

CITY OF
LAKELAND
TENNESSEE



Risk Assessment

Disaster	High	Medium	Minor
Critical	Critical	High	Medium
Critical	High	Medium	Medium
Critical	High	Medium	Low
High	Medium	Medium	

INTERNAL CONTROL MANUAL

REVISED JUNE 2020



TABLE OF CONTENTS

- Introduction 3
- Five Components of Internal Control 4
 - 1. Control Environment 4
 - Organizational Chart 6
 - 2. Risk Assessment 7
 - 3. Control Activities 8
 - Collections/ACHs 8
 - Disbursements/Drafts 9
 - Safeguarding Assets 10
 - Compliance 11
 - 4. Information and Communication 12
 - 5. Monitoring 13
- Summary 13

INTERNAL CONTROL MANUAL

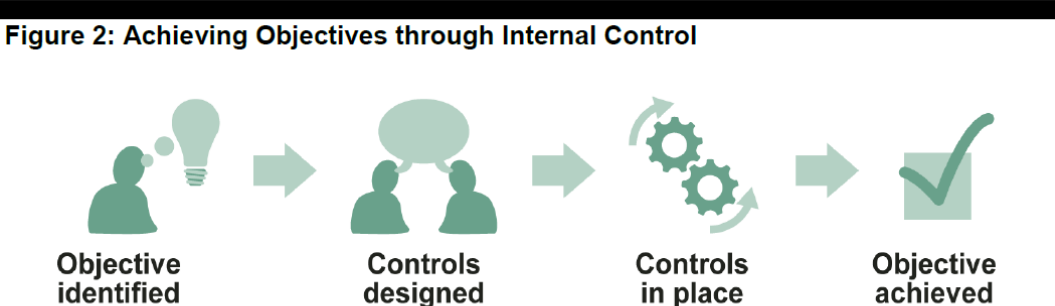
Introduction

The City of Lakeland (the “City”) has the responsibility to its taxpayers, ratepayers, and constituents to be good stewards of public monies and property. In our efforts to serve the public as city officials or employees, the City established this Internal Control Manual using widely recognized best practices as well as state and federal guidance.

State of Tennessee statutes require the Comptroller’s Office, Department of Audit to prescribe uniform accounting systems for entities that handle public funds. Those statutes require public officials to adopt and use the system designated by the Comptroller’s Office. The Tennessee Legislature amended TCA Section 9-2-102 in 2015 to require local governments to establish and maintain internal controls in accordance with guidance issued by the U.S. Government Accountability Office (“GAO”). The guidance is titled *Standards for Internal Control in the Federal Government* (the “Green Book”). The Green Book follows the format developed by the Committee of Sponsoring Organizations (“COSO”) which has been the gold standard of internal control for all entities except the federal government for several years.

What is Internal Control?

Internal control is the process effected by the Board of Commissioners, management, and other City personnel that provides reasonable assurance that the City’s objectives will be achieved. The process of achieving these objectives through Internal Control is illustrated below in Figure 2 from the GAO Green Book.



Source: GAO. | GAO-14-704G

How Does Internal Control Work?

The City’s system of Internal Control applies to all functions, operating units, and divisions. The internal control system consists of three (3) objectives and five (5) main components.

THREE (3) OBJECTIVES OF INTERNAL CONTROLS:

1. Operations – effectiveness and efficiency of operations
2. Reporting – reliability of reporting for internal and external use
3. Compliance – compliance with applicable laws, regulations, contracts, and grant agreements

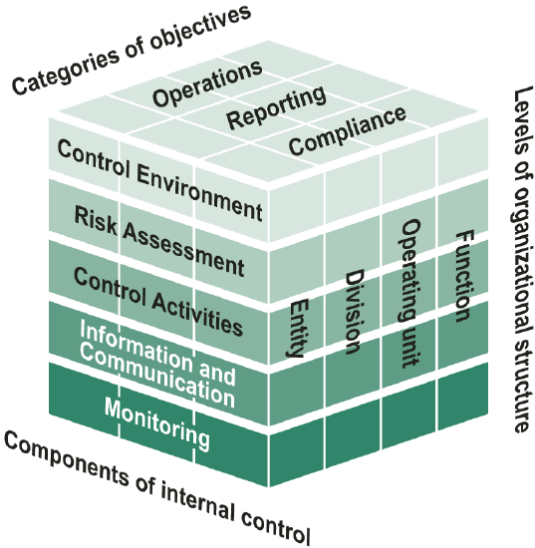
FIVE (5) MAIN COMPONENTS OF INTERNAL CONTROLS:

1. Control Environment
2. Risk Assessment
3. Control Activities
4. Information and Communication
5. Monitoring

INTERNAL CONTROL MANUAL

The relationship of the objectives and components of internal control to the City's functions, operating units, and divisions is typically illustrated by a cube diagram developed by COSO as used in the GAO Green Book as Figure 4.

Figure 4: The Components, Objectives, and Organizational Structure of Internal Control



Sources: COSO and GAO. | GAO-14-704G

What is the Purpose of this Internal Control Manual?

The purpose of this manual is to ensure that the objectives of reporting and compliance are established. The policies to achieve the objectives are derived from various financial best practices and state and federal laws and regulations. Policies may be developed to suit specific needs of City functions and resources. Detailed procedures are then developed and documented as a means for the City to comply with its established policies.

Five Components of Internal Control

1. Control Environment

Overview

The control environment is the foundation for all other components of internal control, providing discipline and structure. Moreover, management establishes the tone at the top regarding the importance of internal control and expected standards of conduct and reinforces expectations at various levels. Control environment factors include the integrity, ethical values, and competence of the city's personnel; the way management assigns authority and responsibility and organizes and develops its personnel; and the attention and direction provided by the governing body.

Objectives

The governing body and management should:

1. Conduct business with integrity and ethical behavior.
2. Provide direction and oversight for city's internal control system.

INTERNAL CONTROL MANUAL

3. Hire qualified and competent management.
4. Establish structure, authority and responsibility, and hold individuals accountable for internal control responsibilities.

Policies

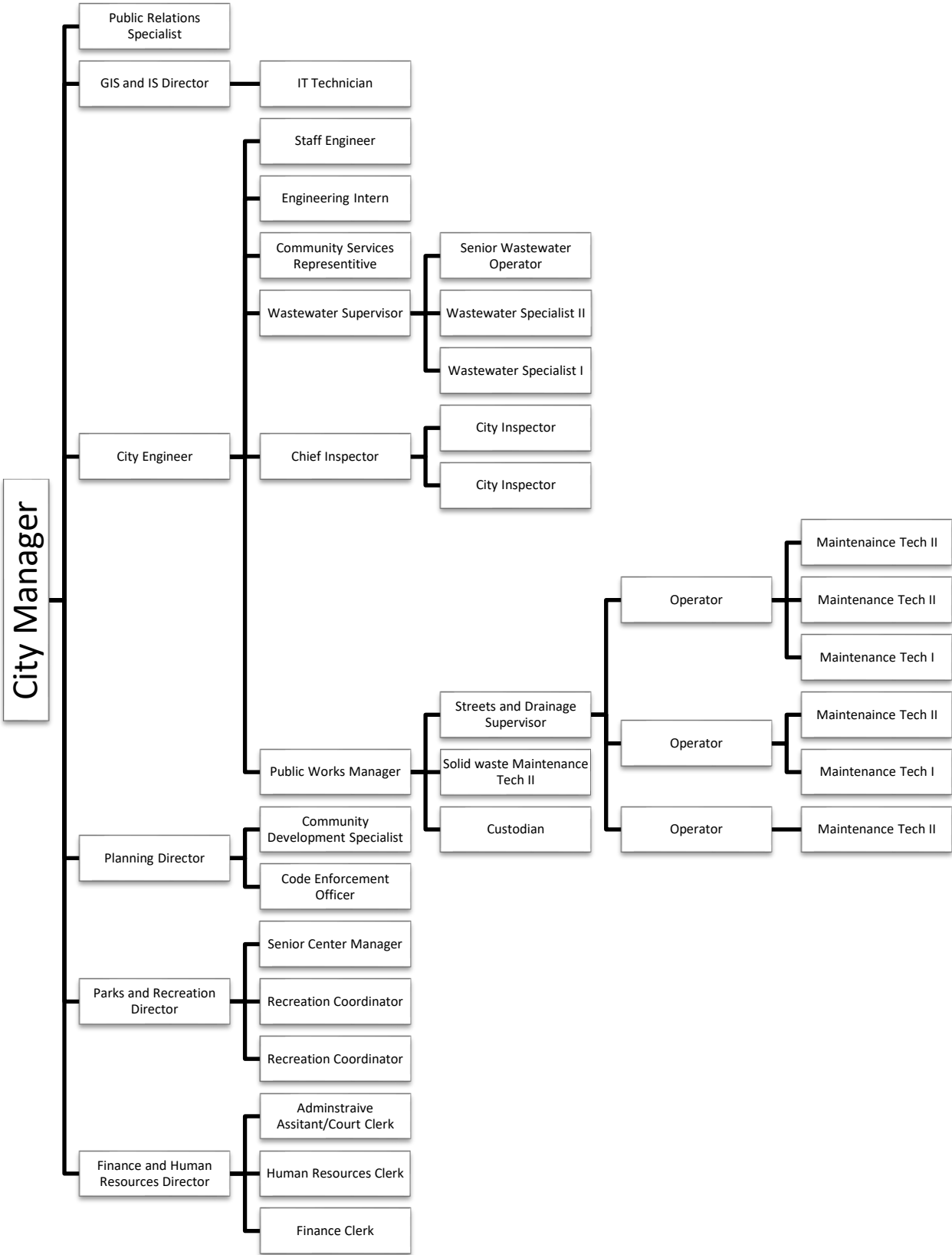
1. The governing body through management has adopted a personnel manual that details policies, expectations, and other employment-related topics.
2. Each employee receives a copy of the city's personnel manual, which includes a policy on business ethics and conduct, and signs an acknowledgement of receipt.
3. Management has developed job descriptions for each position and reviews employee compliance on an annual basis through performance evaluations.
4. The governing body has adopted a financial policies manual that details expectations surrounding the annual budget process, ethical conduct, long-term financial planning, and other key financial-related areas.
5. The governing body uses the budget process as a means of oversight with department heads.
6. Organizational charts are reviewed for needed changes regarding authority and responsibility.

Procedures

- The Finance and Human Resources Director reviews the personnel manual annually to determine needed revisions to comply with federal and state laws, as well as practices of the city.
- The City Manager reviews suggested revisions, if any, by the Finance and Human Resources Director and presents the finalized manual to the Board of Commissioners for approval. The City holds annual required training where human resource topics are covered. The code of conduct and the personnel manual are always part of the training.
- Detailed job descriptions with minimum job requirements are maintained for each position within the city.
- Department heads review employee job descriptions annually to ensure compliance and document employee performance and conformity through an annual employee evaluation.
- The Finance and Human Resources Director prepares the annual budget beginning in January, with input from the City Manager and department heads, using historical data from the three (3) previous years. The Finance and Human Resources Director also prepares an annual capital budget, a five-year CIP projection, and a long-term financial plan as components of the Annual Budget document.
- The proposed budget is presented to the Board of Commissioners during at least one (1) budget workshop. The City Manager, Finance and Human Resources Director, and all department heads are present to explain their budgets or request additional funding.
- The budget ordinance is prepared for first reading in May and second reading and final passage in June. The required public notice is published in the local newspaper no less than ten (10) days prior to the second and final reading.
- City organizational charts were developed based on the city structure required in the city charter.
- The charts are reviewed periodically as job descriptions and positions are added or changed to determine if the reporting structure, authority, and responsibility documented in the chart is still accurate.

INTERNAL CONTROL MANUAL

Organizational Chart



INTERNAL CONTROL MANUAL

2. Risk Assessment

Overview

City officials and management assess risk of operations continually. The city has chosen to transfer the most common types of risk through the purchase of the following types of insurance:

- Property and Casualty
- Liability
- Errors and Omissions
- Worker Compensation
- Surety Bonds

There are risks the City cannot anticipate or know about, and as it relates to financial and compliance issues, the City has assessed the following areas and identified certain risks that need to be addressed by the development of internal control policies and procedures. Internal controls will not eliminate all risk but will help reduce risk to gain reasonable assurance that reporting and compliance objectives are being met.

Objectives

1. **Collections** are complete, timely, and accurate.
2. **Disbursements** are for a valid city purpose and properly recorded.
3. **Assets** are properly safeguarded.
4. City is in **compliance** with contractual, local, state, and federal laws and regulations.

Risks

1. Collections could be lost or misappropriated.
2. Collections could be recorded improperly.
3. Collections may not be deposited in the bank and recorded timely.
4. Disbursements could be unauthorized.
5. Disbursements could be for personal items.
6. Disbursements could be made for items never received.
7. Bank balances may be inaccurate due to failure to reconcile bank accounts.
8. Capital assets or inventory items could be missing.
9. Inventory is not available when needed.
10. Grant funds could be spent for unallowable items.
11. Grant rules may not be followed which could result in having to return federal funds.
12. Federal reporting requirements were not met.

The significant areas of risk are identified above, and policies and procedures will be documented in the next section to explain how the city plans to put internal controls in place to help reduce the key risks associated with these areas of operations.

INTERNAL CONTROL MANUAL

3. Control Activities

Overview

Detailed procedures will be documented in this section. The objectives, policies, and implemented procedures will be described for each of the significant areas identified in the Risk Assessment section.

Collections/ACHs

Objectives

1. Collections are complete, timely, and accurate.
2. Collections are safeguarded.
3. Collections should be recorded accurately and timely in the accounting system.

Policies

1. All collections will be receipted to the appropriate fund and revenue code and recorded in the general ledger daily by the Administrative Assistant and/or Senior Center Manager, as appropriate.
2. A pre-numbered receipt will be issued for each collection made.
3. The cash drawer and payment lockbox will be reconciled monthly by two people and the receipt log will be signed.
4. No checks will be cashed from the cash drawer.
5. All funds will be deposited within three (3) business days.
6. The cash drawer will be locked when unattended and placed in a designated area after hours.
7. At no time will cash be left out in the open unattended.
8. Collections and associated receipts will be immediately placed in the payment lockbox.
9. Employees are prohibited from comingling city assets with personal assets.
10. Chart of accounts codes will be reviewed with the Administrative Assistant and Senior Center Manager on a regular basis.
11. All daily collection reports are posted to the general ledger by the accounting system at the end of each business day as part of the Administrative Assistant's daily closing process.
12. Segregation of duties shall be maintained between access to cash receipts and recording, through the review of daily collection reports by the Finance Clerk and monitoring by the Finance and Human Resources Director.
13. Reconciliations of the City's bank accounts, including cash receipts, are performed monthly by the Finance and Human Resources Director.

Procedures

- The Administrative Assistant will enter all collections immediately in the accounting system using the correct fund and revenue code.
- The Administrative Assistant and/or Senior Center Manager will immediately stamp all checks "for deposit only" in the appropriate fund bearing the city's name.
- A pre-numbered receipt is issued for all collections by the accounting system. Receipt lists date, amount, payer, proper accounting code, cash or check and is signed by cashier. One copy is given to every customer and one copy is retained with the daily receipt log with proper backup documentation.
- The cashier will reconcile his/her cash drawer monthly. All collections will be put into the payment lockbox and retrieved daily by the Finance Clerk for review, verification, and preparation of the deposit.
- The prepared deposit will be given to the Finance and Human Resources Director to review and verify.
- The Finance and Human Resources Director (or their designee) will deliver the deposit to the bank within three (3) business days of collection.

INTERNAL CONTROL MANUAL

- The deposit will be secured in the office of the Finance and Human Resources Director or their designee until it is delivered to the bank.
- The deposit receipt will be returned to the Finance Clerk for reconciliation with the receipt log and general ledger report.
- The Finance and Human Resources Director will reconcile the bank statements monthly and the City Manager will review reconciliations. Dates will be compared to deposit records for timeliness. Receipts will be reviewed for accurate amounts, coding, proper signature, and other required information.
- The cashier retains the key to the cash drawer. The drawer is always to remain locked when unattended.
- The cash drawer will be locked in a designated area after hours and on weekends.
- The cash drawer will be reconciled monthly by two people and a cash report will be signed by both employees.
- The payment lockbox will be reconciled monthly by the Finance Clerk. The lockbox will remain locked at all times and the Finance Clerk will have the only key.
- The Finance and Human Resources Director will periodically perform surprise cash counts to ensure there are no personal checks being held in the cash drawers and to ensure the drawers are in balance.
- The cashier posts the daily transactions to the general ledger after reconciling each day.
- The Finance Clerk will review the transactions for accuracy and make any adjustments or changes with the approval of the Finance and Human Resources Director.
- The Finance and Human Resources Director will reconcile the daily cash reports, deposit slips, and bank statements monthly.

Disbursements/Drafts

Objectives

1. Disbursements are for a valid city purpose and necessary.
2. Disbursements are timely.
3. Disbursements are accurately coded and recorded in the accounting system.
4. Disbursements are legally appropriated.

Policies

1. The city has adopted purchasing policies that comply with state law.
2. Various levels of authority have been assigned.
3. Purchase orders and packing slips are matched (typically electronically through the City's ERP system) and given to the Finance Clerk for payment as soon as possible.
4. Checks are processed weekly to ensure timely payment of invoices.
5. All invoices require electronic approval by a departmental Director and City Manager within the accounting system before checks are processed.
6. All invoices have documentation attached electronically before being submitted for electronic approval.

Procedures

- All purchases will be made in accordance with the City's purchasing policy.
- Employees will complete a requisition in the ERP system for all purchases in order to encumber the funds. The employee's supervisor will review and authorize the requisition electronically.

INTERNAL CONTROL MANUAL

- The accounting system will notify an employee if adequate funds are not available for any requisition, and the requisition will not be processed until available funds have been allocated by way of a budget transfer or amendment.
- Budget transfers are only recorded by the Finance and Human Resources Director.
- After a requisition has been approved, the employee will be notified that a purchase order has been generated.
- Employees will provide printed purchase orders to vendors when a purchase is made.
- The Finance Clerk will verify that packing slips and purchase orders match before payment of invoices.
- The Finance Clerk will prepare weekly invoice batches using backup documentation and present the batches to the Finance and Human Resources Director for review and approval of expenditure codes.
- The Finance and Human Resources Director verifies all expenditure codes for accuracy and availability of funds prior to the Finance Clerk processing invoice payments.
- The approving departmental Director and City Manager review backup documentation and electronically approve all invoices in the accounting system before a check is generated.

Safeguarding of Assets

Objectives

1. Ensure city assets are properly valued and protected.
2. Ensure cash and other asset accounts are reconciled.
3. Ensure investments are safe and in accordance with adopted investment policy.
4. Ensure city assets are protected against loss, misappropriation, or theft.
5. Ensure inventory items are available when needed for use.

Policies

1. All bank account statements (checking, savings, investments, etc.) are reconciled to the general ledger accounts within 30 days of the date of the statement.
2. All bank accounts are appropriately collateralized. Bank accounts maintained in the State Collateral Pool are classified as "Public" on the bank's records.
3. All bank accounts are held in financial institutions under the city's name and only authorized employees (two signatures required) are allowed to open new accounts with the approval of the Board of Commissioners.
4. All withdrawals, checks, liquidations, etc., from any bank account require two signatures.
5. All investments require two signatures.
6. All depository activity is maintained in compliance with the City's Financial Policies Manual.
7. Inventory records contain enough information to readily identify corresponding capital assets. Capital assets are tagged or otherwise identified during a physical inventory that is performed annually.
8. Proper safeguards are in place to prevent theft or loss of assets.

Procedures

- The Finance and Human Resources Director reconciles the bank account statements to the general ledger on a monthly basis using an account analysis of each cash account.
- The City Manager reviews and approves the reconciliations and any adjustments to the general ledger.
- Outstanding reconciling items aged more than ninety (90) days are reviewed by the Finance and Human Resources Director, and appropriate action is taken to resolve the items (such as voiding and re-issuing checks, remittance to the State of Tennessee of unclaimed property).

INTERNAL CONTROL MANUAL

- Any requests for new bank accounts are presented to the Board of Commissioners for approval. If approved, the Finance and Human Resources Director and City Manager will complete the necessary paperwork to open the new account in the city's name and ensure that the bank holds the funds in a fully collateralized account.
- The Finance and Human Resources Director will annually review the accounts for accuracy of signers and proper collateralization.
- Assets valued in excess of \$500 will be appropriately marked or tagged.
- The Finance and Human Resources Director coordinates an inventory count of significant assets on an annual basis through the review process for insurance renewal. Disposal of inventory is done in a way that sensitive information cannot be retrieved.
- Insurance policies are reviewed and renewed annually for accuracy of covered assets.
- Surety bonds are renewed on an annual basis for all employees that handle cash.

Compliance

Objectives

1. Ensure that state laws regarding the issuance of debt are followed.
2. Ensure that state and federal grant regulations are understood and followed.
3. Ensure that note disclosures in the financial statements contain all required elements.

Policies

1. The city has adopted and maintains a debt management policy in accordance with state requirements.
2. The Finance and Human Resources Director and City Manager consult with the city's financial advisor on all debt-related issues.
3. Every department must notify the Finance and Human Resources Director when an application for 100% grant funding is submitted and subsequently awarded.
4. All grants with matching requirements must be approved by the City Manager and Finance and Human Resources Director, and subsequently approved by the Board of Commissioners, prior to submission of application.
5. Once awarded, the Finance and Human Resources Director is to be notified of the project budget and detailed expenditure requirements of the grantor agency.
6. The Finance and Human Resources Director must be provided with the grant contract information, grant or contract numbers, and whether the grant is state or federal funds.
7. The Finance and Human Resources Director will amend the budget as necessary to accommodate awarded grant revenues and expenditures.

Procedures

- The City Manager and Finance and Human Resources Director annually review the debt management policy.
- Before the issuance of debt, the Finance and Human Resources Director consults with the city's financial advisor to determine the impact or implications to the city's financial well-being.
- Department heads are responsible for working with the Finance and Human Resources Director to submit all grant applications.
- All grant applications for grants requiring matching funds will be presented to the Board of Commissioners for approval before submission to ensure that funding will be made available.

INTERNAL CONTROL MANUAL

- The Finance and Human Resources Director will determine any needed budget amendments upon receiving notice of award for any grant funds. The budget amendments will be presented to the Board of Commissioners for approval.
- Grant management responsibilities will be assigned to an appropriate employee for every grant.
- The Finance and Human Resources Director will be notified when any reimbursements have been submitted so that the revenue can be allocated to the appropriate revenue code.
- A copy of every grant application and contract will be filed with the City Recorder and secured electronically.

4. Information and Communication

Overview

Management has the responsibility to adequately communicate and provide information to both internal and external parties. It is important that employees know the objectives, policies, and procedures management has established and what the expectations are for internal controls. External stakeholders (citizens, developers, creditors) also seek information regarding objectives and reliable financial information.

Objectives

1. Ensuring that quality information for achieving the city's objectives is available and used; internally communicated by management; and externally communicated by management.

Policies

1. Information will be communicated in the same format in which it is maintained.
2. Reliable and accurate information will be communicated to those who need it in a timely and useful format.
3. Information will be maintained in a way that allows management to remain confident that information released is accurate, and that the release of information is in compliance with policies and procedures.

Procedures

- The city maintains financial data in a computerized accounting system. Requests for financial information should be provided through a computer-generated report to maintain the integrity of the data.
- Any requests for data maintained in the city's asset management computerized system will be provided through a computer-generated report from that system to maintain the integrity of the data.
- The city complies with the Tennessee Public Records Act, Tennessee Open Meetings Act, and observes the guidelines provided by the Office of Open Records Counsel.
- All requests for information or records will be forwarded to the City Recorder to ensure compliance with state law.
- The city will redact all personally identifiable, confidential, or protected information in accordance with state law.
- Management clearly defines the lines of communication through policy manuals and organizational charts.

INTERNAL CONTROL MANUAL

5. Monitoring

Overview

The internal control system changes as technology, staff, objectives, and policies change. Management is charged with continually monitoring the internal control system to determine if it is operating as it was designed to do and to ensure the controls are being followed.

Objectives

1. Practice activities to monitor the internal control system and evaluate results.
2. Address deficiencies noted in the internal control system in a timely manner.

Policies

1. An annual risk assessment will be conducted to ensure that internal controls continue to work as designed over time.
2. The city will establish more efficient and effective operations over time.
3. Accurate and reliable information will be used in decision-making.

Procedures

- Management annually evaluates the state of the internal control system and determines any deviations from the designed criteria and the current condition of the system.
- Management makes a decision on whether to change the design of the internal control system or implement corrective actions to improve the effectiveness of the existing system.
- Members of management will periodically review the procedures outlined in this manual to ensure that policies are being implemented and objectives are being met.
- Financial reports will be generated monthly and reviewed by those in a position of authority over financial operations. Those in a position of authority include, but are not limited to, the Finance and Human Resources Director/CMFO, City Manager, and Board of Mayor and Commissioners.

Summary

The framework of this manual complies with the state requirements and was created using the Green Book as guidance. This manual will be reviewed annually and updated as needed. All employees of the City of Lakeland will be required to abide by the policies and procedures outlined in this manual, as well as any corresponding state laws. The manual will be made available electronically and in paper form.

The City of Lakeland will abide by the Internal Control and Compliance Manual for Governmental Entities and other Audited Entities in Tennessee issued by the Comptroller of the Treasury.

Supplementary Information

TN Comptroller of the Treasury
<http://www.comptroller.tn.gov>

Internal Control and Compliance Manual (12/2015)
http://www.comptroller.tn.gov/la/pdf/20150202ICManual_Complete.pdf