



## Management Letter

### On the Audit of the Public Procurement and Concessions Commission (PPCC) Financial Statements

*For the Fiscal Period 2019/2020*



**Promoting Accountability of Public Resources**

**P. Garswa Jackson, FCCA, CFIP, CFC  
Auditor General, R.L.**

**Monrovia, Liberia**  
December 2022

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### Acronyms/Abbreviations/Symbols

Acronyms/Abbreviations/Symbol	Meaning
A/C#	Account Number
FCCA	Fellow of Certified Chartered Accountant
AG	Auditor General
CBL	Central Bank of Liberia
CFC	Certified Financial Consultant
CFIP	Certified Forensic Investigation Professional
COSO	Committee of Sponsoring Organizations
CSA	Civil Service Agency
FY	Fiscal Year
GAC	General Auditing Commission
GL	General Ledger
GoL	Government of Liberia
GSA	General Service Agency
INTOSAI	International Organization of Supreme Audit Institution
ISSAI	International Standards of Supreme Audit Institution
IT	Information Technology
LRA	Liberia Revenue Authority
LRD	Liberian Dollars
MFDP	Ministry of Finance and Development Planning
NCB	National Competitive Bidding
PFM Act	Public Finance Management Act
PPC Act	Public Procurement Concession Act
PPCC	Public Procurement and Concession Commission
RFQ	Request for Quotation
RL	Republic of Liberia
ToR	Term of Reference
USD	United States Dollars

September 21, 2023

Hon. Bodger Scott Johnson

**Chief Executive Officer (CEO)**

Public Procurement and Concessions Commission (PPCC)

Executive Mansion Ground, Capitol Hill

Monrovia, Liberia

Dear Hon. Johnson:

**RE: Management Letter on the Financial Statement Audit of the Public Procurement and Concessions Commission (PPCC) for the Fiscal Year July 1, 2019 to June 30, 2020.**

**INTRODUCTION**

The Financial Statements of the Public Procurement and Concessions Commission (PPCC) are subject to audit by the Auditor-General (AG) consistent with Section 2.1.3 of the General Auditing Commission (GAC) Act of 2014 as well as in accordance with the Public Financial Management Act of 2009 as Amended and Restated in 2019 and its accompanying Regulations. The audit covered the Fiscal Year July 1, 2019 to June 30, 2020.

The Audit of the PPCC Financial Statements for the Fiscal Year July 1, 2019 to June 30, 2020 has been completed and the purpose of this letter is to bring to your attention the findings that were revealed during the audit.

**SCOPE AND DETERMINATION OF RESPONSIBILITY**

The audit was conducted in accordance with the International Standards of Supreme Audit Institutions (ISSAIs). These standards require that the audit is planned and performed so as to obtain reasonable assurance that, in all material respects, fair presentation is achieved in the annual financial statements.

An audit includes:

- An examination on a test basis of evidence supporting the amounts and disclosures in the financial statements;
- Assessment of the accounting principles used and significant estimates made by management; and
- Evaluation of the overall financial statement presentation.

The audit also includes an examination, on a test basis, of evidence supporting compliance in all material respects with the relevant laws and regulations which came to our attention and are applicable to financial matters.

The matters mentioned in this letter are therefore those that were identified through tests considered necessary for the purpose of the audit and it is possible that there might be other matters and/or weaknesses that were not identified.

The financial statements, maintenance of effective control measures and compliance with laws and regulations are the responsibility of the Management. Our responsibility is to express our opinion on these financial statements.

### **Key Personnel of the Commission**

During the Fiscal Year under audit, the following key persons managed the affairs of the Commission. **See detailed below;**

#### **Key Management Personnel**

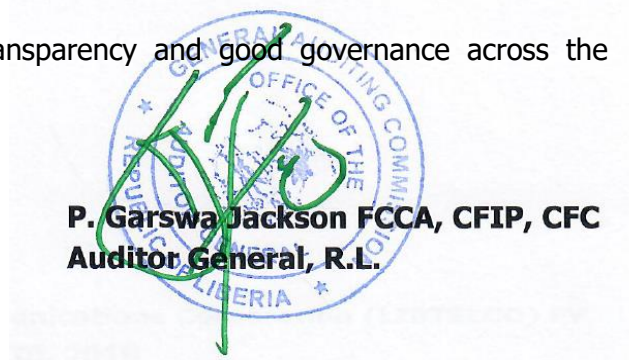
<b>No.</b>	<b>Name</b>	<b>Rank</b>	<b>Time Served</b>
1	Hon. James Dorbor Jallah	Chief Executive Officer	2014 to 2018
2	Hon. J. Roseline Nagbe-Kowo	Chief Executive Officer	2019 to 2023
3	Mr. Joseph S. D. Suah, Sr.	Director of Finance and Administration	2008 to 2020
4	Lysander B. Wokpeh	Director of Policy Standard and Procedures	2009 to 2020
5	Stevenson S. Yond	Comptroller	2015 to 2020
6	Stevenson S. Yond	Director of Finance and Administration	2020 to Present
7	James T. Sengar	Comptroller	2020 to Present

### **APPRECIATION**

We would like to express our appreciation for the courtesy extended and assistance rendered by the Management and Staff of the PPCC during the audit. The audit findings which were identified during the course of the audit are stated below.

Thank you as we strive to promote accountability, transparency and good governance across the Government of Liberia.

**P. Garswa Jackson FCCA, CFIP, CFC  
Auditor General, R.L.**



**Monrovia, Liberia**

September 2023

## 1 DETAILED FINDINGS AND RECOMMENDATIONS

### 1.1 Financial Issues

#### 1.1.1 No Automated Detailed General Ledgers and Accounting Software

##### Observation

1.1.1.1 Regulations A.3 (1) of the PFM Act of 2009 states that "Any public officer concerned with the conduct of financial matters of the Government of Liberia, or the receipt, custody and disbursement of public and trust moneys, or for the custody, care and use of government stores and inventories shall keep books of accounts and proper records of all transactions and shall produce the books of the transactions for inspection when called upon to do so by the Auditor General, the Comptroller General, the relevant internal auditor or any officers authorized by them".

1.1.1.2 During the audit, we observed that Management did not operate a functional accounting software in recording the transactions of the entity. Financial transactions were recorded manually.

1.1.1.3 We further observed that general ledgers and subsidiary ledgers were prepared manually and that there was no trial balance. Financial statements were prepared directly from manual recording of receipts and expenditure schedules.

##### Risk

1.1.1.4 The completeness and accuracy of receipts and expenditure may not be assured; therefore, the financial statements may be misstated.

1.1.1.5 Financial data may be subjected to unauthorized access, and the integrity and security of financial data may be impaired.

1.1.1.6 Management may not fully account for activities of the entity.

##### Recommendation

1.1.1.7 Management should procure and operationalize a functional accounting software to record all financial transactions of the entity.

1.1.1.8 Management should ensure that detailed general ledgers are prepared to support figures mentioned in the financial statements. Periodic reconciliation should be performed between the general ledger and the financial statements. Differences identified should be investigated and adjusted (where applicable) in a timely manner.

1.1.1.9 An automated control should be established such that transactions (along with supporting documents) posted by a junior staff must be reviewed and approved by senior personnel before

the transactions appear in the general ledger. Going forward, an automated linkage should be created between the general ledger, trial balance and the financial statements to facilitate completeness and accuracy of the financial statements.

### **Management's Response**

1.1.1.10 *Management acknowledges the audit observation and the importance of the automated financial reporting software.*

1.1.1.11 *Management will integrate its current manual excel system with an appropriate financial software in accordance with the IPSAS System to ensure furtherance of accurate and periodic reconciliation between general ledger and financial records.*

### **Auditor General's Position**

1.1.1.12 We acknowledge Management's acceptance of our finding and recommendations. We will follow-up on the implementation of our recommendations during subsequent audit.

## **1.1.2 Expenditure without Evidence of Adequate Supporting Documentation**

### **Observation**

1.1.2.1 P.9 (2) of the Public Finance Management (PFM) Regulations of 2009 states that "Payments except for statutory transfers and debt service shall be supported by invoices, bills and other documents in addition to the payment vouchers".

1.1.2.2 During the audit, it was observed that management made payments amounting to USD6,301.80 and LRD848,401.00 without evidence of adequate supporting documents. **Ref. Annexure 1 for details.**

### **Risk**

1.1.2.3 In the absence of adequate supporting documents, the validity, occurrence and accuracy of payments cannot be assured. This may lead to misappropriation of the entity's funds.

1.1.2.4 The absence of adequate supporting documentation for transactions may also lead to fraudulent financial management practices, through the processing and disbursement of illegitimate transactions.

1.1.2.5 Management may override the procurement processes by completing disbursement without utilizing the required procurement processes.

### **Recommendation**

1.1.2.6 Management should fully account for the expenditure made without adequate supporting documents.

1.1.2.7 Management should ensure all transactions are supported by the requisite supporting documents consistent with the financial management regulations. Documentation such as contracts, invoices, goods received notes, job completion certificates, purchase orders, payment vouchers etc. should be prepared and approved for the procurement of goods and services where applicable. All relevant supporting documents should be adequately documented and filed to facilitate future review.

### **Management's Response**

1.1.2.8 *Please see attached relevant supporting documents with the appropriate invoices, bills, etc. in line with the P.9(2) of the PFM Law (tax clearance, business registration and supporting documents attached – Annexure 1). Management has revised its Administrative Manual that makes provision for bereavements, graduations and gifts for special occasions.*

### **Auditor General's Position**

1.1.2.9 We reviewed the documents subsequently submitted by Management after our audit execution. Therefore, we have adjusted the transactions without supporting documents to USD5,881.80 (USD6,301.80–USD420.00) and LRD118,912.00 (LRD848,401.00–LRD729,489.00) to be accounted for by Management.

1.1.2.10 Also, Management's provision of documents after our review, does not guarantee Management effective control of expenditure liquidation and document management.

1.1.2.11 Going forward, Management should ensure that requested documents for audit purpose are submitted in a timely manner. Therefore, we maintain our recommendations. We will follow-up on the implementation of our recommendations during subsequent audit.

## **1.1.3 Payment without Business Registration & Tax Clearance Certificates**

### **Observation**

1.1.3.1 Part U.9. (4) of the Public Financial Management (PFM) Regulation of 2010 states that "A Government Agency shall procure government inventories from persons whose business is registered by the Registrar General's Office and any Government Agency that requires an exemption for any specific case shall apply to the head of government agency with the necessary justification."

1.1.3.2 Part V Section 62 (2) of the Public Procurement and Concession (PPC) Act of 2005 amended and restated in 2010 states that Bids which are not complete, not signed, not accompanied by a bid security in the prescribed form, if one is required, or not accompanied by essential supporting documents such as business registration certificates, business licenses and tax receipts, or are substantially non-responsive to the technical specifications or contract conditions or other critical requirements in the bidding documents, shall be rejected and excluded from further evaluation and comparison.



1.1.3.3 During the audit, we observed that Management authorized several payments amounting to USD6,092.60 and LRD863,460.00 without a valid business registration & tax clearance Certificates. **Ref. Annexure 2 for Details.**

### **Risk**

1.1.3.4 Management's failure to obtain valid business registrations and tax receipts from vendors may deny Government of the needed tax revenues.

1.1.3.5 Management may be in non-compliance with Part V Section 62 (2) of the Public Procurement and Concession (PPC) Act of 2005 amended and restated in 2010. Please see Part V Section 62 (2) of the Public Procurement and Concession (PPC) Act as referenced above.

### **Recommendation**

1.1.3.6 Management should ensure that for all transaction involving procurement of goods and services, valid Business Registration Certificate and valid Tax Clearance should be obtained as required by Part U.9. (4) of the Public Financial Management (PFM) Regulation of 2010 and Part V Section 62 (2) of the Public Procurement and Concession (PPC) Act of 2005 amended and restated in 2010.

### **Management's Response**

1.1.3.7 *Please see attached the various Business registration and Tax Clearance Annexure 2*

### **Auditor General's Position**

1.1.3.1 We reviewed the documents subsequently submitted by Management after our audit execution. Therefore, we have adjusted the transactions of invalid business registration and tax clearance to USD1,136.10 (USD6,092.60–USD4,956.50) and LRD132,300.00 (LRD863,460.00–731,160.00) to be accounted for by Management.

1.1.3.2 Also, Management's provision of documents after our review, does not guarantee Management effective control of expenditure liquidation and document management.

1.1.3.3 Going forward, Management should ensure that requested documents for audit purpose are submitted in a timely manner. Therefore, we maintain our recommendations. We will follow-up on the implementation of our recommendations during subsequent audit.

## **1.1.4 Non-remittance of Tax Deduction**

### **Observation**

1.1.4.1 Regulation T.9 (2) of the Public Financial Management Act of 2009 states that "A head of government agency shall ensure that deductions made from salaries are paid directly into the Consolidated Fund unless otherwise stated in the agreement covering the advance."

- 1.1.4.2 Furthermore, Section 89.16(a) of the NASSCORP New Act and published February 13, 2017 states that "The contribution payable under this Act in respect of an employee shall comprise contribution payable by the employer (hereinafter referred to as the employer's contribution) and contribution payable by the employee (hereinafter referred to as the employee's contribution) and shall be paid to the Corporation. Contribution rate shall be total 10% of the total gross remuneration of each employee; 2% under the Employment Injury Scheme payable by the employer; 4% employer contribution and 4% employee contribution to be remitted by the employer".
- 1.1.4.3 During the audit, we observed no evidence of remittance of Income Taxes and Social Security Contributions amounting to USD159,752.52 and USD26,642.59 as deduction made from employees' salaries respectively.

#### **Risk**

- 1.1.4.4 Failure to remit withholding taxes may deny GOL of the needed tax revenue. Management may be non-compliant with laws and regulations.
- 1.1.4.5 Failure to remit employees' Social Security Contributions, employees may not receive their retirement benefits upon retirement.

#### **Recommendation**

- 1.1.4.6 Management should liaise with the Ministry of Finance and Development Planning (MFDP) to facilitate full remittance of Income Taxes and Social Security Contributions deducted from employees for the period to the designated accounts of the Government of Liberia.
- 1.1.4.7 Evidence of Income Taxes and Social Security Contributions deducted and remitted by the Ministry of Finance and Development Planning (MFDP) should be adequately documented and filed to facilitate future review.

#### **Management's Response**

- 1.1.4.8 *The MFDP withholds the income and Social Securities taxes prior to the issuance of the actual employee's payroll checks. Therefore, said remittances are sent to the relevant entities by MFDP*

#### **Auditor General's Position**

- 1.1.4.9 We acknowledge Management's assertion. However, Management should obtain and adequately file evidences of remittances of Social Security Contributions to NASSCORP on behalf of the entity to validate that deductions made to employees' salary are remitted accordingly as required.

### **1.1.5 Non-remittance of Vendor's withholding Taxes**

#### **Observation**

- 1.1.5.1 Section 905 (J) of the Revenue Code of Liberia Act of 2000 as amended in 2011 stipulates: "within 10 days after the last day of the month, payer described in (a) is required to remit to the tax authorities the total amount required to be withheld during the month", and (m) stipulates "a person who has a withholding obligation under this section and fails to withhold and remit the amount of tax required to be withheld is subject to Section 52 penalty for late payment and failure to pay".
- 1.1.5.2 During the audit, we observed that Management did not withhold nor remit withholding taxes on goods and services.

#### **Risk**

- 1.1.5.3 Failure to withhold and remit taxes may deny GoL of much needed tax revenue.
- 1.1.5.4 Management may be in non-compliant with Section (905) J. of the Revenue Code of Liberia 2000, which may result in to penalties for late payment and failure to pay. Please see Section 52 of the Revenue Code of Liberia as referenced above.
- 1.1.5.5 Non-remittance of withholding taxes may lead to overstatement of the cash book and subsequently the financial statements.

#### **Recommendation**

- 1.1.5.6 Management should facilitate full withholding and remittance of withholding taxes to the LRA in keeping with Section 905 (J) of the Revenue Code of Liberia Act of 2000 as amended in 2011.
- 1.1.5.7 Management should adjust the cash book by the total value of the non-remitted withholding taxes and restate the financial statements with the adjusted cash balance.

#### **Management's Response**

- 1.1.5.8 *Management notes the observation and will continue the withholding and remittance of taxes from vendors*

#### **Auditor General's Position**

- 1.1.5.9 We acknowledge Management's acceptance of our finding and recommendations. We will follow-up on the implementation of our recommendations during subsequent audit.

## **1.1.6 Re-allocation of Budgeted Funds**

### **Observation**

- 1.1.6.1 Regulation E.8 (1) of the PFM Act of 2009 states that where circumstances arise for rearrangement of budget provision, savings under one classification may be utilized to provide for extra expenditure under another without affecting the total funds to be disbursed from the head.
- 1.1.6.2 Additionally, Regulation E.8 (2 and 2h) of the PFM Act of 2009 requires Government entities to seek approval from the Deputy Minister for Budget to reallocate from one budgeted code to another. Request for reallocations within an agency between programs may be approved up to a total for the year not exceeding ten (10) percent of the original appropriation for the program from which the reallocation is to be made.
- 1.1.6.3 Regulation E.8 (3) of the PFM Act of 2009 requires the Deputy Minister for Budget may delegate the power to authorize reallocations to head of government agency, stating clearly the terms and extent of such delegation.
- 1.1.6.4 During the audit, we observed that Management reallocated funds in the amount of USD5,206.69 and LRD827,082.00 from one budget line item to another during the fiscal period. However, Management did not provide documentary evidence justifying the rational of the reallocation.
- 1.1.6.5 Additionally, there was no evidence that reallocation during the period was approved by the Deputy Minister for Budget as required. **Ref. Annexure 3 for details.**

### **Risk**

- 1.1.6.6 Incurring excess expenditure under a budget line item without additional allocation and appropriate approval may lead to misapplication of public funds.

### **Recommendation**

- 1.1.6.7 Management should provide substantive justification for unilaterally transferring funds from one budget line item to another without approval from appropriate authority and documentation of budgetary transfer.
- 1.1.6.8 Going forward, Management should ensure that the rational of all budgetary transfers are appropriately documented and approved consistent with the PFM Regulations.

### **Management's Response**

- 1.1.6.9 *Management notes the observation and henceforth, remain committed to up hold the Public Financial Management Law of Liberia.*

## **Auditor General's Position**

1.1.6.10 We acknowledge Management's acceptance of our finding and recommendations. We will follow-up on the implementation of our recommendations during subsequent audit.

1.1.6.11 However, Management is in breach of financial discipline in line with Regulation A.20 of the PFM Act of 2009.

## **1.2 Compliance Issues**

### **1.2.1 Irregularities Associated with Fuel Consumption**

#### **Observation**

1.2.1.1 Regulations A.3 of the Public Financial Management (PFM) Act of 2009 states" any public officer concerned with the conduct of financial matters of the Government of Liberia, or the receipt, custody and disbursement of public and trust moneys, or for the custody, care and use of government stores and inventories shall keep books of accounts and proper records of all transactions and shall produce the books of accounts and records of the transactions for inspection when called upon to do so by the Auditor General, the Comptroller General, the relevant internal auditor or any officers authorized by them, by the Minister".

1.2.1.2 During the audit, we observed that Management procured and consumed fuel and gasoline amounting to USD5,598.22 and LRD1,229,111.30 without evidence of consumption and distribution log.

#### **Risk**

1.2.1.3 Fuel procured may not be based on an actual consumption.

1.2.1.4 Management may spend above budgeted allocation and fuel may be subjected to misappropriation or theft.

#### **Recommendation**

1.2.1.5 Management should develop, approve and operationalize a policy on fuel procurement, distribution, consumption, and ensure that proper records are maintained.

1.2.1.6 Management should maintain a fuel consumption and distribution log to aid the entity manage cost and inform future purchase.

1.2.1.7 Evidence of fuel consumption and distribution documents should be adequately filed to facilitate future review.

### **Management's Response**

1.2.1.8 *Management affirms the acquisition of fuel and gasoline amounting to US\$5,598.22 and LRD\$229,111.30 for operation and distribution to staff as benefits. Management has copies of approved utilization requisition slips and signed fuel and gasoline distribution list for staff. See attached approved utilization requisition slips, receipts and signed fuel and gasoline distribution list for staff.*

### **Auditor General's Position**

1.2.1.1 We reviewed the documents subsequently submitted by Management after our audit execution. Therefore, we have adjusted the transactions of irregularities associated with Fuel Consumption to USD864.82 (USD5,598.22–USD4,733.40) and LRD294,591.30 (LRD1,229,111.30–LRD934,520.00) to be accounted for by Management.

1.2.1.2 Also, Management's provision of documents after our review, does not guarantee Management effective control of expenditure liquidation and document management.

1.2.1.3 Going forward, Management should ensure that requested documents for audit purpose are submitted in a timely manner. Therefore, we maintain our recommendations. We will follow-up on the implementation of our recommendations during subsequent audit.

## **1.2.2 Irregularities Associated with Fixed Assets Management**

### **Observation**

1.2.2.1 Regulations V.4 (2) of the PFM Act of 2009 and revised in 2019 states that, "The master inventory shall record under each category of item:

- the date and other details of the voucher or other document on which the items were received or issued;
- their serial numbers where appropriate; and
- their distribution to individual locations and the total quantity held."

1.2.2.2 During the audit, we observed the following irregularities associated with the Fixed Assets Management System:

- There was no evidence of a fixed assets management policy.
- The fixed assets register did not contain all the relevant columns.
- The fixed assets register was not regularly updated.
- There was no evidence of periodic physical verification of assets by Management
- There was no evidence of movement of assets form.
- There was no history of disposal of assets.
- There was no evidence that all the fixed assets of the entity were coded.

### **Risk**

1.2.2.3 Fixed Assets Register may be misstated (Over/understated).

- 1.2.2.4 Assets may be damaged or impaired but their values are still on the books.
- 1.2.2.5 Fixed assets may be removed from the entity's premises without authorization, misappropriated, subjected to personal use or theft.
- 1.2.2.6 The lack of asset movement log could make it difficult to keep track of assigned or transferred assets, which may lead to misuse, loss or theft of assets without being noticed.
- 1.2.2.7 Failure to properly account for fixed assets may lead to theft and misapplication of equipment/materials. This may result in the non-achievement of the entity's objectives.
- 1.2.2.8 Fixed Assets not coded may be susceptible to theft or diverted to personal use.

### **Recommendation**

- 1.2.2.9 Management should develop, approve and operationalize a fixed asset management policy to regulate fixed assets activities of the entity.
- 1.2.2.10 Management should set assets value to be recorded, developed and maintained.
- 1.2.2.11 Management should ensure that the fixed assets register is updated to reflect the following; description, source of purchase, date of purchase, class, code, assignee, location, condition, original cost, depreciation expense, accumulated depreciation and net book value of the asset.
- 1.2.2.12 Management should conduct periodic fixed assets count and /or verification to determine the current condition and location of the assets. Evidence of physical verification should be adequately documented and filed to facilitate future review.
- 1.2.2.13 The Fixed Assets Register should be updated periodically to reflect all entity's assets.
- 1.2.2.14 Fixed assets within a particular vicinity should be clearly displayed as required by the PFM Act.
- 1.2.2.15 A movement of Asset Form should be filled and authorized before assets are moved from one location to another. The Fixed Asset Register should be updated to reflect the change in location of asset.

### **Management's Response**

- 1.2.2.16 *The Commission's fixed Assets Register is use to record and monitor movements of all assets and inform management decision on asset disposal. Management will take appropriate actions to update its fixed assets register to include all relevant columns.*
- 1.2.2.17 *In terms of Fixed Asset Management Policies, the Commission notes GAC observation-PPCC also collaborates with General Services Agency (GSA) for the coding and management of fixed assets.*

*(See attached letter from PPCC to GSA requesting coding). Management will develop Asset Management Policy to enhance its asset management process. It is worthwhile to note that there was no assets disposal during the period under review.*

### **Auditor General's Position**

- 1.2.2.18 We acknowledge Management's acceptance of our findings and recommendations. We will follow-up on the implementation of our recommendations during subsequent audit.
- 1.2.2.19 However, Management is in breach of financial discipline in line with Regulation A.20 of the PFM Act of 2009.

## **1.3 Internal Control Related Activities**

### **1.3.1 Irregularities Associated with Pre-Numbered Voucher**

#### **Observation**

- 1.3.1.1 Regulations P.9 (1) and (2) of the PFM Act of 2009 states (1) "All disbursements or payments of public moneys shall be properly supported by pre-numbered payment vouchers. (2) Payments except for statutory transfers and debt service shall be supported by invoices, bills and other documents in addition to the payment vouchers".
- 1.3.1.2 During the audit, we observed that all payment vouchers prepared by Management for the disbursement of funds during the Fiscal Year 2018/19 were not pre-numbered.

#### **Risk**

- 1.3.1.3 Failure to ensure that payment vouchers are pre-numbered may lead to duplication of vouchers numbers. This may lead to double payments for the same transactions.

#### **Recommendation**

- 1.3.1.4 Management should ensure that payment vouchers are pre-numbered and in sequential order.

#### **Management's Response**

- 1.3.1.5 *The Management of PPCC Notes GAC concern about pre-numbering of vouchers and has taken appropriate steps by acquiring pre-numbered and printed vouchers. (Please see attached)*

#### **Auditor General's Position**

- 1.3.1.6 We acknowledge Management's acceptance of our findings and recommendation. We will follow-up on the implementation of our recommendation during subsequent audit.
- 1.3.1.7 However, Management is in breach of financial discipline in line with Regulation A.20 of the PFM Act of 2009.



## 1.3.2 Risk Assessment Processes

### Observation

- 1.3.2.1 Paragraph 17 of the Internal Integrated Framework, published by the Committee of Sponsoring Organizations of the Treadway Commission (COSO) states "In most cases, the board or heads of public entity is ultimately responsible for determining whether management has implemented effective internal control including monitoring.
- 1.3.2.2 The organization makes this assessment by (a) Understanding the risks the organization faces and (b) Gaining an understanding of how senior management manages or mitigates those risks that are meaningful to the organizations' objectives". Obtaining this understanding includes determining how management supports its beliefs about the effectiveness of the internal control system in those important areas".
- 1.3.2.3 During the audit, we observed no evidence that Management has develop a risk assessment process for identifying, analyzing and evaluating organizational risks. Also, there was no evidence that the Entity has a risk management policy to mitigate internal and external risks that could severely impact the achievement of the institution's objectives.

### Risk

- 1.3.2.4 The absence of a risk management policy and processes may lead to Management not being aware of potential risks that may affect the operations of the entity.
- 1.3.2.5 Potential risk to the entity may not be identified, assessed and mitigated/prevented in a timely manner thereby impairing the achievement of the entity's objectives.

### Recommendation

- 1.3.2.6 Management should develop, approve, and operationalize a risk management policy to guide internal and external risks that may impact the achievement of the entity's objectives.
- 1.3.2.7 Evidence of approved risk management policy and periodic risk assessment exercises should be adequately documented and filed to facilitate future review.

### Management's Response

- 1.3.2.8 *The risk assessment process of the Commission is usually done by the Internal Audit Agency (IAA) personnel assigned at the Commission and make recommendations for appropriate actions to mitigate or avoid identified risks. Management will take concrete step to update its administrative manual to include a Risk Assessment Policy*

### Auditor General's Position

- 1.3.2.9 We acknowledge Management's acceptance of our finding and recommendations. We will follow-up on the implementation of our recommendation during subsequent audit.

### 1.3.3 Disaster Recovery Plan

#### Observation

1.3.3.1 According to COSO Internal Control Framework on Control Environment, the Management of an entity should develop a documented Disaster Recovery Plan to provide procedures to be followed in the event of a disaster. The plan would mitigate the loss of transaction data and information. The purpose of the plan is to minimize the effects of service interruption of the operations by:

- Specifying procedures to be followed in the event of a disaster or specific situation, especially measures to be put in place to minimize the effects of disasters;
- Assigning responsibilities to various staff members involved in the implementation of the plan;
- Specifying procedures for the restoration of normal service following a disaster.

1.3.3.2 During the audit, we observed no evidence that Management had developed a disaster recovery plan to help recover transaction data and information to ensure continuity.

#### Risk

1.3.3.3 The failure to establish a disaster recovery plan may result in a complete loss of transaction data and information in the aftermath of disaster.

#### Recommendation

1.3.3.4 Management should ensure that a disaster recovery plan is established, approved and operationalized as part of its risk mitigation strategy for easy recovery of transaction data and information in the aftermath of disaster.

1.3.3.5 Evidence of disaster recovery plan and routine disaster Management activities should be adequately documented and filed to facilitate future review.

#### Management's Response

1.3.3.6 *The Commission is currently reestablishing its Network Domain that has been down as a result of faulty server and firewall. The IT Unit has set up a new server that is currently undergoing configuration to re-establish the domain controller that will serve as a proper disaster recovery plan. It will store all the Commission Data to recover in the case of Data Recovery.*

#### Auditor General's Position

1.3.3.7 We acknowledge Management's acceptance of our finding and recommendations. We will follow-up on the implementation of our recommendation during subsequent audit.

## **1.4 Governance Issue**

### **1.4.1 PPCC Strategic Plan**

#### **Observation**

1.4.1.1 According to COSO Internal Control Framework on Control Environment, the Management of an entity should develop a Strategic Plan to provide procedures to be followed in the event of meeting the entity vision, mission and core values. The plan would clearly define where the entity envisages in a specified time frame. For example, three years or five years. The purpose of the plan is to measure performance against targeted goals set by management in the execution of its operations by:

- Specifying operational plan to be followed in the event of meeting set goal;
- Assigning responsibilities to various staff members involved in the implementation of the plan;
- Specifying procedures for the continuity of the normal service following the strategic plan.

1.4.1.2 During the audit, we observed that management did not provide for inspection an approved strategic plan to drive the organization vision, mission and core values, and actions needed to achieve those goals.

#### **Risk**

1.4.1.3 In the absence of a strategic plan, organization goals and actions needed to achieve those goals may be impaired.

1.4.1.4 The Entity resources could be misdirected, thereby leading to the non-achievement of organization objectives and goals.

#### **Recommendation**

1.4.1.5 Management should develop, approve and operationalize current strategic plan containing strategic goals and objectives, actions needed to achieved those goals, measurement criteria and time line for measurement of goal and objectives.

1.4.1.6 Evidence of approved strategic plan should be adequately documented and filed to facilitate future review.

#### **Management's Response**

1.4.1.7 *Management notes the auditor's observation and herewith provides a draft copy of a Strategic Plan for the period under review. Management has however made considerable improvements now, has an approved copy of a strategic Plan also attached (See attachments as stated).*

### **Auditor General's Position**

- 1.4.1.8 The draft copy of the strategic plan subsequently submitted by Management after our audit execution show no evidence of approval by the Board of Commissioners. The entity's strategic plan should be approved by the Board of Commissioners so that Management can take responsibility for the implementation of operationalizing the strategic goals and objectives of the Commission.
- 1.4.1.9 Therefore, we maintain our finding and recommendations. We will follow-up on the implementation of our recommendations during subsequent audit.

### **1.4.1 Establishment of an Audit Committee**

#### **Observation**

- 1.4.1.1 Part K, Regulation (K.10) of the PFM Regulations of 2009 states that "Head of government agency or government organization shall in consultation with the Internal Audit Governance Board establish and maintain an audit committee for the government agency or organization for which he/she is responsible".
- 1.4.1.2 During the audit, we observed that no Audit Committee was established at the entity to monitor and address audit matters at the institution as required.

#### **Risk**

- 1.4.1.3 Audit issues and lapses identified in the entity's internal control system may not be appropriately monitored and addressed due to the lack of audit committee.
- 1.4.1.4 Internal and external audit recommendations may not be monitored and implemented in a timely manner.

#### **Recommendation**

- 1.4.1.5 Management should liaise with the Board of Commissioners to establish a functional board of directors, including a functional audit committee. The audit committee should be functional evidenced by the documentation of periodic meetings minutes and activities reports.

#### **Management's Response**

- 1.4.1.6 *Management notes your assertions and states that an Audit Committee will be established in line with PFM regulations; However, the IAA during the FY 2019/2020 under review, carried on functions of monitoring transactions and operations at the PPCC.*

#### **Auditor General's Position**

- 1.4.1.7 We acknowledge Management's acceptance of our finding and recommendations. We will follow-up on the implementation of our recommendations during subsequent audit.

1.4.1.8 The audit committee is a non-executive committee of the Board that provide oversight activities over financial management and reporting, compliance with laws and regulations, implementation of internal and external audit recommendations, etc. This committee function is separate from the internal audit function perform by the Internal Audit Agency.

## **1.5 IT Related Issues**

### **1.5.1 IT Continuity Plans**

#### **Observation**

1.5.1.1 DS 4.2 of COBIT 4.1, Develop IT continuity plans based on the framework and designed to reduce the impact of a major disruption on key business functions and processes. The plans should be based on risk understanding of potential business impacts and address requirements for resilience, alternative processing and recovery capability of all critical IT services. They should also cover usage guidelines, roles and responsibilities, procedures, communication processes, and the testing approach.

1.5.1.2 During the audit, our review of the system revealed that there was no evidence of an approved IT Continuity Plan established by Management to aid the recovery of transaction data and information and to ensure business processing and recovery capability.

#### **Risk**

1.5.1.3 The failure to establish a Business Continuity Plan may result in loss of transaction data and information in a situation where the impact of a major disruption on key business functions and processes occurs.

#### **Recommendation**

1.5.1.4 Management should ensure that a Business Continuity Plan is established, approved and operationalized as part of their risk mitigation strategy.

1.5.1.5 Evidence of approved IT continuity plan should be adequately documented and filed to facilitate future review.

#### **Management's Response**

1.5.1.6 *Management notes GAC assertions and will develop an IT continuity plan in accordance with the Government's ICT Policy.*

#### **Auditor General's Position**

1.5.1.7 We acknowledge Management's acceptance of our finding and recommendations. We will follow-up on the implementation of our recommendation during subsequent audit.

## **1.5.2 Environmental Control**

### **Observation**

- 1.5.2.1 DS 12.4 of COBIT 4.1, Protection against Environmental Factors Design and implement measures for protection against environmental factors. Install specialized equipment and devices to monitor and control the environment.
- 1.5.2.2 During the audit, we observed that the server at the IT Department was not separated from the siting facility and document storage of the IT staff.
- 1.5.2.3 We also observed that the air conditioner has a low capacity, and that the Entity has limited specialized equipment and devices to monitor and minimized disaster. More besides, the following lapses were observed:
- Out-dated Fire extinguishers
  - Low-capacity Air conditioning systems (especially in server room)
  - There was no evidence of fire drill been conducted by Management.

### **Risk**

- 1.5.2.4 Failure to separate staff workstation from server room, in the event of disaster this could lead to destruction of personnel and equipment. In the situation of a disaster, the grouping of IT staffer in the same facilitate with the server may result into potential safety hazard.
- 1.5.2.5 In addition, failure to install or maintain fire precaution measures, and practice fire drills regularly could put both equipment and personnel at risk.

### **Recommendation**

- 1.5.2.6 Management should provide for PPCC staff a workstation from sever room. The Air conditioning system in the server room should be enhance to the require temperature.
- 1.5.2.7 In addition, Management should install and maintain fire precaution to implement measures for protection against environmental factors and practice fire drills regularly to safeguard personnel and IT equipment.

### **Management's Response**

- 1.5.2.8 *Management notes GAC observation and will adhere to the audit recommendation*

### **Auditor General's Position**

- 1.5.2.9 We acknowledge Management's acceptance of our finding and recommendations. We will follow-up on the implementation of our recommendation during subsequent audit.

### **1.5.3 IT Security Policy**

#### **Observation**

- 1.5.3.1 According to DS5 of COBIT 4.1: The need to maintain the integrity of information and protect IT assets requires a security management process, this process includes establishing and maintaining IT security roles and responsibilities, policies, standards, and procedures. Security management also includes performing security monitoring and periodic testing and implementing corrective actions for identified security weaknesses or incidents. Effective security management protects all IT assets to minimize the business impact of security vulnerabilities and incidents.
- 1.5.3.2 During the audit, we observed that no evidence of an approved IT security policy to maintain the integrity of information and identified security weaknesses. In addition, our review revealed that employees are not password protected in using the internet; they have access to the internet by means of the server password. This means that the employees have an open-source access to the internet.

#### **Risk**

- 1.5.3.3 The absence of an approved IT security policy may impair data privacy, integrity and security.

#### **Recommendation**

- 1.5.3.4 Management should develop, approve and operationalize an IT security policy to control and safeguard the physical hardware, data processes, documentation and personnel of the entity.
- 1.5.3.5 Evidence of approved IT security policy should be adequately documented and filed to facilitate future review.

#### **Management's Response**

- 1.5.3.6 *Management notes GAC observation and will adhere to the audit recommendation*

#### **Auditor General's Position**

- 1.5.3.7 We acknowledge Management's acceptance of our finding and recommendations. We will follow-up on the implementation of our recommendation during subsequent audit.

## **ANNEXURE**



Management Letter on the Financial Statements Audit of  
The Public Procurement and Concessions Commission (PPCC)  
for the fiscal periods 2019/2020

EXPENDITURE LACKING ADEQUATE SUPPORTING DOCUMENTATION							ANNEXURE-1
No.	DATE	VOUCHER No.	PAYEE/ ACCOUNT	DESCRIPTION	AMOUNT (USD)	AMOUNT (LRD)	COMMENT
1	3-Jul-19	1724	Teplah Reeves	Reimbursement to P. Teplah Reeves, Chairperson of PPCC Commissioners for Using	125.00	-	No evidence of Threshold Policy on Reimbursement, and requisition from
2	12-Jul-19	1728	Patrick S. Clinton	Patrick S. Clinton Whose Uncle Died in Person of Alexander Flomo	50.00	-	No evidence of policy on threshold and Death
3	1-Aug-19	1723	James T. Sengar	Payment to James T. Sengar an Accountant of PPCC as Bereavement for the death of his Father	250.00	-	No evidence of policy on threshold
4	26-Aug-19	1734	Dennis O. Taylor	Payment for Dennis O. Taylor Memorial Service Contribution for the Death of His Grand Son	50.00	-	No evidence of policy on threshold and Death
5	14-Oct-19	1746	Massa E. Sambola	Payment for Transportaion Reimbursement	100.00	-	No evidence of threshold policy for reimbursement; program being held and beneficiaries listings
6	15-Oct-19	1748	Serephina L. Fayiah	Payment to PPCC staff who give birth	150.00		No evidence of policy on threshold
7	17-Oct-19	1750	Massa E. Sambola	Payment of transport reimbursement for media insittution/journalists invited to cover the opening session of Bid Tendering Workshop for Private Sector Business	100.00		No evidence of threshold policy for reimbursement
8	6-Nov-19	1756	Massah E. Sambola	Payment for transportation to media institution/journalist to cover the launch of compliance monitoring and review exercise	200.00		No evidence of beneficiaries received Log
9	21-Nov-19	1773	Johnny R. Jackson	Payment fo reimbursement for cotabolationtings purchase, culture troops transportation and spreading of crush rock	230.80		No evidence of policy on threshold for reimbursement
10	22-Nov-19	1759	Evelyn Zuah	Payment to PPCC Security in Person of Mr. Paye Zuah...	50.00	-	No evidence of policy on threshold and Death Certificate
11	25-Nov-19	1762	Johnson G. Nemah	Payment fo security transportation for the mth of Nov.	180.00		No evidence of approved policy on transportatio Allowance
12	30-Nov-19			Payment for Confabulation tings & Others	330.00		Unsupported Payment
13	30-Nov-19			Securities Transportation	230.00		Unsupported Payment
14	2-Dec-19	1776	Joseph S. D. Suah Sr	Reimbursement to Joseph S.D.Suah for payment made on behalf of PPCC for repair of vehicle	200.00		No evidence of Threshold policy on reimbursement
15	12-Dec-19	1778	P. Tarplah Reeves	Reimbursement to PPCC chairlady for payment on behalf of the commission to repair vehicle	180.00		No evidence of Threshold Policy of reimbursement
16	19-Dec-19	1780	Gloria K. zayzay Dole	Payments for Assorted Christmas decoration materials	222.00		No evidence of receipts and Cheque Copy
17	27-Dec-19	1782	Evelyn Zuah	Payment for bereavement for the death of PPCC security Mr Paye Zuah	500.00		No evidence of policy on threshold and Death
18	31-Dec-19			Payment for Vehicles Repair	380.00		Unsupported Payment
19	31-Dec-19			Payment for Bereavement	722.00		Unsupported Payment
20	31-Dec-19			Payment for Half Page Publication	1,152.00		Unsupported Payment
21	15-Jan-19	1730	Paye Suah	Payment for transportation to security that do not ride the bus	180.00		No evidence of approved policy on transportation Allowance
22	20-Feb-20	1797	Samuel Banwreh, Jr.	Payment to Samuel Banwreh as Assistance from PPCC Towards the death of his Elder Brother	50.00	-	No evidence of approved threshold Policy and Death
23	21-Feb-20	1804	Johnson G. Nemah	Payment fo security transportation for the mth of Feb.		38,912.00	No evidence of approved policy on transportatio Allowance
24	2-Mar-20	1805	Johnny R. Jackson	Reimbrusment of PPCC CEO 100 use to purchase fuel for two days of operation, payment to be made in the name of Johnny R. Jackson		20,000.00	No evidence of approved threshold Policy on reimbursement
25	6-Apr-20	1823	Saksouk Shopping Center	Payment for (10) Pieces of Scratch Cards for Kelvin P. Paye & Antoine Dayrell to Facilitate Communication while they are Seconded to NPHL	50.00	-	No evidence of beneficiary's log
26	6-Apr-20	1822	Jefferson Kpeisei	Payment for security transportation allowance who do not ride the bus	200.00		No evidence of approved policy on transportation Allowance
27	12-Jun-20	1156	Annie Momo	Payment to Annie Momo as PPCC Contribution Towards the Death of her Mother	-	20,000.00	No evidence of approved threshold Policy on bereavement
28	19-Jun-20	1160	Jefferson Kpeisei	Payment for Securities Transportation Allowance July-Sept. 2020		40,000.00	No evidence of approved policy on transportation Allowance
<b>TOTAL</b>					<b>5,881.80</b>	<b>118,912.00</b>	

<b>BUSINESS REGISTRATION AND TAX CLEARANCE</b>							<b>ANNEXURE-2</b>
<b>No.</b>	<b>DATE</b>	<b>VOUCHER No.</b>	<b>PAYEE/ACCOUNT</b>	<b>DESCRIPTION</b>	<b>AMOUNT (USD)</b>	<b>AMOUNT (LRD)</b>	<b>COMMENT</b>
1	20-Aug-19	1736	Mamadee Konneh	Payment for the Repair of Land Cruiser Jeep with Plate Number RL-6012...	100.00	-	No Evidence of Business Reg. Tax Clearance and Quotation
2	12-May-20	1136	Harbel Super Market	Payment for Provision for CEO	211.10	-	No evidence of Tax Clearance and Business Registration
3	15-May-20	1137	Blue Sea Web Designs	Payment for hosting management and web site maintenance support	500.00		Expired Tax Clearance
4	15-May-20	1138	Blue Seas Web Designs	Balance Payment to Blue Seas for Email Hosting & Management & Web Site Maintenance Support	325.00		No Business Reg., Tax Clearance and Quotation
5	10-Jun-20	1151	Cross Word Ltd.	Payment for Cannon-Sensy 237 W all in one B/W Copier, printer, scanner with ADF complete with starter		93,100.00	Expired Tax Clearance
6	10-Jun-20	1152	Emanso Group of Companies	Payment for washing machine use by commission		39,200.00	No evidence of Tax Clearance and Business Registration
				<b>TOTAL</b>	<b>1,136.10</b>	<b>132,300.00</b>	

Management Letter on the Financial Statements Audit of  
The Public Procurement and Concessions Commission (PPCC)  
for the fiscal periods 2019/2020

RE-ALLOCATION OF BUDGETED FUNDS							ANNEXURE-3
No.	DATE	VOUCHER No.	PAYEE/ACCOUNT	DESCRIPTION	AMOUNT (USD)	AMOUNT (LRD)	COMMENT
1	7-Aug-19	1742	Technical Cooling System	Payment for repairs and maintenance of five Air-Conditions	518.40		Reallocation of repair and maint. Equipment to repair and maint. Veh. Without approval
2	30-Sep-19	1775	Robbin G. Jackson	Payment for bereavement	50.00		Reallocation of Entertainment, Representation & Gift to Repair, Maaintenance, Machine & Equipment without approval
3	6-Nov-19	1032	Cattee group Lib Inc	Payment to thr above fo rental of canopies and chairs	205.00		Reallocation of Entertainment, to Repair and Maint. Mach. & Equipt without approval
4	21-Nov-19	1758	International Aluminum Factory	Payment as balance of 50% Illusion Roller...	441.00	-	Reallocation of Repair & Maint. Civil to Repairs & Maint. Mechanery & Equip. without approval
5	20-Dec-19	1781	Marconi and Company	Payment for the purchase of 2 rolls of 10 electrical wires, 2 pcs. Of sec. lights & 3 pcs of wire clamp	446.00		Reallocation of Repair & Maint. Civil to Repairs & Maint. Mechanery & Equip. without approval
6	31-Dec-19	1772	Johnny R. Jackson & Dennis O. Taylor	Payment for DSA to two PPCC staff to travel to Nimba,Ganta for funeral		30,000.00	Reallocation of Domestic Travel, Means of Travel to Print, Bind, & Publication without approval
7	23-Jan-20	1790	United Office Supplies and Equipment	Payment for A4 paper, double A legal, pens and laserjet cartridge	453.70		Reallocation of print, bind and pub. Serv. without approval. No withholding tax
8	20-Feb-20	1798	Naresh Brothers	Payment for microwave to be use in CEO office	130.00		Reallocation of Other Office Material and Consumable to Entertainment without approval.
9	28-Feb-20	1813	Agabous P. Grugbay	Part payment of 2,642 for reaire of generato	-	70,000.00	Reallocation of repair and maint. Generator to repair, maint. And Equipt. Without approval.
10	9-Mar-20	1809	Electrical Construction Center	Balance Payment of \$2,642.00 for Repair & Maint. Of PPCC Generator	-	200,000.00	Reallocation of Repair and Maint. Gen. to Repair and Maint Machine. Equipt. Without approval
11	9-Apr-20	1827	Harbel Supermarket	Payment for 140 pcs of \$4.45 lonestar cards and 260 pcs \$4.55 orange scratch cards use by commission	1,083.00		Reallocation of Scratch Card to Telecom, Internet without approval
12	9-Apr-20	1146	Harbel Supermarket	Payment for 140 pcs of 4.45 lonestar cards and 260 4.55 orange cards used by Commission		144,480.00	Reallocation of Scratch Cards to Stationery without approval.
13	2-May-20			Paymnet for Genset Repair	744.19		Reallocation of Repair and Maint. Gen. to Repair and Maint Machine. Equipt. Without approval
14	2-May-20	1132	Electrical Construction Ce	Payment for Gen. set Repair		99,226.00	Reallocation of Repair and Maint. Gen. to Repair and Maint Machine. Equipt. Without approval
15	15-May-20	1190	Harbel Supermarket	Payment for 68 pcs of orange card & 40 pcs of lonestar card for commission operation	487.40		Reallocation of Scratch Card to Telecom, Internet without approval
16	3-Jun-20			Paymnet for Genset AVR-R-250	360.00		Reallocation of Repair and Maint. Gen. to Repair and Maint Machine. Equipt. Without approval
17	11-Jun-20	1155	International Aluminum Factory	Payment for the Replacement of the Commission Front Door Glass Handle	-	29,760.00	Reallocation of Repair & Maint. Civil to Repairs & Maint. Mechanery & Equip. without approval
18	11-Jun-20	1153	City Builders Inc	Payment for material for electcal works for downstairs repair & maint of PPCC		33,216.00	Reallocation of Repair & Maint. Civil to Repairs & Maint. Mechanery & Equip. without approval
19	15-Jun-20	1158	Computer Shop Inc	Payment for one (1)PC IR 2520 Fusel Unit Cover, Paper Tray Complete & Image Print Board	-	70,000.00	Reallocation of Stationery to Repair and Maint Mach & Equip without approval
20	18-Jun-20	1210	Ultimate building Material	Paymwnt for the purchase of assorted painting materials for painting PPCC interior building		150,400.00	Reallocation of Repair & Maint. Civil to Repairs & Maint. Mechanery & Equip. without approval
21	25-Jun-20	125	Lonestar Communication Corp.	Payment for one (1) LTE Router and 1024 GB Data for thirty Days(Unlimited Bundles)	288.00	-	Reallocation of ICT Infrastrutrial to Telecom, Internet without approval
				<b>TOTAL</b>	<b>5,206.69</b>	<b>827,082.00</b>	