

FULTON COUNTY, GEORGIA OFFICE OF THE COUNTY AUDITOR Treasury Gift Card Audit July 31, 2025

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INTRODUCTION

In accordance with the 2024 approved Audit Plan, the Office of the County Auditor performed an audit of the Treasury Gift Card Program administered by the Finance Department's Office of Treasury. This audit was conducted as required by the *Treasury Gift Card Policies and Procedures*.

BACKGROUND

The Finance Department's Office of Treasury manages the Treasury Gift Card Program which consists of procuring, safeguarding, and distributing prepaid gift cards to all Fulton County programs. The Treasury Gift Card Program allows departments within Fulton County to obtain prepaid VISA gift cards in denominations of \$25, \$50, \$75, \$100, \$200, and \$500. The purpose of the gift cards shall be for use as incentives for participation in award/reward ceremonies offered by the County. During our review, a total of 20 requests for gift cards were made from the following eight (8) departments who participated in the Treasury Gift Card Program:

The Department of External Affairs provides gift cards for the following:

- "Fulton One County United in Service" (F.O.C.U.S) awards. The F.O.C.U.S. program recognizes employees of Fulton County Government for their exemplary service. Any employee of Fulton County may nominate another employee for recognition in one (1) of ten (10) possible categories. The award categories are as follows:
 - Customer Service
 - Impact
 - Efficiency
 - Helping Hands
 - Technology Trailblazer
 - The Above and Beyond Workers
 - Safety is Our Business
 - Innovation and Ideas
 - Leadership
 - o Heroism

Nominations may include individual employees or teams of employees who work together. All nominations are reviewed by a countywide Nomination Review Committee which evaluates each nomination based on award criteria. Selection for the F.O.C.U.S Award indicates that an employee has made significant contributions during the employee's tenure with Fulton County that have had a positive impact on citizens and operations.

County Manager Chat & Chew Initiative involves the County Manager and Executive team
hosting monthly open discussions with employees and supervisors about a variety of
topics. The feedback received contributes to County-Wide Changes, which ultimately help
make Fulton County a great place to work.

Customer Service Division oversees the Customer Service Legend of the Year Award. Each year the Customer Service Division recognizes one employee for exceptional service. This award was designed to allow county employees, department heads and elected officials to nominate employees for their exceptional customer service. The Customer Service Legend of the Year is announced and recognized during Customer Service Week.

The Department of Public Works Water Resources Division sponsors:

- A Model Water Tower Competition which requires students to design and build a model water tower. The competition was held at Tom Lowe Atlanta – Fulton County Water Treatment Plant.
- An Art Calendar Contest in which Fulton County students in grades K-12 are encouraged to participate. The students are invited to create artwork promoting better water quality and water conservation practices to assist in positive environmental awareness. The art from the contest is featured in the 2024 Water Art Calendar.
- A Recycled Art Program Contest in which participants create and submit original artwork using recycled items.

The Department of Human Resource Management hosted the following events:

- HR Day Prize Winnings, for employees participating in games and events related to the celebration and recognition of HR professionals at Fulton County.
- Ugly Sweater Contest, holiday contest where employees can participate by wearing ugly holiday sweaters for a chance to win prizes. Gift card was provided to the winner of the competition.
- Best Hand Walk/Run Race, where departments walk or run to compete for the best hand. Gift Cards were provided to the winners of the competition.

The Department of Behavioral Health and Developmental Disabilities:

- Minority HIV Initiative is a grant funded program which was awarded to the Department of Behavioral Health and Developmental Disabilities. Funds are provided through the Substance Abuse and Mental Health Services Administration. The purpose of the program is to increase engagement in care for racial and ethnic minority individuals with substance use disorders (SUD) and/or co-occurring substance use and mental health disorders (COD) who are at risk for HIV or are HIV positive and receive HIS services or treatment. The gift cards were used as incentives to encourage program participants to remain active in the program and complete the follow up incentives needed to meet grant goals and deliverables.
- Advancing Health Literacy Program, Fulton County DBHDD's Advancing Health Literacy Program is funded by the Office of Minority Health under the Department of Health and Human Services. The program implements evidence based, culturally tailored health literacy strategies to enhance COVID 19 testing, contact tracing, mitigation measures and vaccine confidence. It also addresses the urgency of behavioral health literacy and access to related services among racial and ethnic minority populations, as well as other socially vulnerable populations. The gift cards were incentives to encourage participation during

- Commissioner events sponsored by the department. These events supported COVID 19 screening, vaccination, and the promotion of health literacy in the community.
- Mental Health Awareness Day, gift cards were provided as incentives to encourage participation in Mental Health Awareness Day.

Fulton County District Attorney held a mock trial competition for summer interns. Gift cards were awarded to participants.

Department of Arts and Culture held a National Art Program Exhibit at Fulton County for artists to participate and display their artwork. Gift cards were awarded to the winning participants.

Fulton County Housing and Community Development utilized gift cards for the Point In Time Count (PITC), which is a HUD required activity to count homeless individuals in the GA-502 Continuum of Care jurisdiction on a single day in January. The gift cards were distributed to volunteers with homeless experiences, to assist with the PITC.

OBJECTIVE

The objectives of the audit were to ascertain the effectiveness of the existing policies and procedures related to the procurement and distribution of gift cards and to determine the adequacy of controls over the departmental operating procedures to ensure compliance with the Treasury Gift Card Procedures.

SCOPE

The scope of this audit was from January 1, 2024, through December 31, 2024.

METHODOLOGY

We conducted this audit in accordance with *Generally Accepted Government Auditing Standards* (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives.

To achieve our audit objectives, we performed the following audit procedures:

- Conducted interviews with key staff, to determine the established processes and procedures;
- Performed walkthroughs to observe key processes and internal controls related to gift card distribution and safeguarding of gift cards;
- Performed a hand count of gift card inventory on hand within the Treasury office;
- Reviewed the Treasury Gift Card Standard Operating Procedures;
- Reviewed Fulton County Departmental Gift Card Standard Operating Procedures;
- Reviewed US Bank Gift Card Order Requests;

- Reviewed Gift Card Request Forms;
- Reviewed the Gift Card Inventory Log;
- Reviewed Gift Card Reconciliation Forms; and
- Reviewed Asset Management System (AMS) Cash Receipt Forms

We believe that the evidence obtained provides a reasonable basis for our findings and recommendations based on our audit objectives. Our findings and recommendations are detailed below.

FINDINGS AND RECOMMENDATIONS

Finding 1 – Outdated Standard Operating Procedures

Best Practices states that a periodic review of department policies and procedures should be done to ensure efficiency, accuracy and compliance with current operations. During our review, we noted that some procedures documented did not reflect current operations. More specifically, the procedures state that "each file should include an inventory listing of which cards were disbursed to what agency via signature and date." However, this procedure would require Treasury to open the gift card envelopes when ordered, to document each specific gift card number prior to distribution. Per discussion with Treasury staff, this section should have been changed to notate that "the original cash receipts are signed and dated when gift cards are disbursed to the requesting agency." This is the preferred and efficient method of documenting gift card distribution.

Outdated procedures may hinder performance and productivity, increase errors, and decreases the effectiveness of internal controls.

Recommendation

We recommend the Office of Treasury conduct a comprehensive review of current procedures to ensure they are updated and reflect current operations.

Finding 2 – Lack of Management Review Over Gift Card Log

The gift card log is essential in the gift card process as it is used to document the activity of gift cards when they are ordered, received by Treasury, and if a gift card is returned by a department. According to the Treasury Gift Card procedures, "The Gift cards will immediately be inventoried in by an authorized individual. They will be responsible for counting the cards to confirm the receipt of all cards included in the order against the gift card log included with the order. The gift card log will be reviewed periodically under dual control to ensure accuracy. "

During our review we determined a lack of management review over the gift card log, which resulted in the following inaccuracies:

- One (1) instance where the gift card request form and the number documented on the gift card log did not match
- One (1) instance where the gift card request was not documented on the gift card log

Per discussion with Treasury, the gift card log was not updated due to the timeliness of when the gift cards were needed. An accurate gift card log is essential as it provides a tracking system for all gift cards ordered and distributed. Failure to maintain an accurate gift card log may result in inaccurate record-keeping, the inability to track gift cards, and the potential for fraudulent activity.

Recommendation

We recommend the Office of Treasury maintain a detailed and accurate gift card log. Additionally, ensure reviews are performed on gift card logs periodically for accuracy, consistency, and completion.

Finding 3 – No Approval Signature On Gift Card Request Form

According to the Treasury gift card procedures, "The Gift Card Request Form must be filled out with a detailed description of the program purpose as well as signatures of the department head or his/her designee. Treasury will review the Gift Card Request Form for proper signatures. "

During our review, we found the following:

• One (1) out of 20 gift card request forms lacked the required signature from the department head. Specifically, the form included a typed name, but no actual signature was not documented on the gift card request form.

Per discussion with Treasury staff, this was an oversight due to the timeliness of the gift card request. Failure to ensure proper signature may lead to fraudulent and or unauthorized requests.

Recommendation

We recommend the Office of Treasury ensure gift card request forms are reviewed for proper authorization by the department head prior to ordering gift cards. This will ensure the requesting departments have proper approval and authorization prior to ordering the gift cards.

CONCLUSION

Based on the audit performed, the Treasury Gift Card program appears to be operating effectively and efficiently. However, we have identified the following three (3) findings that require the attention of management:

- Outdated Standard Operating Procedures
- Lack of Management Review Over Gift Card Log
- No Approval Signature On Gift Card Request Form

Please provide a written response to this audit within ten (10) business days. Be sure to address the written response to Anthony Nicks, County Auditor. The written response should be submitted to Shauna Herbert, Audit Manager, in the Office of the County Auditor at shauna.herbert@fultoncountyga.gov. We would like to thank management and staff for their timely cooperation and assistance during this audit. The distribution of this report is reserved for the executive management of Fulton County and the Board of Commissioners.