

2. REPORTS TO BE RECEIVED FOR FILING:

- a. Pinellas County Comprehensive Annual Financial Report for the Fiscal Year ended September 30, 2013.
- b. Continuing Bond Disclosure Report dated April 30, 2014 pursuant to Rule 15c2-12 of the Securities and Exchange Commission for:
 - \$86,580,000 Sewer Revenue Bonds, Series 2003
 - \$25,205,000 Sewer Revenue Refunding Bonds, Series 2006
 - \$59,510,000 Sewer Revenue Refunding Bonds, Series 2012
- c. Division of Inspector General, Audit Services, Clerk of the Circuit Court and Comptroller, Report No. 2014-13 dated May 7, 2014 – Audit of Health & Community Services' Community Help and Electronic Data Application System (CHEDAS).
- d. Juvenile Welfare Board Monthly Financial and Investment Report dated March 31, 2013.



DIVISION OF INSPECTOR GENERAL

KEN BURKE, CPA

**CLERK OF THE CIRCUIT COURT AND COMPTROLLER
PINELLAS COUNTY, FLORIDA**

AUDIT OF HEALTH & COMMUNITY SERVICES' COMMUNITY HELP & ELECTRONIC DATA APPLICATION SYSTEM (CHEDAS)



CHEDAS

Community Help & Electronic Data Application System



**An Accredited Office of
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**May 7, 2014
REPORT NO. 2014-13**



Ken Burke, CPA

CLERK OF THE CIRCUIT COURT AND COMPTROLLER
PINELLAS COUNTY, FLORIDA

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Recorder of Deeds
Clerk and Accountant of the Board of County Commissioners
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May 7, 2014

The Honorable Chairman and Members of the Board of County Commissioners

We have conducted an audit of the Health & Community Services' (HCS) Community Help and Electronic Data Application System (CHEDAS). Our audit objectives were to:

- Determine that adequate audit trails have been designed into the system.
- Determine that adequate input processing, error correction procedures, balancing, and reconciliation have been designed to provide reasonable assurance of the completeness and accuracy of system data.

We conclude that CHEDAS has adequate audit trails designed into the applications. We have determined that adequate input, processing, error correction, balancing, and reconciliation procedures have been designed in CHEDAS to provide reasonable assurance of the completeness and accuracy of system data. However, the Accounting Application Program Interface internal controls over data can be improved with written policy and procedure manuals and by reconciling exported CHEDAS Accounting payment files to the imported Oracle Financial Accounts Payable files. Time sensitive payments for utilities' bills should be spot checked to assure timely payment.

We appreciate the cooperation shown by the staff of Health & Community Services during the course of this review. Management's responses indicated that they concurred with the audit recommendations and we commend management for their responses.

Respectfully Submitted,

Hector Collazo Jr.
Inspector General/Division of Inspector General

Approved:

Ken Burke, CPA*
Clerk of the Circuit Court and Comptroller
Ex Officio County Auditor*Regulated by the State of Florida



TABLE OF CONTENTS

	Page
Introduction	4
Action Plan	6
Opportunities for Improvement	
1. The CHEDAS Accounting Application Program Interface And Oracle Financial Accounts Payable Data Interface Lack Adequate Internal Controls.	10
2. There Are No Policies And Procedures For The CHEDAS Accounts Payable Function.	12
3. Time Sensitive Invoice Payments Were Not Processed Timely At The Beginning Of The Audit, But Have Since Been Resolved.	13

INTRODUCTION

Synopsis

The internal controls for reconciling payment data sent from the Community Help and Electronic Data Application System (CHEDAS) Accounting application to the Oracle Financial Accounts Payable application are not adequate to ensure data integrity. Written policies and procedures were not present to describe how the CHEDAS business processes ensure the payment data is valid, complete, and accurate.

Scope and Methodology

We conducted an audit of the Department of Health & Community Services (HCS) Community Help and Electronic Data Application System (CHEDAS) used by the department to record and process invoice payments. The scope included the interface with Finance's Oracle Financial Accounts Payable application to pay suppliers for health care and other essential community services. Our scope included an evaluation of internal controls over the CHEDAS interface process.

The objectives of the audit were to:

- Determine that adequate audit trails have been designed into the system.
- Determine that adequate input processing, error correction procedures, balancing, and reconciliation have been designed and functioning to provide reasonable assurance of the completeness and accuracy of system data.

In order to meet the objectives of the audit, we:

- Interviewed Health & Community Services management.
- Reviewed supporting documentation to obtain an understanding of CHEDAS processes and the related policies and procedures.
- Evaluated the adequacy of these policies and procedures, as well as the internal controls.
- Tested, on a sample basis, supporting documentation in files regarding the payment of invoices.

Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* and the *Principles and Standards for Offices of Inspector General*, and accordingly, included such tests of records and other auditing procedures, as we considered necessary in the circumstances. The audit period was October 1, 2012 through January 31, 2013. However, transactions and processes reviewed were not limited by the audit period.

Overall Conclusion

We conclude that CHEDAS has adequate audit trails designed into the applications. We have determined that adequate input, processing, error correction, balancing, and reconciliation procedures have been designed in CHEDAS to provide reasonable assurance of the completeness and accuracy of system data. However, the Accounting Program Interface Application internal controls over data can be improved with written policy and procedure manuals and by reconciling exported CHEDAS Accounting payment files to the imported Oracle Financial Accounts Payable files. Time sensitive payments for utilities' bills should be spot checked to assure timely payment.

Action Plan

FINDING NO.	FINDING (CAPTION) RECOMMENDATIONS	MANAGEMENT RESPONSES			IMPLEMENTATION STATUS		
		Concur	Partially Concur	Do Not Concur	In Progress	Planned	Implemented
1	<i>The CHEDAS Accounting Application Program Interface And Oracle Financial Accounts Payable Data Interface Lack Adequate Internal Controls.</i>						
	We recommend HCS management develop procedures for reconciling exported CHEDAS payment request transaction files to the imported Oracle Financial Accounts Payable transactions.	✓					
2	<i>There Are No Policies And Procedures For The CHEDAS Accounts Payable Function.</i>						
	We recommend HCS management develop written policies and procedures that communicate management's expectations for the CHEDAS accounts payable function. The policies should clearly spell out the monitoring and control reports that management will need to review to evaluate the efficiency and effectiveness of the accounts payable function.	✓					
3	<i>Time Sensitive Invoice Payments Were Not Processed Timely At The Beginning Of The Audit, But Have Since Been Resolved.</i>						
	Develop policies and procedures that specify time periods for HCS to submit time sensitive invoices to Finance Accounts Payable to ensure prompt payment.	✓					
	Develop a monitoring method that sets out measurements for lateness so management can take necessary action.	✓					

Background

Health & Community Services Department

The Department of Health & Community Services (HCS) provides health care and other essential community services to disadvantaged Pinellas County residents to assist them in reaching their maximum potential for self-sufficiency. The Department's Health Services include funding for:

- Medical homes
- Specialty care
- Pharmacy
- Dental
- Mental health
- Home health
- Hospitalization for residents with limited income and assets who do not qualify for other health care coverage
- Mobile medical services which provide preventive primary care for the homeless

Funding is also provided for:

- State-mandated funding for local mental health organizations, the county's share of Medicaid nursing homes, and in-patient hospital bills.
- The disposition of indigent and unclaimed bodies.

The Department's Community Services assist residents in becoming self-sufficient primarily through assistance with rent and utility payments and advocacy in attaining Social Security or Veteran's benefits. Various other community social service needs are met through Social Action Funding and Community Mental Health Support Programs that provide funding to local non-profit social service agencies.

An additional fund, the Pinellas County Health Program, provides the budgetary framework to separately account for the revenues and expenditures restricted for indigent health care services. The County receives funding from local hospitals that is restricted for indigent health care services and must appropriate the funds from a Trust and Agency account to this Special Revenue Fund.

Fund	Expenditures By Fund		
	FY12 Actual	FY13 Budget	FY14 Request
General Fund	\$45,424,013	\$54,556,530	\$52,062,010
Summer Food Program	\$383,885	\$164,670	\$0
Pinellas County Health Program	\$7,808,735	\$8,000,000	\$5,066,480*
Expenditures by Fund Total	\$53,616,633	\$62,721,200	\$57,128,490

*The Pinellas County Health Program Fund, created in Fiscal Year 2012, decreased in Fiscal Year 2014 from Fiscal Year 2013 about \$3 million or 37%. This fund helps provide medical services to Pinellas County residents who do not qualify for Medicaid, but are in need of assistance. The revenue for this fund is provided by community partners and can only be used for this purpose.

Health & Community Services CHEDAS System

The CHEDAS System consists of three major applications and several interfaces as follows:

Applications:

- Care Scope is the case management system containing client profiles and service history.
- NextGen is the case imaging system containing client charts, labs, pharmacy orders, invoices, and other documents.
- Accounting contains the financial records for the clients.

Interfaces:

- Accounting Application Program Interface (AAPI)
- Pharmacy Enrollment and Billing interfaces
- Hospital Enrollment interface
- Emdeon (clearinghouse) interface
- Agency for Health Care Administration (AHCA) format interface

The interfaces join the three applications together and allow connections to external partners and other systems, such as Pinellas County Oracle Financials. The external partners include pharmacy services, specialty care, data collaborative, hospitals, and medical homes. The AAPI was written by Pinellas County Business Technology Services (BTS) with the support of the CHEDAS contractor and maintained by BTS. The AAPI produces the transaction files for upload to the Oracle Financial Accounts Payable application.

Health & Community Services CHEDAS Process

Citizens in need of medical services or financial assistance come to HCS to apply for benefits. In Care Scope, a case is opened for the citizen to determine their eligibility to receive benefits.

Citizens meeting eligibility standards then become clients in CHEDAS. The HCS Case Managers will then authorize medical service or financial assistance.

The authorization is called a "Service Pending Payment Authorization," which records the person/date/time of the approval. After the treatment/service pricing review, the rationale is that if the invoice from the service provider matches the authorization, no further approval is deemed necessary to pay the invoice. The HCS Accountant "Approved" status records the person/date/time that the Accountant matched the authorization to the invoice. The HCS Accountant then "Submits" the approved invoice transaction to the CHEDAS Accounting application, which is exported by the AAPI to a file. The output file is transmitted to Oracle Financial Accounts Payable for payment processing.

OPPORTUNITIES FOR IMPROVEMENT

Our audit disclosed certain policies, procedures, and practices that could be improved. Our audit was neither designed nor intended to be a detailed study of every relevant system, procedure, or transaction. Accordingly, the Opportunities for Improvement presented in this report may not be all-inclusive of areas where improvement may be needed.

1. The CHEDAS Accounting Application Program Interface And Oracle Financial Accounts Payable Data Interface Lack Adequate Internal Controls.

The CHEDAS Accounting application data uploaded to Oracle Financial Accounts Payable by the Accounting Application Program Interface (AAPI) process does not contain standard internal controls over data. The process incorporates both automated and manual steps to generate payments for the invoices. The internal control weakness could result in invoices for rent and utilities that are time sensitive to not be paid timely.

The CHEDAS AAPI configuration was developed as an in-house custom program that generates an output file in a format that can be uploaded to Oracle Financial Accounts Payable. The program customization did not include standard data control reports needed to assure the interface process integrity. The output files do not contain headers or footers with hash totals or other control totals that could be used to verify counts or amounts.

Health & Community Services CHEDAS Payment Process

- A. Services are authorized by the HCS Case Managers through Care Scope; a unique "Service History" identification number is created for the "Service Pending Payment" transaction.
- B. Authorized services are provided to the clients.
- C. The invoices for the authorized services are mailed from the service providers to the HCS Finance Section.
- D. The HCS Finance Section clerks enter the invoice information into CHEDAS Accounting and the invoice information is matched to the "Service Pending Payment" transaction.
- E. The invoice is scanned in the NextGen imaging system.

- F. The AAPI exports the payment requests into a file four times per day. Since the procedure to generate the AAPI files is incorporated into the automated task scheduler, it provides assurance that the export file generation will be maintained during any CHEDAS upgrades.
- G. The AAPI generates an output file in a format that can be uploaded to the Oracle Financial Accounts Payable.

Finance Accounts Payable has access to the file subdirectory where the CHEDAS output file is stored for uploading to Oracle Financial Accounts Payable. Princeton University's definition of an application program interface (API) is:

"A particular set of rules and specifications that a software program can follow to access and make use of the services and resources provided by another particular software program that implements that API. It serves as an interface between different software programs and facilitates their interaction, similar to the way the user interface facilitates interaction between humans and computers."

In this case, CHEDAS exports payment request transactions in a file that can be input or loaded into Oracle Financial Accounts Payable.

In summary, the AAPI payment request transaction files become the input files that are uploaded to Oracle Financial Accounts Payable for payment of invoices. The total invoice count and amounts for each batch file uploaded are emailed back to HCS by Finance Accounts Payable for approval. HCS responds with their approval, but it is not based on any verification of the number of files, invoices or amounts, or other control totals.

When data is being transferred between two applications that contain both automated and manual operations, adequate balancing, reconciliation, and error routines have to be designed and in place to provide reasonable assurance of the completeness and accuracy of system data interface.

- On the CHEDAS side of the AAPI, there are weak internal controls over the files and their contents that are exported to Oracle Financial Accounts Payable. The application does not generate control reports regarding the four transaction files.
- On the Oracle Financial Accounts Payable side of the AAPI, Finance is requesting confirmation and approval of totals that HCS does not have available.

We recommend HCS management develop procedures for reconciling exported CHEDAS payment request transaction files to the imported Oracle Financial Accounts Payable transactions.

Management Response

Management agrees that the CHEDAS application currently does not generate control reports regarding exported transaction files. Management is working with Pinellas County Business Technology Services to add programming to the CHEDAS system that generates a control copy of the exported transaction file. Management anticipates this programming to be completed before September 30, 2014. This control copy will be used to verify the number of files and amounts to ensure the completeness and accuracy of the system data interface

2. There Are No Policies And Procedures For The CHEDAS Accounts Payable Function.

HCS did not have formal written policies and procedures that cover management's oversight of the CHEDAS accounts payable function. The function is defined as the CHEDAS Accounting application, the AAPI, and the Oracle Financial Accounts Payable processes. We did observe that HCS was practicing many basic procedures that provide control over the payment process, but there were no written policies and procedures to measure against to determine adequacy of the process and internal controls.

For instance, the Supervisor can view outstanding invoices, which is done on a daily basis. After a few days, the Accounting Support Specialist is contacted to follow up. A more effective procedure would include established time frames and guidance on usual problems such as:

- Invoices of significant amounts
- Past due invoices
- When clients will be affected
- Vendors that usually fail to provide adequate invoices

Written policies and procedures serve as a basis for management planning, control, and evaluation of activities. They communicate management's expectations of timeliness, responsibility, authority, and restrictions. Additionally, a procedure manual serves as a guide for personnel in performance of daily operations and assistance in routine problem solving. These procedures can also provide standards for performance, and are useful in training new employees.

There is also a legal requirement that the County pay invoices in a timely manner or pay interest penalties (Florida Prompt Payment Act). HCS has the responsibility to process invoices within a period that will allow Finance to make timely payment.

Directly related to the CHEDAS accounts payable function, written procedures would be able to identify and provide information to solve routine processing problems and escalate

corrective action to management. HCS has to perform review and approval of invoices in a timely manner to allow Finance to pay the vendor promptly.

We recommend HCS management develop written policies and procedures that communicate management's expectations for the CHEDAS accounts payable function. The policies should clearly spell out the monitoring and control reports that management will need to review and evaluate the efficiency and effectiveness of the accounts payable function.

Management Response

Management agrees that a written policy manual that documents management's expectations for the CHEDAS accounts payable function would enhance current payment processing controls already in place. Management has already begun drafting this policy manual to document management's expectations and anticipates completion of the manual by April 30, 2014. Management is currently working with Pinellas County Business Technology Services to enhance the reporting capabilities of the CHEDAS system. This enhanced reporting will include monitoring and control reports that management will use to review and evaluate the efficiency and effectiveness of all departmental processes. Management anticipates this programming to be completed before September 30, 2014.

3. Time Sensitive Invoice Payments Were Not Processed Timely At The Beginning Of The Audit, But Have Since Been Resolved.

At the beginning of the audit, HCS management reported that time critical invoice payments for clients' rent and utilities were not being paid timely. The issue resulted in vendor complaints of not receiving payments and for utilities stopping service.

At management's request, we performed an analysis on the payment process for rent and utilities. Information was obtained from the General Ledger application for April 2013. The result of the test showed that rent payment time averaged eight days and utility payment time averaged 22 days. The cause was determined that Finance Accounts Payable are two to three weeks behind in processing utility invoice payments.

We performed a follow-up analysis in August 2013 to determine if the problem was resolved. The result of the test showed that rent payment time averaged three days and utility payment time averaged six days. Payments over six or more days were a result of holds by Finance Accounts Payable for additional information requested from HCS. Additional analysis found that the missing information needed by Finance Accounts Payable was not present in "NextGen" (the CHEDAS application that stores scanned invoices by HCS). The HCS process is for the invoice to be scanned on Friday, but the request for payment made earlier in the

week. HCS is now scanning invoices the same day as the request for payment is input to the CHEDAS Accounting application.

A key service requirement for HCS is to assure time sensitive payments are not being delayed by the applications, interface processing of invoice/payment requests, and manual procedures. By the end of the audit, there was no backlog of payments for HCS and Finance Accounts Payable operations.

We recommend HCS management:

Develop policies and procedures that specify time periods for HCS to submit time sensitive invoices to Finance Accounts Payable to ensure prompt payment. (Prior to the issuance of this report, HCS management was currently developing the procedures and written policies.)

Develop a monitoring method that sets out measurements for lateness so management can take necessary action. (Prior to the issuance of this report, HCS management was currently developing these metrics.)

Management Response:

Management agrees that a written policy manual that documents management's expectations for the CHEDAS accounts payable function would enhance current payment processing controls already in place. Management has already begun drafting this policy manual to document management's expectations and anticipates completion of the manual by April 30, 2014. The final policy manual will include documentation of management's policy regarding time periods to submit time sensitive invoices to Finance Accounts Payable to ensure prompt payment. Management is currently working with Pinellas County Business Technology Services to enhance the reporting capabilities of the CHEDAS system. This enhanced reporting will include monitoring and control reports that management will use to review and evaluate the efficiency and effectiveness of all departmental processes including measurements of accounts payable processing times. Management anticipates this programming to be completed before September 30, 2014.



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