

**STATUS OF IMPLEMENTING DEPARTMENT OF AUDIT REPORT RECOMMENDATIONS**

**Audit Title:** Former ROD’s Willful Disregard for County Policies and Procedures and Cooperative Vendors Facilitated Development of a “Pot of Gold” for Improper Use of County Funds  
**File Number:** 21-297

**Audit Issued:** February 2021

**Status Report Date:** January 2022

**Department:** Register of Deeds, et al

Number & Recommendation	Deadlines Established		Deadlines Achieved		Implementation Status		Comments
	Yes	No	Yes	No	Completed	Further Action Required	
1. The Comptroller and the Department of Administrative Services: <ul style="list-style-type: none"> <li>a. Update the current policies and procedures including any financial system instructional manuals to include a reminder to departments that the County does not pre-pay for services.</li> <li>b. Update any current and any new training on payment systems to include a reminder that the County does not pre-pay for services.</li> <li>c. Explore the possibility of adding a pop up reminder to any new financial systems implemented at the county that the county does not pre-pay for services.</li> </ul>	X					X	<p><b>Facilitating Dept - Comptroller:</b>                      Milwaukee County implemented a new financial system (Infor) in June 2021. The County continues to review policies that were previously implemented to make changes which would comply with the new system and appropriate policies.</p> <p>At present, we are not making any changes to the system from how it was developed to ensure that we gain a full understanding of our current rules within the system.</p> <p>We are currently updating all system job aids and training materials and will include the reminder, where appropriate, that Milwaukee County does not pre-pay. In the system optimization phase, planned for the fourth quarter of 2021, we will work with DAS-Procurement to determine what features of the new system might allow for the pre-pay message.</p> <p><b>January 2022 Update:</b>                      The County has now implemented the Infor Financial System. We have not yet updated policies with regards to contracting for services. It is unlikely that we will be able to do a Pop-Up in the new system. However, for all contracts, they must go through Central Accounts Payable of the Comptroller office for approval. We have told this</p>

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							group that prepayments cannot be included in contracts unless they receive the approval of the Comptroller or Deputy Comptroller. For Purchase Orders, terms of payment do not allow for prepayment except in the case of rental agreements or software licenses, which is a general industry practice to allow for prepayments.
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2. The Department of Administrative Services and the Office of Corporation Counsel review the conduct of SSR and determine if debarment as a county vendor is an appropriate action.		X				X	<p><b>Facilitating Dept - Department of Administrative Services:</b>                      DAS – Procurement is reviewing the Milwaukee County debarment process with the Office of Corporation Counsel to determine whether debarment of SSR is appropriate.</p> <p><b>January 2022 Update:</b>                      DAS – Procurement has drafted the proposal to debar SSR and is awaiting the Office of Corporation Counsel to determine whether debarment of SSR is appropriate.</p>
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3. The Department of Human Resources work to create and publish guidelines for departments to use when establishing procedures to follow when employees request to perform work for an outside entity including specific instructions when that outside entity is a vendor under a county contract.	X					X	<p><b>Human Resources:</b>                      The Department of Human Resources has begun to draft departmental guidelines outlining procedures they can use for employees working with outside entities. Draft guidelines have a targeted completion date of August 31, 2021.</p>
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							<p><b>January 2022 Update:</b>                      The Department of Human Resources (DHR), in collaboration with Ethics Board, has completed a draft of departmental guidelines on secondary or dual employment. DHR will continue to partner with the Ethics Board on these guidelines and other ethics related matters under their purview. In addition, guidelines and procedures regarding dual employment are covered in the annual mandatory Ethics for Milwaukee County e-learning, which all employees are required to complete by March 31, 2022.</p>
4. The ROD should work with the Department of Human Resources to review the conduct of ROD employees who were included on email correspondence discussing the former ROD’s scheme and who processed inappropriate invoices on his behalf to determine whether corrective action is appropriate for violation of State Statutes, county ordinances, policies and procedures.		X			X		<p><b>Facilitating Dept – Register of Deeds:</b>                      ROD Ramon met with representatives of Human Resources (HR) and Office of Corporation Counsel (OCC) on 02/25/2021. An investigation plan was developed which was carried out by HR in consultation with OCC. ROD Ramon did not take part in the actual investigation given that his tenure postdated the events in question. ROD Ramon made his office and staff available to the investigators. The investigation included interviews with key ROD management and supervisory personnel. ROD Ramon received the Investigation Summary Report on 07/21/2021. The report was carefully reviewed, and he met with HR representatives on 07/28/2021 to discuss their recommendations. ROD Ramon thanked HR for its</p>

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							<p>thorough investigation and has determined that the Report findings and recommendations are consistent with Civil Service Rules and reasonable employment practices. He has adopted the Report and recommendations as his own and will implement the recommendations accordingly.</p> <p><b>January 2022 Update:</b>                      Recommendations contained in the Investigation Summary Report were fully implemented by ROD Ramon. Implementation began 9/13/2021 and successfully concluded on 12/7/2021.</p>
5. The Administrator of the Ethics Board prepare a resolution to be considered by the County Board to modify the Statement of Economic Interest form to include information regarding the status of vendor’s relationship with a department when a gift has been received in excess of \$50.	X				X		<p><b>Ethics Board:</b>                      In May, the Ethics Board approved new language for MCO §9.14 that would modify the SEI form to satisfy this request. The Ethics Board Administrator is preparing a resolution to submit to the County Board by the August 20, 2021 submission deadline for consideration during the Board’s September cycle.</p> <p><b>January 2022 Update:</b>                      The resolution to update the language of MCO §9.14 which was approved by the County Board in September. The changes to the SEI form were incorporated for future submissions beginning last November.</p>

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6.		X			X		<p><b>Register of Deeds:</b>                      ROD Ramon received the full documentation of debits from Fidar on 02/26/2021. The documentation was then reviewed by ROD Ramon and key supervisory staff. The documentation was submitted to Audit Services Director Jennifer Folliard and Deputy Molly Pahl on 03/01/2021 with notations meant to improve their understanding of the documentation from ROD Ramon.</p> <p><b>DAS - Procurement Division:</b>                      Procurement is facilitating the RFP process. It is expected that an RFP will be issued on or before August 30, 2021. The RFP process included examination of the Audit findings and inclusion of necessary detail for any future vendor(s). Updates may be obtained from Procurement as needed</p> <p><b>Register of Deeds:</b>  <b>January 2022 Update:</b>                      ROD Ramon and the ROD Office worked closely with Procurement in facilitating the development and issuance of a land records RFP which occurred on or about</p>
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							8/30/2021. An RFP evaluation committee was formed consisting of members of the ROD Office, Procurement, IMSD, and the Milwaukee County Land Information Office. The RFP evaluation committee continues to evaluate proposals received.
7. The Comptroller work with the Treasurer and the Department of Administrative Services to review the documents received by the Treasurer for Cash Receipt deposits entered into the county’s financial system and consider the inclusion of an attestation that the deposit reflects all earned revenue and it is being deposited in a timely manner. In addition, exploration of a process to monitor accuracy and appropriateness of revenues should be included with that review possibly limited to revenues received from vendors.		X				X	<p><b>Facilitating Dept - Comptroller:</b> Milwaukee County implemented a new financial system (Infor) in June 2021. The new system does not have any attestation wording when preparing a deposit since the software is prepared for Infor’s many financial customers. In addition, there is currently a hold on any changes to the new financial system.</p> <p>The Office of the Comptroller will discuss this issue with the Treasurer office and Department of Administrative Services to see if there is any alternative proposal that could help assist with this point. The likely alternative would be a policy that provided to departments.</p> <p><b>January 2022 Update:</b> The County went live with the new financial system in the past year and has been working to close the books for 2021. For 2022, the County still has funds in the project</p>

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							to make improvements or fix any issues with the system. We will know in the next six months if it is possible to make changes as recommended by audit.
8. The Comptroller work with the Office of Corporation Counsel and the Department of Administrative Services to update Chapter 56.30 of the Milwaukee County Code of Ordinances, where applicable, to reflect current statutory guidelines for contract approval at Milwaukee County. In addition, language that results in the inclusion of revenue contracts be added.		X				X	<p><b><u>Facilitating Dept - Comptroller:</u></b>                      The Office of the Comptroller, Corporation Counsel and Administrative Services had a meeting to begin discussions on changes to Ordinances and Policies as they relate to professional services. Discussions will continue on this matter.</p> <p><b><u>January 2022 Update:</u></b>                      During the next six months the group is planning to meet to create an AMOP and resulting ordinance change. We are more settled with the new financial system now, which allows us to create a procedure around how the system operates.</p>
9. The Department of Administrative Services, the Comptroller and the Office of Corporation Counsel form a workgroup to finalize and issue an updated AMOP that is accessible on the AMOP website that includes current and accurate procedures to follow for purchasing contracts.		X				X	<p><b><u>Facilitating Depts. - Department of Administrative Services/Comptroller:</u></b>                      DAS is forming a workgroup with the Comptroller and the Office of Corporation Counsel to draft and issue an AMOP that includes current and accurate purchasing contract procedures.</p>

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							<p><b>January 2022 Update:</b>                      During the next six months the group is planning to meet to create an AMOP and resulting ordinance change. We are more settled with the new financial system now, which allows to create a procedure around how the system operates.</p>
10. The Department of Administrative Services, the Comptroller and the Office of Corporation Counsel form a workgroup to develop a training program (and accompanying manual) for newly elected officials to explain the role of elected officials and the application/explanation of relevant county policies and procedures.		X				X	<p><b>Facilitating Depts. - Department of Administrative Services/Comptroller:</b>                      DAS is forming a workgroup with the Comptroller and the Office of Corporation Counsel to develop a training program and accompanying manual for newly elected officials to explain the role of elected officials and the application/explanation of relevant County policies and procedures as they relate to purchasing contracts.</p> <p><b>January 2022 Update:</b>                      The workgroup on contracts will finish the modifications to ordinances and the AMOP first. From this work, a training program and manual for elected officials will be produced within the next year, with a focus on contracting.</p>