

## **IPERA**

Improper Payment Elimination and Recovery Act

Brian Adams May 10, 2017



## What is IPERA?

### Improper Payments Information Act of 2002

- Commonly abbreviated as IPIA
- Improve integrity of gov't payments and efficiency of its programs
- Requires agency head to:
  - Identify programs and activities susceptible to significant improper payments
  - Estimate and report on the annual amount of improper payments
  - Report on actions to reduce improper payments

### Improper Payments Elimination and Recovery Act of 2010

- Signed into Law on July 22, 2010 by President Obama
- Directive of OMB Circular A-123, Appendix C
- Amended IPIA and repealed the Recovery Auditing Act
- Significantly increased agency payment recapture efforts by:
  - Expanding the types of payments that are in scope for review
  - Lowers threshold of annual outlays required for recapture audit programs





## **Guidance and Attachments**

#### Guidance

- Received from Toya Craig at Treasury Departmental Offices
- Arrives in late May or early June
- Contains:
  - Instructions for completing attachments
  - Timeline for improper payment deliverables
- Non-Treasury agencies follow similar process for audit purposes

#### Attachments

<u>Standard</u> <u>High Risk</u>

A: Baseline Inventory Report D: Reduction Outlook

B: Risk Assessment E: Classification

C: Payment Recapture Audit F: Root Cause Category Matrix

G: Status of Internal Controls

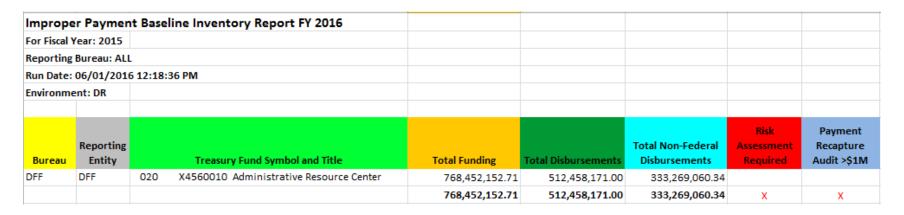




## **Baseline Inventory Report**

#### Attachment A

- Due Date for FY 2016 was June 17, 2016
- Based upon all Treasury Fund Symbols (TFS) resident in the Treasury Information Executive Repository (TIER) as of 9/30/15



- Verify fund symbol and title are accurate
- Reconcile "Total Funding" column using lines 1910 + 3100 on SF-133,
   Report of Budget Execution
- Reconcile "Total Disbursements" column using lines 4020 + 4110 on SF-133





## Risk Assessment

#### Attachment B

- Due date for FY 2016 was July 18, 2016
- Required for TFS with Disbursements or Total Funding equal to or greater than \$10 million
- Also required for TFS that have been identified as special interest programs initially classified as Risk Assessment Required

### Questionnaire

- Completed for each payment type applicable to the TFS where risk is being assessed
- Common payment types include:
  - Contract Payments and/or Invoices
  - Purchase Card
  - Travel Card
  - Federal Employee Payments, including Payroll





### Questionnaire Categories

- Internal Control Environment
- Risk Assessment
- Internal Control Activities
- Information and Communication
- Monitoring

Attachment B - IPERA Risk Assessment for FY 2016										
Bureau/Office: Fund Group										
Name:	Select Payment Type	Assigned by Your Bureau or Office								
Payment Type:	Select Layment Type	All Payment Types	within a Fund (	Group must b	e completed					
	WARNING! You have not answered all of the ques	tions								
Question Number	Risk Assessment Question		Yes	No	N/A					
	INTERNAL CONTROL ENVIRONMENT									
<u> </u>	The foundation for an internal control system. It provides the discipline and structure to help an	entity achieve its	obiectives.							
1	Do program management and staff adhere to applicable laws and regulations?									
2	Are employees encouraged to bring internal control problems to management's attention	1?								





#### Questionnaire Results

Response Totals	TOTAL SCORE FROM A	0			
Risk Assessment Results	f Total Score is 0 through 11 = If Total Score is 12 through 28 = If Total Score is 29 or Greater = LOW RISK MEDIUM RISK HIGH RISK				
Reviewed By:		Title:		Phone:	
Signature:				Date:	

## Payment Type Summary

- Completed for each payment type (Contracts & Invoices, Travel card etc.) within a given TFS for which a questionnaire was answered
- Use Discoverer report to reconcile trial balance data for Payment
   Type Summary to the Baseline Inventory Report





### Payment Type Summary (cont'd)

- Report focus is on the following USSGL obligation activity
  - 4802 Undelivered orders, obligations prepaid/advanced
  - 4882 Upward adjustments of prior-year undelivered orders prepaid/advanced
  - 4902 Delivered orders, obligations paid
  - 4982 Upward adjustments of prior-year delivered orders, obligations paid
- Additional parameters:
  - Vendor Name
  - Vendor Number
  - Vendor Type
  - MOC/BOC





## Payment Type Summary (cont'd)

Atta	chment B - IPERA Risk Assessment Payment Ty	ype Summary for FY	2016			
Bureau/Office: Fund Group Name:		Assigned by Your Bureau or Office				
Payment Type:	Payment Type Summary					
Risk Assessment Rating	Payment Types	Annual Payment Amount	Annual Percentage			
Low Risk	Select Payment Type	\$0.00	0.0%			
Low Risk	Select Payment Type	\$0.00	0.0%			
	Total Fund Group Annual Payments	\$0.00	0.0%			



## Payment Recapture Audit

#### Attachment C

- Due date for FY 2016 was October 3, 2016
- Required for each program or activity that expends \$1 million or more annually
- Review and analysis of a bureau or program's accounting and financial records, supporting documentation, and other pertinent information designed to identify overpayments
- Data is based on recaptured payments in current fiscal year

### Questionnaire

- Reviewed for changes
- Completed using responses from previous year's submission





#### Results tab

- Sections include:
  - Scope
  - Results
  - Disposition
  - Balance
  - Costs
  - Targets
- Data is entered into the applicable section based on backup documentation provided by payment type areas





### Disposition from Results tab

- Lines 22-26, 32-36, 42-51

Payment Off-Set		Number	Dollar Amount
Amount of Erroneous or Improper Contract Payments Identified on Line 12 Offset from Other Payments or Collected bef	ore A/R 22	0	\$0.00
Amount of Erroneous or Improper Grant Payments Identified on Line 13 Offset from Other Payments or Collected bef	ore A/R 23	0	\$0.00
Amount of Erroneous or Improper Benefit Payments Identified on Line 14 Offset from Other Payments or Collected bef	ore A/R 24	0	\$0.00
Amount of Erroneous or Improper Loan Payments Identified on Line 15 Offset from Other Payments or Collected bef	ore A/R 25	0	\$0.00
Amount of Erroneous or Improper Other Payments Identified on Line 16 Offset from Other Payments or Collected bef	re A/R 26	0	\$0.00
Collections - Current Year Amounts		Number	Dollar Amount
Amount of Accounts Receivable Identified on Line 27 Co	llected 32	0	\$0.00
Amount of Accounts Receivable Identified on Line 27 Co Amount of Accounts Receivable Identified on Line 28 Co Amount of Accounts Receivable Identified on Line 29 Co Amount of Accounts Receivable Identified on Line 29 Co Amount of Accounts Receivable Identified on Line 30 Co	llected 33	0	\$0.00
Amount of Accounts Receivable Identified on Line 29 Co	llected 34	0	\$0.00
Amount of Accounts Receivable Identified on Line 30 Co	llected 35	0	\$0.00
Amount of Accounts Receivable Identified on Line 31 Co	llected 36	0	\$0.00
Collections - From Prior Years	100000	1 1	
	(00000	Number	Dollar Amount
Amount of Contract Payments from FY 2015 Collected in I	Y 2016 <b>42</b>	Number 0	Dollar Amount \$0.00
Amount of Contract Payments from FY 2015 Collected in I Amount of Grant Payments from FY 2015 Collected in I		Number 0 0	
•	Y 2016 43	0 0 0	\$0.00
Amount of Grant Payments from FY 2015 Collected in I	Y 2016 43 Y 2016 44	0 0 0 0	\$0.00 \$0.00
Amount of Grant Payments from FY 2015 Collected in I Amount of Benefit Payments from FY 2015 Collected in I	Y 2016 43 Y 2016 44 Y 2016 45	0 0 0 0	\$0.00 \$0.00 \$0.00
Amount of Grant Payments from FY 2015 Collected in I  Amount of Benefit Payments from FY 2015 Collected in I  Amount of Loan Payments from FY 2015 Collected in I	Y 2016 43 Y 2016 44 Y 2016 45 Y 2016 46	0 0 0 0 0	\$0.00 \$0.00 \$0.00 \$0.00
Amount of Grant Payments from FY 2015 Collected in I Amount of Benefit Payments from FY 2015 Collected in I Amount of Loan Payments from FY 2015 Collected in I Amount of Other Payments from FY 2015 Collected in I	Y 2016 43 Y 2016 44 Y 2016 45 Y 2016 46 Y 2016 47	0 0 0 0 0 0	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00
Amount of Grant Payments from FY 2015 Collected in I Amount of Benefit Payments from FY 2015 Collected in I Amount of Loan Payments from FY 2015 Collected in I Amount of Other Payments from FY 2015 Collected in I Amount of Contract Payments from Prior Years Collected in I	Y 2016 43 Y 2016 44 Y 2016 45 Y 2016 46 Y 2016 47 Y 2016 48	0 0 0 0 0 0 0	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00
Amount of Grant Payments from FY 2015 Collected in I Amount of Benefit Payments from FY 2015 Collected in I Amount of Loan Payments from FY 2015 Collected in I Amount of Other Payments from FY 2015 Collected in I Amount of Contract Payments from Prior Years Collected in I Amount of Grant Payments from Prior Years Collected in I	Y 2016 43 Y 2016 44 Y 2016 45 Y 2016 46 Y 2016 47 Y 2016 48 Y 2016 49	0 0 0 0 0 0 0 0	\$0.00 \$0.00 \$0.00 \$0.00 \$0.00 \$0.00



#### Tables tab

- Reflects treatment of recaptured improper payments
- Three sections
  - Aging schedule
  - Disposition table
  - Overpayments recaptured outside of payment recapture audits

			Aging of Outstanding Overpayments - CY Amount Outstanding*					
Туре	Total CY O/S	0-6 Mos.	6 Mos. To 1 Yr.	Over 1 Year	Amount determined to not be collectable	Comments/Explanations, including justifications		
Contracts	\$0.00							
Grants	\$0.00							
Benefits	\$0.00		ſ					
Loans	\$0.00							
Other	\$0.00							

	Disposition of Recaptured Funds**								
Туре	Total Recaptured Funds	Agency Expenses	Auditor Fees	Financial Management Improvement (Up to 25%)	Original Purpose (Up to 25%)	Office of IG (Up to 5%)	Expired Account	Returned to Treasury	
Contracts	\$0.00								
Grants	\$0.00								
Benefits	\$0.00								
Loans	\$0.00								
Other	\$0.00								





#### Tables tab

- Backup/Supporting Documentation should tie
  - Original Purpose: Current year funds
  - Expired Account: Any funds other than current year
- Other Line
  - Combines Payroll and Travel data
  - Use formulas for total (separates data)





## Ideas for Efficiency

- Review and understand backup documentation
  - Where it ties on disposition etc.
- Save backup documentation and attachments to provide auditors
  - Auditor asks for
    - Attachment
    - Support/Backup for Attachment
    - Questionnaire
- Supporting Documents will be saved on MAX.gov
  - Web address: <u>www.max.gov</u>
  - Applicable customer parent page; IPERA child page
- BFS/ARC will consolidate backup into one file
  - We will use one excel sheet with multiple tabs this year
    - Contracts/Invoices
    - Payroll
    - Travel





## **Contact Information**

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