

# AUDIT REPORT

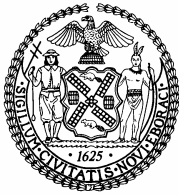


CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
BUREAU OF MANAGEMENT AUDIT  
**WILLIAM C. THOMPSON, JR., COMPTROLLER**

## **Audit Report on the Financial Controls Over Cash Receipts at the Department of Finance Business Centers**

*MJ07-097A*

**June 11, 2007**



THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
1 CENTRE STREET  
NEW YORK, N.Y. 10007-2341

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WILLIAM C. THOMPSON, JR.  
COMPTROLLER

**To the Citizens of the City of New York**

Ladies and Gentlemen:

In accordance with the Comptroller's responsibilities contained in Chapter 5, § 93, of the New York City Charter, my office has examined the financial controls over cash receipts collected at the six Department of Finance (DOF) Business Centers. The audit covered December 1, 2006, through March 31, 2007.

DOF assesses the values of all New York City properties, maintains property records, administers business income and excise taxes, and oversees the operations of the Parking Violations Bureau. DOF is also responsible for the efficient collection of taxes and other revenue due the City. Audits such as this provide a means of ensuring that agencies adequately safeguard and ensure the accurate, timely, and complete recording and reporting of cash receipts.

The results of our audit, which are presented in this report, have been discussed with DOF officials, and their comments were considered in the preparation of this report.

I trust that this report contains information that is of interest to you. If you have any questions concerning this report, please e-mail my audit bureau at [audit@comptroller.nyc.gov](mailto:audit@comptroller.nyc.gov) or telephone my office at 212-669-3747.

Very truly yours,

A handwritten signature in cursive script that reads "William C. Thompson, Jr.".

William C. Thompson, Jr.

**Report:** MJ07-097A  
**Date:** June 11, 2007

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*The City of New York*  
*Office of the Comptroller*  
*Bureau of Management Audit*

**Audit Report on the Financial Controls  
Over Cash Receipts at the  
Department of Finance Business Centers**

**MJ07-097A**

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**AUDIT IN BRIEF**

This audit determined whether the New York City Department of Finance (DOF) maintains adequate financial controls over cash receipts collected at its six Business Centers.

(DOF) assesses the values of all New York City properties, maintains property records, administers business income and excise taxes, and oversees the operations of the Parking Violations Bureau. DOF is also responsible for the efficient collection of taxes and other revenue due the City. DOF operates six walk-in Business Centers—two in the Bronx and one in each of the other four boroughs—that provide services and accept payments for parking violations, red-light camera traffic fines, property taxes, water charges, etc. According to DOF, during calendar year 2006, the Business Centers collected \$4.8 billion.<sup>1</sup>

**Audit Findings and Conclusions**

DOF maintains adequate financial controls over cash receipts collected at its six Business Centers. These controls generally adhere to and comply with Comptroller's Directives #1 and #11. Based on our observations, DOF maintained adequate segregation of duties over the handling, processing, and reconciliation of cash receipts. Further, the cash receipts, totaling \$43.1 million, collected by 39 cashiers on the days of our observations at particular centers were appropriately reconciled and found to be accurate, timely, and complete.

However, regarding other related matters, we found that DOF did not have formal written policies and procedures to cover all aspects of the cash collections and reporting functions. In addition, while DOF has general and technical controls in place to protect NYCServ data and ensure the availability of system services, the agency does not have a formal business continuity and disaster recovery plan for NYCServ.<sup>2</sup>

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<sup>1</sup> Based on information provided by DOF.

<sup>2</sup> NYCServ is a fully-integrated, electronic, information processing system that consolidates the DOF Business Center cashiering system and other payment systems with various City agencies' mainframe systems.

While these conditions do not detract from our overall opinion regarding the controls over cash receipts at the Business Centers, they do increase the risk that DOF may not be adequately prepared to respond to a major disaster or unplanned disruption of NYCServ and other mission-critical DOF system operations. These matters are discussed in greater detail in the following sections.

### **Audit Recommendations**

To address these issues the audit made two recommendations. We recommend that DOF should:

- Ensure that written policies and procedures for each work unit involved in cash collections (i.e., Payment Operations, Reconciliation Unit, etc.) comprehensively document and address the various processes, controls, and levels of responsibility. The written policies and procedures documentation (e.g., manual) should be distributed to appropriate DOF departments and personnel and be updated periodically to address newly implemented or restated procedures.
- Develop and periodically test a formal BCP-DRP to ensure that NYCServ and other agency mission-critical applications are adequately protected in the event of a disaster or unplanned disruption in operating capabilities. The BCP-DRP should incorporate plans for an alternative processing facility, Business Center recovery strategies, and written backup and off-site storage procedures.

### **Agency Response**

DOF agreed with the two recommendations made in this audit. The full text of the DOF response is included as an addendum to this report.

# INTRODUCTION

## **Background**

The Department of Finance (DOF) assesses the values of all New York City residential and commercial properties, maintains property records, administers 14 business income and excise taxes, and oversees the operations of the Parking Violations Bureau. DOF is also responsible for the efficient collection of taxes and other revenue due the City, and enforces compliance with various City tax and revenue regulations.

DOF provides multiple channels through which people can pay their taxes, fines, and other fees owed the City, including traditional mail, the Internet, an interactive telephone payment system (IVR), and payment kiosks located around the City. DOF also operates six walk-in Business Centers—two in the Bronx and one in each of the other four boroughs—that provide services and accept payments for parking violations, red-light camera traffic fines, property taxes, water charges, etc. During calendar year 2006, the Business Centers collected \$4.8 billion.

DOF uses NYCServ, a fully-integrated, electronic-processing system that consolidates the Access-to-Government (A2G)<sup>3</sup> Business Center cashiering system and other payment systems (Internet, IVR, and kiosks) with various City agencies' mainframe systems. A2G cashiering terminals are used by cashiers at the Business Centers to call up customer accounts, enter payments, issue receipts, and provide other services. A2G automatically encodes each customer payment with the appropriate agency and revenue codes, disassembles the information, and tallies and reports the amount of cash to be deposited into the City's treasury accounts. All payments collected at the Business Centers and recorded in the A2G system are transmitted through NYCServ to update the respective customer accounts in the various agencies' systems.

## **Objective**

The objective of this audit was to determine whether DOF maintains adequate financial controls over cash receipts<sup>4</sup> collected at its six Business Centers.

## **Scope and Methodology**

The audit scope covered December 1, 2006, through March 31, 2007. To accomplish our objective we performed the following procedures.

We reviewed information obtained from the Comptroller's *Comprehensive Financial Annual Report* for Fiscal Years 2005 and 2006, the *Mayor's Management Report*, the DOF Web site, and other sources to gain a general understanding of operations of the DOF Business Centers. Also, an unannounced observation of the Brooklyn Business Center was conducted on

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<sup>3</sup> A2G is a point-of-sale cashiering and payment-processing system used to capture customer payment information at the Business Center cashier stations.

<sup>4</sup> Cash receipts include currency, checks and money orders, and credit card payments.

December 1, 2006, where we observed the general flow of customers and the physical safeguards in place at the Center.

To evaluate DOF financial controls over cash receipts, we used the following sources as audit criteria:

- Comptroller’s Directives #1, “Principles of Internal Control”; #11 “Cash Accountability and Control”; and #18, “Guidelines for the Management, Protection and Control of Agency Information and Information Processing Systems.”
- Department of Investigation (DOI) Information Security Directive #D2.13, “Business Continuity.”

To gain an understanding of the financial controls in place over the handling, processing, reconciling, and reporting of cash receipts at the Business Centers, we interviewed the Director of DOF Payment Operations, officials from the DOF Reconciliation Unit, and cashier supervisors and cashiers at each of the six Business Centers. We also reviewed documentation outlining the flow of transactions, including the receipt, recording, deposit, and reconciliation of cash receipts. To supplement our understanding of the volume of cash receipts handled by the Business Centers, we analyzed cash collection statistics for calendar years 2003 through 2006 detailing the total revenue collected at each center.

**Tests of Controls**

To determine whether adequate controls were in force to ensure the accurate, timely, and complete recording and reporting of cash receipts, we reviewed DOF policies and procedures regarding cashiering operations. We also determined whether DOF policies and procedures generally complied with requirements of Comptroller’s Directives #1 and #11.

To test for compliance with DOF policies and procedures and to ascertain whether adequate segregation of duties were in force, we conducted walkthroughs and observations at each of the six DOF Business Centers. As shown in Table I below, during the period January 17, 2007, through February 7, 2007, we spent one day at each center and analyzed cash collections for each site by payment type.

**Table I**

Observation Dates and Total Cash Receipts Collected at Each Business Center

Business Center	Date of Observation	# Cashiers	Payments by Checks	Payment by Cash	Payments by Credit Card	Total Cash Receipts
Manhattan	1/17/2007	10	\$32,610,520	\$27,083	\$42,717	\$32,680,321
Brooklyn	1/30/2007	8	\$2,745,530	\$48,699	\$14,643	\$2,808,872
Queens	2/6/2007	11	\$3,194,008	\$67,503	\$17,638	\$3,279,150
Staten Island	2/6/2007	3	\$1,089,953	\$7,399	\$4,186	\$1,101,538
Bronx, Arthur Ave	2/7/2007	2	\$3,081,913	\$26,000	\$1,886	\$3,109,798
Bronx, Williamsbridge	2/7/2007	5	\$10,823	\$79,336	\$23,218	\$113,376
<b>Total (% of Total)</b>		<b>39</b>	<b>\$42,732,747 (99.2%)</b>	<b>\$256,020 (0.6%)</b>	<b>\$104,288 (0.2%)</b>	<b>\$43,093,055 (100%)</b>

The cash receipts, totaling \$43.1 million, collected by 39 DOF cashiers on the days of our observations at particular centers formed the basis of our audit sample, which we used to test and evaluate the accuracy, timeliness, and completeness of cash-receipts processing and reporting (discussed below).

While at the centers, we observed the controls over the handling and processing of cash receipts. Specifically, we observed cashiers accept, record, and process payments for various transaction types (e.g., real estate taxes, fines, etc.). Also, observations were made of the daily closeout procedures and the preparation of the daily bank deposits. We determined whether remittance checks were properly endorsed upon receipt, recorded in NYCServ, and deposited in the bank in a timely manner. The adequacy of safeguards over cash receipts and the physical security measures and safeguards in place at each of the Business Centers were also evaluated.

Further, we conducted a walkthrough of Reconciliation Unit procedures for reconciling cash receipts from all sources in NYCServ (Business Centers, Internet, IVR, and kiosk payments) to the bank statements and to the recording of cash in the City's Financial Management System (FMS) to ensure the accuracy, timeliness, and completeness of cash receipts reporting in the City's financial statements.

### **Evaluation of Cash Reconciliations**

The accuracy, timeliness, and completeness of cash receipts collected and recorded in NYCServ at each business center for the days of our respective observations were evaluated. Using close-out documentation obtained during our observations along with related documentation provided by the DOF Reconciliation Unit, we traced the total cash receipts for each cashier to the NYCServ-generated cashier summary (reconciliation) report, then to the bank deposit slips (for cash and for checks) and credit card totals for each cashier. Subsequently, we reconciled the totals for each cashier to the NYCServ Cash Receipts Summary Report for each center and determined whether it was appropriately reconciled by the DOF Reconciliation Unit. Also, we determined whether there was evidence of supervisory review and certification of the accuracy of the cash receipts collected by the cashiers. Further, we investigated 16 transactions with unusual amounts (less than \$1) that were recorded on the days of our observations to verify the authenticity of each transaction.

The results of the above tests, while not projectable to the entire population of cash receipts for the year, provided a reasonable basis for us to assess the adequacy of DOF financial controls over cash receipts collected at its Business Centers.

### **Evaluation of NYCServ Controls**

To gain an understanding of the NYCServ system, and to determine whether adequate general controls were maintained to support and secure NYCServ operations and data, we interviewed officials from the NYCServ Operations Unit, the NYCServ User Group, and representatives from CGI-AMS, Inc., under contract with DOF to support and upgrade NYCServ. We also interviewed officials from the Facilities Operations and Audit Services divisions of the Department of Information Technology and Telecommunications (DoITT) and conducted a



walkthrough of the DoITT data center, which houses the NYC Serv computer center. In addition, we reviewed documentation pertaining to NYC Serv user access, system architecture, backup procedures, and disaster preparedness. We did not review the controls at the varied agency mainframe systems since such a review was outside the scope of our audit.

This audit was conducted in accordance with generally accepted government auditing standards (GAGAS) and included tests of records and other auditing procedures considered necessary. This audit was performed in accordance with the audit responsibilities of the City Comptroller, as set forth in Chapter 5, §93, of the New York City Charter.

### **Discussion of Audit Results**

The matters covered in this report were discussed with DOF officials during and at the conclusion of this audit. A preliminary draft report was sent to DOF officials and discussed at an exit conference held on May 3, 2007. We submitted a draft report to DOF officials with a request for comments on May 8, 2007. We received a written response from DOF on May 22, 2007. DOF agreed with the two recommendations made in this audit. DOF stated:

“Thank you for the opportunity to review and respond to this audit and especially the professionalism of the audit team that worked on it. The report is helpful to us and serves as further incentive to continue to improve our business processes and to fulfill the needs and our obligations to the taxpayers.”

The full text of the DOF response is included as an addendum to this report.

## FINDINGS AND RECOMMENDATIONS

DOF maintains adequate financial controls over cash receipts collected at its six Business Centers. These controls generally adhere to and comply with Comptroller's Directives #1 and #11. Based on our observations, we determined that adequate segregation of duties were in force over the handling, processing, and reconciliation of cash receipts. In addition, we determined that the cash receipts, totaling \$43.1 million, collected by 39 cashiers on the days of our observations at particular centers were appropriately reconciled and found to be accurate, timely, and complete.

Regarding other related matters, we found that DOF had written policies and procedures for certain processes; however, they are limited and do not comprehensively address all aspects of the agency's cash collections and reporting functions. In addition, while DOF has general and technical controls in place to protect NYCServ data and ensure the availability of system services, the agency does not have a formal business continuity and disaster recovery plan for NYCServ.

While these conditions do not detract from our overall opinion regarding the controls over cash receipts at the Business Centers, they do increase the risk that DOF may not be adequately prepared to respond to a major disaster or unplanned disruption of NYCServ and other mission-critical DOF system operations. These matters are discussed in greater detail in the following sections.

### **DOF Maintains Adequate Financial Controls**

In general, key duties and responsibilities over the handling and processing of cash receipts at the Business Centers are adequately segregated, thereby reducing the risk of error or fraud. Specifically, the responsibilities for authorizing, processing, recording, and reviewing transactions and handling related adjustments are adequately segregated. In addition, DOF procedures generally conform to requirements contained in Comptroller's Directives #1 and #11. The cash receipts, totaling \$43.1 million, collected by 39 cashiers on the days of our observations at particular centers were appropriately reconciled and found to be accurate, timely, and complete. Moreover, DOF has implemented control procedures to detect and investigate anomalies and unusual amounts, such as zero dollar transactions.

Financial controls are intended to ensure the accuracy, timeliness, and completeness of financial data, as well as compliance with policies and procedures. Financial controls also help to prevent and detect erroneous and inappropriate transactions. The goals of a strong system of financial controls are to ensure the reliability of financial data, the safeguarding of assets and records, and the adherence to policies and procedures.

Cashiers, cashier supervisors, and personnel from Payment Operations and the Reconciliation Unit generally followed established control procedures. Also, the duties over the collection, reconciliation, and reporting of cash receipts were adequately segregated. For example, at the time of the daily cashier closeout, the cashiers prepare separate deposit slips for

cash and checks, which are verified by the cashier supervisor, who also reconciles the cashier totals with cash receipts at closeout. The DOF Reconciliation Unit is responsible for reconciling cash receipts data reported in NYCServ for all the Business Centers to the bank statements and reporting cash collections into the City's FMS system for financial reporting.

Further, there were adequate physical safeguards in place at the Business Centers to secure and protect cash receipts from theft or misappropriation. For example, the cashier areas at the Business Centers are equipped with safety glass partitions separating cashiers from customers. Also, the cashier area is adequately secured, and each cashier station is equipped with locks, which are used to secure cashier cash drawers.

Maintaining a system of strong financial controls over cash receipts collected at its Business Centers provides for the assurance that City assets are adequately safeguarded. Strong financial controls also provide assurance for the accurate, timely, and complete recording and reporting of cash receipts in the City's financial system and records.

### **Limited Written Policies and Procedures**

DOF maintains strong controls over cash receipts operations at the Business Centers and these controls are generally complied with. While DOF had written policies and procedures to address some of these controls and processes, they are limited and do not comprehensively address all aspects of the agency's cash collections and reporting functions, as required by Comptroller's Directive #1.

Comprehensive written policies and procedures that address all aspects of organization functions and processes (e.g., financial controls) are recognized as good operating practices. They provide an organization with assurance that every person involved in a process within the organization understands the tasks that are to be accomplished and the acceptable methods to be used in performing those tasks. They also provide an effective mechanism for training and evaluating the performance of staff in their duties.

The Business Centers have the A2G user manual that provides detailed instructions for cashiers and cashier supervisors on how to operate (i.e., enter and report) the system and report on transactions, and the Reconciliation Unit maintained a set of documents to illustrate the reports and flow of information involved in cash receipt reconciliations. However, DOF did not have comprehensive, written policies and procedures to detail the responsibilities and procedures to be followed by Business Center personnel, Reconciliation Unit personnel, and other units involved in each aspect of cash receipts processing, reconciliation, and reporting. For example, DOF did not have written procedures that detail the tasks followed in the daily reconciliation of each individual Center or the manual steps to be followed in the event that A2G becomes unavailable. In addition, DOF did not have written procedures detailing the tasks involved in the reconciliation of credit card payments to electronic funds transfers to the City's accounts by the credit card companies.

## **Recommendations**

The DOF should:

1. Ensure that written policies and procedures for each work unit involved in cash collections (i.e., Payment Operations, Reconciliation Unit, etc.) comprehensively document and address the various processes, controls, and levels of responsibility. The written policies and procedures documentation (e.g., manual) should be distributed to appropriate DOF departments and personnel and be updated periodically to address newly implemented or restated procedures.

*DOF Response:* “Finance agrees.”

## **Lack of a Formal Business Continuity and Disaster Recovery Plans**

DOF has general and technical controls to adequately support and secure NYCServ operations and data; however, DOF does not have formal documentation detailing its backup procedures and business continuity and disaster preparedness strategies.

DOI’s Information Security Directive “Business Continuity” states, “City agencies must develop and document Business Continuity Plans that work in tandem with Disaster Recovery Plans to ensure that required systems, resources and personnel are available to recover critical business functions within specified time frames after a catastrophe . . . occurs.” In addition, Comptroller’s Directive #18 requires that agencies include a network recovery component and, if applicable, a business-service plan at the service bureau level as an integral part of the agency’s business continuation plan. Both of these directives require that adequate backup procedures, alternative processing facilities, and service unit recovery plans be maintained.

There are strategies and technical controls in effect that provide for the continued operation of NYCServ (e.g., the A2G cashiering system at each of the Business Centers can run stand-alone). However, DOF does not have a formal Business Continuity Plan or Disaster Recovery Plan (BCP-DRP) that: (1) identifies key personnel and teams to be called upon, (2) defines the roles and responsibilities of the key BCP-DRP teams and personnel, and (3) details the resources required and steps to be followed in the event of a disaster or other unplanned disruption of its information processing capabilities. In addition, DOF does not: maintain plans for the recovery of individual Business Centers; have an alternative processing facility; or have written backup procedures—all of which should be addressed in the agency’s BCP-DRP.

While DOF officials contend that NYCServ is addressed in the DoITT Citywide BCP-DRP, as is any agency system that relies on DoITT as its service bureau, DOF is nonetheless responsible for developing and implementing its own BCP-DRP to address agency-owned, mission-critical applications, such as NYCServ. Since NYCServ is an important component of the City’s financial operations, DOF needs to ensure that appropriate plans are implemented to ensure that NYCServ cash collection services will continue in the event of a disaster or unplanned disruption.

**Recommendation**

The DOF should:

2. Develop and periodically test a formal BCP-DRP to ensure that NYCServ and other agency mission-critical applications are adequately protected in the event of a disaster or unplanned disruption in operating capabilities. The BCP-DRP should incorporate plans for an alternative processing facility, Business Center recovery strategies, and written backup and off-site storage procedures.

*DOF Response:* “Finance agrees with this recommendation.”



**FINANCE  
NEW YORK**  
MARTHA E. STARK  
COMMISSIONER

May 22, 2007

Mr. John Graham  
Deputy Comptroller  
Office of the Comptroller  
1 Centre Street  
New York, NY 10007-2341

**Re: Audit # MJ 07-097A  
Draft Report Audit on the Financial Controls  
Over Cash Receipts at the Department of Finance  
Business Centers**

Dear Mr. Graham:

This letter is the New York City Department of Finance (Finance) response to the City of New York Office of the Comptroller (Comptroller) Draft Audit Report on the Financial Controls Over Cash Receipts at the Department of Finance Business Centers.

Thank you for the opportunity to respond to the findings and recommendations of the above referenced audit report. Finance is especially proud of the progress it has made over the last several years to consolidate payment functions at its Business Payment Centers. The positive findings of the audit concerning the maintenance of adequate financial controls by Finance over cash receipts collected at its six Business Centers, the principal purpose of the audit, were most gratifying and serve as further incentive to continue improving the operations of the Business Payment Centers. The audit did make recommendations for two general operational improvements with which the agency agrees as explained below:

**Recommendation: The DOF should:**

1. Ensure that written policies and procedures for each work unit involved in cash collections (i.e. Payment Operations, Reconciliation Unit, etc.) comprehensively document and address the various processes, controls, and levels of responsibility. The written policies and procedures documentation (e.g. manual) should be distributed to appropriate DOF departments and personnel and be updated periodically to address newly implemented or restated procedures.

**Agency Response:**

Finance agrees on the need for comprehensive written policies and procedures and feels that it is already in compliance with this recommendation. Finance has an array of written policies and procedures covering critical aspects of its Business Center processes. The value of and adherence to these written procedures, is evidenced by the smooth functioning and apparent control of the receipts at the Centers, as indicated in the Audit findings.

Finance does however believe there is further merit in your recommendation that these policies and procedures be distributed to appropriate departments and personnel and will therefore review the option of compiling its existing written materials into a single repository for maintenance and distribution at the Business Centers. In doing this, Finance will where necessary revise and otherwise update these materials when new procedures are implemented and to provide for any further needs that may become clear in such a review process.

**Recommendation: The DOF should:**

Develop and periodically test a formal BCP-DRP ["Business Continuity Plan-Disaster Recovery Plan"] to ensure that NYCSERV and other agency mission-critical applications are adequately protected in the event of a disaster or unplanned disruption in operating capabilities. The BCP-DRP should incorporate plans for an alternate processing facility, Business Center recovery strategies, and written backup and offsite storage procedures.

**Agency Response:**

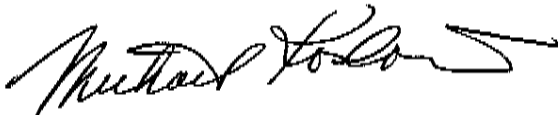
Finance agrees with this recommendation. While NYCServ currently does not have a disaster recovery site, planning for a secondary hot site has progressed up to the point of identifying a location. Finance is working with the Department of Information Technology and Telecommunications to identify this site.

In the short-term, Finance is currently utilizing tape backup and having the tapes moved off-site to secure storage. To further secure the NYServ system, Finance is reviewing vendor backup proposals that may temporarily provide disaster recovery services.

Once again, thank you for the opportunity to review and respond to this audit and especially the professionalism of the audit team that worked on it. The report is helpful to us and serves as further incentive to continue to improve our business processes and to fulfill the needs of and our obligations to the taxpayers.

If you have any questions, or require further information, please contact me at (212) 669-4878.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Koslow". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael Koslow  
Sr. Advisor-Audit Coordinator

Cc: Martha E. Stark, Commissioner, Department of Finance  
Rochelle Patricof, First Deputy Commissioner, Department of Finance  
Leslie Zimmerman, Assistant Commissioner, Payment Operations

: