax Collections & Distributions
Finance	False Vendors
Finance	Procurement - Emergency Purchases
Finance	Sole Source Vendors
Finance	Investments Audit
Finance	Payments in Lieu of Taxes
Finance	Bank Account Reconciliation
Finance	Salaries and Benefits Split Between Funds or Programs
Finance	Procurement Card - Rebate Process
Finance	Payroll Testing and Processes
Finance	Payroll Monitoring Processes
Fleet	Fuel Purchase Controls
Fleet	Fuel Purchase Reasonableness
Fleet	Fuel Purchase Monitoring (Unexpected time of day, out of County, etc.)
Fleet	Are parts reconciled to work orders?
Fleet	Monitoring process of core parts and dispensable goods
Fleet	Aging of Fleet
Fleet	Recommended Maintenance of Fleet
Fleet	Monitoring of GPS Tracking
General Services	Construction Project
General Services	Work Orders
General Services	Janitorial Services - Confidentiality and Background Checks
General Services	Temperature Setting in Buildings
General Services	Physical Key Access
HHS	Emergency Rental Assistance Testing

Department	Focus
HHS	Medicaid
HHS	Restaurant Inspections
HHS	Workday - Client Expenses Reconciled to Case Files
HHS	Inspections and Follow-ups
HHS	Complaints about Care and/or Facilities
HHS	APS - Complaint Process and Response
HHS	Foster Children Program
HHS	COVID-19 Vaccine Security and Storage
HHS	QA Processes
HHS	Public Assistance Testing
HHS	Clinical Reviews
HHS	Telehealth
HHS	Public Health Accreditation
HHS	Child Care Subsidy
HHS	MAHEC Partnership for School Nurses
HHS	Multiple Service Contracts
HHS	1571 Process
HHS	IV-E Program and Revenue
HHS	Program Integrity Unit Review
Human Resources	Political Activity of Employees
Human Resources	Employee Background and Credit Checks
Human Resources	Employment Forms
Human Resources	Employee Terminations and Benefits/Leave Payouts
Human Resources	Employee Terminations and Off-Boarding/Access Disabling
Human Resources	New Hires - Benefit Enrollment
Human Resources	Benefits - Dependents
Human Resources	Benefits - Accuracy of coverage
Human Resources	Benefits - COBRA Compliance
Human Resources	Benefits - Short-Term Disability
Human Resources	Wellness Program
Human Resources	Verification of Active Employees
Human Resources	Workday - Employee Service Dates Compliance
Human Resources	Ticket Sales to Employees
Human Resources	Are exempt/non-exempt employees properly classified?
Human Resources	Rehired Employees
Human Resources	Part-time Employees
Human Resources	Workplace Harassment & Violence Reporting & Investigations
Human Resources	Salary Alignment with Pay Grades
Human Resources	Employee PII
Human Resources	Administrative Leave with Pay
Human Resources	FMLA Compliance
Human Resources	Disciplinary Investigations and Actions
Human Resources	Job Requirements Upon Hire Compliance (i.e. Certified in 1 year)
Human Resources	Recruitment
Human Resources	Equity in Recruitment/Outreach
Human Resources	Exit Interviews
ID Bureau	Gun Permit Process
ID Bureau	Concealed Carry Permit Process
ID Bureau	Centralized Data Entry Process & QA
ID Bureau	Denial Hearings
ID Bureau	Data Security and Privacy

Department	Focus
Information Technology	IT Controls in Individual Software Systems
Information Technology	Workday - Individual Business Process Audits
Information Technology	Workday - Segregation of Duties Testing
Information Technology	Workday - Security Roles
Information Technology	Electronic Recycling
Information Technology	Monitoring of Data Logs
Information Technology	Equipment Inventory Testing
Information Technology	Security of Equipment
Information Technology	Equipment Disposal and Data Removal Process
Information Technology	Verizon Bill
Information Technology	Improper Use of Software
Information Technology	Improper Use of Personal Devices
Information Technology	Testing Active Directory Accounts
Information Technology	Disabling Access Process
Information Technology	Software Contracts Monitoring for Data Security & Other Requirements
Information Technology	NIST Controls
Information Technology	Data Backups
Information Technology	Employee Training for Data Security & Cybersecurity
Information Technology	Testing of many systems, integrations and databases (Over 400 listed)
Information Technology	Shadow Systems and Emails
Information Technology	Radio Towers - Continuity and Safety
Information Technology	Systems Managed Outside of BCIT
Information Technology	Readiness for equipment deployment for unusual circumstances
Information Technology	Legacy Data
Information Technology	Contract Workers and IT Risks
Justice Services	PSA Testing
Justice Services	Violation Testing
Justice Services	Electronic Monitoring Program
Justice Services	In-House Drug Testing
Justice Services	Incentives for Client Participation
Justice Services	Specialty Court Compliance
Legal & Risk	Drivers License Monitoring Process
Legal & Risk	Overtime and Workers Compensation/Vehicle Accident Claims
Legal & Risk	Employee Safety (Lower Claims & Insurance Rates)
Legal & Risk	Safety Training Audit
Library	Cash Handling and Deposits
Library	Partnership with 501(c)(3)s at each branch
Library	501(c)(3) Cash Management
Library	Outsourced Service Providers
Library	Volunteer/Contract Worker Management
Library	State Aid Revenue
Library	Valuable Asset Management & Security
Library	Inventory Process and Testing
Library	Equity in Services Offered
Performance Management	Data Access and Security
Permits	Electronic Plan Reviews
Permits	Online Services Review
Permits	Revenue Over Operating (NCGS)
Permits	Reconciliation from Accela to Workday
Permits	Permits Testing
Permits	Inspections Testing

Department	Focus
Permits	Revenue Controls Testing
Planning	Housing Trust Fund
Planning	Employee Down Payment Assistance Program
Planning	911 Addressing
Planning	Erosion Control Permitting
Planning	Stormwater Permitting
Planning	Zoning Permitting
Planning	Mountain Mobility Contract
Recreation Services	Pool Management
Recreation Services	Safety at Facilities
Recreation Services	Revenue Controls Testing
Recreation Services	Partnerships with Third Parties
Recreation Services	Special Events Testing
Recreation Services	Equity in Services Offered
Register of Deeds	Automation Fund
Register of Deeds	Reconciliation from COTT to Workday
Register of Deeds	· · · · · · · · · · · · · · · · · · ·
Schools	Revenue Controls Testing
	Test Emergency Response System
Sheriff's Office	Firearms Inventory & Ammo Consumption
Sheriff's Office	Firearms Purchase and Trade-In
Sheriff's Office	Use of Force
Sheriff's Office	Body Camera
Sheriff's Office	Qualifications Audit
Sheriff's Office	Reserve Deputies
Sheriff's Office	BLET Sponsorship
Sheriff's Office	Forfeiture Funds
Sheriff's Office	Evidence Room - Disposal Procedures
Sheriff's Office	Evidence Room - Sampling
Sheriff's Office	Evidence Room - Retention Compliance
Sheriff's Office	Inmate Trust Fund
Sheriff's Office	Inmate Deposits and Release of Funds
Sheriff's Office	Inmate Medical Care
Sheriff's Office	Controls for Seized Property (Cash, Weapons, Illegal Substances)
Sheriff's Office	Civil Process Fees
Sheriff's Office	Federal Inmate Revenue
Sheriff's Office	Inmate Release Policies (Release, Work Release, Pretrial Requirements, etc.)
Sheriff's Office	Sex Offender Registry Process
Sheriff's Office	Detention Facility Classification System
Sheriff's Office	Inmate Commissary
Sheriff's Office	Controls of Inmate Bank Account
Sheriff's Office	BCAT Audit
Sheriff's Office	Mental Health & Substance Abuse Training
Sheriff's Office	Monitoring Staff for Mental Health and PTSD
Solid Waste	Waste Works - Revenue
Solid Waste	Compliance with Environmental Regulations
Solid Waste	Engineering Costs
Solid Waste	Waste Pro Contract
Solid Waste	Equipment Life Cycle Monitoring & Budgeting
Solid Waste	Compliance with SWANA
Solid Waste	Generator Revenue
Solid Waste	State Revenue
L	L

Department	Focus
Solid Waste	Accounts Receivable - New Accounts & Delinquent Accounts
Solid Waste	Hazardous Materials & Safety in Landfill/Transfer Station
Strategic Partnerships	Community Investment Monitoring
Sustainability	Partnerships with Sustainable Energy Partners
Sustainability	Energy Savers Network Monitoring Process (Residential Weatherization)
Sustainability	Solar Consultants Review
Sustainability	Energy Manager Software and Data Reliance
Tax Assessment	Assessment Process and Effect on Revenue
Tax Assessment	Related Party Assessments
Tax Assessment	Permits and Assessments
Tax Assessment	Business Asset Assessments
Tax Assessment	Appeal Process
Tax Assessment	Printing and TMA Monitoring Process
Tax Assessment	Exemptions
Tax Collections	Controls for Relief Programs
Tax Collections	Tax Refunds
Tax Collections	Regular Collections Process
Tax Collections	Forced Collections Process
Tax Collections	Occupancy Tax Collections
Tax Collections	NCPTS Controls Testing
Tax Collections	Cash Collections, Remote Deposit Capture Controls
Tax Collections	Lockbox Testing
Tax Collections	Reconciliation of Data from Tax Assessment to Billing to Collections
Tax Collections	Collections and Revenue
Tax Collections	Municipality Agreements & Revenue
Tax Collections	Preauthorized Debit Process
Tax Collections	Deferred Revenue



Internal Audit Department Audit Committee Update November 10, 2021

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AUDIT PROJECTS	
NONAUDIT PROJECTS	
ADMINISTRATIVE	
ADMINISTRATIVE	

SUMMARY

The Internal Audit Department (Internal Audit) provides this report to assist the Audit Committee (Committee) with their oversight responsibilities for the Internal Audit. It is Internal Audit's goal to be a leader among local government Internal Audit Departments and provide support to the Buncombe County Board of Commissioners, County Management, the Audit Committee, and residents and visitors of Buncombe County in assessing accountability, transparency, and continuous improvement in County operations.

Internal Audit has continued to operate with one employee since the Director's resignation effective June 30, 2021. However, the employee has accepted a position in another County Department, which will leave the Internal Audit Department unstaffed. The Audit Subcommittee, the employee and the employee's new supervisor are currently working on a transition plan to ensure that the critical duties of the Internal Audit function are covered during the time of no staffing.

The recruitment for a Director in ongoing, and the recruitment for the entry-level auditor position will begin after a Director is hired. The comprehensive annual risk assessment and draft risk-based audit plan has been placed on hold by the direction of the Committee and County Management until a new Director is hired. In addition, if the governance documents change the scope of Internal Audit responsibility or update the nonaudit services that will be performed, updates to the plan may be necessary.

The Internal Auditor has focused on the daily operations of the Internal Audit Department, ongoing investigations, implementation of two technology solutions, planning the Internal Audit budget request for Fiscal Year 2023, and participating in various County workgroups and serving as an advisor when requested.

If there are any questions regarding the content of this report, I am available for discussion. Thank you for your public service to Buncombe County and your continued support of Internal Audit.

Respectfully Submitted,

Kelly Houston, CIA, CGAP, CFE, Internal Auditor

AUDIT PROJECTS

Internal Audit performs audit projects in accordance with generally accepted government auditing standards (GAGAS), issued by the Government Accountability Office's Comptroller General of the United States. These standards provide guidance to Internal Audit regarding qualifications of staff, requirements for systems of quality control and peer review, as well as planning, conducting, supervising, documenting, and reporting on audits. Internal Audit also consults the International Professional Practices Framework (IPPF) published by the Institute of Internal Auditors (IIA).

PROJECTS IN PROGRESS

A procurement card (p-card) audit is in the planning stage and will serve as a model for the implementation of audit management software.

PLANNED PROJECTS

To Be Determined

Internal Audit planned projects are based on the risk-based audit plan, pending approval from the Committee. Once the Committee approves the proposed risk-based audit plan, the plan will then be presented to the Board of Commissioners for approval, keeping in mind the need for flexibility. Risk is measured by likelihood of occurrence and impact if the event occurred. Internal Audit works to ensure the objectives of the County are met and uses risk-prioritization from information gathered during the risk assessment to determine the projects. It is the desire of Internal Audit that the Committee, the Board, and Management view Internal Audit as a trusted partner. The Committee, Board, and Management can place confidence in the work of Internal Audit from the requirement of a thorough review of Internal Audit policies, procedures, and conclusions by external subject matter experts. This process, called a Peer Review, ensures the guidance and mandates within the appropriate standards were followed and documented appropriately.

NONAUDIT PROJECTS

Internal Audit performs nonaudit projects as appropriate under GAGAS standards. Because of strict independence and objectivity requirements identified by these standards for staff, Internal Audit only performs certain nonaudit functions as defined in Internal Audit's governing documents. In addition, per the Personnel Ordinance¹, Internal Audit has been given primary responsibility for all investigations of illegal or unethical behavior across the County.

Investigations

Internal Audit has received 54 investigations during Fiscal Year 2021 (July 2020 through June 2021). Of these cases, 51 are complete and 3 do not have the details available to Internal Audit. It should be noted that 25 of the 3rd Party Hotline requests are related to similar issues, and have required an extensive investigation in partnership with Human Resources. The extensive investigation was divided into three parts. The first two reports were discussed in a prior Audit Committee meeting, and Internal Audit worked with Human Resources and County Management on the third part of the investigation.

Internal Audit has received 15 investigations during Fiscal Year 2022 (July 2021 through current). Of these cases, 2 are still active. It should be noted that 7 of the 15 complaints are related to the similar issues noted in the paragraph above, and Internal Audit worked with Human Resources and County Management on the third part of the investigation.

Internal Audit has no way to verify that there are no other report intake mechanisms used by the County and cannot ensure the Personnel Ordinance is being followed. It should be noted that Human Resources has determined it will not use Ethics Point as a case management tool, opting instead to use Microsoft Excel; therefore, Internal Audit does not have an updated count of complaints that went directly to Human Resources. This is a violation of the current Personnel Ordinanace¹.

It is common for a County our size to have an active hotline. Internal Audit intends to work on additional ways to market Ethics Point (or as known by County staff the 'Employee Ethics Report Line' or EERL). In addition, Internal Audit intends to work to inventory other reporting mechanisms that may exist within the County and explore a centralized repository for lodging complaints. Communications & Public Engagement intends to procure software to centralize public communications and input and Internal Audit intends to participate in discussions on how to best centralize all complaints for appropriate investigation or delegation.

Reporting Sources for FY2021 Investigative Services		
3 rd Party Hotline	47	
Direct to Internal Audit	7	
Direct to Human Resources	Unknown	
Direct to Other Existing Reporting Channels	Unknown	
Grand Total	54	

Reporting Sources for FY2022 Investigative Services		
3 rd Party Hotline	15	
Direct to Internal Audit	0	
Direct to Human Resources	Unknown	
Direct to Other Existing Reporting Channels	Unknown	
Grand Total	15	

¹It should be noted that the Human Resources Director has been tasked with a rewrite of the Personnel Ordinance.

Coordination

These services include coordination and facilitation for external auditing or monitoring agencies. Internal Audit staff have worked with the County Legal Department on external matters.

Other Concerns Reported

Internal Audit maintains a log of other concerns brought to Internal Audit's attention that do not rise to the level of an investigation.

In Fiscal Year 2021 (July 2020 through June 2021), 10 concerns were brought to Internal Audit's attention. Examples of these concerns include inconsistencies with IRS guidance, concerns over terminated employees still having access to County systems, Workday Business Process failures, and a potential CJIS violation. These concerns were discussed with management.

In Fiscal Year 2022 (July 2021 through current), 9 concerns have been brought to Internal Audit's attention. Examples of these concerns include policy violations reported, conflicts of interest, concern about an underrepresented group, pay inequity, red flags noted in financial processes, and concerns with promotional processes. These concerns have been communicated to management, and one concern may require an investigation by Internal Audit after more information is received.

ADMINISTRATIVE

Departmental Administrative Duties

Internal Audit performs administrative functions for the department to maintain day-to-day operations. The Fiscal Year 2022 Internal Audit Budget that was recommended by the Audit Committee was not adopted by County Management due to competing priorities. As a result, Internal Audit will not be able to place assurance on much of the County's highest risks or assist in risk identification to the extent desired. However, Internal Audit was granted audit management and data analytic software and an additional position that was put on hold in FY2020 to await the impact of COVID-19. The software project was approved mid-FY2021 to move forward, and implementation has started in FY2022. In addition, the entry-level audit position will be sought after the first of the calendar year once the software has been implemented and a Director is hired (anticipated to hire January 2022).

In the last report to the Audit Committee, Internal Audit was implementing two key resources. The first was an additional module through the Navex Global solution for Conflict of Interest Disclosures. This solution would have allowed disclosure and reporting on potential conflict of interests all employees may have. Internal Audit completed the implementation. However, in seeking guidance from County Management on wording choices for the employee survey through the module, County Management determined they would prefer to use the existing ERP system to design a process to accomplish this

task. Therefore, the Conflict of Interest Disclosures Module will not be implemented. A contract was signed for this product, and Internal Audit is currently working with the County Legal Department to determine the ramifications of this change of course. It is unknown at this time what the financial impact will be.

The second implementation is the audit management and data analytics tool. The audit management portion is the first phase of implementation. Due to the Buncombe County Internal Audit Department being new in policies and procedures, the solution will be implemented out of the box (meaning, limited customization). As the Department matures and hires a Director, the solution can be customized to meet any changing needs. Internal Audit is in the final stages of training and prototype review and is expected to go live in November 2021. At that time, Internal Audit will update the departmental policies and procedures to reflect the new software. Once policies and procedures are updated, a test audit will be conducted to get data in the system and then Internal Audit will provide a demonstration of the software to the Audit Committee. The data analytics portion will be implemented after a Director is hired. The Internal Audit Budget has funds available to obtain additional support from the software vendor for implementing this tool, as the IT Department has stated they do not have the staff resources available to assist with this implementation.

Internal Audit also plans and coordinates Audit Committee meetings in conjunction with the Audit Committee Chair, as well as provides resources, information, and documentation to the Audit Committee.

Internal Audit has also participated in continuing professional education (CPE). CPE is required for audits performed under GAGAS standards whether auditors are certified or not. A minimum of 80 CPE hours over two years with no less than 20 per year is required. Additional CPE requirements may be necessary depending on staff certifications (i.e., Certified Fraud Examiner). The Internal Auditor is also participating in a year-long course through the UNC School of Government (Municipal and County Administration Course) which will further add value to the work of the County.

Outreach throughout the County and involvement in national organizations have occurred since the previous meeting. Since the last meeting, Internal Audit trained a department on the COSO Internal Control Framework, gave a COSO presentation to the Management Advisory Group and was an interview panelist for a key position in the IT Department. The Internal Auditor serves on the Professional Issues Committee through the Association of Local Government Auditors (ALGA). The Internal Auditor is also a mentor for the Association of Certified Fraud Examiners for global professionals.

Internal Audit has also participated in business planning related to the County's strategic plan. With the direction and guidance of the Office of Strategy and Innovation, minor changes were made to Internal Audit's Business Plan. Ongoing work in implementation of Internal Audit's Business Plan continues, as this is an ongoing process.

Internal Audit has worked with the Audit Committee, Board of Commissioners, and County Management to ensure they have the appropriate information needed to assist Internal Audit in decision-making, prioritizing work, and evaluating risk.

County Administrative Duties

Internal Audit also performs administrative functions on behalf of management, while ensuring to keep independence and objectivity at the forefront. These projects include:

- 1) Monitoring: Monthly review of timecards, expense reports, and purchase card activity for all appointed and elected officials, in response to an audit finding during the fiscal year 2018 external audit, as directed by the Board of Commissioners
- 2) Meetings: Department Director meetings, Grants Governance Team, Offboarding Work Group, Investigative/Admin Leave Work Group, IT Security and Data Privacy Work Group, Tech Review Team, COVID Revenue Team, Policy Review Team, Foundational Focus Group and the Race for Equity Co-Design Team
- 3) Department Assistance: Internal Audit assists departments as requested with questions related to historical information, questions about best practices, etc.

Employee Ethics Report Line Fiscal Year 2021 Summary

Report #	Summary	Action	Notes
25	Supervisor Issue	Training/Coaching	Closed
26	Supervisor Issue	Training/Coaching	Closed
27	Favoritism	Substantiated-Identified System Issue	Closed
28	Test Report	Setting up system for HR use	Closed
29	Test Report	Setting up system for HR use	Closed
		Probable Sustantiation with Additional	HR to Reassess in
30	Favoritism	Evidence	May/June 2021
31	Discrimination/Harassment	Training/Coaching	Closed
32	Test Report	Setting up system for HR use	Closed
33	Complaint about apartment	Not in Buncombe County's Jurisdiction	Closed
34	Test Report	Setting up system for HR use	Closed
	Misleading Information in		
35	Workday	Substantiated-Management Addressed	Closed
36	Test Report	Setting up system for HR use	Closed
			Closed-See Investigation
37	Hiring Irregularities	Identified System Issue	Report
			Closed-See Investigation
38	Hiring Irregularities	Identified System Issue	Report
39	HR Entry	Unsubstantiated-No Action Necessary	Closed
		Substantiated-Non-Disciplinary Action	
40	HR Entry	Issued	Closed
41	HR Entry	Not Actionable	Closed
42	HR Entry	Not Actionable	Closed
43	Test Report	Setting up system for HR use	Closed
44	HR Entry	Not accessible to Internal Audit staff	N/A
45	HR Entry	Not accessible to Internal Audit staff	N/A
46	HR Entry	Not accessible to Internal Audit staff	N/A
47	Supervisor Issue	Unsubstantiated-No Action Necessary	Closed
		Original Issue Unsubstantiated-	Closed-See Investigation
48	Discrimination/Harassment	Compliance Violations Noted	Report
49	Compensation	Identified System Issue-No Action Taken	Closed
50	Management Issue	Identified System Issue	Closed
51	Management Issue	Identified System Issue	Closed
			Closed-See Investigation
52	Hiring Irregularities	Identified System Issue	Report
53	Compensation	Identified System Issue-No Action Taken	Closed
54	Inquiry about On-Call Pay	Inquiry Resolved-Provided Information	Closed
55	Process Review	Not Actionable	Closed

Employee Ethics Report Line Fiscal Year 2021 Summary

Report #	‡ Summary	Action	Notes
			Closed-See Investigation
56	Hiring Irregularities	Identified System Issue	Report
			Closed-See Investigation
57	Hiring Irregularities	Identified System Issue	Report
			Closed - Management
58	Supervisor Issue	Insufficient Information	and HR work ongoing
59	Substance Abuse	Insufficient Information	Closed
			Closed - Management
60	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
61	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
62	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
63	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
64	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
65	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
66	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
67	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
68	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
69	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
70	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
71	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
72	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
73	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
74	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
75	Supervisor Issue	Insufficient Information	and HR work ongoing
76	Employee Concern	Identified System Issue	Closed

Employee Ethics Report Line Fiscal Year 2021 Summary

Report #	Summary	Action	Notes
			Closed - Management
77	Supervisor Issue	Insufficient Information	and HR work ongoing

Employee Ethics Report Line Fiscal Year 2022 Summary

Report #	Summary	Action	Notes
			Closed - Management
78	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
79	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Sheriff's Office
80	Favoritism	Unsubstantiated	provided information
			Closed - Management
81	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
82	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
83	Supervisor Issue	Insufficient Information	and HR work ongoing
			Closed - Management
84	Supervisor Issue	Insufficient Information	and HR work ongoing
	Employee Performance		Closed - Management
85	Concern	Not Actionable	and HR work ongoing
	Inadequate Staffing Concern		
86	(Public Safety)	In Progress	
			Closed - Made
	Failing Equipment (Public		recommendations to
87	Safety)	Insufficient Information	management
			Closed - Management
		Substantiated - Identified System Issue -	action pending
88	Compensation	No Action Taken	compensation study
			Closed - Made
			recommendations to
89	County Policy Violation	Insufficient Information	management
90	Retaliation Complaint	Identified System Issue	Closed
			Closed - Referred to
91	Unrelated to BC Operations	Not Actionable	Sheriff's Office
92	Inquiry about Hiring Decision	In Progress	