December 3, 2014

Mr. Paul E. McGreevy
Director
Rhode Island Department of Business Regulation
1511 Pontiac Avenue
Cranston, RI 02920

Dear Director McGreevy:

The Bureau of Audits has completed its audit of the Department of Business Regulation cash controls in place over revenues collected during fiscal year 2014. The audit was conducted in accordance with Rhode Island General Laws (RIGL) §35-7-3. The recommendations included herein have been discussed with members of management, and we considered their comments in the preparation of this report.

Rhode Island General Law §35-7-3(b), entitled Audits performed by bureau of audits, states that, “Within twenty (20) days following the date of issuance of the final audit report, the head of the department, agency or private entity audited shall respond in writing to each recommendation made in the final audit report.” Accordingly, management submitted its response to the audit findings and recommendations on November 21, 2014, and such response is included in this report. Pursuant to this statute, the Bureau may follow up regarding recommendations included in this report within one year following the date of issuance.

We would like to express our sincere appreciation to the staff of the Department of Business Regulation for the cooperation and courtesy extended to the members of our team during the course of this audit.

Respectfully yours,

Dorothy Z. Pascale, CPA
Chief

c- Steven T. Hartford, Director, Department of Administration
Honorable Daniel DaPonte, Chairperson, Senate Committee on Finance
Honorable Raymond Gallison, Chairperson, House Finance Committee
Dennis Hoyle, CPA, Auditor General
Executive Summary

Why the Bureau Did This Review

The Bureau is conducting a statewide review of departments and agencies that collect fees for licenses, services, and other purposes in accordance with Section §35-7-3 of the Rhode Island General Laws. The purpose of this engagement was to determine if adequate cash controls are in place at DBR to ensure safeguarding of assets, accurate reporting, and collection of revenues in accordance with applicable statutes.

Background Information

The Department of Business Regulation is organized under Title 42 of the Rhode Island General Laws. The Department’s primary function is the implementation of state laws mandating the regulation and licensing of designated businesses, professions, occupations, and other specified activities. The respective divisions that make up the Department include: Banking, Insurance, Securities, Commercial Licensing and Racing and Athletics, Design Professionals and Board of Accountancy, and the Office of the Health Insurance Commissioner (OHIC). The collection of revenue within the Department is not centralized. Receipts are sent to the Department through several types of payments, including checks, money orders, or credit cards and are received via mail, the Internet, or a third-party provider. The divisions use various internal and external licensing systems for the collection and tracking of receipts.

To Improve Controls the Department of Business Regulation should:

- Centralize and segregate the functions of the receipt, deposit, recording, and reconciliation for all revenue.
- Develop written policies and procedures for the cash receipts process.
- Restrictively endorse checks immediately unless deposited same day.
- Retain deposited checks for 60, but not more than 90, days.
- Ensure assets are safeguarded.
- Ensure timely deposit of monies in accordance with RIGL §11-28-1.
- Ensure revenue is collected for licenses approved.
- Reconcile licenses/certificates issued to payments received daily.
- Reconcile licensing systems to RIFANS timely.
- Restrict and address override capability and access levels in DBR’s internal licensing system.
Contents

Objective and Scope.............................................................................................................. 4
Methodology .......................................................................................................................... 4
Introduction ............................................................................................................................ 4
Recommendations for Improved Controls and Management Responses ......................... 5
  Ensure Adequate Segregation of Duties for the Handling of Cash Receipts .......................... 5
    Division of Design Professionals and Board of Accountancy ........................................... 5
  Securities Division .............................................................................................................. 6
  Banking Division ................................................................................................................ 6
  Insurance Division .............................................................................................................. 7
Summary ............................................................................................................................... 7
Implement Department-Wide Cash Handling Policies and Procedures ......................... 8
Safeguard Assets .................................................................................................................... 8
Comply with Rhode Island General Law regarding Timeliness of Deposit ...................... 9
Ensure Revenue is Collected for Licenses Approved ......................................................... 9
Reconcile Licenses Approved to Payments Received ......................................................... 10
Reconcile Licensing Systems to the State Accounting System ........................................ 11
  Division of Design Professionals and Board of Accountancy, Securities Division, and Commercial Licensing and Racing & Athletics ................................................................. 11
  Insurance Division ............................................................................................................ 12
Protect Personally Identifiable Information ....................................................................... 12
Improve System Access Controls ....................................................................................... 12
Control Weaknesses Noted Within the Insurance Division ................................................ 13
  Ensure Revenue Received is Accurate ............................................................................... 13
  Develop a Policy which Dictates the Recording of Revenue ........................................... 14
Objective and Scope
The Bureau of Audits (Bureau) conducted a limited scope audit of the Department of Business Regulation (DBR) revenues collected for licenses, fees, and services for the period of July 1, 2013, through June 30, 2014. The purpose of this engagement was to determine if adequate cash controls are in place at DBR to ensure safeguarding of assets, accurate reporting, and collection of revenues in accordance with applicable statutes.

Methodology
As part of our audit work, we gained an understanding of the existing cash controls and reviewed the receipt and recording procedures utilized by DBR. To address our audit objective, we performed the following:

- Interviewed DBR management and staff
- Reviewed applicable state laws and regulations
- Gained an understanding of departmental policies and procedures governing the processing and recording of receipts
- Tested transactions from various revenue accounts pertaining to licenses, fees, and services

Introduction
The Department of Business Regulation was established in 1939 and is organized under Title 42 of the Rhode Island General Laws. The Department’s primary function is the implementation of state laws mandating the regulation and licensing of designated businesses, professions, occupations, and other specified activities. The respective divisions that make up the Department include: Banking, Insurance, Securities, Commercial Licensing and Racing and Athletics, Design Professionals and Board of Accountancy, and the Office of the Health Insurance Commissioner (OHIC).1 Although the divisions are organized under DBR, the roles and responsibilities of each division are unique. The following summarizes the responsibilities of each division and the sources of revenue which they collect:

- **The Banking Division** provides regulatory oversight of state-chartered financial institutions, credit unions and licensees through financial examinations and reviews to determine compliance with state banking laws, financial solvency, and safety and soundness of operations. The primary sources of revenue received are through examination, enforcement, and license fees.
- **The Insurance Division** is responsible for conducting financial and market-conduct examinations, licensing of companies, producers, adjusters and appraisers, reviewing rate and

1 Due to the immaterial amount of revenue that OHIC receives on an annual basis, the Bureau did not include the division as part of its testing.
form filings, and handling complaints and inquiries from insurance consumers. This division’s main revenue sources are licensing fees, examinations, and administrative penalties.

- **The Securities Regulation Division** is responsible for the registration of certain securities, the licensing and regulation of broker dealers, sales representatives, certain investment advisers and certain investment adviser representatives. It is also responsible for enforcing compliance with the state’s Franchise Investment Act, the registration of charitable and fund-raising groups, and the states’ Real Estate Time-Share Act. Receipts are predominately received from licensing, registrations, examinations, investigations, and enforcements.

- **The Commercial Licensing and Racing and Athletics Division** is responsible for the licensing and regulation of real estate agents, brokers and appraisers, auto body and salvage re-builder shops, auto wrecking and salvage yards, upholsterers, auctioneers, liquor wholesalers, breweries, wineries, salespersons (representing wholesalers) and agents (representing manufacturers and distillers), Class G (boat/airline/railroads) license holders, line-cleaners, and mobile and manufactured homes and parks. License and registration fees are the main sources of revenue received.

- **The Division of Design Professionals and Board of Accountancy (Boards)** are responsible for the administration of the licensing of architects, landscape architects, professional engineers, professional land surveyors, and certified public accountants. Fees received for licenses and penalties are the primary sources of revenue.

The collection of revenue within the Department is not centralized. Each division is responsible for all aspects of the cash receipt process, from opening the mail to reconciling accounts. Receipts are sent to the Department through several types of payments, including checks, money orders, or credit cards and are received via mail, the Internet, or a third-party provider. The divisions use various internal and external licensing systems for the collection and tracking of receipts.

**Recommendations for Improved Controls and Management Responses**

**Ensure Adequate Segregation of Duties for the Handling of Cash Receipts**

Segregation of duties is a basic building block of internal controls and sustainable risk management. The principle is based upon sharing key process responsibilities and critical functions among more than one person or department. Without this separation, the risk of fraud or error is heightened.

*Divisions within the Department of Business Regulation have personnel performing duties which oftentimes eliminate or significantly weaken the segregation of duties control.* The lack of checks and balances in the process noted below, coupled with the lack of reconciliations being performed, result in a high risk rating to the divisions discussed below.

**Division of Design Professionals and Board of Accountancy**

The Boards have two employees responsible for its administrative functions. The Administrative
Support Specialist is responsible for all aspects of the revenue process for the Board of Accountancy, Architects, and Landscape Architects, including:

- Receiving customer payments
- Depositing funds
- Recording the transaction in the State general ledger (RIFANS)
- Reconciling the accounts

The Administrative Support Specialist also processes the related applications and issues the related licenses. Additionally, this individual performs the deposit and recording functions for the Board of Engineers and Land Surveyors. Currently, reconciliations are not performed for either of the Boards’ two RIFANS revenue accounts. Refer to Reconcile Licensing Systems to the State Accounting System on page 10 of this report. The lack of checks and balances in the process noted above, coupled with the lack of reconciliations being performed, result in a high risk for misappropriation or loss of funds.

Securities Division
The Administrative Assistant in the Securities Division is responsible for all aspects of the revenue process. Additionally, this same employee has administrative access within DBR’s internal licensing system, CAVU, and therefore has the ability to make systemic changes without secondary approval. Reconciliations are not completed in this division. Therefore, the division risk of misappropriation or loss of funds is rated as high.

Banking Division
The Banking Supervisor of Examinations is responsible for the receipt and deposit of paper checks. All supporting documentation for paper check deposits, including the bank verification, is submitted to the accountant in the Insurance Division. The Insurance Division accountant is responsible for recording the transaction and reconciling the accounts. For electronic payments received by the Banking Division, the Supervisor prints supporting documentation of the payments from the Nationwide Mortgage Licensing System (NMLS) and provides it to the Insurance accountant. The accountant’s responsibilities include:

- Confirming the bank deposit
- Recording the transaction in RIFANS
- Reconciling the accounts

During FY 14, no reconciliations were completed. A compensating control would have been in place if the Banking Supervisor of Examinations ensured the revenue recorded in RIFANS was entered accurately; however, this, too, was not performed. The lack of checks and balances in the process noted

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2 The Bureau’s review of cash receipts was for FY 14, and during this time, this employee was assigned these responsibilities. However, the recording and reconciliation responsibilities have now been shifted to the accountant in the Insurance Division. In February 2014, the Administrative Assistant was promoted to a Systems Analyst position, but retained prior job responsibilities.

3 CAVU is utilized by the Securities Division, Commercial Licensing and Racing and Athletics, and the Board of Accountancy and Design Professionals.
above, coupled with the lack of reconciliations being performed, result in a high risk for misappropriation or loss of funds.

Insurance Division
The accountant in the Insurance Division is responsible for the deposit, recording, and reconciliation of all insurance revenues. For certain types of revenue, this individual also receives the payments. Because one individual performs key tasks in the cash handling process, the risk of loss or misappropriation to this division is high.

Summary
Without adequate segregation of duties, cash receipts are not properly safeguarded, and there is an increased risk of misappropriation or other types of fraud or error. The Bureau recognizes that an optimum degree of segregation is not always possible due to limited staffing. However, in such circumstances compensating controls should be implemented. Across all DBR divisions, there are insufficient compensating controls, such as increased management oversight.

The Department should strive for an acceptable level of segregation of duties, which when combined with compensating controls, minimizes the impact of control deficiencies and reduces the risk of misappropriation, internal manipulation, or error.

Recommendations:

1.) Centralize and segregate the functions of the receipt, deposit, recording, and reconciliation for all revenue through the implementation of a central business office, and potentially realign current employees.

2.) If a centralized structure is not feasible, reorganize the revenue functions within the divisions to ensure adequate segregation of duties is in place over the receipt process. Implement compensating controls to ensure that the transactions are free from any misappropriation and are properly recorded in the general ledger.

Management Responses: The Department is currently working with the Human Resources department and union representatives to allocate two individuals who are currently assigned, through their job postings, to specific divisions. We hope to establish two “floater” positions that can be assigned as needs arise. These two individuals in addition to the Department accountant would be assigned to the cash receipt process with a segregation of duties as described above.

Responsible Party: Brian Riggs/Joe Torti/Maria D’Alessandro

Completion Date: June 2015 (Dependence upon agreement with union necessitates this date)

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4 The Insurance Division Accountant is currently also responsible for the reconciliation and recording of revenue for the Banking Division and Securities Division.
Implement Department-Wide Cash Handling Policies and Procedures

DBR has not developed formal written procedures outlining the proper controls over the handling of cash receipts. Formal policies and procedures are a key component of a sound internal control environment and educate staff to effectively and efficiently achieve department objectives. In the event that there are changes to personnel, documented policies and procedures will facilitate training and provide guidelines.

The lack of written policies and procedures has resulted in inadequate controls and inconsistent procedures over the handling of cash receipts by each division which are detailed throughout the report. An example: each division does not deposit funds on a standard department-wide schedule. This resulted in untimely deposit of funds. Refer to Comply with Rhode Island General Law Regarding Timeliness of Deposit, page 9. Additionally, supporting documentation is not consistently maintained by the Insurance Division. In some instances, there was no way to verify whether an application was completed.

Recommendation:

3.) Develop and document clear and concise policies and procedures for the cash receipts process.

Management Response: The Department will interview all individuals currently working with cash receipts to garner all the different steps involved in the process. Once all information is received, it will then be reviewed by Senior Staff and the Department will formulate universal policies and procedures that will be instituted for all deposit types. New procedures will be implemented in the restructure noted above. A draft will be provided to the Bureau of Audits as soon as it is formulated.

Responsible Party: Brian Riggs/Joe Torti/Maria D’Alessandro

Completion Date: June 2015

Safeguard Assets

Cash receipts within each of the DBR divisions are not safeguarded both prior to and subsequent to deposit. Field work revealed no restrictive endorsement is made upon receipt of a check payment. The Office of the General Treasurer recommends immediate restrictive endorsement unless checks are remotely deposited the same day they are received. Additionally, after a remote deposit has been made, checks are not properly protected from fraud or duplicate deposit. DBR staff does not mark checks after deposit, and maintains checks in excess of the 60- to 90-day time period recommended by the Office of the General Treasurer. Further, the paperwork on which licenses and certificates are printed and issued is not consistently stored in a secure location.

5 Refer to Comply with the Rhode Island General Law regarding Timeliness of Deposit section of this report for a discussion of the findings and recommendations regarding issues discovered during the audit.

6 A remote deposit is the ability to deposit funds to a bank account via a check scanning machine that communicates directly to the financing institution.
Internal control systems should involve procedures to restrict access to and enhance control over resources (in this instance, deposited checks and license/certificate paperwork). However, DBR has no formal procedure for the safeguarding of assets. Without adequate safeguards in place, funds may be misappropriated or lost. Furthermore, certificates/licenses could be created and falsely issued without proper payment of the fee or a qualification review.

Recommendations:

4.) Restrictively endorse checks immediately unless checks are remotely deposited the same day they are received.
5.) Retain deposited checks for 60, but no more than 90, days. After deposit, mark checks to prevent duplicate deposit.
6.) Ensure assets are safeguarded at all times. Physically secure checks (before and after remote deposit) and the license/certificate paperwork.

Management Responses: In realigning and reassessing the Department’s cash receipt process the three recommendations listed above will be implemented and included in the Department’s restructuring.

Responsible Party: Brian Riggs/Joe Torti/Maria D’Alessandro

Completion Date: June 2015

Comply with Rhode Island General Law regarding Timeliness of Deposit

Rhode Island General Law §11-28-1, Failure to pay state funds into treasury, requires all funds belonging to the State to be deposited within seven business days.

All DBR divisions are frequently noncompliant with this statutory requirement. A sample of deposits across all divisions showed that deposits are made in an inconsistent and untimely manner. Our sample of 28 deposits revealed 16 did not comply with the mandate. The longest period held before deposit was 89 business days. The exposure to theft or loss of funds is significantly increased by not complying with RIGL §11-28-1. In addition, funds that are not promptly deposited results in a loss of investment income to the State.

Recommendation:

7.) Implement a schedule to timely deposit monies received to safeguard against loss and to mitigate possible theft. Ensure all divisions comply with RIGL §11-28-1.

Management Response: In realigning and reassessing the Department’s cash receipt process the three recommendations listed above will be implemented and included in the Department’s restructuring. In the interim the Department will realign our procedures to comply with RIGL §11-28-1.
Ensure Revenue is Collected for Licenses Approved

Instances of licenses approved without proper payment were identified during testing. There are override capabilities in the CAVU system which allows the user to approve applications prior to receipt of payment. A CAVU report can be generated to show exceptions in which revenue was collected prior to licenses being approved. There were 311 licenses from July 1, 2013, through June 30, 2014, which appeared as approved without receipt of the appropriate fee. Fifteen were randomly selected for further review. Of the 15 licenses, 2 were approved without payment and therefore operating without a valid license.

These system override capabilities resulted in a loss of revenue to the State, and if not corrected, may result in lost future revenue. As of the end of fieldwork, the System Analyst is investigating all exceptions.

**Recommendations:**

8.) For licenses approved without payment, collect appropriate revenue or revoke the license.
9.) Ensure that the system override capability in CAVU is properly restricted.

**Management Responses:** The Department has collected the revenue for all but 16 of the original 311 licensees. The CAVU system workflow has been configured to require that the fee is paid before the workflow can be approved. Only those with supervisory permissions are granted the ability to override the workflow steps related to fees. To ensure that employees cannot issue a license without approving a workflow, the Department has requested that the vendor, IronData, customize CAVU so that only the employees with supervisory permissions are able to change status and expiration dates. Once the Department receives a quote for this customization, a RI Tech Investment Fund Application will be submitted to request funding from the Information Technology Investment Fund (ITIF).

**Responsible Party:** Maria D’Alessandro/ Bridgette Stranko

**Completion Date:** December 31, 2014 (All licenses issued without payments will be resolved) / Workflow changes that can be made in house are complete. System changes required by vendor -TBD. The Department is waiting on a quote from IronData.

Reconcile Licenses Approved to Payments Received

Adequate licensing procedures include the reconciliation of licenses issued to payments received by an employee independent of the cash receipts and license processing functions. Reconciliations of licenses approved to payments received are not performed across all DBR Divisions. There is an overall risk that not all revenue will be collected and an application may be approved without payment. Refer to Improve System Access Controls.
Recommendations:

10.) Develop a procedure to have an employee(s), independent of the cash receipts and license processing functions, daily reconcile licenses/certificates issued to payments received.
11.) Incorporate Recommendation 10 into the policies and procedures referenced in Implement Department-Wide Cash Handling Policies and Procedures on page 7.

Management Responses: In realigning and reassessing the Department’s cash receipt process the two recommendations listed above will be implemented and included in the Department’s restructuring. In addition a supervisor will periodically review reconciliations.

Responsible Party: Brian Riggs/ Joe Torti/ Maria D’Alessandro

Completion Date: June 2015

Reconcile Licensing Systems to the State Accounting System

The process of reconciliation ensures the accuracy and validity of financial information. It ensures that unauthorized transactional changes have not occurred during processing. Reconciliation processes are most effective when they are consistent and thorough. Employees involved in the process should be knowledgeable and clear on their responsibilities and expectations. Reconciliation should be documented to verify that a review has been performed.

Divisions within DBR utilize different licensing systems as detailed in the Ensure Adequate Segregation of Duties for the Handling of Cash Receipts noted above. The licensing systems at DBR are not reconciled to the State accounting system. There is an overall risk that the revenue reported via the State accounting system is not identical to the licensing systems. The divisions in which the Bureau noted issues are discussed below.

Division of Design Professionals and Board of Accountancy, Securities Division, and Commercial Licensing and Racing & Athletics

The Division of Design Professionals and Board of Accountancy, Securities Division, and Commercial Licensing Division record revenues within the internal licensing system, CAVU. Fiscal year 2014 revenues received were obtained from the CAVU system and matched to the ending balances for the respective RIFANS revenue accounts.

For 22 of the 26 RIFANS revenue accounts reviewed, the FY 14 ending balance per the CAVU system did not agree with the ending balance per the RIFANS system. Major factors causing this difference are:

- The CAVU system lacks systematic controlled key identifying information, such as the RIFANS general ledger number (GLN).
  - GLN selection is subject to manual input error.
- Revenue recording timing differences between CAVU and RIFANS.
  - Example: RIFANS accounts reflected revenues recorded in beginning of fiscal year that were earned and reflected on the CAVU system during prior fiscal year.
• Third-party revenue recorded in RIFANS only.
  o Differences between the CAVU and RIFANS balances remained even when third-party revenues were added to CAVU balances.

A lack of internal controls and reconciliations resulted in management’s failure to detect the revenue variances and weaknesses noted above.

Insurance Division
The Insurance Division is not reconciling its licensing systems to the State accounting system on an annual basis. A comprehensive report detailing the annual revenue of the licensing systems was not on hand, preventing an annual reconciliation from being performed.

Recommendation:
12.) Perform reconciliations between the DBR’s licensing systems and RIFANS on a scheduled consistent basis.

Management Response: The Department plans to have the Department accountant function as the sole cash receipt reconciler. These reconciliations will be on a scheduled and consistent basis to be determined by senior staff. In addition, a supervisor will periodically review reconciliations.

Responsible Party: Brian Riggs/Joe Torti/Maria D’Alessandro

Completion Date: January 2015

Protect Personally Identifiable Information (PII)
The Department of Business Regulation holds PII in its databases and systems. As a result of this audit, three recommendations were given to the Department for consideration. Due to the nature of the information, this section has been redacted in accordance with Rhode Island General Law §35-7-15 Audit of Information Security Systems.

Improve System Access Controls
System access controls are inadequate in the internal licensing system, CAVU. Access rights are the permissions or privileges granted to users to create, change, delete, or view data and files within a system as defined by rules established by data owners and the information security policy. Only privileges essential to the user’s work requirements should be granted. The Bureau obtained an access level report for the CAVU system. There are four access levels utilized, and the majority of employees are provided with the highest two levels of access within the system. Allowing all employees the highest level of access negates the purpose of having levels of responsibility within a system. Control weaknesses resulted in overrides. Refer to Ensure Revenue is Collected for Licenses Approved.
Recommendations:

13.) Ensure that only privileges essential to the user's work requirements are granted.
14.) Restrict the ability of system overrides by changing staff access levels.

Management Responses: Management has reviewed the permissions and privileges granted to users to create, change, delete, or view data and files within a system. Management has made a decision on which privileges are essential to the user's work requirements. The staff access levels have been changed to restrict the ability of system overrides by changing staff access levels.

Responsible Party: Bridgette Stranko

Completion Date: Completed in November 2014

Control Weaknesses Noted Within the Insurance Division

During the course of the audit, the Bureau noted issues that related specifically to the Insurance Division. The Insurance Division uses multiple electronic and manual systems to record revenue. These include the:

- State Based Systems (SBS)
- National Insurance Producer Registry (NIPR)
- System for Electronic Rate and Form Filing (SERFF)
- Online Premium Tax for Insurance (OPTINS)
- Manual tracking spreadsheets

There are several specific areas in this Division where controls should be improved which are discussed below.

Ensure Revenue Received is Accurate

It is a best practice of internal control to require employees approving transactions to have firsthand knowledge of those transactions. Personnel must review the supporting documentation to verify the validity and appropriateness of transactions.

The Insurance Division utilizes the Online Premium Tax for Insurance system (OPTins) to record revenue related to annual contract producer reports. In one business day in which 23 transactions were recorded, there were 3 exceptions in which the revenue per OPTins report did not agree with the supporting documentation. In these instances the companies overpaid, and a refund should have been issued. Sound business practice would indicate that any form of payment should only be accepted for the exact amount due, and any overage should be refunded. Without appropriate review, the Insurance Division cannot guarantee that received revenue is accurate.

Recommendation:

15.) Review supporting documentation and reconcile to revenue received. Investigate and correct any discrepancies within 30 days of receipt of the revenue.
Management Responses: The Department has addressed this issue with the Licensing Aides and Administrative Officer. Refunds are being processed and discrepancies corrected within 30 days.

Responsible Party: Brian Riggs/Joe Torti/Maria D’Alessandro

Completion Date: Completed in November 2014

Develop a Policy which Dictates the Recording of Revenue
Ensuring revenue is allocated accurately among accounts helps an agency to develop a budget and assess the progress of program objectives and goals.

The supporting documentation provided by the Insurance Division did not provide sufficient evidence as to the allocation of revenue received to the applicable RIFANs accounts. In one instance, an employee prints a report and manually writes the allocation of revenue per the report to the various RIFANS accounts. This employee provides the Insurance Accountant with the allocation and the Accountant enters the transactions into the accounting system. The accountant is not knowledgeable of the reasoning behind the allocation, and there is no review of the allocation performed. This manual allocation is necessary due to system limitations. The categories of payments which are subtotaled on the report do not correspond to a RIFANS revenue account. Payments often include funds for multiple types of transactions (i.e., license and continuing education) that are required to be allocated between several RIFANS accounts.

Appropriate revenue classification can be a difficult process due to the nature and complexity of the Insurance Division. There are multiple RIFANS revenue accounts utilized by the division, as well as numerous external systems. This complexity combined with the lack of formal processes to deal with the recording of revenue results in an inability to attest to the accuracy of the revenue allocation and also to the completeness of revenue in RIFANS. Revenue accounts could be misstated which will impact the division’s budget and assessment of performance measures.

Recommendations:
16.) Develop and incorporate a procedure which clearly dictates how revenue should be allocated to each applicable RIFANS account into the policies and procedures referenced in the recommendation to Implement Department-Wide Cash Handling Policies and Procedures on page 7.

17.) Communicate with Division of Information Technology (DoIT) to develop an automated report which generates the information to be directly input to RIFANS.

Management Responses: Included in the Department policies and procedures for the cash receipts will be a listing of license types and their corresponding deposit account numbers. The Department will investigate the possibility of creating automated reports from each elicensing system which would generate deposit information to assist in the receipting of deposits in the RIFANS system. These reports will need to be programmed by the various vendors. These custom reports will represent a
cost to the State and will be submitted for funding from the Information Technology Investment Fund (ITIF).

**Responsible Party:** Brian Riggs/Joe Torti/Maria D’Alessandro/Bridgette Stranko

**Completion Date:** December 2015