

November 16, 2023

Colorado Springs Audit Committee

Subject: 2024 Audit Plan for Approval

Audit Committee:

I am seeking your approval of the 2024 Audit Plan. The attached Audit Plan is based on a risk assessment as required by professional auditing standards. As part of this risk assessment process, I considered input from City Council, City Administration, Colorado Springs Utilities (CSU) Administration, audit staff, and others. This document will serve as the primary work plan for the Office of the City Auditor. The proposed Audit Plan utilizes current authorized staffing level of 14 Auditors and a journey level paraprofessional. Fifty-five percent of 2024 audit hours will be utilized on Utilities audits, 41% to City and the remaining 4% to the Colorado Springs Airport.

Once the Audit Plan has been reviewed and approved by the Audit Committee, a copy will be posted on the Office of the City Auditor webpage.

Respectfully,

Jacquelin Moulul

Jacqueline Rowland City Auditor

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2024 AUDIT PLAN

The 2024 Audit Plan includes the audit projects that are required or have been risk assessed to be the best use of resources of the Office of the City Auditor. The audit projects are listed in two categories:

• Standard Audits

These audits are required by City Code, a city ordinance, a Utilities Board Instruction, or some other requirement. Standard audits also include annual financial system and information system audits.

• Audits Prioritized by Annual Risk Assessment

These audits are identified by the annual risk assessment process. This process includes a risk assessment model with numeric scoring for risk areas. City Auditor utilizes, among other categories, organization's strategic goals, leadership input, and annual budgets as risk criteria for determining proposed audits.

STANDARD AUDITS

City of Colorado Springs External Auditor Oversight

The City Auditor administers the external auditor contract for the City. The City Auditor monitors issues as they arise between the external auditor and the City, Colorado Springs Utilities, or its audited entities. The external auditor will report to the City Auditor and the Audit Committee, who will then communicate with City Council, as needed.

In accordance with City Charter, 3-160 Independent Audit: "The Council shall provide for an independent annual audit of all City accounts and may provide for more frequent audits as it deems necessary. Such audits shall be made by a certified public accountant or firm of such accountants who have no direct personal interest in the fiscal affairs of the City government or any of its officers."

City of Colorado Springs External Financial Audit Staffing/Assistance

Colorado Springs Utilities External Financial Audit Staffing/Assistance

The Office of the City Auditor will provide 250 hours of audit assistance each to the external auditors of the City of Colorado Springs and Colorado Springs Utilities annual financial statement audits. City Auditor staff performs this work under the direction of the external auditor.

Colorado Springs Utilities Board Instructions 2 and 8 Monitoring

Colorado Springs Utilities Board Instruction 4 Monitoring

The purpose of these audits is to verify the report of Colorado Springs Utilities management to Utilities Board on Instruction 4 related to Enterprise Risk Management, along with Instruction 2 related to Financial Condition and Activities and Instruction 8 related to Asset Protection. In accordance with City Code, 1.2.206 Cooperation Among Appointive Officers of the City: The Utilities Board requested the City



Auditor perform an annual compliance review of Colorado Springs Utilities Board Instructions Policies I - 2, Financial Condition and Activities, I-8, Asset Protection, and I-4, Risk Management.

City of Colorado Springs; Financial System Reviews

Colorado Springs Utilities; Financial System Reviews

The purpose of financial system audits is to evaluate internal controls used to ensure the reliability of financial information and assets. We also consider operational best practices, efficiency, and effectiveness in these audits. The operations included as financial systems are cash receipts, billing, cash disbursements, payroll, debt, investments, and procurement. The Office of the City Auditor will perform a risk assessment of financial systems at the City and Colorado Springs Utilities early each year to determine which systems will be audited for the year. We will consider and coordinate the internal control work done by the external auditors in our risk assessment. For example, system or staffing changes as well as complexity of operations or decentralized activities would indicate higher risk profiles for audit services.

In accordance with City Code, 1.2.704 Perform Postaudit and 1.2.706 Examine Books, Records: "The City Auditor shall perform a current postaudit of the financial operation of the City government and its enterprises. The City Auditor shall submit reports to Council of periodic audits of each enterprise, department, division, office, agency, or account.' 'The City Auditor shall examine and inspect all books, records, files, papers, documents and information stored on computer records or in other files or records relating to all financial affairs of every office, department, division, agency, enterprise, political subdivision and organization which receives funds from the City or under the direct or indirect control of the City Council."

City of Colorado Springs; Information System Reviews

Colorado Springs Utilities; Information System Reviews

The purpose of information system audits is to evaluate information system controls used to protect City assets, ensure data integrity, and alignment with overall City goals. Information system audits examine not only physical security controls, but also business and financial controls that involve information technology systems.

The Office of City Auditor will perform an annual risk assessment of information systems at the City and Colorado Springs Utilities early each year to determine audit assignments. The City Auditor and Information System Auditors will meet with information technology and cyber security staff for discussion and collaboration regarding value added audit scopes. We will consider system changes, key staffing changes, governance, operations, and policies. We will consider operational best practices, efficiency, and effectiveness in these audits. Information system risks will also be monitored throughout the year.

City of Colorado Springs, Colorado Springs Utilities, and all City Enterprises; Follow Up

The purpose of this project is to follow up on status of all audit recommendations and related management responses issued in the 2023 and unresolved issues from prior years. In accordance with the Institute of Internal Audit Practice Advisory 2500.A1: "The chief audit executive must establish a



follow up process to monitor and ensure that management actions have been effectively implemented or that senior management has accepted the risk of not taking action."

Colorado Springs Utilities Rate Filing Reviews

Colorado Springs Utilities ECA/GCA Rate and Clean Heat Charge Verification

Colorado Springs Utilities periodically files rate adjustments as well as Electric Cost Adjustments or Gas Cost Adjustments (ECA/GCA) with the City Council. In 2024 Utilities will be charging customers a new natural gas charge to recover expenses related to state mandates.

The purpose of these audits is to evaluate whether Colorado Springs Utilities prepares rate filings in a consistent and accurate manner. We verify management is using sound methodology that is supported by verifiable data and logical assumptions. We also verify that the rates support management objectives.

Colorado Springs Utilities Partner Billing for the Southern Delivery System

The purpose of this audit will be to verify the accuracy of cost allocation related to the Southern Delivery System (SDS). Per the Intergovernmental Agreement among the City of Colorado Springs, City of Fountain, Security Water District, and Pueblo West Metropolitan District for Operations, Maintenance, Replacement and Expansion of the Southern Delivery System; "A review of the accuracy of the Participants' cost allocation shall be included in the City of Colorado Springs City Auditor's audit of SDS operations following their normal audit schedule and procedures."

City of Colorado Springs Purchasing Card Monitoring

The purpose of this audit will be to annually review a sample of each City department purchasing card transactions for compliance with City Procurement Card (p-card) policies and procedures. In 2022, the Office of the City Auditor began using audit data analytic tools to analyze all transactions.

City of Colorado Springs Ballot Measure 2C Compliance

The purpose of this audit will be to ensure the City complies with the specifications related to Ballot Issue 2C. The Ballot measure stated, "The expenditure of these revenues for road repairs and improvements is to be in addition to, and not in lieu of, amounts currently being expended by the City for road maintenance and improvements. During the period the temporary sales and use tax increase is in effect, the City will maintain spending on repair and maintenance of roads and streets at the average of the City's annual spending amount for such repair and maintenance during fiscal years 2012, 2013 and 2014. The City Auditor will perform an audit to calculate such average spending amount. Subject to City Charter limitations on preparation, submission and approval of the annual budget and annual appropriation ordinance, during such period, the City will annually expend at least the amount so computed on repair and maintenance of roads and streets." We will verify that General Fund spending maintained the pre-2C level as specified on the ballot.

TOPS—Trails, Open Space and Parks Audit

The purpose of this audit is to review the City's Trails, Open Space and Parks activity as required by City Code 4.6.203, which states, "The City shall adopt regulations requiring an independent biennial audit of



the expenditures of all of the net proceeds from the sales tax and other revenue. The City Council, with City and advisory committee participation, shall regularly review the audits with a view to establishing expenditure priorities. (Ord. 97-96; Ord. 01-42; Ord. 03-69; Ord. 15-92)".

AUDITS PRIORITIZED BY ANNUAL RISK ASSESSMENT, LISTED BY AUDITED ENTITY

City of Colorado Springs

Colorado Springs 2021 Ballot Issue 2D, Retain Revenue for Regional Wildfire Mitigation and Prevention Program

The purpose of this audit will be to verify compliance with voter approved 2021 Ballot Issue 2D criteria.

In 2021, voters passed ballot measure 2D allowing the City to retain and spend up to \$20M to create a city-wide and regional wildfire mitigation and prevention program to be managed by the Colorado Springs Fire Department.

Colorado Springs Police Department Weapons Inventory Policy Compliance

The purpose of this audit will be to evaluate weapons inventory policy compliance in police operations. The review will be comparing Colorado Springs Police Department policy requirements to supporting evidence for compliance.

Department Performance Review

The audit will include review of a specific City department to provide an assessment of the performance and management of the operations. The review will consider department goals accomplishment, efficiency, effectiveness and economy of resources, and service delivery among other criteria.

City Code 1.2.705 calls the City Auditor to determine whether City programs are achieving desired objectives. This section of Code also requires the City Auditor to review administrative control systems of all departments and divisions for adequacy and effectiveness. City Code 1.2.709 calls the City Auditor to report to Council with recommendations promoting frugality and economy in fiscal management.

Fire Department Staffing and Overtime

The purpose of this audit will be to continue our 2023 review of Fire staffing and overtime costs. In 2023 we reviewed staffing and overtime data for the 11 years from 2012 to 2022. In 2024 we will review the impact of Colorado Springs Fire Department initiatives to reduce overtime costs. We will also use our initial analysis to further consider overtime causation and opportunities for improvements.

Short Term Rental Compliance

The purpose of this audit will be to review short term rentals for City Code regulatory compliance. We will also consider City Code enforcement processes related to short term rentals.





Colorado Springs Airport

Airport Rates and Charges

The purpose of this audit will be to review the City of Colorado Springs Airport rates and charges model. This model determines airport user fees which account for the primary Airport revenues. Review of the model would assist our office in better understanding the Airport's business model. Additionally, the methodology should be consistently applied. We will also review for compliance with any applicable regulations.

Colorado Springs Utilities

Sustainable Energy Plan (SEP); Multi-year Monitoring Review

SEP is a multi-year program that includes planning, engineering, procurement, and delivery of the implementation. Projects within the program include new and expanded substations and transmission lines, advanced technologies campus, portfolio management, demand side management (DSM) distributed energy strategies, and distributed generation resources.

The purpose of this audit will be to monitor this multi-year initiative to include project management and internal controls. Consistent with our audit standards and policies, we will include risk assessment activities to optimize and align audit resources to the operational activities.

* Automated Metering Infrastructure (AMI); Multi-year Monitoring Review

The Advanced Metering Infrastructure project involves upgrading meters with new electric meters and installing new hardware on natural gas and water meters across the entire customer base. This project updates technology and enables two-way communication.

The purpose of this audit will be to monitor the implementation of the component projects under the AMI program for project management and technology governance.

Enterprise Resource Planning (ERP); Multi-year Monitoring Review

The purpose of this project will be to monitor the replacement of the Utilities' Financial, Human Resources Systems as well as, certain supply chain functionality. The audit will include monitoring of vendor contracts, project management, technology governance, security, quality assurance, and internal controls.

Operational Fiber Network; Multi-year Monitoring Review

Starting in 2022 Colorado Springs Utilities began construction of a next-generation fiber network to be completed in 2028. This city-wide modern network is projected to enhance utility operations, allow better service to customers, and meet community needs by enabling multi-gigabit internet connectivity to every home and business in the City. Utilities has entered into a lease agreement with a national fiber network provider and others for a non-exclusive network.

The purpose of this audit will be to monitor the multi-year execution of building the fiber optic network. Our review will include project management and technology governance using annual risk assessments.



Utilities Green-E Certification

The purpose of this project will be to validate green energy sales are from a renewable energy source. Utilities requested our office perform this work to avoid fees by a third-party vendor.

***** Utilities System Improvement (SIP)/Line Extension Program

The purpose of this audit will be to review the administration of the SIP program for compliance with program objectives and policies. We will determine compliance with line extension policy including required contributions for new or modified service.

Capital Projects Prioritization and Management

Colorado Springs Utilities 2024 capital projects accounted for 29% of the total budget. The purpose of this audit will be to review short-term and long-term project planning and prioritization. We will also review project budgeting, tracking, and reporting. We will perform planning and discovery work to determine the final scope of this review.

Office of City Auditor Administration

Fraud Hotline Response/Management

The objective of the hotline is to be a resource for employees of the City, City entities, Colorado Springs Utilities, citizens, and contractors to report fraud, waste and abuse related to City resources.

Office of City Auditor (OCA) Continuous Improvements

The primary strategic objectives for the OCA in 2024 include succession planning through cross training, growth in utilization of data analytic tools, and project management. Project hours are set aside for these strategic goal initiatives.

BACKGROUND

The remainder of this report includes background information on the Office of the City Auditor authority, mission, types of audits, and audit universe.

AUTHORITY

The City Auditor is an appointee of City Council. The City Auditor has the authority to establish policies and procedures to facilitate the consistent operation of the office. The Office of the City Auditor will also comply with the policies and procedures prescribed for the City.

The City Auditor derives authority from the Colorado Springs City Code. The primary authority given is in Section 1.2.706, which states,

"The City Auditor shall examine and inspect all books, records, files, papers, documents and information stored on computer records or in other files or records relating to all financial

Office of the City Auditor 2024 Audit Plan



affairs of every office, department, division, agency, enterprise, political subdivision and organization which receives funds from the City or under the direct or indirect control of the City Council. The Auditor may require any person to appear at any time upon proper notice and to produce any accounts, books, records, files and other papers pertaining to the receipt or expenditure of City funds, whether general or special. If that person fails to produce the papers, then the Auditor may request Council approval to search for and take any book, paper or record in the custody of that person or public official." (Ord. 11-18)

MISSION STATEMENT

To provide the City Council an independent, objective, and comprehensive auditing program for operations of the City of Colorado Springs (to include Colorado Springs Utilities and other enterprises of the City); evaluate the adequacy of financial controls, records, and operations, and the effectiveness and efficiency of organizational operations; and provide City Council, management, and employees objective analyses, appraisals, and recommendations for improving systems and activities.

AUDIT UNIVERSE

The audit universe for the City Auditor is very broad. Per the City Code, the City Auditor shall examine and inspect all books, records, files, papers, documents, and information stored on computer records or in other files or records relating to all financial affairs of every office, department, group, enterprise, political subdivision, and organization which receives funds from the City or under the direct or indirect control of the City Council.

STANDARD AUDITS

These audits are required by City Code, a city ordinance, a Utilities Board instruction, or some other requirement. Standard audits also include system audits that the City Auditor uses to meet this duty. These audits are automatically added to the audit plan at the appropriate time.

RISK ASSESSMENT MODEL

The City Auditor uses a risk assessment model to identify projects for its annual audit plan. The model provides numeric scoring for risk areas and a cumulative score for the project. The higher values, representing higher risk projects are then reviewed and a balance is reached between staff resources and workload of the various entities.

The City Auditor also considers the strategic goals and objectives and risk concerns of audited entities for audit planning. City Council, Utilities Board, and executive management recommendations are considered in the risk assessment of potential projects for annual audit planning.





BALANCING AUDIT TIME BETWEEN ORGANIZATIONS

The City Auditor recommends audit services based on the annual risk assessment. This process resulted in following percentage of time for each of the entities:

- 41.0% City of Colorado Springs
- 55.0% Colorado Springs Utilities
- 4.0% Colorado Springs Airport

AUDIT FLEXIBILITY

The City Auditor sets aside approximately 10% of the scheduled staff time annually for projects that may arise during the year and require immediate attention. An example of such a project would be the investigation of reports alleging fraud, waste, or abuse via the Fraud Hotline. Similarly, City Council or management may request an audit or consulting engagement that needs immediate attention.

All the projects listed may not be completed in 2024. Any audit projects not completed in 2024 will be risk assessed for inclusion in future audit plans. The 2024 Audit Plan may be revised during the year based on various factors such as resource changes or a modified risk assessment.

TYPES OF AUDITS

The Office of the City Auditor performs a variety of audits. While each audit involves unique planning, techniques, and execution, we can divide most of the audits into the following types.

FINANCIAL SYSTEM AUDITS

The purpose of the financial system audits is to evaluate the internal controls used to ensure the reliability of financial information. The major systems audited on a risk assessed basis are cash receipts, billing, cash disbursements, payroll, debt, investments, and procurement.

EXTERNAL FINANCIAL AUDITS

Our office provides audit assistance to the external auditor for the City of Colorado Springs, and Colorado Springs Utilities annual financial audits. This work is defined, supervised, and reviewed by the external audit firms. The Office of the City Auditor provides assistance per the external audit contracts, approximately 250 hours each, to assist in reducing the audit fee.

The City Charter states, "3-160 Independent Audit. The Council shall provide for an independent annual audit of all City accounts and may provide for more frequent audits as it deems necessary. Such audits shall be made by a certified public accountant or firm of such accountants who have no direct personal interest in the fiscal affairs of the City government or any of its officers." Acting as City Council's agent, the City Auditor provides oversight of the contract with the independent external audit firm along with providing staff assistance to the firm.



PERFORMANCE AUDITS

Performance audits are objective and systematic examinations of a specific area of an organization to provide an assessment of the performance and management of the operation. It usually involves a review of the

- compliance with internal and external rules and regulations,
- accomplishments of goals and objectives
- reliability of data,
- economy, efficiency, and effectiveness of service delivery, and
- safeguarding of assets.

City Code states the duties of the City Auditor include, "1.2.705 Determine Effectiveness and Efficiency of Programs: The City Auditor shall determine the extent to which legislative policies are being efficiently and effectively implemented by administrative officials. The City Auditor shall determine whether City programs are achieving desired objectives...."

RATE REVIEWS

The Office of the City Auditor is required to review all utility rates or charges. The City Auditor reviews the rates to determine whether the rate model has been accurately and consistently applied in the calculation of appropriate rates. City Council votes on whether to implement the rate or adjustment.

City Code requires that rate filings be submitted to the City Auditor. City Code states, "12.1.108 REGULATION OF ELECTRIC, STREETLIGHT, NATURAL GAS, WATER AND WASTEWATER RATES, CHARGES, AND REGULATIONS: C. Adopted By Resolution; Hearing: Base rates or regulations or any change shall be adopted by resolution, which shall adopt by reference the appropriate tariff sheet or sheets to be established or revised. 1. Preliminary Information For The City Auditor And City Attorney: When Utilities proposes to change base rates, and the proposed change will result in the determination of a new revenue requirement supported by a cost of service study, Utilities will provide a draft of the proposal and cost of service study to the City Auditor and the City Attorney at least thirty (30) days prior to filing the proposed resolution with City Council. When changes to base rates are proposed, but do not involve a cost of service study, a draft of the proposal will be provided to the City Auditor and the City Attorney seven (7) days prior to the filing of a proposed resolution. Any request for additional information by the City Auditor and any response by Utilities, will be in writing."

INFORMATION SYSTEM AUDITS

The purpose of an Information System/IS (or Information Technology/IT) audit is to review and evaluate the availability, security, confidentiality, and integrity of the City's (and its entities') information technology infrastructure. The evaluation helps to ensure that the organization is adequately safeguarding assets, maintains data integrity, and is operating effectively and efficiently to achieve the organization's goals. Audits are performed on a risk assessed basis. Types of IS/IT audits include:



- review of computerized systems and applications to verify that they are appropriate to the entity's needs, are efficient, and are adequately controlled to ensure valid, reliable, timely and secure input, processing, and output at all levels of the system's activity;
- review of information processing facilities to verify that the facility is controlled to ensure timely, accurate, and efficient processing of applications under normal and potentially disruptive conditions;
- review of systems development to verify that the system under development meets the objectives
 of the organization, includes adequate controls to safeguard information input, processing, and
 output as well as ensuring the system is developed in accordance with generally accepted standards
 for systems development; and
- review of management and enterprise architecture to verify that IT management has developed an
 organizational structure and procedures to ensure a controlled, efficient environment for
 information processing.

City Code states, "The City Auditor shall examine and inspect all books, records, files, papers, documents, and information stored on computer records or in other files or records relating to all financial affairs of every office, department, group, enterprise, political subdivision, and organization which receives funds from the City or under the direct or indirect control of the City Council." The information systems audits are primarily concerned with computer records and ensuring the reliability of data.

MONITORING PROGRAMS

The Office of the City Auditor monitors various aspects of the City and the entities associated with City Council/Utilities Board. We accomplish this function by attending meetings and auditing specified projects. We also utilize technology to assist in the monitoring process. For instance, the City Auditor monitors the City's purchasing card program to verify policy compliance.

City Code states, "1.2.703 Ensure Public Accountability: The City Auditor shall ensure that administrative officials are held publicly accountable for their use of public funds and the other resources at their disposal. The City Auditor shall investigate whether or not laws are being administered in the public interest, determine if there have been abuses of discretion, arbitrary actions or errors of judgment, and shall encourage diligence on the part of administrative officials." Monitoring activities allow the City Auditor to help ensure public accountability.

FOLLOW UP AUDITS

Audit report recommendations and management responses are monitored to ensure that management actions are completed as specified in their responses. These follow up audits are required by professional standards and supported by previously quoted sections of City Code that direct the City Auditor to ensure public accountability.