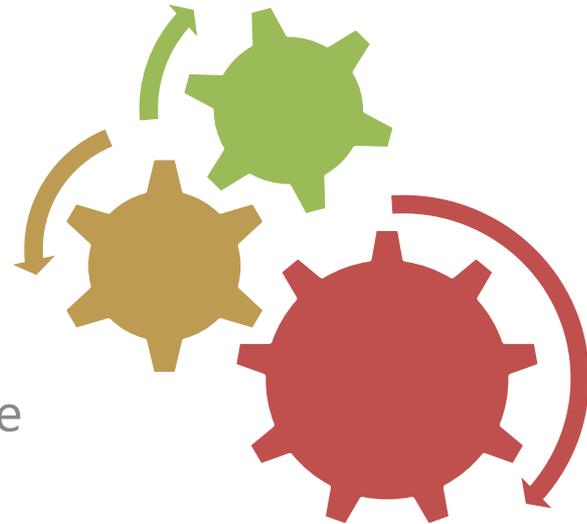


# Practicing Effective Internal Controls

Prepared by  
The University of Tennessee  
County Technical Assistance Service  
2016



# Purpose of Class

- Provide an overview of the five components of the internal controls framework (theory).
- Expand on the principles of each of these components to assist you with being able to enhance your office's internal controls (application).
- Help you comply with amendment to T.C.A. § 9-18-102(a) as well as new federal grant requirements.

# What are Internal Controls?

U.S. Government Accountability Office  
(GAO) Green Book Definition:

**Internal control is a process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved.**

*Source: COSO, GAO Greenbook, Para. OV1.01*

# What is an Internal Controls System?

“An internal controls system is a continuous built-in component of operations, effected by people, that provides **reasonable** assurance, not absolute assurance, that an entity’s objectives will be achieved.”

*Source: COSO, GAO Greenbook Para. OV1.04*

# T.C.A § 9-18-102(a)

An amendment to state law requiring all county governments to establish and maintain internal controls which provide reasonable assurance that...

1. Obligations and costs are in compliance with applicable law;
2. Funds, property, and other assets are safeguarded against waste, loss, unauthorized use, or misappropriation; and
3. Revenues and expenditures are properly recorded and accounted for to permit the preparation of accurate and reliable financial and statistical reports and to maintain accountability over the assets.

**Law takes effect June 30, 2016!  
Must have systems in place by then.**

# Why Do County Governments Need Internal Controls?

- a) Reduce opportunities for fraud and waste
- b) Help management make better informed decisions
- c) Establish performance standards
- d) Helps ensure compliance with applicable laws, regulations, policies, and procedures
- e) Eliminate adverse publicity
- f) Protect county assets
- g) Promote effectiveness and efficiency of operations
- h) Ensure reliability of financial reporting
- i) Promote transparency and accountability

# Enhanced Single Audit Requirements for Federal Grant Recipients

Auditors will be required to focus more on internal controls of grant recipients dealing with:

- purchasing (including bidding procedures)
- conflict of interest policies
- sub-recipient grant monitoring
- cost principals for personnel and indirect grant costs
- financial reporting

*OMB Super Circular, Audits of States, Local Governments and Non-Profit Organizations.*

<https://nonprofitquarterly.org/2015/07/29/explain-the-omb-super-circular/>

# Non-Compliance with this Amendment to State Statute

- State Audit's position is that they will document non-compliance with an audit finding (remember, this is now a state statute, not just an auditing standard).
- If non-compliance is egregious enough, then this can impact state/federal grant eligibility and payments.
- Potential negative impact on county bond rating (rating agencies will be asking about your documented internal controls processes during upcoming rating calls).

# SEC Rating Call Question

"...Please elaborate upon the process of your identification and remediation of the material weakness in internal controls over financial reporting. Include as part of your response a sufficiently detailed timeline that lays out your course of action. Specifically identify in this timeline when the deficiency was identified, when management concluded that the deficiency resulted in a material weakness, when a remediation plan was developed and implemented including its documentation, communication, and any testing..."

*From SEC Comments and Trends, An Analysis of Current Reporting Issues, 2014.*

# Weak Internal Control

## Consequences

- Rita Crundwell, Dixon, IL, City Treasurer
- Trusted employee for over 3 decades
- Stole **\$53,000,000** (ranked the largest municipal fraud and 5<sup>th</sup> largest fraud of any kind in U.S. history)
- Fraud occurred over a 20-year period
- Her annual salary was \$80,000
- Allowed her to be player in Quarter Horse industry

# How She Did It...

- No segregation of duties over keeping the accounting records and disbursing funds. Everyone trusted her!
- City already had a Capital Development Fund at a local bank.
- She opened a separate bank account under the city's name called the **"Reserve Sewer Development Construction Account"**.
- She wrote checks from the Capital Development Fund to the Treasurer. She then deposited those funds into the Reserve Sewer Fund.
- She was the only authorized check signer for account, she alone reviewed/reconciled all city bank statements, and the side bank account was not recorded on city general ledger.
- Rita created **179** fictitious construction invoices from IDOT and disbursed funds from regular city accounts to the side bank account.

# How Rita Was Caught

- In the fall of 2011, Rita took an extended vacation.
- A city clerk employee responsible for overseeing the city finances while Rita was gone requested all of the bank statements.
- The employee noticed the Reserve Sewer Account and notified the mayor who in turn contacted the FBI.
- The FBI conducted their own investigation and in the Spring of 2012 arrested Rita and charged her with defrauding the City of Dixon and misappropriating over **\$30,000,00** from **2006 to 2012**.

# Financial Damage to the Community

- Total Embezzlement: **\$53,000,000**.
- CPA firms agreed to a payment of **\$36,150,000** in lawsuit settlement with city. Auditors released statement taking a share of the responsibility for the fact that the fraud was not detected.
- The city's bank settled in lawsuit for **\$3.85** million.
- U.S. Marshal Service seized Rita's property and assets and sold for around **\$10,000,000**.
- The City incurred **\$10,000,000** in legal fees.
- In the end, the City still lost **\$13,000,000** from the fraud.

# Fallout in the Community

- City endured operating deficits and budget cuts for years while fraud was occurring. Rita's excuse to council...cuts in state funding.
- City police chief was informed by Rita there was no money available for emergency vehicle and equipment replacement due to drop in revenue (she had purchased a motor home for \$2.1 million).
- City endured layoffs and hiring freezes over the course of the embezzlement.
- The city pool was closed for years..."lack of" maintenance funds.

# Moral of the Story...

*Trust and independent auditors are NOT internal controls!*

Establish and maintain sound internal controls for your office.

Remember...You can delegate authority, but you cannot delegate responsibility.

# Who is Responsible for Establishing Internal Controls?

School Management is responsible for:

**design, implementation and  
maintenance**

of adequate internal controls over the office/department in which they are elected/appointed.

T.C.A. § 9-18-102(a).

# But isn't it the State Comptroller's responsibility to detect fraud and internal controls weaknesses?

**No** ...Auditors test internal controls during their annual audit of the county's financial statements, *and...*

...Auditors write hundreds of findings each year concerning internal controls weaknesses, *but...*

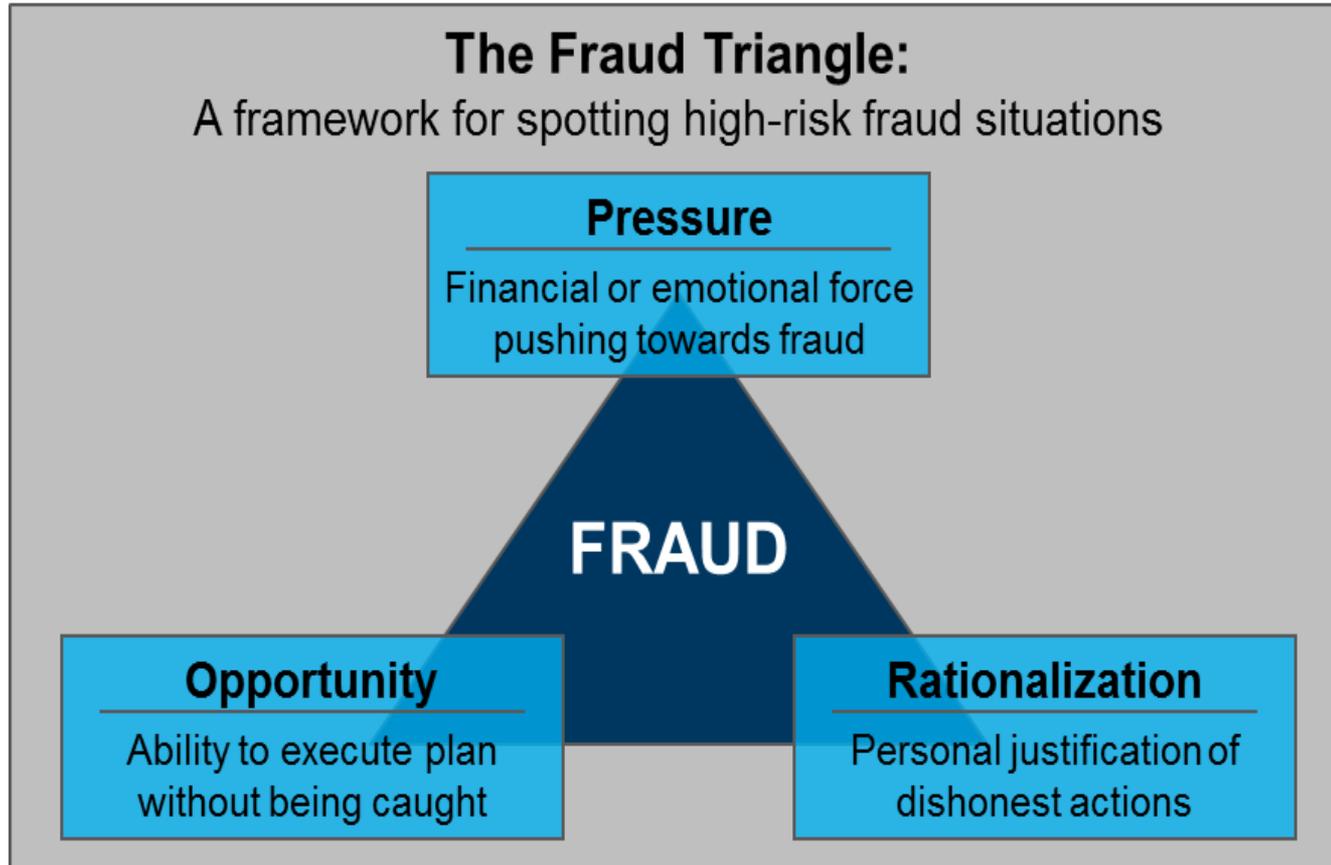
...They are not expressing an opinion on the effectiveness of the internal controls over county assets....effective internal controls is management's responsibility, *and...*

...The published audit report actually includes a disclaimer of auditor's opinion on whether the county's internal controls are effective or not.

# A Point about Auditors and Fraud Detection...

- Per the 2014 Annual Report to the Nations from the Association of Certified Fraud Examiners (ACFE), external auditors (performing routine annual audits) were responsible for detecting less than 5% of identified occupational fraud.
- Per same report, more fraud was identified by *accident* than by the external annual financial and compliance auditors.

# Poor Internal Controls = Opportunity for FRAUD



# Fraud Happens in Tennessee County Government Every Day

- **TN county school central office:**
  - \$319,134 stolen through fraudulent payroll scheme, bookkeepers paid themselves unauthorized bonus checks without approval (lack of oversight) of the school director.
- **TN county school technology office:**
  - \$1,089,820 in questionable spending and kickbacks of federal E-rate funds. Fraud occurred in a school system of around 2,000 students. Bids and invoices falsified. Lavish “gifts” of Rolex watch, Vera Bradley bags and trips provided to county school technology director from vendors

# More Examples in Tennessee County Government...

- **TN county mayor's office:**
  - \$202,345 stolen by bookkeeper, mayor did not review invoices to support disbursements when he hand-signed 191 fraudulent checks over an almost five year period.
- **TN county clerk:**
  - \$54,611 cash shortage, deposits were shorted, personal checks cashed out of office funds, bank deposits not made for up to 67 days from time of receipt.

# Cash Shortages...

Identified cash shortages in TN county government from  
FY June 30 were:

**2013 – \$775,221**

**2014 - \$2,162,244**

**2015 - \$1,154,633**

Majority of thefts went undetected for considerable  
length of time due to lack of or poor internal controls.

<http://www.comptroller.tn.gov/repository/CA/2014/2014Cash%20Shortages.pdf>

# Sound Internal Controls are Needed for Good Financial Reporting/Management

- Lack of internal controls over financial reporting = poor budgeting and reporting practices that can lead to:
  - Unnecessary tax increases
  - Missed grant opportunities and/or loss of grant funds
  - Late/failure to file penalties
  - Bond rating downgrades

# The Five Components of Internal Controls

- Control Environment
- Risk Assessment
- Control Activities
- Information and Communication
- Monitoring
- Remember these with acronym "CRIME"

# Lets take a 15 Minute Stretch Break!



# Components & Principles of Internal Controls

## Components

### Control Environment

## Principles

1. Demonstrate Commitment to Integrity and Ethical Values
2. Exercise Oversight Responsibility
3. Establish Structure, Responsibility, and Authority
4. Demonstrate Commitment to Competence
5. Enforce Accountability

### Risk Assessment

6. Define Objectives and Risk Tolerances
7. Identify, Analyze, and Respond to Risk
8. Assess Fraud Risk
9. Analyze and Respond to Change

### Control Activities

10. Design Control Activities
11. Design Activities for the Information System
12. Implement Control Activities

### Information & Communication

13. Use Quality Information
14. Communicate Internally
15. Communicate Externally

### Monitoring Activities

16. Perform Monitoring Activities
17. Remediate Deficiencies

Source: GAO.

# Control Environment

The foundation for an internal controls system. It provides the discipline and structure to help an entity achieve its objectives.

*Source: COSO, GAO Greenbook Para. OV2.04*

# Control Environment – Demonstrate Commitment to Integrity & Ethical Values

- Setting the *“tone at the top”* for ethical and competent management:
  - What do the office’s employees see as acceptable behavior from their school director/department heads?
  - What is management’s attitude toward establishing/ maintaining internal controls over office operations?
- Establish standards of conduct:
  - County ethics policy-TCA 8-17-101
    - Limits on and disclosure of gifts to officials and employees, disclosure by officials that appear to impact their discretion.
  - School board policy
  - Personnel policies up to date and provided to employees

# Control Environment, cont...

- If your county has not adopted the 1957 or 1981 Financial Acts, be sure your county ethics policy is up to date, copies provided to your staff, and is being followed. Federal grants require these steps.
- Assignment of authority and responsibility (written job descriptions for employees).
- Clear organizational structure (org. chart), who reports to whom in the office?

# Last Points about the Control Environment

- It's impossible to overstate the importance of the control environment's impact on overall effective internal controls.
- If management views internal controls as "red tape" or obstacles in their way, then do not be surprised when the office staff circumvent the policies.
- Even the best policies and procedures cannot overcome the force of a bad example from top management.

# Risk Assessment

Examines the risks facing the entity as it seeks to achieve its objectives. This review provides the basis for developing appropriate risk responses.

*Source: COSO, GAO Greenbook Para. OV2.04*

# Performing a Risk Assessment

- First step...You, as management, must have an understanding of the internal controls (and control deficiencies) that are in place in your department right now.
- Review the processes in your department and note the internal controls over them.
  - *Example: You have a policy that requires purchase orders prior to purchases being made for most goods and services. You walk into your bookkeepers office and see her filling out purchase orders after the checks have been signed for invoices already received? Do you have an enforced purchasing policy?*
- After you gain an in-depth understanding of your department's internal controls (and weaknesses), document these for later reference.
- Document the good, the bad and the ugly at this time, not what you wish it looked like.

## **Sample Questions for Assessing Your Current Internal Controls/Weaknesses**

- Who has a key to the central office/school finance office and when were the locks last rekeyed?
- Does your office have a written store card policy and where are the cards secured when not in use? Who reconciles the monthly invoice of the card purchases/receipts?
- Who reviews the software-generated audit logs and verifies that voided receipts are legitimate?
- Who reviews monthly bank reconciliations and journal entries after the bookkeeper does them to ensure accurate accounting?
- Who besides the bookkeeper opens the monthly bank statement and reviews the canceled checks and timeliness of deposits?

# More Sample Questions for Assessing Your Current Internal Controls/Weaknesses

- When was the last time the active employee list in the payroll software was reviewed by management to check for ghost employees and bogus payroll deductions?
- Who is assigned to monitor 3<sup>rd</sup> party vendors that pay or bill the county based on a variable factor to be sure they are in compliance with their contracts?
- When was the last time the school department's financials and outstanding check lists were reviewed for unclaimed property, especially for refund checks that have been returned to the office?

# Once You Understand Current Internal Controls...

- Identify factors that may increase risk
  - office doors not rekeyed for a decade
  - computer passwords taped onto computers
  - Long outstanding checks ...
- Determine the significance of risk and likelihood of fraud, waste, abuse and inaccurate financial reporting (think reducing risk vs. cost of control).
  - *Remember, you want effective internal controls, NOT red tape.*
- Develop specific actions to reduce the risk to an acceptable level.

# Documenting Your Risk Assessment

- School department should involve key management while doing a formal risk assessment.
- Hold a brain-storming session, look at your internal controls in place and think...
  - *How could someone purposely circumvent these controls?*
  - *How could material reporting errors go undetected by my management team*

# To Summarize So Far...

1. Gain an understanding of the 5 components of internal controls.
2. Complete the Uniform Grant Guidance (UGG) that the State DOE provided.
3. Gain an understanding of your department's actual internal controls/weaknesses and document this. You can use the county finance department internal control assessment as a template.
4. Complete a Risk Assessment after you have gained this understanding.
5. Update your department's internal controls as you deem appropriate based on the outcome of your risk assessment.

# Control Activities

The actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal controls system, which includes the entity's information system.

*Source: COSO, GAO Greenbook Para. OV2.04*

# Control Activities Include:

1. Adequate segregation of duties over financial transactions and assets.
2. Proper authorization of transactions and activities.
3. Adequate documents and records.
4. Physical control over assets and records and back up of information systems' records.
5. Independent checks on performance (active senior management oversight).

# Proper Segregation of Duties

Design internal controls to separate these three categories of duties:

1. Custody of assets.
2. Authorization or approval of transactions affecting those assets.
3. Recording or reporting of related transactions.

# Compensating Controls

The application of different procedures that reduces the vulnerabilities in ineffectively segregated functions, which include the risk of errors, omissions, irregularities and deficiencies in process quality.

# Examples of Compensating Controls

- County commissions under T.C.A. § 8-22-115 can elect to employ (or contract with) an internal auditor to do this review.

# Employment of an Internal Auditor

- Authorized by state statute: T.C.A § 8-22-115
- Recommended by GFOA, GAO, and Charles Hall, CPA, in his book "Local Government Fraud Prevention"
- Some TN counties already employ internal auditors (Davidson, Hamilton, Knox and Shelby)
- Smaller counties could consider contracting with a CPA firm to establish compensating controls or test/improve specific internal controls activities

# Information and Communications

The quality of information management and communications personnel use to support the internal controls system.



*Source: COSO, GAO Greenbook Para. OV2.04*

# Information and Communications

- Management has reasonable assurance that the methods used to operate the school department's financials are accurate and can be prepared timely.
- Plan is in place to safeguard entities financial records:
  - Disaster recovery plan
  - Record retention
  - Computer system backups
- School department employees understand these policies and procedures.

## Examples of Internal Controls Deficiencies in Information and Communications

- Often when top management needs basic financial information, there is an excessive rush to assemble it because the information was not readily available or accurate.
  - *Think budget or annual audit time.*
- Management is using poor quality information or outdated information for making decisions.
- Capital asset inventories are in disarray/not up to date.
- Indirect costs for federal/state grants are not tracked/reported accurately.

# Monitoring Activities

**Assesses the quality of performance over time and promptly resolves the findings of audits and other reviews.**

*Source: COSO, GAO Green Book Para. OV2.04*

# Monitoring Activities cont.

- Monitor department operations to ensure internal controls are functioning properly.
- Management addresses any identified internal controls deficiencies noted in audits.
- Works with an audit committee to review audit findings that deal with internal controls.
- Remember!
  - *Establishing internal controls is the job of county management, not the auditors or the school board/county commission*

# Internal Controls of Third Party Service Organizations

- Trend in recent years is to outsource financial functions that used to be done in-house in the past.
- Example:
  - Outsourcing cafeteria billing/AR
- Remember!
  - *You can delegate authority, but not responsibility with public funds.*

# Service Organization Control Reports (SOC)

- At a minimum, request a copy of the financial and compliance audit of the contracted service organization.
- Actively monitor the organization's performance.
  - *If they are not delivering effective service, does it appear they have internal controls issues? (example: contracted staff is poorly trained, makes a lot of billing errors)*
  - *If you see a problem, address it with the contractor for remediation*
- Speak to your auditors this spring about any additional internal controls reports from service organizations that they would recommend based on professional guidance.

# What Do I Do Now???

- Review the Comptroller's updated *Internal Controls Manual for Counties* for more guidance.
- Gain an understanding of your internal controls and possible deficiencies and document them.
  - Use the sample internal controls assessments and UGG as a guide
- Complete a risk assessment after you gain an understanding of your department's controls.
  - Use the sample risk assessment template as a guide
- Update the documented internal controls and written internal controls assessment in your department.
- Continue to monitor the controls you have put in place to ensure compliance.<sup>8</sup>
- Enjoy efficient, financially sound office operations!

# How to Proceed

- Public Chapter 112 requires three aspects be addressed
  - Whether obligations and costs of the operation are in compliance with applicable laws
  - Whether county funds, property and other assets are safeguarded against waste, loss, unauthorized use or misappropriation
  - Whether revenues and expenditures are properly recorded and accounted for to permit the preparation of accurate and reliable financial and statistical reports and to maintain the accountability over the assets

# Compliant Obligation and Cost

- Purchasing:
  - ❖ Has the county adopted a policy for purchasing?
  - ❖ Which purchases are excluded from having a requisition approved by the county finance office?
  - ❖ Who receives the requisitions in county finance from the other departments to verify available funding in the budget?
  - ❖ Who issues the purchase order once the funding is verified?
  - ❖ Who enters the purchase order into the accounting software?

# Compliant Obligation and Cost

- Response to Purchasing
  - ❖ The finance department complies with the county purchasing policy adopted under the County Financial Management System of 1981 that is in effect for Sample County government.
  - ❖ Purchase Orders: The county finance department complies with and administers the written policy for purchase orders in the county financial management policies. No purchases (other than insurance, travel, utilities) can be made until a requisition has been received and approved by the county finance office and the applicable department head/elected official. County departments will bring in, email or fax a requisition to the finance department purchasing coordinator, who will verify the availability of funding in the budget. The purchase order is then issued, and the requesting department can make a purchase. Tina Turner, accounts payable clerk, enters the purchase order into the LGDPC accounting software that the county finance department utilizes. When the finance department receives the corresponding invoice for the ordered goods, the finance department requires the department/office that ordered the goods to sign off on the invoice verifying the goods were received. The purchase order is then liquidated (if not open blanket PO), and checks are prepared for payments by Marilyn Monroe, purchasing specialist. The county finance office typically negotiates early discount payments from vendors. If these are not offered, the vendor will receive their payments net 30 of the invoice date unless a special exception (local small business) is agreed upon ahead of the purchase. See the purchase order section of the county purchasing policy for more detail of the county purchasing process.

# Safeguarding County Funds and Assets

- Disbursements:

- ❖ Who collects the payroll change notices from department heads/elected officials?
- ❖ Who checks the employee database and current fiscal year budget for availability of funds for the changes being requested in regard to payroll/staff?
- ❖ Who performs new hire orientation, and/or processes the approved changes in the payroll software?
- ❖ Who checks data entries for employee additions or changes in the payroll software to ensure accuracy?
- ❖ Who physically enters invoices and prepares for the issuance of checks?
- ❖ Who physically prints checks and prepares the checks for signature?
- ❖ Who determines the reason and examines documentation for the issuance of the check?
- ❖ Are two signatures signed on county non-payroll checks? Who signs for each department? Who are the backup signers?

# Safeguarding County Funds and Assets

- Response for Disbursements
  - ❖ See the segregation of duties for procedures for payroll and non-payroll disbursements. All non-payroll checks are generated on official, pre-printed checks, and all payroll transactions are done by direct deposit.

# Proper Statement of Revenues and Expenditures

- Expenditures and Revenues
  - ❖ Does the finance office perform monthly reconciliations for all funds with the county trustee?
  - ❖ Who is responsible for ensuring that revenues and expenditures are coded correctly?
  - ❖ Who posts all purchase orders and contracts to the software as encumbrances to assist with ongoing monitoring of the appropriation budget?
  - ❖ Who reviews the budget of each fund to ensure the original approved budget and any subsequent budget amendments are posted correctly to the accounting software?
  - ❖ Who is responsible for identifying and correcting internal control weaknesses within the finance department?
  - ❖ How does the finance department stay up to date on state law pertaining to accounting, purchasing and budgeting?

# Proper Statement of Revenues and Expenditures

- Response for Expenditures and Revenues
  - ❖ The finance department performs monthly reconciliations for all funds with the county trustee. This reconciliation includes ensuring that revenues and expenditures for the month were coded correctly.
  - ❖ The finance department posts all purchase orders and contracts (except phone, utilities, insurance premiums, surety bonds) to finance software as encumbrances to assist with ongoing monitoring of the appropriation budget.
  - ❖ The county finance director and her deputy review the budget of each fund to ensure the original approved budget and any subsequent budget amendments are posted correctly to the accounting software.

# Sample IC Checklist

Internal Control Checklist				
Budget	See Column Instructions Below			
Budget Operations				
	Prepare the Annual Budget for County Commission Approval	Review the Budget Monthly	Prepare Budget Amendments and Post to Accounting Records	Major Appropriation Category Budgets should not be Exceeded.
	(1)	(2)	(3)	(4)
<i>Two-Person Office:</i>				
County Mayor	X	X	X	X
Employee #1	X	X	X	X
<i>Three-Person Office:</i>				
County Mayor	X	X	X	X
Employee #1				
Employee #2 - Bookkeeper	X	X	X	X
<i>Four-Person Office:</i>				
County Mayor	X	X	X	X
Employee #1				
Employee #2				
Employee #3 - Bookkeeper	X	X	X	X
<i>Five-Person Office:</i>				
County Mayor	X	X	X	X
Employee #1				
Employee #2				
Employee #3				
Employee #4 - Bookkeeper	X	X	X	X

# Sample IC Checklist

Column Instructions:	
XX	The Person indicated by the XX is the preferred person to perform the procedure.
<b>Budgeting</b>	
(1)	The budget should be presented to the Budget Committee and/or County Commission for approval on a timely basis. Depending on the specific statute your government operates under, the budget should be presented and approved by July 31st. Some statutes may require an earlier date. The budget must be balanced. Estimated Expenditures may not exceed Estimated Revenues plus beginning Estimated Fund Balance. CTAS is available to help prepare your budget upon request.
(2)	The bookkeeper and County Mayor should review the budget each month. A copy of Departmental budgets should be presented to each Department Head each month. The County Mayor should meet with individual Department Heads as necessary to discuss Departmental budget concerns. The accounting system will normally present revenues and expenditures as a percent of the total line item budget. These percentages should be closely examined. (For example, if you are looking at the budget for gasoline at the end of December, you would expect approximately 50% of the budget to be used. If 80% of the gasoline budget is used by mid-year, some corrective action will be necessary.) The bookkeeper should assist the County Mayor in recognizing any potential problem areas. <b>The most important internal control over budget operations is to simply examine the budget monthly. The monthly budget review should be documented by memo, the County Mayor's initials and date on the Departmental Budgets, or some other logical and consistent method.</b>
(3)	Most counties find it necessary to amend the original budget during the fiscal year. Most amendments require County Commission approval. Refer to the budget document for additional information on budget amendments. Increases to appropriations (expenditures) should be presented with a corresponding source of funding that will allow the increase. The bookkeeper should prepare budget amendments and the amendments should be approved and submitted to the County Commission by the County Mayor. After the amendments have been approved, they should be posted to the accounting records.
(4)	For most counties, the Budget is approved at the Major Appropriation Category level. Examples of Major Appropriation Categories are: County Commission; County Mayor; County Trustee's Office; Sheriff's Department; Landfill Operation; etc. Expenditures should not exceed a Major Appropriation Category although line items within a Major Appropriation Category may sometimes be exceeded. Salaries and Wages are an exception to this general rule.

# What's Next?

1. Define your Control Environment (# of employees, # of cash drawers, etc.)
2. Gather all necessary documents, policies, and procedures (job descriptions, ethics policy, personnel policy, documented procedures, etc.)
3. Document what's taking place in your control environment (office)
4. Document/Implement control activities, including segregation of duties checklist

# A Word of Caution...

- Remember that on average (per ACFE), only about 5% of fraud is detected by independent auditors.
- Should you discover fraud is occurring in your school operations (or have a reasonable suspicion), it is your statutory duty (T.C.A. § 8-4-501) to report this in a timely fashion (within 5 working days) to the State Comptroller.
- <https://www.comptroller.tn.gov/la/LGSfraudReporting.asp>

