



RESOLUTION 12-02-2020

A RESOLUTION APPROVING THE REQUIRED ANNUAL FRAUD RISK ASSESSMENT

WHEREAS, on April 3, 2020, the Office of the State Auditor (OSA) issued Audit Alert 2020-01 requiring that each local governmental entity completes an annual Fraud Risk Assessment before the end of each fiscal year starting with the current fiscal year; and

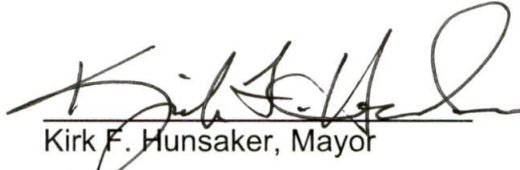
WHEREAS, the Santaquin City Manager, Santaquin City Recorder/Finance Director and Santaquin City Treasurer/Administrative Services Director completed said audit (See attached) which is now available for review, consideration and possible approval by the Santaquin City Council; and

WHEREAS, many of the best practices outlined by the OSA were already in place while others recommendations are in the process of being implemented;

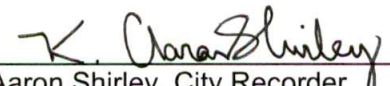
NOW THEREFORE, be it resolved by the Santaquin City Council to accept and approve the attached annual Fraud Risk Assessment for Santaquin City for FY2020.

ADOPTED AND PASSED by the City Council of the City of Santaquin, Utah this 1st day of December, 2020.

CITY OF SANTAQUIN


Kirk F. Hunsaker, Mayor

Attest:


K. Aaron Shirley, City Recorder



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 below.
- Total the points of the questions marked "Yes" and put on the "Total Points Earned" line below.
- Using the points earned, circle the risk level on the "Risk Level" line below.

Total Points Earned: 325 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?	200	200
2. Does the entity have written policies in the following areas:		
a. Conflict of interest?	5	5
b. Procurement?	5	5
c. Ethical behavior?	5	5
d. Reporting fraud and abuse?	5	5
e. Travel?	5	5
f. Credit/Purchasing cards (where applicable)?	5	5
g. Personal use of entity assets?	5	5
h. IT and computer security?	5	5
i. Cash receipting and deposits?	5	5
3. Does the entity have a licensed or certified expert as part of its management team? (CPA, CGFM, CMA, CIA, CFE, CGAP, CPFO)	0	20
a. Do any members of the management team have at least a bachelor's degree in accounting?	10	10
4. Are <u>employees</u> and elected officials required to annually commit in writing to abide by a statement of ethical behavior?	10	20
5. Have all of the board members completed the State Auditor online training at least once in the last four years?	20	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?	20	20
7. Does the entity have or promote a fraud hotline?	0	20
8. Does the entity have a formal internal audit function?	20	20
9. Does the entity have a formal audit committee? (<i>Informal</i>)	0	20

Certified By: K. Anna Blinley Certified By: Shanna Hagan

* MC = Mitigating Control

Basic Separation of Duties

See page 2 of this questionnaire 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?	✓			
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?		✓	✓	
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".		✓	✓	
4. Are all the people who have access to blank checks different from those who are authorized signers?		✓	✓	
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?	✓			
6. Does someone other than the clerk review periodic reports of all general ledger accounts to identify unauthorized payments recorded in those accounts?	✓			
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".	✓			
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".	✓			
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".	✓			
10. Does the person who authorizes payment for goods or services, who is not the clerk, verify the receipt of goods or services?	✓			
11. Does someone authorize payroll payments who is separate from the person who prepares payroll payments? If no W-2 employees, check "N/A".	✓			
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".		✓	✓	



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.

☹ 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.

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 governments.

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.



Fraud Risk Assessment

Refer to the Implementation Guide for more detailed explanations of concepts and criteria. See resources.auditor.utah.gov/s/article/Fraud-Risk-Assessment-Implementation-Guide

To complete the assessment, identify or obtain the following:

- ✓1. Name of the Board/Council Chair Kirk F. Hunsaker, Mayor
- ✓2. Name of the Clerk/Finance Officer K. Aaron Shirley, City Recorder / Finance Director
- ✓3. Name of the Treasurer Shannon Hoffman
- ✓4. Copies of credit/purchasing card statements, payments and supporting documentation. (E)
- ✓5. Copies of bank reconciliations for all bank accounts and related bank statements.
- ✓6. Copies of the following policies if they existed during the assessment period:
 - a. Conflict of Interest
 - b. Procurement
 - c. Ethical Behavior
 - d. Reporting fraud and abuse
 - e. Travel
 - f. Credit/Purchasing Cards
 - g. Personal use of entity assets
 - h. IT and computer security
 - i. Cash receipting and deposits
- N/A 7. Copy of the CPA's license, if there is a CPA who is a member of the staff; provide the contact for a contract accountant who is a CPA.
- ✓ 8. Copy of the diploma if a member of the staff has a bachelor's degree in accounting (not required if documentation was provided for number 8 above).
- ✓ 9. Copies of the commitment to ethical behavior by the officials/officers of the entity. ~~Added~~ one for officials in process
- ✓10. Copies of the training certificate for the Office of the State Auditor board member training completed during the last 4 years. Completed as Council in Council Meeting. (Minutes)
- ✓ 11. Documentation (certificates, agendas, etc.) demonstrating that a member of the management team had at least 40 hours of financial training during the last year.
- N/A 12. Copy of the internal audit plan for the assessment period.
- ✓ 13. Name of the internal auditor and a list of duties. If contractually performed, provide a copy of the contract. K. Aaron Shirley
14. Copies of any internal audit reports issued during the assessment period or last year, whichever is longer.
15. Copy of the audit committee charter.
16. A list of audit committee members during the assessment period.
17. Minutes or agendas for audit committee meetings, if meetings are confidential, a list of action items from those meetings would suffice.

In process
of
establishing
Audit
Committee