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Chief Audit Executive

**August 2023**

**DeKalb County Government  
Finance Department**

**Audit Of Wire Transfer Processes**

**FINAL REPORT**

**Audit Report No. IA- 2022-081-FN**

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Lavois Campbell  
Chief Audit Executive

**FINANCE DEPARTMENT  
AUDIT OF WIRE TRANSFER  
PROCESSES  
AUDIT REPORT NO. 2022-081-FN  
FINAL**

**HIGHLIGHT SUMMARY**

**Why We Performed the Audit**

In accordance with the Office of Independent Internal Audit's (OIIA) audit plan, our office conducted a performance audit of DeKalb County's wire transfer processes. The objective of this audit was to determine if Internal controls over wire transfer processes across the County were adequately designed and operating as intended.

**How We Performed the Audit**

Our audit focused on wire transfer transactions, processes, and procedures from January 1, 2022, through December 31, 2022.

Our methodology included, but was not limited to, the following:

- Interviewed relevant County personnel.
- Reviewed current written policies and procedures.
- Researched related best practices.
- Tested a sample of transactions for compliance with policies and procedures.

**Background**

DeKalb County processed wire transfer payments totaling **\$697,486,587.75** in 2022. Wire transfer activity **increased 292% over the last five years**, from \$239,099,866.22 in 2018 to \$697,486,587.75 in 2022. Transfers are initiated when user departments (UD) submit supporting documentation to Treasury requesting that a wire transfer be processed. The supporting documentation is verified, and information is keyed into the Wells Fargo Bank's Commercial Electronic Office (CEO) application for payment. After the wire transfer is processed, a wire log is sent to the UD of all wires processed that day. Accounts Payable (AP) receives confirmation from Treasury of completed wire transfers. AP records the completed wire transfers in the County financial records.

**What We Found**

Our audit noted that the County has documented policies and procedures related to wire transfer processes. Also, there is appropriate entity-level segregation of duties between the user department (UD) initiation and approval of the wire transfer request, processing of the wire transfer payment by the Treasury Division and recording the completed transaction in the County's financial records by the Accounts Payable program area. However, the audit noted several areas where internal controls should be strengthened to help ensure wire transfers are accurate, complete, authorized, and safeguarded from fraudulent activities. The following table outlines those areas:

Audit Findings	Ratings
<b>1. Unauthorized User Department (UD) Employees "Initiated" and "Approved" Manual Wire Transfers Payments.</b>	
<b>2. Some Manual Wire Transfer Payments, Requested by UD's, Were Not Supported with Documented Evidence of Authorization.</b>	
<b>3. Some Preauthorized Debit Wire Transfer Payments Were Not Supported with Evidence of Senior Management Authorization Permitting Vendors to Initiate Payments from County Bank Accounts.</b>	
<b>4. No Evidence Senior Management Authorized the Opening of Some of the County Bank Accounts Used to Make Wire Transfers Payments.</b>	
<b>5. Treasury Management Monitoring Controls Were Not in Place for Wire Transfers Activities.</b>	
<b>6. Operating Policies and Procedures Are Not Current or Complete and Need to be Updated.</b>	
	No exceptions or internal control deficiencies were noted.
	Internal control enhancements were noted.
	Exceptions or internal control deficiencies were noted.

**What we Recommend**

We recommend that the Finance Department collaborate and work with user departments to address the internal control deficiencies and process improvements identified in this report.

**How Management Responded**

Finance Management agreed with all six findings identified in the report. Management also identified action plans to address the report findings by October 1, 2023.



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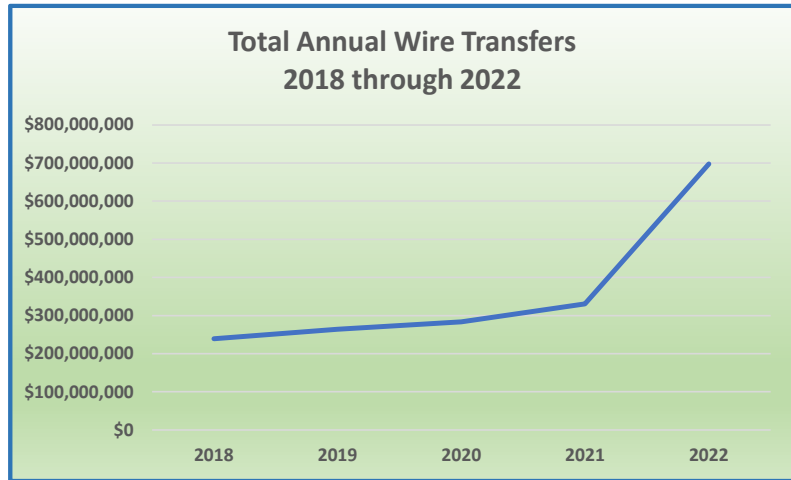


**BACKGROUND AND INTRODUCTION**

“A wire transfer is an electronic transfer of funds via a network that is administered by banks and transfer service agencies around the world. Wire transfers involve a sending and receiving institution and require information from the party initiating the transfer, such as the receiver’s name and account number. Wire transfers do not involve the physical exchange of cash but are settled electronically”<sup>1</sup>.

**Figure 1:**

DeKalb County processed wire transfer payments totaling **\$697,486,587.75** in 2022. Wire transfer activity **increased 292%** over the last five years, from \$239,099,866.22 in 2018 to \$697,486,587.75 in 2022. as shown in **Figure 1**.



Source: Oracle Blitz Report (DeKalb All Wires Issued) from Oracle, which is the County's official financial system of record

Wire transfers increased by \$367,052,123.82, or 53%, between 2021 and 2022. **Figure 2** below shows the top eight vendors that contributed to the increase:

**Figure 2:**

Wire Transfer Payments Variances 2021 through 2022			
Vendor Name	2022	2021	Variance
ADP INC	\$513,249,168.84	\$126,546,731.82	\$386,702,437.02
City of Atlanta	\$48,138,530.22	\$4,648,331.24	\$43,490,198.98
Blackhawk Network DBA OMNICARD LLC	\$3,035,752.55	\$1,017,862.95	\$2,017,889.60
BCBS of Georgia	\$36,561,763.81	\$35,169,520.07	\$1,392,243.74
Fulton DeKalb Hospital Authority	\$2,400,000.00	\$1,087,438.67	\$1,312,561.33
Georgia Piedmont Technical College	\$1,000,000.00	\$0.00	\$1,000,000.00
Care Mark	\$9,141,600.87	\$8,402,286.13	\$739,314.74
US Bank	\$25,445,644.26	\$25,057,214.06	\$388,430.20

Source: Oracle Blitz Report (DeKalb All Wires Issued). From Oracle, which is the County's official financial system of record.

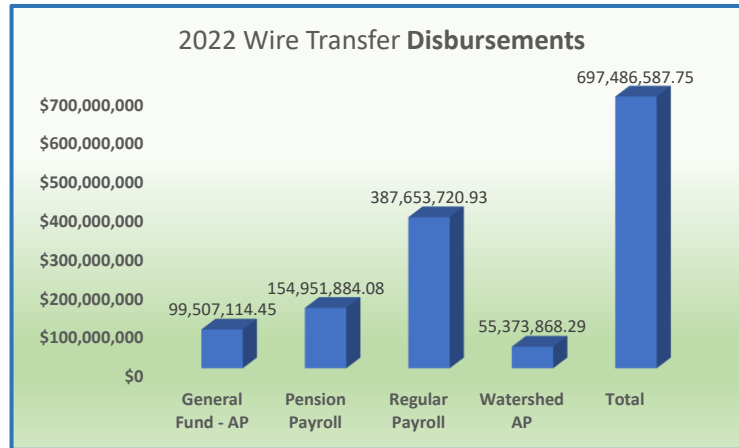
<sup>1</sup> <https://www.investopedia.com/terms/w/wiretransfers>



## Wire Transfer Disbursements

The County utilized four bank accounts from which wire transfers were disbursed during 2022. The largest single disbursement was made from the Regular Payroll account to ADP, Inc., as shown in **Figure 3** below:

**Figure 3:**



Source: Oracle Blitz Report (DeKalb All Wires Issued) from Oracle, which is the County's official financial system of record

Wire transfers are used primarily by a select number of County user departments (UD's) (e.g., Finance Department and Watershed Management Department) to make electronic payments to vendors.

The Oracle Gateway is an application within the Oracle Financial System that is used to initiate wire transfers. To initiate a transfer, the UD staff completes an Oracle Gateway Invoice Data Form that is signed by the UD initiator requesting the wire and routed with supporting documentation to the UD management for approval, and then the invoice details are keyed into the Oracle Gateway Financial system by the initiator. The Oracle Gateway Invoice Data Form and other UD support are forwarded to Treasury Division (Treasury), Finance Department for processing. Wire transfers are processed within the Wells Fargo Commercial Electronic Office (CEO) banking application, managed by Wells Fargo Bank. The CEO application is not integrated into the County's Oracle Financial System; the completed wire transfers are manually recorded into Oracle by Accounts Payable.

Wire transfers are either "manual" or "preauthorized debit" transactions. Manual wire transfers are non-recurring wires initiated by UD's and require manual input of data followed by review and approval of the wire instructions before wire payments are released. Preauthorized debit wire transfers are initiated by select vendors that the County's Chief Executive Officer or Chief Financial Officer (CFO) has preauthorized to access and disburse funds from specified County bank accounts for payment of regularly invoiced services. The preauthorization is perpetual until canceled by the County.

The following policies and procedures outline the requirements for the wire transfer processes:



- Treasury Disbursement – Policy & Procedure.
- How to Create a Wire and Book Transfers.
- DeKalb County Watershed (WS) Retainage Cash Processing Standard Operating Procedures – Treasury Department.

The objective of this audit was to determine if internal controls over wire transfer processes were adequately designed and operating as intended.

### **Audit scope and methodology**

Our audit focused on wire transfer transactions, processes, and procedures from January 1, 2022, through December 31, 2022.

Our methodology included, but was not limited to, the following:

- Interviewed relevant County personnel.
- Reviewed current written policies, procedures, and related best practices.
- Tested a sample of wire transfer transactions.

This audit did not include other payment types and processes, such as Automated Clearing House (ACH) and check payments; these areas were audited under the recent audits.

### **AUDIT RESULTS**

Our audit noted that the County has documented policies and procedures related to wire transfer processes. Also, there is appropriate segregation of duties between the user department (UD) initiation and approval of the wire transfer request, processing of the wire transfer payment by the Treasury Division and recording of the completed transaction in the County's financial records by the Accounts Payable program area. No fraud was identified in the sample of transactions tested for this audit. However, the audit noted several areas where internal controls should be strengthened to help ensure wire transfers are accurate, complete, authorized, and safeguarded from fraudulent activities.

This report details the findings and corresponding recommendations identified during our audit.

### **FINDING 1: Unauthorized User Department (UD) Employees “Initiated” and “Approved” Manual Wire Transfers Payments.**

Management confirmed that the department/division head designates user department (UD) initiators and approvers of wire transfer requests. The designation is documented by using an “Authorized Signatories for Electronic Funds Transfer (EFT) Form.” During our audit, we reviewed 28 wire transfer items to determine if the UD initiators and approvers were authorized to submit the requests to Treasury for payment. We determined that:

- 10 of 28 (36%) sampled wire transfer payments, totaling \$120,402,746.97, were requested by UD employees who were **not** designated by the UD head as an “initiator” and “approver” for wire transfer payment requests.
- Seven (7) individuals “initiated” wire transfer requests who were not designated authorized initiators.



- Three (3) individuals “approved” UD wire transfer requests who were not designated UD approvers.
- The process for establishing or determining authorized signatories, initiators, and approvers was **not** outlined in the existing wire transfer policy and procedures manual.

UD employees who were not authorized to initiate or approve wire transfers could submit fraudulent transactions for payment processing, resulting in a financial loss/liability to the County. In addition, due to the nature of the transactions, the County may have limited recourse to recover any fraudulent payments.

**Recommendations:**

We recommend that Finance management:

- Require that user departments document the name and signature of authorized initiators and approvers for wire transfer requests. The list should be periodically reviewed and updated by the UD head to help ensure it does not include employees who have separated from the department. Any updates should be immediately communicated to Treasury.
- Require that Treasury personnel verify with documented evidence that the initiator and approver of the request were authorized by the UD head **before** processing the wire transfer.
- Document the procedures for establishing authorized UD initiators and approvers for wire transfer requests submitted to Treasury.

**Management Response (Finance Management):**

<b>Management Agreement</b>	<b>Description of Management’s Action Plan to Address Finding</b>	<b>Estimated Timeline to Implement Action Plan</b>
<input checked="" type="checkbox"/> <b>Agree</b> <input type="checkbox"/> <b>Disagree</b>	Treasury will document all the names and signatures of all authorized wire transfer request personnel and update them as needed with the UD head. Treasury will update the procedures to include verifying all wire request signatures are authorized.	October 1, 2023

**FINDING 2: Some Manual Wire Transfer Payments, Requested by UDs, Were Not Supported with Documented Evidence of Authorization.**

County policy indicates that “business units that originate wire transfer requests must submit (to Treasury) an authorized *Oracle Invoice Gateway Data Form*, which includes the signatures of department... authorized initiators, and authorized approvers.” Treasury management stated that, after they receive the authorized form, they then verify that the information is consistent with supporting documents (e.g., supplier invoice) and approved by an authorized UD employee prior to Treasury personnel initiating and approving the processing of the wire transfer in the Wells Fargo’s Bank CEO application. We determined that processes were not adequate to demonstrate approval and verification for some wire transfer transactions, as shown below:

1. We selected a sample of 28 wire transfers. We reviewed the emails and other supporting documents (invoices) from the UD requesting the wire transfer.





However, we determined that 10 (36%) of the wire transfers sampled, totaling \$121,393,058.04, were not supported with the required Oracle Invoice Gateway Data Form or other documentation confirming that the requests were initiated and approved by UD employees who were authorized to make the requests.

Additionally, there was no evidence that Treasury verified the 10 requests prior to processing the payments.

2. We determined that the date fields and electronic signatures of UD initiators and approvers on some Gateway forms were not restricted from editing and could be manipulated.
3. The Wells Fargo CEO application can report the Treasury personnel who “initiated” the wire transaction; however, the CEO application cannot generate a report indicating the Treasury personnel that “approved” the final processing and payment of the wire transfer within the CEO application. Treasury management currently signs off on the physical Gateway forms when the wire transfer process is complete to document approval. However, a limitation with the CEO application prevented us from confirming that Treasury personnel who approved the wire transfer in the CEO application was consistent with the physical sign-off.

UD wire transfers requests without the required Oracle Invoice Gateway Data Form may not have been initiated and approved by UD employees who were authorized to make the requests. Furthermore, not verifying the authorization of the request prior to making payment may result in payments for unauthorized transactions and potentially fraudulent activity.

### **Recommendations:**

We recommend that Finance management:

- Collaborate with UDs to implement procedures to ensure UD wire transfer requests are **not** processed without a completed UD authorized Oracle Gateway Data form **or** an alternative standardized cover document capturing similar information.
- Revise the policy to indicate the types of transactions that require the use of the Gateway form so that it is clear when a Gateway form is required or not.
- Implement procedures requiring the retention of the form and supporting documents.
- Document procedures for Treasury’s verification of wire transfer requests upon receipt, supporting documentation, and UD authorization.
- Develop procedures to help ensure electronic signatures are “restricted” from editing. For example, using the restricted signature feature in the Adobe Acrobat application to prevent the date and signatures from being manipulated.
- Work with Wells Fargo Bank to implement procedures for obtaining application user activity reports, including “approval” of wire transfer transactions in the CEO application.



**Management Response (Finance Management):**

<i>Management Agreement</i>	<i>Description of Management’s Action Plan to Address Finding</i>	<i>Estimated Timeline to Implement Action Plan</i>
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Treasury will implement and revise all policies and procedures to ensure wire transfer requests are properly documented and secure. We will pull and save the audit wire transfer report every quarter.	October 1, 2023

**FINDING 3: Some Preauthorized Debit Wire Transfers Were Not Supported with Evidence of Senior Management Authorization Permitting Vendors to Initiate Payments from County Bank Accounts.**

Through discussions with management, we confirmed that County senior management (Chief Executive Officer or Chief Financial Officer) authorized select vendors to initiate access to and disbursement of funds from County Bank accounts for payment of regularly invoiced services. The preauthorization is perpetual until canceled by the County. We determined that documentation evidencing senior management’s preauthorization of vendors to initiate wire transfers was not available. Specifically, we noted the following:

- We tested a sample of four (4) vendors who were granted preauthorized debit for wire transfers. We determined that preauthorization agreements were **not** available for three (75%) of the four vendors. These vendors have initiated wire transfers totaling \$544,420.38 from the County’s bank accounts during 2022.
- The Preauthorized Wire Transfers process was not included in the Treasury Disbursement – Policies & Procedures manual.
- Upon review of the Oracle report of all wire transfers processed in 2022, we could **not** determine which transactions were identified as preauthorized debit wire transfers. Management was also unable to distinguish manual from vendor-initiated preauthorized wire transfers.

Without evidence of a preauthorized debit wire transfer agreement, there is the risk that the terms of any prior agreement may no longer be valid and current. In addition, the County may have been charged for unauthorized transactions submitted by unauthorized individuals, resulting in potential financial loss to the County.

**Recommendations:**

We recommend that Finance management:

- Request from Wells Fargo Bank a list of all vendors that are preauthorized to debit a county account for wire transfer transactions.
- Request that user departments review, at least annually, all vendor preauthorized wire transfer agreements to verify and update preauthorization terms if necessary. All documents supporting vendor approval and wire transfer preauthorization should be retained and available for review.
- Document procedures for handling preauthorized wire transfers.



**Management Response (Finance Management):**

<b>Management Agreement</b>	<b>Description of Management’s Action Plan to Address Finding</b>	<b>Estimated Timeline to Implement Action Plan</b>
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Treasury will send the master list to the UD to review annually and update procedures.	October 1, 2023

**FINDING 4: No Evidence Senior Management Authorized the Opening of Some of the County Bank Accounts Used to Make Wire Transfers Payments.**

We selected a sample of four (4) bank accounts, opened in 2018 and 2019, that facilitate the deposit and subsequent wire transfer payments of retainage funds related to vendor contract progress payments. Treasury facilitates the opening of County Bank accounts as requested by the UD and authorized by the CFO and Chief Executive Officer (CEO). Our audit determined that the authorization and approval for opening the County bank accounts were not always documented. We noted the following:

- For 2 of 4 (50%) bank accounts, evidence supporting the UD’s request and County authorization to open the bank accounts was unavailable. For the other two accounts in our sample, we were provided with the Account Opening Notice Letters endorsed by the CFO. The letters authorized Treasury to request that Wells Fargo bank open the accounts.
- We were not provided with evidence of the endorsed Wells Fargo Signature Cards that confirm account signatories for the four (4) bank accounts used to hold vendor retainage payments.

In addition, Treasury’s Retainage Account Policy states that the opening of a new bank account requires the authorization of the CEO **and** CFO. In contrast, the County prepared Wells Fargo DeKalb Authorization Certification/instructions to the bank indicated that *either* the CEO **or** the CFO could sign. There is an inconsistency between the County policy requirements and the certified bank instructions.

Without the required evidence, it is difficult to determine if all County bank accounts were authorized and have current and valid account signatories. Furthermore, it increases the risk of unauthorized and fraudulent transactions charged to the accounts, which could lead to financial and reputational losses for the County.

**Recommendations:**

We recommend that Finance management:

- Review all County bank account documentation to ensure documentation authorizing the opening of accounts are available. If documents are not currently on file with the County, Treasury should collaborate with Wells Fargo Bank to obtain copies of the supporting documentation, including the account signatory cards.
- Revise the Treasury Retainage Account Policy to help ensure it is consistent with the Wells Fargo DeKalb Authorization Certification.



**Management Response (Finance Management):**

<i>Management Agreement</i>	<i>Description of Management’s Action Plan to Address Finding</i>	<i>Estimated Timeline to Implement Action Plan</i>
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Treasury will ensure authorizing account information is available if requested.	October 1, 2023

**FINDING 5: Treasury Management Monitoring Controls Were Not in Place for Wire Transfers Activities.**

Based on discussions with management, we were informed that they were not performing monitoring procedures of wire transfer transactions over a period of time, e.g., year-over-year analysis. Management did not have documented procedures for performing and reporting on periodic monitoring activities of wires requested and processed. The analysis of historical and statistical data could support management decision-making **and** identify trends and patterns that may indicate inefficiencies in the process or fraud red flags for further investigation.

Examples of monitoring activities include a review of the following:

- Wire payments not processed promptly (aging report).
- Trend of wire activity (e.g., number, dollar, average).
- Total and average number of wires.
- Total and average dollar amount of wires.
- Volume of outgoing wire activity.
- Vendors that account for at least XX% of the wires disbursed.
- The largest or smallest wire transfer amounts are disbursed at a given time.
- Significant changes (increase/decrease) in wire transfer payments per vendor.
- Canceled wire transfer payments.

Furthermore, we determined that Treasury management does have access to the data needed to perform periodic monitoring activities. Treasury management can access the County’s financial record of completed wire transfer transactions via the Oracle Blitz reporting tool. Additionally, reports of wire transfer activities can be generated monthly or up to three months at a time via the Wells Fargo Commercial Electronic Office (CEO) system. Transaction data for a 12-month period are also available for a fee from Wells Fargo Bank.

Effective monitoring and evaluation activities help assess whether transactions and activities are processing in compliance with policies and procedures, internal controls are operating effectively, and performance goals are being met. Additionally, if monitoring and reporting activities are not performed, critical problems may not be highlighted, and opportunities for growth identified.

**Recommendations:**

We recommend that Finance management:

- Document procedures for performing and reporting on periodic analytical or monitoring activities of wires processed. Treasury should collaborate with the



county senior management and user departments to determine analytical and statistical information needs.

- Perform and report on the results of periodic analysis of wires transfer data. The reporting should consider the abovementioned examples and include but is not limited to an aging report and year-over-year trend analysis.

**Management Response (Finance Management):**

<i>Management Agreement</i>	<i>Description of Management’s Action Plan to Address Finding</i>	<i>Estimated Timeline to implement Action Plan</i>
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Treasury will develop Monitoring/Metric reports.	October 1, 2023

**FINDING 6: Operating Policies and Procedures Are Not Current or Complete and Need to be Updated.**

The Treasury Division’s Disbursement – Policy & Procedures manual, and the procedural document on How to Create a Wire and Book Transfers, includes several key controls, such as a) established wire templates for repeat transactions, b) a standardized form to evaluate wire transfers, c) required approvals to initiate and execute a wire transfer, and d) use of security token keys to control application user access to the Wells Fargo CEO application to process the wires.

However, our audit identified control deficiencies in the current policies and procedures. The table below highlights key processes that were 1) in practice but not documented or not implemented at all and 2) Areas in the current policies or procedures that need to be aligned with better practices.

#	1) Areas not documented in current policy and or operating procedures	#	2) Areas included in the current policies and procedures that need improvement.
1	<p><b>Authorization</b></p> <ul style="list-style-type: none"> <li>• The “Authorized Signatories for Electronic Funds Transfer (EFT) Form” is used by some departments to document the authorization of employees to initiate and approve a wire. However, this procedure is <u>not</u> documented. See Finding # 3 recommendations.</li> <li>• Implement requirements for UD to specify the approval limits for authorized UD initiators and approvers of wire transfer requests.</li> <li>• Document procedures for vendor-preauthorized debit wire transfers (see Finding #3 recommendations).</li> </ul>	1	<p><b>Wire request submission method</b> – specify the acceptable method (s) of submitting wire requests (e.g., in-person, phone, fax, email).</p>



#	1) Areas not documented in current policy and or operating procedures	#	2) Areas included in the current policies and procedures that need improvement.
2	<b>Wire request validation</b> Require Treasury personnel to: <ul style="list-style-type: none"> <li>Validate the completeness and accuracy of transaction data and the legitimacy of wire transfer requests <u>prior</u> to processing payment.</li> <li>Verify and authorize changes in vendor contact info and wire transfer bank account/template information <u>within</u> the Wells Fargo CEO application.</li> </ul>	2	<b>Wire transfer request form</b> – Require a standard form/cover sheet to support wire transfers not processed using the Oracle Invoice Gateway Data Form.
3	<b>Management monitoring activities</b> <ul style="list-style-type: none"> <li>Implement requirement for Treasury management to perform periodic monitoring activities: Refer to finding # 5.</li> <li>Document the existing process for preparing and distributing the daily wire log.</li> </ul>	3	<b>Roles and responsibilities</b> <ul style="list-style-type: none"> <li>Specify the key Treasury and UD roles and responsibilities for requesting, authorizing, processing, and management monitoring activities for the wire transfer process.</li> <li>Document the requirement for segregating conflicting duties, such as initiating and approving the wire in the CEO application.</li> </ul>
4	<b>Application User Access Management</b> Document procedures user account access management for Oracle Gateway Financial System and Wells Fargo CEO application. (Finding # 2, recommendation).		
5	<b>Record Retention</b> – outline wire transfer document type and associated retention periods.		

Comprehensive policies that are aligned with better practices and controls will help establish the tone at the top, ensure consistency and efficiency in wire transfer processes and activities, and enhance the security of public funds.

**Recommendations:**

We recommend that Treasury management revise its wire transfer policies and procedures to address the abovementioned gaps and deficiencies.

**Management Response (Finance Management):**

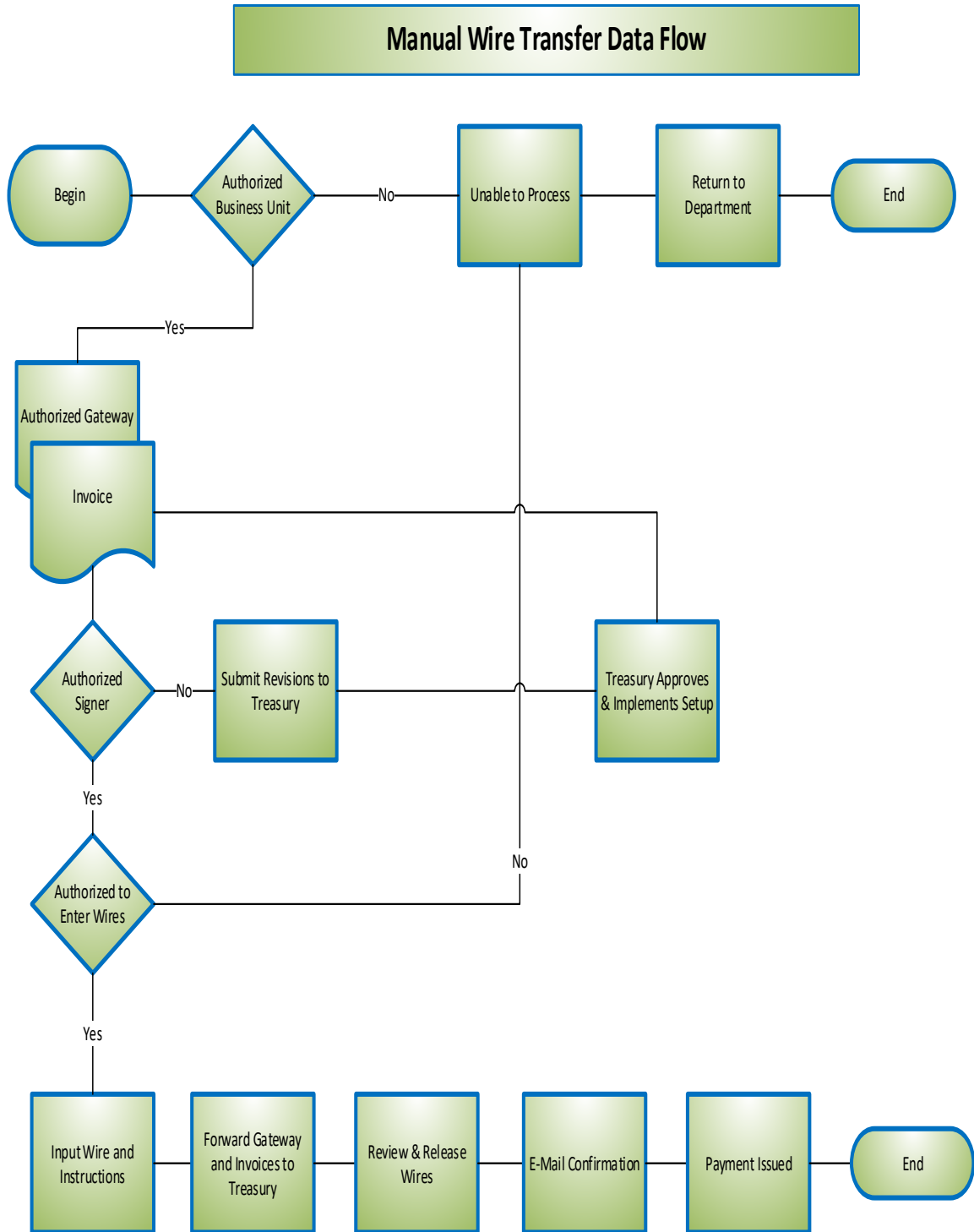
Management Agreement	Description of Management’s Action Plan to Address Finding	Estimated Timeline to Implement Action Plan
<input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree	Treasury will incorporate the resolutions to Findings 1 – 5 in its revised policy.	October 1, 2023





APPENDICES

Appendix I – Wire Transfer Process Flow Chart





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## Appendix II – Purpose, Scope, and Methodology

### Purpose

The objective of this audit was to determine if Internal controls over the wire transfer processes are adequately designed and operating as intended.

### Scope

Our audit focused on wire transfer transactions, processes, and procedures for current transactions. Audit samples included, but were not limited to, transactions from January 1, 2022, through the present.

### Methodology:

Our methodology included, but was not limited to, the following:

- Interviewed relevant County personnel.
- Reviewed current written policies and procedures.
- Researched related best practices.
- Tested a sample of transactions for compliance with County wire transfer policies.





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## Appendix III – Management Response

August 16, 2023

Lavois Campbell  
Chief Audit Executive  
Office of Independent Internal Audit  
1300 Commerce Drive, Suite 300  
Decatur, Georgia 30030

**RE: Management Response to “Audit of the DeKalb County Wire Transfer Processes”**

Dear Mr. Campbell:

In accordance with DeKalb County, Georgia – Code of Ordinances / Organizational Act Section 10A- Independent Internal Audit, this is our response to the finding and recommendations in the OIIA’s Audit of the DeKalb County Wire Transfer Processes”. As required by the ordinance, our response includes 1) a statement regarding our agreement or disagreement along with reasons for any disagreement, 2) our plans for implementing solutions to issues identified, and 3) the timetable to complete such plans.

If you have any questions about this response, please contact me.

Sincerely,



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## Appendix IV – Definitions and Abbreviations

### Acronyms and Abbreviation

**CFO:** Chief Financial Officer

**BOC:** Board of Commissioners

**CEO:** Chief Executive Officer.

### Definitions

**ACH Payments:** Are electronic payments made through the Automated Clearing House (ACH) network.

**Wire Transfer:** is a method of electronic funds transfer from one person or entity to another. A wire transfer can be made from one bank account to another bank account, or through a transfer of cash at a cash office.

**Token Keys:** It acts like an electronic key to access something. Examples of security tokens include wireless keycards used to open locked doors, or a banking token used as a digital authenticator for signing into an online banking or signing a transaction such as a wire transfer.



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Robert Atkins, Deputy CFO, and Treasurer



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## PROJECT TEAM

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**This report was submitted by:**

*Clenty C. Hinton*

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Clenty Hinton, CGAP  
Internal Auditor, Senior.  
Office of Independent Internal Audit

8.21.23

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Date

**This report was reviewed by:**

*Len Ohnstad*

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Leonard Ohnstad, CIA, CPA  
Internal Audit Manager  
Office of Independent Internal Audit

8.21.2023

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Date

**The report was approved by:**

*Lavois Campbell*

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Lavois Campbell, CIA, CFE, CISA, CGA  
Chief Audit Executive  
Office of Independent Internal Audit

8.21.2023

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Date



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## STATEMENT OF ACCORDANCE

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### Statement of Accordance

*The mission of DeKalb County is to make the priorities of the citizens of DeKalb County; the priorities of County government - by achieving a safer DeKalb, building stronger neighborhoods, creating a fiscally accountable and more efficient county government, and uniting the citizens of DeKalb County.*

*The mission of the Office of Independent Internal Audit is to provide independent, objective, insightful, nonpartisan assessment of the stewardship or performance of policies, programs, and operations in promoting efficiency, effectiveness, and integrity in DeKalb County.*

*This performance audit was prepared pursuant to DeKalb County, Georgia – Code Ordinances/Organizational Act Section 10A- Independent Internal Audit. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.*

*This report is intended for the use of the agency to which it was disseminated and may contain information that is exempt from disclosure under applicable law. Do not release without prior coordination with the Office of Independent Internal Audit.*

*Please address inquiries regarding this report to the Office of Independent Internal Audit at 404-831-7946.*