

# Internal Controls and Best Practices for Solid Waste Authorities

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# OBJECTIVES

- Identify common causes of fraud and effective risk detection methods
- Understand the role of internal controls in promoting accountability
- Review key expectations and criteria for Performance Reviews
- Explore how internal controls and Performance Reviews work together
- Learn how the SWMB is changing to assist you

# Importance of Internal Controls

- COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS
- <u>A</u>CCOMPLISHMENT OF THE ENTITY'S MISSION
- RELEVANT AND RELIABLE FINANCIAL REPORTING
- EFFECTIVE AND EFFICIENT OPERATIONS
- **S**AFEGUARDING OF ASSETS

INTERNAL CONTROLS ARE THE KEY TO ACHIEVING DESIRED OUTCOMES WITHOUT EXPERIENCING UNDESIRABLE EVENTS.

# STRONG INTERNAL CONTROLS LEAD TO.....

# FRAUD PREVENTION

# THE FRAUD MENTALITY

- Deliberate Deception for personal gain
- Government Entities 2<sup>nd</sup> most frequent victims
- Undetected for 12-18 mos.
- Median Loss ~ \$148k / case

WHAT

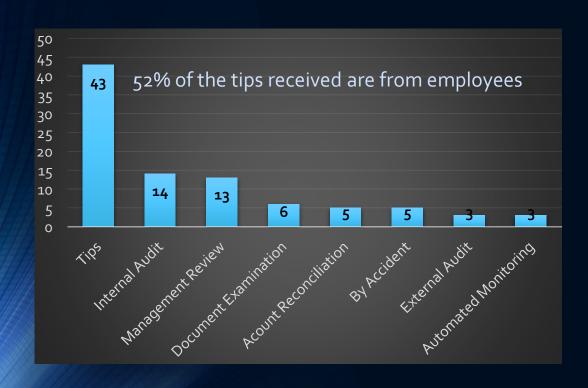


- Situational
- Deviant
- Multi-interest
- Well Intentioned
- Disengaged employee



# HOW DO WE FIND FRAUD?

# HOW FRAUD IS FOUND



# BEHAVIOR RED FLAGS

- Living beyond means (39%)
- Financial Difficulties (25%)
- Unusually close with vendors
- Excessive control issues
- Recent personal issues

# FRAUD HOT SPOTS

Procurement	Payables	Credit Card / Pcard
Shell Companies	Check Fraud / Reimbursements	Missing / Non-Itemized Receipts
False Quotes	Falsified Invoices	Delayed Reconciliation
Kickbacks / Collusion	Cash Skimming	Co-mingling accounts
Change Orders	Ghost Employees	Unapproved Merchants

# Look out for...

- Round Number, Split, or Repeat Transactions
- Sole-Source Contracts or Bypassed Processes
- Inconsistent Receipts and Transactions Outside Business Hours
- Access to Vendor Records and Employee Files

# HOWDO WESTOP FRAUD?

# INTERNAL CONTROLS

### Segregation of Duties

- > Separate purchasing, approvals, and payment duties
- Define roles to ensure no one person controls all steps

### Written Polices and Procedures

- Maintain updated, board-approved financial & operational policies
- > Train staff on procedures and revise as needed

### Scale House & Cash Reconciliation

- Reconcile receipts daily & verify against billing and tonnage
- > Separate duties of receiving, reconciling, and auditing

### **Budget & Expenditure Approvals**

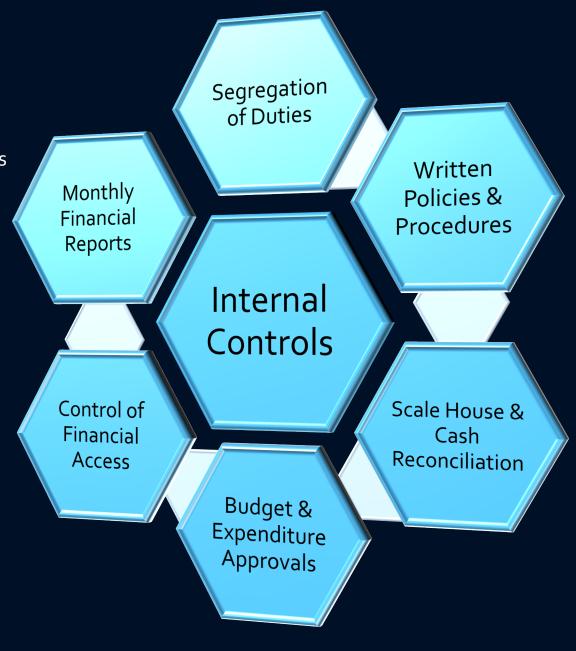
- Require prior approval and board-adopted budgets
- > Set dollar thresholds and review variances monthly

### **Control of Financial Access**

- Limit access by job role and apply dual oversight
- Monitor activity for unauthorized or unusual access

### **Monthly Financial Reports**

- Prepare Income Statement, Balance Sheet and budget reports
- Include account activity, tonnage data, and capital project updates



# Why does this matter to you?

# Performance Measures & Reviews SWMB Code \$54-6

- Quarterly Measures
  - Regulatory and Statutory Compliance
  - Financial Records
  - Business Operations Management
  - Employees titles, classification, wages
  - Program outcomes & outputs

- Biennial Reviews
  - Gauge productivity & operational health and identify serious impairments
  - Board appointments, vacancies & attendance
  - Compliance with applicable Code
  - Financial accountability
  - General business procedures, safety and training programs

# Strong Controls

Successful Compliance

Prevent fraud, protect public funds, and ensure regulatory compliance

Drive accuracy in records used for quarterly reports & performance reviews

Ensure consistency and accountability across all operations

Accurate financial reporting, audits, and cash management

Transparency in payroll, grants, tonnage, and regulatory reporting

Board governance, budgeting, and operational oversight

# Balancing Controls and Compliance

# Consequences of Non-Compliance

Mandatory Corrective
Action Plan

Loss of Grant Eligibility

Potential Board Intervention

Supersedure by SWMB

# Strong Controls = Stronger Reviews

# Adopt & Follow Clear Procedures

 Maintain up-to-date financial, operational, and safety policies – and obtain Board approval.

## Segregate Duties

 Clearly define financial roles – no single person controls all steps! This includes external accounting services.

### Limit & Monitor Access

 Restrict access to bank accounts, credit cards and cash handling but make sure you have oversight.

# Reconcile Regularly

 Perform daily, monthly, and quarterly reconciliations of cash, scale, and accounts – and review with your Board!

## Maintain Updated Records

 Submit financials, tonnage logs, board minutes, and other documents on time.

# Track Board Actions & Approvals

 Ensure budgets, contracts, and board decisions are adopted and documented. Communicate with your board!

## Prioritize Safety

 Hold regular safety meetings, update safety plans, and document accident responses.

# Use Quarterly Reports to Self-Audit

• Treat each quarterly report as a mini audit to identify and fix issues early.

# Common Concerns

- Segregation of Duties
- No documented Board approval of policies
- Improper cash handling / untimely deposits
- Documented reconciliation of accounts – scale to tonnage, tonnage to fees, fees to payments

- Accrual vs. Cash based accounting
- Monthly accounting vs. Annual audits
- Appointment forms not submitted or updated
- Annual Reports not submitted
- Comp & Siting Plans not current

# Our Commitment to Your Success



## **Streamlined Reporting**

• Simplified quarterly reports with one fillable form and fewer required documents



### Setting Clear, Measurable Standards

• Performance reviews based on standardized benchmarks and quantifiable data



## **Building Stronger Partnerships**

• Ongoing support through meeting attendance and proactive assistance



### Focusing on Guidance, Not "Gotcha"

• Working with you to strengthen operations, not criticizing after the fact



### **Being Your Trusted Resource**

• Providing knowledge, tools, and best practices to help your authority succeed and grow

# Help Us Help You

- ■Be Proactive Set the Tone!
- Identify weaknesses and take action
- Establish clear Policies and Procedures
- Maintain open communication between Board and staff
- Continually assess and adjust finances, policies, and processes
- Acknowledge what you don't know and ask for assistance



# Thank you!

Visit us on the web SWMB.WV.GOV

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