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Mary Modelski

**Cook County Auditor** 

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June 12, 2023

The Honorable Toni Preckwinkle, President and Board of Cook County Commissioners 118 N. Clark Street, Room 537 Chicago, Illinois 60602

Dear President Preckwinkle and Board of Commissioners:

The Office of the Cook County Auditor has conducted an audit from the fiscal year 2021 audit plan of the Employee Reimbursement Process for Cook County in accordance with the Cook County Auditor Ordinance.

The objectives of our audit were to determine if there are current policies, collective bargaining agreements, and standard operating procedures that govern the employee reimbursement process; verify internal controls over the employee reimbursement process at the initiating department / agency level as well as in the Comptroller's Office and to determine if requested reimbursements are supported by required documentation, approved by appropriate department management, and are properly paid. The scope of our work consisted of reviewing and testing a sample of employee reimbursements that were requested and processed from December 2020 through November 2022.

Please refer to the following audit report for the results of the audit. The Executive Summary provides an overview of the audit and recommendations. The audit report contains seven recommendations.

We appreciate the cooperation of the Bureau of Finance, Bureau of Human Resources, Bureau of Administration, and Cook County Health & Hospital System during our audit. We have discussed our recommendations with the management of the noted departments / agencies.

Respectfully Submitted,

Mary Modelski

**Cook County Auditor** 

cc: Tanya Anthony, Chief Financial Officer
Zahra Ali, Chief Administrative Officer
Lawrence Wilson, Comptroller
Velisha Haddox, Bureau Chief, Bureau of Human Resources
Pamela Cassara, Chief Financial Officer, Cook County Health



# COOK COUNTY GOVERNMENT OFFICE OF THE COUNTY AUDITOR

Employee Reimbursement Process Internal Audit Report

Report Date: June 12, 2023

Issued By: Mary Modelski, County Auditor

Audit Conducted By: James Butler, Field Auditor IV Julie Stack, Audit Supervisor

# **EXECUTIVE SUMMARY**

The Office of the County Auditor completed an audit of the Employee Reimbursement Process for Cook County. The objectives of our audit were to determine if there are current policies, collective bargaining agreements, standard operating procedures, and internal controls that govern the employee reimbursement process. Make certain that all reimbursement requests are supported by required documentation, approved by appropriate department management, and are properly paid and accounted for in the initiating department / agency and Comptroller's Office.

This was accomplished by gathering, reviewing, and testing relevant supporting documentation to reach a conclusion on each of our audit objectives.

Management was presented and asked to respond to seven recommendations. Each recommendation is organized by department.

#### The Bureau of Finance (BOF) should:

- Review and update the current Travel and Business Expenses Policy and Procedures on a consistent basis. Expand the current policy to include parameters, as well as authorization over non-travel reimbursable expenses. Provide training to all employees to make certain reimbursements are not approved for commuting mileage, parking / toll expenses are supported by a receipt, and the 29A Voucher Form is properly completed. (**Recommendation #1**)
- Revise the Transportation Expense Voucher (TEV) to remove the following statement "The Comptroller's Office requires a 29A to be submitted along with the Transportation Expense Voucher for reimbursement." (Recommendation #2)

#### The Comptroller's Office should:

• Review existing cost codes and create additional element name codes to properly classify non-travel employee reimbursement requests. Code employee reimbursement requests for tuition under the Element Name "Payout Tuition" in EBS. (Recommendation #3)

### The Bureau of Human Resources (BHR) should:

- Review and update the Cook County Tuition Reimbursement Policy and Application for Course Approval/Tuition Reimbursement. As well as include it on the BHR website to ensure Cook County Employees have immediate access to the document. (**Recommendation #4**)
- Print and include the section / page from the applicable Collective Bargaining Agreement (CBA) with the tuition reimbursement request documentation to ensure the employee is not reimbursed for an amount that exceeds the allowable value per the CBA and include in the revised policy. (Recommendation #4)
- Revise the Tuition Reimbursement Policy to instruct the employee to sign the 29A Form after it has been completed by BHR or have the employee complete the form in its entirety prior to sending it to BHR. (Recommendation #5)

# The Cook County Health & Hospital System (CCHHS) should:

- Review and update the current Cook County Health & Hospital System Tuition Reimbursement Program
  Procedures on a consistent basis to ensure it is being properly implemented as intended and produces the
  desired goals and objectives.
  - (Recommendation #6)
- Review the Tuition Reimbursement Request supporting documentation submitted to CCHHS HR by one or two designated staff personnel to make certain each item is included and properly completed per the Cook County Health & Hospital System Tuition Reimbursement Program Procedures.

  (Recommendation #6)
- Consistently follow Cook County's Procurement Process and have vendors invoice Cook County for all goods provided and/or services rendered at competitive prices. (**Recommendation #7**)
- Create a policy that outlines a set of parameters and authorization for allowable reimbursement expenses incurred by Attending Physicians. (**Recommendation #7**)

Please refer to the Recommendations section for more detail on the recommendations along with management's response, corrective action plans and estimated completion dates.

# **BACKGROUND**

The County of Cook ("County") has a fiduciary responsibility to ensure County resources are used responsibly and that individuals do not incur inappropriate or excessive expenses or gain financially from the County. As such, all persons who travel and/or incur non-travel expenses on behalf of the County are fiscally responsible and accountable for all County expenditures. The Travel and Business Expenses Policy and Procedures was originally administered by the Bureau of Administration (BOA). However, in 2020 the administration responsibility transferred to the Bureau of Finance (BOF).

The purpose of the policies that govern local travel, non-local travel, training, and education are to provide guidelines for payment of authorized incurred expenses in an efficient, cost-effective manner, and to enable employees to successfully execute their business requirements at the lowest reasonable costs, resulting in the best value for the County.

The Cook County Travel and Business Expenses Policy and Procedures, and all associated requirements, applies to all County and County Health Employees and all County officials, whether elected or appointed, who incur travel/non-travel or business expenses while conducting official business on behalf of the County.

Cook County offers tuition reimbursement for training and education to any full-time Cook County Employee or part-time employee (except for CCHHS Registered Nurses). Tuition expenses up to \$300 per employee per fiscal year are covered and to apply for tuition reimbursement, employees must complete the "Application for Course Approval/Tuition Reimbursement". The completed application that includes the Department Head's signature must be submitted to BHR for review and approval.

Cook County Health and Hospital System offers a tuition reimbursement program for staff nurses covered under the Collective Bargaining Agreement (CBA) between the National Nurses Organizing Committee (NNOC) and Cook County. The County will reimburse Registered Nurses (RNs) for 100% of the cost of tuition and mandatory fees for up to three approved education courses per semester. To be eligible for the program RNs must follow the defined procedures and criteria to be considered and receive reimbursement.

RNs must submit their completed and department approved application along with all required supporting documentation to Cook County Health Department of Human Resources CCHHR for review and approval.

Cook County and Cook County Health Employees requesting reimbursement are responsible for ensuring that his/her expense and related reimbursement request complies with all applicable policies, is properly authorized, and is supported with necessary receipts and documentation.

Each department is held accountable for the use of County funds and must verify that all travel and non-travel is budgeted, and expenditures are charged to the correct general ledger account(s). Expenditures are approved by department heads.

The County will reimburse employees for reasonable and necessary expenses incurred during travel on its behalf. Each County Bureau and Department are charged with the responsibility for determining the necessity, available resources and justification for the need to incur travel and non-travel expenses. For local travel that is performed for official purposes in and around the employee's primary work location and does not entitle the traveler to lodging, meals or other travel related allowances, employees are responsible for completing a required Transportation Expense Voucher (TEV) that can be accessed through the Transportation Expense Voucher System (TEVS) via the following Uniform Resource Locator (URL) https://apps.cookcountyil.gov/voucher/login.aspx. The TEV should only include non-commuting mileage, parking, and tolls.

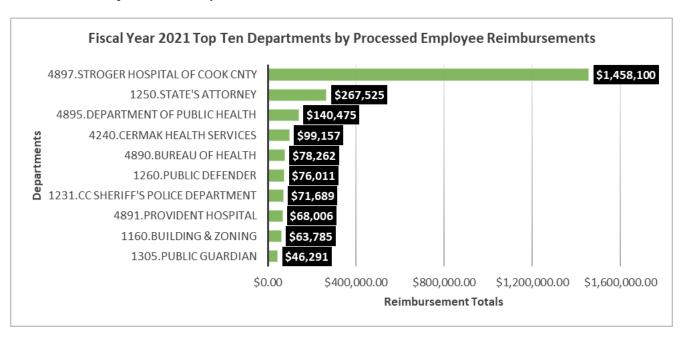
All travel outside the employee's primary work location and Chicago Metropolitan Area is considered non-local and requires two forms to be completed. The first form is the Travel Request Form (TRF) which must be approved by the traveler's department head and submitted to the bureau chief (or equivalent) as far in advance as possible, but no later than 10 business days prior to the date of non-local travel. The second form for reimbursement of non-local travel expenses must be submitted on the Travel Reimbursement Voucher (TRV). The TRV must be supported by receipts for transportation, lodging, meals, and incidental expenses. The TRV should be completed by the employee and approved by department management.

All vouchers along with supporting documentation must be submitted to the Comptroller's Office for review and processing prior to reimbursement. Each processed reimbursement request will appear as a reimbursement on the employee's payroll check. All documentation that supports each employee reimbursement request shall be retained by each county and county health bureau/department and the Comptroller's Office.

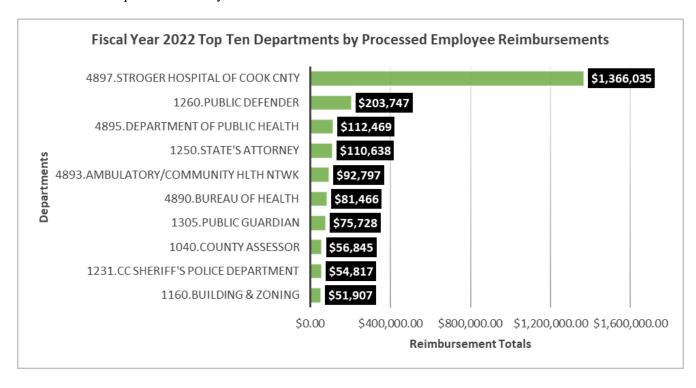
The chart below represents the total number of employee reimbursement requests in dollar value submitted by department to the Comptroller's Office that were processed in fiscal year 2021 and 2022.

Fiscal Year	# of Departments Submitted Employee Reimbursement Requests	Total # of Employee Reimbursements Processed	Employee Reimbursements Total Dollar Value	
2021	80	5,427	\$2,808,540	
2022	82	5,799	\$2,827,125	
1	Total Processed & Dollar Value	11,226	\$5,635,665	

Below is a graph that represents the top 10 departments with the highest number of processed employee reimbursement requests for fiscal year 2021.



Below is a graph that represents the top 10 departments with the highest number processed employee reimbursement requests for fiscal year 2022.<sup>1</sup>



# **AUDIT SCOPE AND OBJECTIVES**

Our audit was designed to assess the internal controls over the employee reimbursement process at the initiating department/agency level as well as in the Comptroller's Office to verify compliance with the Cook County Travel and Business Expenses Policy and Procedures and Tuition Reimbursement Policy. The scope of our work consisted of reviewing a sample of employee reimbursement requests and policies and procedures established by both individual departments and the Comptroller's Office.

We conducted this audit in accordance with generally accepted accounting principles. These standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions, based on our audit objectives. Our fieldwork was conducted from October 2022 through February 2023 and sample of employee reimbursements were selected from requests processed from December 2020 through November 2022.

## Our objectives were to:

- Determine if there are current policies, collective bargaining agreements, standard operating procedures that govern the employee reimbursement process.
- Verify internal controls over the employee reimbursement process, at the initiating department/agency level as well as in the Comptroller's Office, to determine they are compliant and allowable with established policies, collective bargaining agreements, and standard operating procedures.

<sup>&</sup>lt;sup>1</sup> Data for each chart and graph was obtained from the 2021 and 2022 Element Register Reports generated from the EBS System provided by the Comptroller's Office.

• Determine if requested reimbursements are supported by required documentation, approved by appropriate department management, and are properly accounted for and paid in the initiating department / agency and Comptroller's Office.

The following procedures were performed to assess the objectives:

- Obtained and reviewed the Travel and Business Expenses Policy and Procedures, the Tuition Reimbursement Policy for Cook County and Cook County Health.
- Interviewed staff within the Comptroller's Office, Bureau of Administration, Bureau of Human Resources, Cook County Health: Finance, Human Resources, Administration responsible for reviewing, approving, and processing employee reimbursement requests.
- Reviewed the documentation for a sample of employee reimbursement request processed in fiscal year 2021 and 2022.
- Conducted physical observation of employee reimbursement requests being processed within the EBS System.

# **AUDIT RESULTS**

Based on our analysis and evaluation of the internal controls and the operations surrounding the employee reimbursement process, we have noted seven recommendations as detailed in the Recommendation Section. Regarding the other audit objectives, our review determined the following conclusions:

- Written policies, collective bargaining agreements, standard operating procedures that govern the employee reimbursement process need to be reviewed, expanded, and updated.
- Internal controls over the employee reimbursement process, at the initiating department/agency level including: the Bureau of Finance (BOF), Bureau of Administration (BOA), Bureau of Human Resources (BHR), Cook County Health (CCH) Finance / Human Resources / Administration as well as in the Comptroller's Office need to be reviewed and improved. The following internal control weaknesses and improvements were identified:
  - All Policies and Procedures that govern Cook County & County Health Employee Reimbursements need to be published on the agency's website for immediate access and availability.
  - All Cook County & Cook County Health Employees need to be trained on all Policies and Procedures that govern employee reimbursements.
  - o Local & Non-Local Travel as well as Non-Travel Vouchers need to be reviewed and approved by each department initiating said voucher.
  - O Documentation such as receipts, invoices, etc. needs to be provided to support each applicable voucher.
  - Additional element name codes need to be created to properly classify non-travel employee reimbursement requests. Employee reimbursement requests for tuition need to be coded under the Element Name "Payout Tuition" in EBS.
  - o Approved and processed employee reimbursement requests need to be retained in the initiating department as well as in the Comptroller's Office.
- Requested reimbursements are not consistently supported by required documentation, nor approved by appropriate department management. We found instances where the required documentation could not be provided and other instances where the appropriate approvals were not documented.

# RECOMMENDATIONS

# **Recommendation #1:**

Cook County has not reviewed and updated the existing 2017 Cook County Travel and Business Expenses Policy and Procedures. The policy being outdated could expose Cook County to internal control risks and lead to inconsistent practices throughout the various departments / agencies.

We also determined that the 2017 Travel and Business Expenses Policy and Procedures does not include a section governing non-travel reimbursable expenses such as office supplies / equipment, desktop computers, laptops, smartphones, catering services, meeting refreshments, and dry cleaning, etc. that are incurred by Cook County and Cook County Health Employees. Given that the current policy does not include procedures for the completion of a 29A Voucher Form and non-travel reimbursement expenses could expose Cook County to internal control risks and inconsistent business practices within the various departments and agencies.

The Transportation Expense Voucher (TEV) that is completed and submitted by the employee is not being properly reviewed by Department Heads within Cook County. If Department Heads do not properly review the TEV, employees could be reimbursed for expenses that are not allowed per the Travel and Business Expenses Policy and Procedures, such as commuting mileage.

During our testing of the Travel and Business Expenses Policy and Procedures and review of the supporting documentation for 27 employee reimbursement requests for local travel (TEV), non-local travel (TRV) and non-travel (29A Voucher), the following exceptions were identified:

Fifteen local travel mileage reimbursement (TEV) requests for Cook County Employees tested:

- There are four occurrences where the employee was reimbursed for commuting mileage.
- There are 13 occurrences where written approval for Personally Owned Vehicle (POV) use was not included with the reimbursement request.
- There is one occurrence where the employee did not sign and date the Transportation Expense Voucher (TEV).
- There is one occurrence where the department supervisor did not sign and date the Transportation Expense Voucher (TEV).
- There is one occurrence where the department head did not sign and date the Transportation Expense Voucher (TEV).
- There are two occurrences where the employee did not provide a receipt for Parking and / or Tolls that were included on the Transportation Expense Voucher (TEV).
- There is one occurrence where the employee submitted the Transportation Expense Voucher (TEV) pass the 20th day of the month following the month in which the travel expense was incurred.
- There is one occurrence where the department submitted the Transportation Expense Voucher (TEV) to the Comptroller's Office pass the 60th day after the end of the month in which the travel expense was incurred.

Two non-local travel reimbursement (TRV) requests for Cook County Employees tested:

• There is one occurrence where the Travel Reimbursement Voucher (TRV) was not signed by the Department Heads.

Ten non-travel reimbursement (29A Vouchers) requests for Cook County Employees tested:

- There is one instance where the employee did not sign the 29A Form and two instances where department heads did not sign the 29A Form. Due to Covid and employees working remotely, approval signatures were accepted on supporting documentation instead of the 29A form.
- There is one instance where the employee was reimbursed for a tip that was included on the Uber receipt. Per page four of the "Cook County Travel and Business Expenses Policy and Procedures" "Tipping is at the traveler's expense and not reimbursable."
- There was one instance where the reimbursement request should have been coded under "Mileage Reimbursement" due to the fact it is classified as "local travel" per the Travel Policy.

We recommend Cook County complete the following:

Review and update the current Travel and Business Expenses Policy and Procedures on a consistent basis to ensure it is being properly implemented as intended and produce the desired guidelines for payment of authorized travel and non-travel expenses.

Expand the current Travel and Business Expenses Policy and Procedures to include parameters as well as authorization over non-travel reimbursable expenses and provide training to all employees to ensure the new policy and procedures are being followed consistently, including the completion of the 29A Form.

Departments must properly review the Transportation Expense Voucher to ensure the employee is not reimbursed for commuting mileage and parking / tolls included on the voucher are supported by a receipt. Department Heads should be trained on the Travel and Business Expenses Policy and Procedures.

## **Management Response:**

The Cook County Travel and Business Expense Policy and Procedures has been updated to address internal control risks and inconsistent practices throughout all departments/agencies. The updated policy includes a section to address eligible reimbursable necessary business expenses (authorized out of pocket expenses or losses that are incurred by the Official or Employee in the discharge of employment or official duties, that inure to the primary benefit of the County and that cannot be procured under the County's Procurement Code or Direct Pay Policy) which include categories such as Food Supplies (for ceremonial events, budget hearings and board meetings, community events, employee morale events and trainings), Registration Fees, Travel Expenses (includes types of travel eligible for reimbursement – local and non-local), acceptable modes of local travel and non-local travel, and a Miscellaneous Category. Occasionally, eligible necessary business expenses, such as subscriptions for software licenses, may be reimbursable if they are unable to be acquired through the procurement process. Failure to use the Procurement Code process or Direct Pay process to purchase items or services on behalf of the County may lead to the expense being ineligible for reimbursement.

The updated policy also includes a section to define and exclude a list of specific ineligible business expenses. Expenses incurred in connection with normal commuting between home and work are expressly not reimbursable under the updated policy. All forms have been updated to conform to the requirements of the policy. Form 29A Voucher Form has been eliminated and account numbers are referenced on updated reimbursement forms.

The updated policy outlines a process for requesting pre-authorization for eligible necessary business expenses and seeking reimbursement which includes a pre-authorization form, a business and/or travel expense reimbursement form and supporting documentation. To authorize a necessary business expense, the pre-authorization form must be reviewed and signed by the requestor (within 21 calendar days of the authorizing party receiving such documentation) and the appropriate authorizing party as defined in the updated policy. The pre-authorization form (to be submitted 30 days in advance of the expense or detail why it is not submitted prior thereto) must note the details of the expense(s) to be incurred, including the amount and when and where the

purchase or expense will be made, the purpose of the expense, and a reason why the item is not being purchased using the methods provided in the Cook County Procurement Code. Submission of a business and/or travel expense reimbursement form must include a copy of the approved pre-authorization form, copies of itemized receipts for all expenses and/or an affidavit for lost receipts form if necessary. All forms must be executed and timely filed (within 60 days of incurring the expense pending unusual circumstances) for processing per the updated policy.

The appropriate authorizing party (Department Head (or equivalent), if requested by the employee within the Department; Bureau Chief, if requested by a Department Head; Chief of Staff, if requested by a Bureau Chief; Employing Official, if requested by a Chief of Staff or where there is no person in a higher-level position within the requestor's organizational chart to authorize the expense, such as an Official, the reimbursement request shall be referred to the Agency's Chief of Staff, where applicable or the Budget Director of the Agency does not employ a Chief of Staff for pre-authorization) is required to send all required forms and supporting documents to the department's assigned budget analyst. By approving the reimbursement request and forwarding it to the budget analyst, the appropriate authorizing party the appropriate authorizing party certifies the appropriateness of the expenditure and reasonableness of the amount, compliance with applicable reimbursement policies and completeness of supporting documentation (first level of review). All supporting documentation will be further reviewed by a Budget analyst (second level of review). If approved, the budget analyst will submit the reimbursement request to the Comptroller's Office for payment. Failure to timely correct or supplement a request for reimbursement if requested will result in a denial of reimbursement.

# **Estimated Completion Date:**

Completed. Please see revised 2023 Cook County Employee and Official Business and Travel Expense Reimbursement Policy.

# **Recommendation #2:**

We reviewed the Transportation Expense Voucher (TEV) that is in Cook County's Travel and Business Expenses Policy and Procedures and on the Transportation Expenses Voucher System (TEVS). Employees are required to utilize the TEVS to complete the TEV form for all mileage reimbursement and other transportation expenses associated with local travel including tolls and parking. We noted the TEV includes the following statement "The Comptroller's Office requires a 29A to be submitted along with the Transportation Expense Voucher for reimbursement." It was determined that a 29A does not need to be completed and submitted to the Comptroller's Office along with the TEV form because it is not required, due to redundancy.

We recommend the Bureau of Finance revise the Transportation Expense Voucher (TEV) to remove the following statement "The Comptroller's Office requires a 29A to be submitted along with the Transportation Expense Voucher for reimbursement."

#### **Management Response:**

The Transportation Expense Voucher (TEV) has been updated to remove any reference to Form 29A. Form 29A is no longer required under the updated policy. Necessary and updated forms/documentation include a preauthorization form, Request for Reimbursement form, original receipts, TEV form, etc.).

# **Estimated Completion Date:**

Completed

#### **Recommendation #3:**

The Payroll Division within the Comptroller's Office is currently using only two of the five Element Names to code employee reimbursement requests in Oracle E-Business Suite (EBS). Payroll is not using the "Payout Tuition" Element Name to code requests submitted by employees for reimbursement of incurred tuition expenses. Payroll is currently coding non-travel employee reimbursements as "Other Travel Reimbursements" in EBS. By not expanding the use of the existing Element Name Codes could result in employee reimbursement requests being mis-coded in EBS. The chart below shows the Element Name Codes that were used in fiscal year 2021 and 2022 to categorize reimbursement requests.

Fiscal Year	Mileage Reimbursement	Other Travel Reimbursement	Parking Reimbursement	Payout Tuition	Refund Travel Reimbursement	Travel Allowance	Totals
2021	\$374,031.78	\$2,428,875.06	\$0.00	\$0.00	-\$764.25	\$6,397.76	\$2,808,540
2022	\$364,079.68	\$2,480,797.74	\$0.00	\$0.00	-\$17,752.17	\$0.00	\$2,827,125

We reviewed the Travel Element Register Report for fiscal year 2021 and 2022 and selected a sample of 55 employee reimbursements from 2021 and 2022. The sample selection of 55 was submitted to the Comptroller's Office for them to provide us with all supporting documentation for each request. It was determined that Payroll had to reach out to the department to obtain the supporting documentation for two of the requests.

The following was noted based on our initial review of the employee reimbursement sample request:

- Two reimbursements could not be located so, new reimbursement selections had to be made and requested.
- One reimbursement was never provided so, a new reimbursement was selected and requested.
- 15 of 16 pages for one provided request were illegible and could not be read a new reimbursement was selected and requested.

During our review of the 55 reimbursement requests for Cook County and Cook County Health & Hospital System Employees the following exceptions were identified:

- There are two instances where the reimbursement request was for non-local travel and should have been coded as "Other Travel Reimbursement" in EBS. However, they were coded as "Travel Allowance".
- There is one instance where the reimbursement request was for non-travel expense and should have been coded as "Other Travel Reimbursements" in EBS. However, it was coded as "Refund Travel Reimbursement".
- There are three instances where the reimbursement request was for mileage and should have been coded as "Mileage Reimbursement" in EBS. However, they were coded as "Other Travel Reimbursement".
- There is one instance where the reimbursement request was for local travel and should have been coded as "Mileage Reimbursement" in EBS. However, it was coded as "Travel Allowance".

We recommend that Payroll complete the following:

- Create additional element name codes to properly classify non-travel employee reimbursement requests.
- Code employee reimbursement requests for tuition under the Element Name "Payout Tuition" in EBS.
- Properly code the reimbursements in EBS to account for correct expenses in addition, have an overall review of cost codes.

#### **Management Response:**

We agree with the recommendations that each travel and non-travel expense be coded with the appropriate budgeted expenditure code. Tuition reimbursement has been excluded for inclusion in BHR policy.

#### **Estimated Completion Date:**

August 31, 2023

#### **Recommendation #4:**

It was determined through review that the current Cook County Tuition Reimbursement Policy and Application for Course Approval/Tuition Reimbursement was last reviewed in February of 2014 and is not published on the Bureau of Human Resources (BHR) Website. The policy being outdated could expose Cook County to internal control risks and does not address needed procedural improvements throughout the various departments / agencies. Cook County Employees who need the policy and application will not readily have access to the documentation and will need to reach out to BHR directly.

It was concluded through review of seven reimbursement requests for tuition that BHR is not printing and including with the request the section/page from the applicable Collective Bargaining Agreement (CBA) that states the maximum dollar value they are allowed for education. The possibility of an employee being reimbursed over the allowable amount outlined in the CBA exists if the section / page from the CBA is not included with the request for review by BHR Management.

During our noted review we identified one Cook County Health Employee who was reimbursed for a seminar taken in December 2021 and April 2022 totaling \$890. Both were taken during the 2022 fiscal year. Per the employee's job code 1816 – Physician Assistant identified in the following CBA - Service Employees International Union (SEIU) 73, they are allowed to be reimbursed up to an amount not greater than \$550 in a fiscal year. The employee was reimbursed \$340 (\$890 - \$550) over the allowable reimbursement amount per the CBA.

We recommend that the Bureau of Human Resources perform the following:

The current Cook County Tuition Reimbursement Policy and Application for Course Approval/Tuition Reimbursement should be reviewed and updated on a consistent basis to ensure it is being properly implemented as intended and are producing the desired goals and objectives. According to BHR, the existing policy is currently being reviewed and updated. However, said policy was not available for audit review.

Publish Cook County's Tuition Reimbursement Policy and Application for Course Approval/Tuition Reimbursement on their website to ensure Cook County Employees have access to the documentation.

Print and include the section / page from the applicable Collective Bargaining Agreement (CBA) with the tuition reimbursement request documentation to ensure the employee is not reimbursed for an amount that exceeds the allowable value per the CBA and include it in the revised policy.

#### **Management Response:**

The Office of the County Auditor recommended that the Bureau of Human Resources regularly review and update the Cook County Tuition Reimbursement Policy and Application for Course Approval/Tuition Reimbursement, as well as print and include the section/page of the applicable Collective Bargaining Agreement (CBA) with the tuition reimbursement request documentation.

The Office of the County Auditor's report indicates that the Bureau of Human Resources last reviewed the Cook County Tuition Reimbursement Policy and Application for Course Approval/Tuition Reimbursement in February 2014. This information is inaccurate as the Bureau of Human Resources regularly reviews policies on an annual basis for process changes. This review of policies does not always generate an update to the policy. The Bureau of Human Resources last reviewed the Cook County Tuition Reimbursement Policy and Application

for Course Approval/Tuition Reimbursement in December 2022, and made updates to these documents. The Bureau of Human Resources was ready to publish the updated policy, but decided to postpone that launch as we were in the middle of the Employee Reimbursement Audit and knew there may be potential changes. We wanted to ensure that any adopted recommendations were captured in the updated Cook County Tuition Reimbursement Policy and Application for Course Approval/Tuition Reimbursement. The Bureau of Human Resources will continue its practice of regularly reviewing the Cook County Tuition Reimbursement Policy and Application for Course Approval/Tuition Reimbursement and make changes as needed.

The Bureau of Human Resources was previously printing and including the section/page of the applicable CBA with the employee's tuition reimbursement request documentation but stopped this practice during the pandemic as access to printing was reduced. The Bureau of Human Resources will adopt the Office of the County Auditor's recommendation and resume its practice of printing and including the applicable section/page of the CBA with the tuition reimbursement request documentation to ensure correct amounts are reimbursed. This step will be updated in our standard operating procedures.

The Office of the County Auditor also recommended that the Bureau of Human Resources publish the Cook County Tuition Reimbursement Policy and Application for Course Approval/Tuition Reimbursement on our website.

The Bureau of Human Resources considered this recommendation and will adopt the recommendation to publish the Cook County Tuition Reimbursement Policy and Application for Course Approval/Tuition Reimbursement on the County website to allow Cook County employees to readily access the documents.

# **Estimated Completion Date:**

June 30, 2023

#### **Recommendation #5:**

Per the Tuition Reimbursement Policy, employees are instructed to sign a blank 29A Form and send it to the Bureau of Human Resources who will complete the Form on the employee's behalf. The 29A Form could be completed incorrectly or contain false information if not completed by the employee.

We recommend that the Bureau of Human Resources (BHR) should revise the Tuition Reimbursement Policy to instruct the employee to sign the 29A Form after it has been completed by BHR or have the employee complete the form in its entirety prior to sending it to BHR.

# **Management Response:**

The Office of the County Auditor recommended that the Bureau of Human Resources revise the Tuition Reimbursement Policy to have the employee sign the 29A Form after the form has been completed by the Bureau of Human Resources or have the employee complete the 29A form in its entirety prior to sending it to the Bureau of Human Resources.

The Bureau of Human Resources considered these recommendations and will adopt the recommendation to have the employee review and sign the 29A form after it has been completed by the Bureau of Human Resources. This step will be updated in our standard operating procedures.

# **Estimated Completion Date:**

June 30, 2023

#### **Recommendation #6:**

It was determined through review that the current Cook County Health & Hospital System (CCHHS) Tuition Reimbursement Program Procedures was last revised in February 2013. The policy being outdated could expose CCHHS to internal control risks and does not address needed procedural improvements throughout the various departments.

During our testing of 11 tuition reimbursement requests for Cook County Health & Hospital System (CCHHS) Nursing Staff the following exceptions were identified:

- There was one occurrence where the total amount on the 29A Form did not agree with the tuition reimbursement noted on the report provided by CCHHS HR.
- There was one occurrence where the Application for Tuition Reimbursement was not submitted with the reimbursement request.
- There were four occurrences where the CCH Tuition Reimbursement Checklist Part #1 was not submitted with the reimbursement request.
- There were two occurrences where the CCH Tuition Reimbursement Checklist Part #2 was not submitted with the reimbursement request.
- There was one occurrence where paid receipts, transcripts, canceled check(s), and/or credit card statement were not submitted with the reimbursement request.

We recommend that Cook County Health & Hospital System (CCHHS) Human Resources (HR) complete the following:

The current Cook County Health & Hospital System Tuition Reimbursement Program Procedures should be reviewed and updated on a consistent basis to ensure it is being properly implemented as intended and are producing the desired goals and objectives.

Tuition Reimbursement Request supporting documentation submitted to CCHHS HR should be reviewed by one or two designated staff personnel to make certain each item is included and properly completed per the Cook County Health & Hospital System Tuition Reimbursement Program Procedures.

# **Management Response:**

Management agrees with finding and will institute practice of reviewing and updating Tuition Program every two years or as needed. In addition, procedures will be revised to include a review and sign off by CHRO or designee that all required documentation is included and properly completed before submission for reimbursement.

#### **Estimated Completion Date:**

August 1, 2023

# **Recommendation #7:**

During our review of 10 non-travel reimbursement requests for Cook County Health & Hospital System (CCHHS) Employees the following exceptions were identified:

- There was one instance where CCHHS Finance did not sign the 29A Form as evidence of review and approval.
- There were five instances where employees were reimbursed for incurred expenses that were paid to vendors for goods and services rendered using their own personal credit card. Nor did they have the vendor(s) go through Cook County's Procurement Process.

Cook County Health & Hospital System (CCHHS) does not have a Contract / Collective Bargaining Agreement (CBA) or Policy that governs employee reimbursement expenses such as equipment, educational classes, seminars, etc. that are incurred by Attending Physicians. Failure to create a policy or include reimbursable expenses in the CBA will not allow CCHHS Attending Physicians and Administration to be educated and aware of all reimbursable employee expenses.

We recommend Cook County Health & Hospital System (CCHHS) perform the following:

For the procurement of supplies, materials, equipment, and services follow CCHHS's Supply Chain Management Procurement Policy and have vendors invoice CCHHS for all goods provided and/or services rendered at competitive prices. Electronic equipment such as computers, laptops, and smartphones, etc. purchased by CCHHS Employees should follow the System Acquisition, Development, Maintenance Policy that identifies acceptable and prohibited uses of information technology resources under the jurisdiction of CCHHS. Create a policy that outlines a set of parameters and authorization for allowable reimbursement expenses incurred by Attending Physicians.

## **Management Response:**

Management agrees with finding and will follow all applicable CCH Supply Chain and Information System policies related to procurement of goods and/or services. In addition, CCH will create/revise any applicable policy(s) related to the authorization and reimbursement of allowable business expenses for all employees including Attending Physicians.

#### **Estimated Completion Date:**

December 1, 2023