OFFICE OF THE INSPECTOR GENERAL

SOCIAL SECURITY ADMINISTRATION

SINGLE AUDIT OF THE **COMMONWEALTH OF PUERTO RICO** DEPARTMENT OF THE FAMILY FOR THE FISCAL YEAR **ENDED JUNE 30, 2010**

September 2012 A-77-12-00012

MANAGEMENT ADVISORY REPORT



Mission

By conducting independent and objective audits, evaluations and investigations, we inspire public confidence in the integrity and security of SSA's programs and operations and protect them against fraud, waste and abuse. We provide timely, useful and reliable information and advice to Administration officials, Congress and the public.

Authority

The Inspector General Act created independent audit and investigative units, called the Office of Inspector General (OIG). The mission of the OIG, as spelled out in the Act, is to:

- O Conduct and supervise independent and objective audits and investigations relating to agency programs and operations.
- O Promote economy, effectiveness, and efficiency within the agency.
- O Prevent and detect fraud, waste, and abuse in agency programs and operations.
- O Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.
- O Keep the agency head and the Congress fully and currently informed of problems in agency programs and operations.

To ensure objectivity, the IG Act empowers the IG with:

- O Independence to determine what reviews to perform.
- O Access to all information necessary for the reviews.
- O Authority to publish findings and recommendations based on the reviews.

Vision

We strive for continual improvement in SSA's programs, operations and management by proactively seeking new ways to prevent and deter fraud, waste and abuse. We commit to integrity and excellence by supporting an environment that provides a valuable public service while encouraging employee development and retention and fostering diversity and innovation.



MEMORANDUM

Date: September 11, 2012 Refer To:

To: Amy Thompson Senior Advisor

Audit Management and Liaison Staff

From: Inspector General

Subject: Management Advisory Report: Single Audit of the Commonwealth of Puerto Rico Department of the Family for the Fiscal Year Ended June 30, 2010 (A-77-12-00012)

This report presents the Social Security Administration's (SSA) portion of the single audit of the Commonwealth of Puerto Rico Department of the Family for the Fiscal Year ended June 30, 2010. Our objective was to report internal control weaknesses, noncompliance issues, and unallowable costs identified in the single audit to SSA for resolution action.

Aquino, DeCordova, Alfaro & Co., LLP performed the audit. We have not received the results of the desk review conducted by the United States Department of Agriculture (USDA). We will notify you when the results are received if USDA determines the audit did not meet Federal requirements. In reporting the results of the single audit, we relied entirely on the internal control and compliance work performed by the Aquino, DeCordova, Alfaro & Co., LLP and the reviews performed by USDA. We conducted our review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

For single audit purposes, the Office of Management and Budget assigns Federal programs a Catalog of Federal Domestic Assistance (CFDA) number. SSA's Disability Insurance (DI) program is identified by CFDA number 96. SSA is responsible for resolving single audit findings reported under this CFDA number.

The Puerto Rico Disability Determination Services (DDS) performs disability determinations under SSA's DI program in accordance with Federal regulations. The DDS is reimbursed for 100 percent of allowable costs. The Puerto Rico Department of the Family (PRDF) is the Puerto Rico DDS' parent agency. The single audit reported PRDF:

¹ Aquino, De Cordova, Alfaro & Co., LLP, Commonwealth of Puerto Rico Department of the Family Single Audit Report Fiscal Year Ended June 30, 2010.

- Did not have adequate documentation to support payroll costs claimed for Federal reimbursement as required by OMB Circular A-87. The corrective action plan indicated a strategy for compliance with OMB Circular A-87 began in December 2010.²
- Submitted expenditures and obligations to SSA on the State Agency Report of Obligations on the SSA Disability Programs (Form SSA-4513) that did not agree with the amounts recorded in PRDF's accounting records. The corrective action plan indicated procedures are in place to ensure that all of the obligations at the closing date of the reports are included.³

We made recommendations to SSA in prior reports for corrective action on these two findings.⁴ SSA has not provided us with documentation showing that corrective action was taken on these prior findings. Therefore, we again recommend SSA:

- 1. Ensure the Puerto Rico DDS maintains documentation to support payroll costs charged to SSA.
- 2. Determine if the inaccurate reporting of expenditures on the Form SSA-4513 resulted in inappropriate reimbursements to the Puerto Rico DDS and, if so, request the return of any inappropriate reimbursements.

In addition, the single audit reported PRDF:

Had deficient accounting policies, procedures, and financial reporting practices including a lack of self-balancing accounts, inappropriate and/or incomplete monthly and year-end cut-off and closing procedures, and inappropriate and/or incomplete budgeting control between grants award distribution and programmatic activities allocations. The corrective action plan indicated a Manual of Procedures and Functions has been created for the implementation of the accounting and financial management system.⁵

² Aquino, De Cordova, Alfaro & Co., LLP, *Commonwealth of Puerto Rico Department of the Family Single Audit Report Fiscal Year Ended June 30, 2010,* finding 2010-02.

³ Aquino, De Cordova, Alfaro & Co., LLP, Commonwealth of Puerto Rico Department of the Family Single Audit Report Fiscal Year Ended June 30, 2010, finding 2010-18.

⁴ Management Advisor Report: Single Audit of the Commonwealth of Puerto Rico, Department of the Family, for the Fiscal Year Ended June 30, 2008 (A-77-11-00012), issued June 14, 2011 and Management Advisory Report: Single Audit of the Commonwealth of Puerto Rico, Department of the Family, for the Fiscal Year Ended June 30, 2009 (A-77-11-00013), issued July 6, 2011.

⁵ Aquino, De Cordova, Alfaro & Co., LLP, Commonwealth of Puerto Rico Department of the Family Single Audit Report Fiscal Year Ended June 30, 2010, finding 2010-01.

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 Did not have adequate procedures and controls over the timing of cash draws for SSA's disability program. The corrective action plan indicated existing written procedures regarding the proper authorization and processing of Federal drawdowns will be reviewed with existing and new personnel.⁶

We made recommendations to SSA in prior reports for corrective action on these two findings. We confirmed that SSA took appropriate corrective actions to address these findings. Therefore, we will not repeat the recommendations in this report.

Please send copies of the final Audit Clearance Document to Shannon Agee. If you have questions, contact Shannon Agee at (877) 405-7694, extension 18802.

Patrick P. O'Carroll, Jr.

CC:

Lynn Bernstein

⁶ Aquino, De Cordova, Alfaro & Co., LLP, Commonwealth of Puerto Rico Department of the Family Single Audit Report Fiscal Year Ended June 30, 2010, finding 2010-03.

⁷ Management Advisor Report: Single Audit of the Commonwealth of Puerto Rico, Department of the Family, for the Fiscal Year Ended June 30, 2006 (A-77-09-00011), issued August 5, 2009 and Management Advisory Report: Single Audit of the Commonwealth of Puerto Rico, Department of the Family, for the Fiscal Year Ended June 30, 2007 (A-77-09-00012), issued August 20, 2009.

Overview of the Office of the Inspector General

The Office of the Inspector General (OIG) is comprised of an Office of Audit (OA), Office of Investigations (OI), Office of the Counsel to the Inspector General (OCIG), Office of External Relations (OER), and Office of Technology and Resource Management (OTRM). To ensure compliance with policies and procedures, internal controls, and professional standards, the OIG also has a comprehensive Professional Responsibility and Quality Assurance program.

Office of Audit

OA conducts financial and performance audits of the Social Security Administration's (SSA) programs and operations and makes recommendations to ensure program objectives are achieved effectively and efficiently. Financial audits assess whether SSA's financial statements fairly present SSA's financial position, results of operations, and cash flow. Performance audits review the economy, efficiency, and effectiveness of SSA's programs and operations. OA also conducts short-term management reviews and program evaluations on issues of concern to SSA, Congress, and the general public.

Office of Investigations

OI conducts investigations related to fraud, waste, abuse, and mismanagement in SSA programs and operations. This includes wrongdoing by applicants, beneficiaries, contractors, third parties, or SSA employees performing their official duties. This office serves as liaison to the Department of Justice on all matters relating to the investigation of SSA programs and personnel. OI also conducts joint investigations with other Federal, State, and local law enforcement agencies.

Office of the Counsel to the Inspector General

OCIG provides independent legal advice and counsel to the IG on various matters, including statutes, regulations, legislation, and policy directives. OCIG also advises the IG on investigative procedures and techniques, as well as on legal implications and conclusions to be drawn from audit and investigative material. Also, OCIG administers the Civil Monetary Penalty program.

Office of External Relations

OER manages OIG's external and public affairs programs, and serves as the principal advisor on news releases and in providing information to the various news reporting services. OER develops OIG's media and public information policies, directs OIG's external and public affairs programs, and serves as the primary contact for those seeking information about OIG. OER prepares OIG publications, speeches, and presentations to internal and external organizations, and responds to Congressional correspondence.

Office of Technology and Resource Management

OTRM supports OIG by providing information management and systems security. OTRM also coordinates OIG's budget, procurement, telecommunications, facilities, and human resources. In addition, OTRM is the focal point for OIG's strategic planning function, and the development and monitoring of performance measures. In addition, OTRM receives and assigns for action allegations of criminal and administrative violations of Social Security laws, identifies fugitives receiving benefit payments from SSA, and provides technological assistance to investigations.