

# 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
- ACCOMPLISHMENT OF THE ENTITY'S MISSION
- RELEVANT AND RELIABLE FINANCIAL REPORTING
- **E**FFECTIVE 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 Segregation of Duties **Written Polices and Procedures** Maintain updated, board-approved financial & operational policies Written Monthly Train staff on procedures and revise as needed Policies & **Financial Procedures** Reports Scale House & Cash Reconciliation Reconcile receipts daily & verify against billing and tonnage Internal Separate duties of receiving, reconciling, and auditing **Controls Budget & Expenditure Approvals** Require prior approval and board-adopted budgets Scale House & Set dollar thresholds and review variances monthly Control of Cash Financial Reconciliation **Control of Financial Access** Access Limit access by job role and apply dual oversight 3udget & Monitor activity for unauthorized or unusual access **Expenditure Approvals 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

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

## Successful Compliance

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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