Lenoir County ABC Board

Performance Audit Report







Alcoholic Beverage Control

COMMISSIONERS:

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The Honorable George W. Graham, Jr, Chairman Lenoir County Board of Commissioners PO Box 3289 Kinston, NC 28502

Dear Chairman Graham,

We are pleased to submit this performance audit report of the Lenoir County ABC Board. The objective of this audit was to examine existing policies, practices, and controls and to provide recommendations on methods to improve operating efficiency at the ABC Board.

This report consists of an executive summary, background information and operational findings and recommendations. The ABC Board reviewed a draft copy of this report and their written proposals to our recommendations are included.

We would like to thank the ABC Board and their staff for the assistance and cooperation provided to us during the audit and we hope you and your fellow County Commissioners will find the report informative.

Respectfully,

Michael C. Herring Administrator

Cc: Michael W. Jarman, County Manager Lenoir County ABC Board

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EXECUTIVE SUMMARY

By state law, the ABC Commission shall ensure that all local ABC Boards comply with established performance standards by conducting regular audits or performance evaluations. Performance standards shall include, but are not limited to, standards that address enforcement of ABC laws, store appearance, operating efficiency, solvency, and customer service. Performance audits are examinations of existing operating policies, practices, controls, and activities to determine those areas in which there may be a need for improvements. This audit was conducted in accordance with Government Auditing Standards. This report details findings and recommendations with regard to organizational and operational issues.

To achieve the objectives of the audit, ABC Commission staff

- Reviewed applicable General Statutes, ABC Commission Rules, and administrative policies;
- Reviewed applicable reports and studies of ABC boards with similar size and geography;
- Verified compliance with Commission and Board policies;
- Reviewed organizational chart and job descriptions;
- Reviewed ABC store annual audit for the fiscal year 2011;
- Visited all stores:
- Interviewed key ABC store personnel.

The Lenoir County ABC Board has submitted a response to the performance audit recommendations and has begun to take steps toward becoming more profitable through analyzing and reducing current costs. Policies and procedures have been established to maintain compliance with statutes and to ensure efficient operations.

BACKGROUND INFORMATION

Located approximately seventy-five miles east of Raleigh and seventy-five miles west of Morehead City, Lenoir County has a blend of agriculture and manufacturing. The county consists of three municipalities: Kinston, LaGrange, and Pink Hill. Its neighboring counties include Jones, Wayne, Greene, Pitt, and Duplin.

Chapter 493 of the 1935 Pasquotank Act authorized Lenoir County to hold an election. The referendum was held July 6, 1935. The vote for an ABC store passed 3,004 to 1,030. The date of the first retail sales was July 29, 1935.

A mixed beverage election was held on June 14, 1983 and did not pass. A second mixed beverage election was held August 23, 1983 and passed 2,004 to 1,844.

Upon election of an ABC store, the county was authorized to create an ABC Board consisting of a chairman and two members. Current board members are Wiley Dawson, board chairman, Emmett Taylor and Coley Little, board members.

The Lenoir County ABC Board operates three retail stores. Two stores are located in Kinston and the third store is located in Pink Hill. The board staffs fourteen employees consisting of a business manager/general manager, finance officer, store managers, full-time and part-time sales associates, and warehouseman. The business manager is responsible for the daily operations including supervising personnel, retail operations and administrative functions of all stores. The finance officer is responsible for performing fiscal operations, including cash disbursements, payroll, and bookkeeping, as well as administrative functions as determined by the board and the business manager. Store manager's duties consist of store maintenance, training and supervision of sales association. Sales associate duties consist of daily stocking, assisting with customers and daily cash management functions. The warehouseman is responsible for landscape and yard maintenance at all locations, shipments from LB&B, deliveries to all stores, and routine inventory maintenance of the warehouse.

Profitability

For fiscal year 2011, the board showed a profit; gross sales were \$3,211,201; income from operations was \$176,929, resulting in a profit percentage to sales of 5.51%. Current sales have increased 3.17% over last year's sales. In comparing sales over the past ten years of similar size boards, Lenoir County ABC sales have increased following the state's 56% ten year increase. *Refer to Charts 1 and 2*.

Factors affecting sales and profitability:

- Total population for Lenoir County has decreased 5% over the past ten years
- Population twenty-five years and older has decreased 5% over the past ten years
- Adult working population has decreased 5% over the past ten years
- Poverty levels have increased 30% over the past ten years
- 10.4% unemployment rate in Lenoir County in September which resulted in a 5% decrease from the previous month

Distribution

G.S. 18B-805 (c) (2) requires the board to expend quarterly at least five percent of profits for law enforcement. The statue requires the board to expend annually as follows:

- 25% of profits from stores in towns to town General Fund
- Remainder to Lenoir County General Fund

In 2011, the Lenoir County ABC Board made distributions to law enforcement \$18,459 and to the county and municipalities \$158,560. *Refer to Chart 3.*

FINDINGS AND RECOMMENDATIONS

On October 13, 2011, ABC Commission Board Auditor, Moniqua S. McLean, visited all ABC stores in Lenoir County and interviewed Brantley Uzzell, general manager, Angela Melton, finance officer, and Emmett Taylor, board member. The following are the finding and recommendations relating to the performance audit.

1. <u>Inventory Turnover</u>

The inventory turnover rate is calculated by dividing the cost of goods sold by the average inventory in the system. The Commission has set goals for determining an effective rate based on the frequency of deliveries. Below are the turnover rates based on the delivery schedule:

- Once a week deliveries target at 6 times or more per year
- Twice a week deliveries target at 5 times or more per year
- Monthly deliveries target at 4.5 times or more per year

The Lenoir County ABC Board has a bi-weekly delivery schedule. For fiscal year 2011, the inventory turnover rate for Lenoir County is 5.8 and meets the target rate set by the Commission.

Recommendations:

In addition to current practices, consider the following:

- Continue requesting permission from the Commission for a price reduction to sell off dead or discontinued stock. Use proceeds for distribution or for more saleable inventory.
- Continue to borrow selling/ordering/marketing techniques from other boards.
- Utilize marketing strategies, such as cross merchandizing and product placement, to help in selling off higher priced or discontinued product.

2. Operating costs

Operating costs are calculated by dividing total operating expenses less depreciation by gross profit on sales. Below are the average cost ratios for boards with and without mixed beverage sales:

- Boards with 3 or more stores with MXB cost ratio .67 or less
- Boards with 3 or more stores without MXB cost ratio .94 or less
- Boards with 2 stores cost ratio .83 or less
- Single store boards with MXB cost ratio .77 or less
- Single store boards without MXB cost ratio .93 or less

For fiscal year 2011, the Lenoir County ABC Board had an operating cost ratio of .74 and did not meet the target set by the Commission. In comparison with other similar size boards, Lenoir County's expenses are not out of line. Overhead expenses are relatively higher because of the leases on all stores and the warehouse. To meet the goal of .67 and remain at current expense levels, revenues must be greater than \$4,000,000. To meet the goal and remain at current revenue levels, expenses must be reduced to \$515,000. See Charts for breakdown of operating expenses of similar size boards.

Recommendations:

- Request bids annually from various vendors to get the best rates possible on audit, utilities, maintenance contracts, and credit card processing fees.
- Because salaries and rent are the largest segment of operating expenses, analyze personnel hours to assess efficient personnel usage and re-negotiate rental agreement to get a better rate.
- OPEB expenses will continue to rise. Discuss long-term expense implication with CPA and if the board has not already done so, consider cancelling this benefit for future employees.
- Monitor budget frequently to ensure that expenses do not exceed budgeted amounts.

3. Store Appearance

- All stores were clean and well-lit. Countertops were free of clutter.
- The exterior areas in all locations were neat and free of trash; there is no defined parking area at the Kinston and Pink Hill locations.
- The shelf management system in all stores was clearly defined, consistent, and easily understood.
- The required Fetal Alcohol Syndrome poster was displayed. The Commission Auditor supplied the store with updated posters.
- Upon entering the stores, each employee greeted the ABC Commission auditor as well as entering customers in a professional manner exhibiting good customer service.

Recommendations:

- Improve parking areas by defining parking spaces for the above mentioned stores.
- Replace torn/worn signs around the cash registers. *Refer to Picture 3.*

4. Profit percentage to sales

The profit percentage to sales is calculated by dividing the total profit before distributions by gross sales. The Commission has set efficiency goals based on the following breakdown:

- Gross sales greater than \$10M target rate at 9%
- Gross sales between \$2M to \$10M target rate at 6.5%
- Gross sales less than \$2M target rate at 5%

The Lenoir County ABC Board has a profit percentage to sales of 5.51% and met the targeted rate set by the Commission.

5. Working Capital

Working capital is total cash, investments, and inventory less all unsecured liabilities. Gross sales means gross receipts from the sale of alcoholic beverages less distribution as defined in G.S. 18B-

805 9b), (2), (3), and (4). The Commission has set efficiency goals based on the following breakdown:

- Four months for boards with gross sales less than \$1.5M
- Three months for boards with gross sales less than \$50M and greater than or equal to \$1.5M
- Two months for boards with gross sales equal to or greater than \$50M

For FY2011, the Lenoir County ABC Board had a working capital of \$320,021 and is within the limits set by the Commission.

6. Policies and Procedures

- The board updated the mixed beverage policy. The new policy was given to the auditor.
- Board does not have a credit card policy.

Recommendations:

- Adopt a credit card policy. Include a maximum limit allowed on purchased before a board member is notified for approval. The board is to be notified of all purchases over the limit. Once adopted, submit a copy to the Commission. Have procedures for the usage of the credit card including:
 - o Who has authority to use the card,
 - o What types of items the card may be used for,
 - Personal usage is not allowed,
 - o A detailed receipt for every transaction is required,
 - o A purchase order must accompany each receipt.

7. Administrative Compliance

- Board meeting minutes were available and followed the order of proceedings for conducting business meetings. However, the minutes did not reference the conflict of interest statement.
- Board information on the Commission website does not reflect the board members' latest appointment dates.
- Nepotism The board currently employs two immediate family members who were grandfathered in when the law changed.
- Purchase orders are not used for store and office supplies. A sample purchase order template was provided by the auditor.
- Order edit list to LB&B does not bear the pre-audit certificate required by G.S. 18B-702(m).
- Current shelf prices in the Pink Hill location do not reflect the price set by the Commission. Jose Cuervo Tequila Especial .75L showed May prices on shelf.

Recommendations:

- In an effort to avoid possible conflicts of interest, it is recommended that at the beginning of each board meeting the Chairman ask fellow board members if there are any potential conflicts of interest. *Refer to Appendix B* (1) *for rule.*
- Update board information on the Commission website to reflect current appointment dates.
- Use purchase orders when ordering all store and office supplies. Purchase orders are required to have the pre-audit certificate signed by the finance officer. *Refer to Appendix B* (2) *for statute.*
- Orders to LB&B for liquor must have a pre-audit certificate signed by the finance officer. This signifies that the order amount has been budgeted.
- North Carolina statues require uniform pricing in all ABC stores. Immediately audit all shelf tags in all stores and cash register system for correct pricing.
- Ensure that sufficient controls are in place so that one family member does not supervise the work of the other family member.
- 8. <u>Personnel/Training Compliance</u>
- Board members, general manager, and finance officer have attended the mandatory ethics class.
- Employee training is conducted whenever the need arises and whenever new information is available.
- Employees have expressed feelings that their concerns are not being considered. The morale of
 employees continues to be low. There are many rumors, accusations, assumptions and
 perceptions floating around the Lenoir County ABC Board, much due mainly to poor
 communications between management and employees.

Recommendations:

- Continue annual training, such as the Responsible Alcohol Seller Program offered by the Commission and other approved venues. Include training on other areas of employee relations, sexual harassment or violence in the workplace.
- Create a checklist for use in training new and existing employees and have each employee sign once training is complete.
- Have regular employee training on customer service, policy changes, and store functions.
- Continue cross training employees on key functions that include ordering liquor, closing the month, paying bills, and filing taxes in the event the general manager or finance officer were suddenly unavailable.
- To restore trust and improve morale to employees, schedule routine meetings with employees'
 anytime substantial changes are made to the personnel policy. At least once a year, have a
 meeting attended by all employees and board members at which information is shared and

concerns may be voiced. Establish an employee board or have a suggestion box to establish a feeling of involvement.

9. Internal Control

- Inventory counts for the warehouse are performed weekly by warehouse staff. Inventory counts for all three stores are performed monthly by all scheduled staff. The general manager and a warehouse manager check discrepancies between physical counts and inventory management system. The general manager performs spot checks if needed. Unsaleable inventory is deleted from the system monthly. When an employee accidentally breaks a bottle, the board absorbs the cost.
- All bank statements, credit card statements, petty cash and cash fund inquiries are reconciled by the finance officer.
- Two stores are operated with one cash drawer. The cash drawer is counted at each shift before the start of business. In some instances, the same clerk works open to close.
- Checks are signed by the finance officer and the board chairman.
- A deputy finance officer has not been appointed to fill in if the finance officer is absent.

Recommendations:

- To ensure stronger internal controls, the following need to occur:
 - Have board members spot check inventory on a regular basis and continue to review all monthly inventory adjustments.
 - Have a second person not responsible for cash management reconcile the petty cash and change funds and credit card statements. A board member could do this each month during the course of the monthly board meeting.
- Appoint a deputy finance officer to aid in the duties of the finance officer when he/she is absent. *Refer to Appendix B* (3).



Chart 1 reflects current sales of similar size boards.

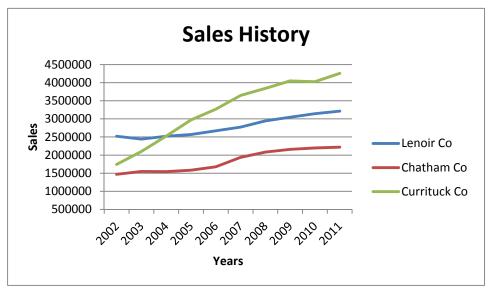


Chart 3 reflects the sales history comparison of similar size boards.

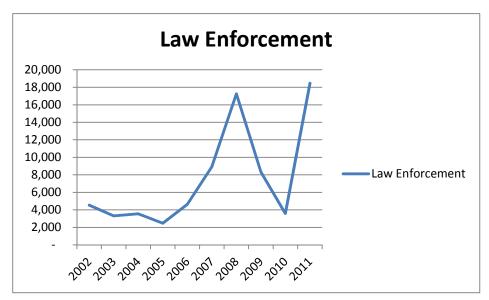


Chart 4 reflects the law enforcement distribution history.

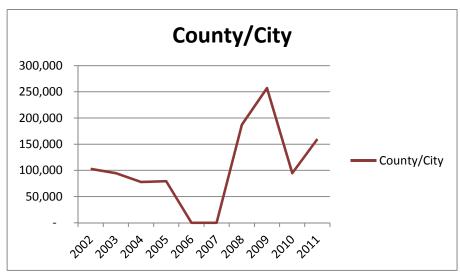


Chart 5 reflects the county and city distribution history.

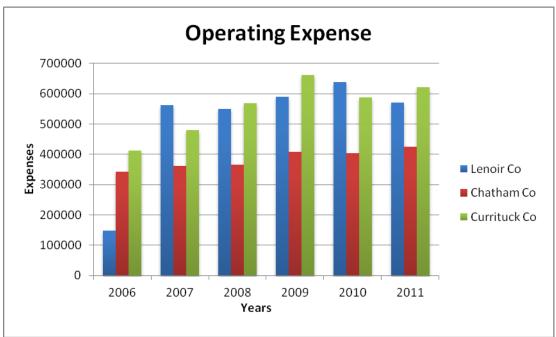


Chart 6 reflects total operating expense less depreciation comparison of similar size boards.

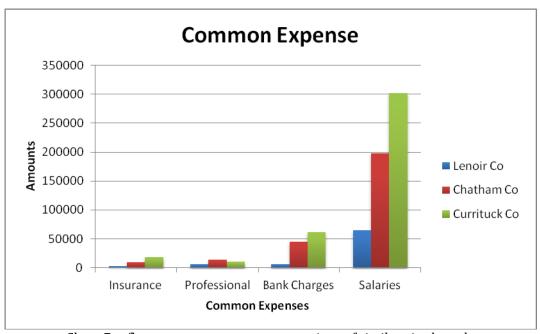


Chart 7 reflects common expense comparison of similar size boards.

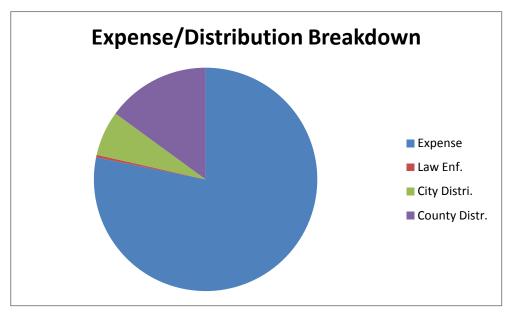


Chart 8 reflects the expense and distribution breakdown from gross profit.

APPENDIX A

Picture 1



Parking area at the Pink Hill location.

Picture 2



Incorrect shelf price at the Pink Hill location.

Picture 3



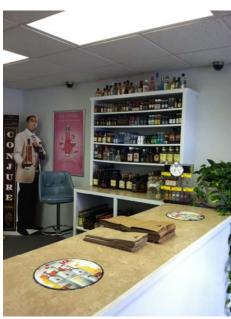
Counter view at the main store.

Picture 4



View from main entrance at the Pink Hill location.

Picture 5



Counter view at second Kinston location.

APPENDIX B

(1) OP 4.19.4 states, "In an effort to avoid possible conflicts of interest it is recommended at the beginning of each meeting the Chairman ask fellow board members if there are any potential conflicts of interest. This can be done by reading the following ethics reminder:"

In accordance with GS 18B-201, it is the duty of every Board member to avoid both conflicts of interest and appearances of conflicts. Does any member have any known conflict of interest or appearance of conflict with respect to any matters coming before the Board today?

(2) 18B-702 (m) states "...the <u>contract</u>, <u>agreement</u>, <u>or purchase order</u> shall include on its face a certificate stating that the instrument has been pre-audited to assure compliance. The certificate, which shall be signed by the finance officer or any deputy finance officer approved, shall take substantially the following form:

"This instrument has been pre-audited in the manner required by GS 18B-702."

(Signature of finance officer)

(3) GS 18B-702 (p) states ""...all checks or drafts on an official depository shall be signed by the finance officer or a properly designated deputy finance officer."

Lenoir County ABC Board

110 South Herritage Street Post Office Box 3188 Kinston North Carolina 28502

To: The North Carolina Alcoholic Beverage Control Commission

From: The Lenoir County ABC Board

Re: Response to Performance Audit October 13, 2011

Date: 12/13/2012

To whom it may concern,

The Lenoir County ABC Board would like to thank Moniqua Mclean for taking the time to show the Board where improvement is needed and making recommendations to implement this improvement. The Lenoir County ABC Board would like to first say that the Board has been under reconstruction for the past year or so and we feel that a good amount of progress has been made and we understand while we may not have improved all aspects of our business with the recommendations in this report we can get that much closer in doing so. When Mr. Uzzell was hired he implemented a performance improvement plan and the Board has seen improvement in different areas of the business. The Board will address and respond to each section as outlaid in the report and give reasons, explanations, and justifications as follows:

Inventory Turnover

- The Inventory turnover rate we understand does meet the Commission's recommendations. It has improved from 5.1 to 5.8 from fiscal year 2010 to 2011. In response to recommendations by the Commission:
 - We have and do request price reductions from the ABC Commission and by doing this we have been able to reduce our dead inventory to about 2-3 items compared to 20.
 - Regarding borrowing techniques from other Boards. Mr. Uzzell has brought experience from two other Boards and while certain techniques work for those Boards he has instated techniques that work for the Lenoir County ABC Board and at the present time shows positive improvement.
 - o The Lenoir County ABC Board does practice cross merchandizing and product placement. Mr. Uzzell has implemented a shelf management system that has increased sales and also allows the salesman representing the different brands to adjust product as they see fit.

Operating Cost

- The Operating cost did not meet the Commission's target rate however it has improved from 0.87 to 0.74 from fiscal year 2010 to 2011 and the Board plans on seeing even more of a reduction in fiscal year 12. In response to recommendations by the Commission:
 - We have and do request bids on most all of our expense that can be replaced by another vendor or provider. We cut on cash register cost and insurance in fiscal year 11. We also saved on bags, paper, and other supplies (see annual audit). The Board plans to see more returns in fiscal year 12 and 13 in these areas. The Board has chosen to implement change in expenditures at a regulated pace in order to not cause an immediate jolt to the overall system.
 - Our employees have been dedicated employees and most of them have been employed for 20 years plus, they have earned what they make in salary. Our rent is a consequent of past decisions. However, the 110 S. Herritage St. location is rented from Lenoir County. This is our most costly location it is also our main store, warehouse, and office. The location is maintained by the county and if we did own the building the money paid in rent would be returned in distributions anyway we understand that it would make our cost go down and profit go up but as long as everyone is on the same page we will continue as we are. However, the Board is in the process of scouting land for a new stand alone location on HWY 70 East, the board has discussed different options in financing such a project.
 - o Because of the rising healthcare cost the Board has addressed OPEB and anyone hired after July 1st, 2010 will not get post employment benefits.
 - The Budget is monitored on a regular basis and presently all areas are under budget.

Store Appearance

- The Board would like to thank its employees for doing a great job in maintaining the appearance of the stores.
 - We intend on talking to our leases' about making defined parking spaces.
 However, in the past they have been reluctant to modify or allow us to make changes. We have also noticed that even with defined spots people are reluctant to park in them.

Profit Percentage to Sales

• The Board continues to increase sales by using different marketing techniques our number one goal is to make as much money for our county and cities as possible. The Board is happy to report that we jumped from 106 to 61 State ranking from FY 10 to FY 11. Our sales have increased and our cost is down therefore the board plans on jumping another few spots in FY 12.

Policies and Procedures

The Board has adopted a Credit Card policy stated in the minutes that anything spent over \$50.00 will have a purchase order along with a call to the Chairman of the Board and only Mr. Uzzell is allowed to use the CC for ABC Board products. Currently the Board sees the dollar amount charged. In future meetings the Board has opted to see an itemized list of purchases.

Administrative Compliance

- Over the past year and a half the Board has addressed many compliance issues that were recommended by the commission in the past. The Board will continue to improve and take all recommendations into consideration.
 - o The Board meeting minutes now bare the conflict on interest statement.
 - The Board member appointing dates have now been obtained from the county and are up to date in personnel files and on the Commission website.
 - O Purchase orders are now in place and are filled out for any purchase over \$50.00 and are stamped with the pre-audited stamp.
 - o LB&B orders are now stamped with the pre-audit stamp.
 - O While we understand that there is a uniform pricing system throughout the state it is not uncommon for human era. In response to this we have a shelf price policy in place that will rectify any wrong price. All price changes are sent to the stores through the computer from the ABC Commission accompanied with Price reduction sheets to verify.
 - o The employees related to other employees do not supervise one another. Mr. Uzzell is the primary supervisor over all positions and employees.

Personnel/Training Compliance

- The Board would like to thank the ABC Commission for supplying the training needed that is required to operate. The Board has utilized and learned a great deal from the training provided. Training in the Lenoir County ABC Board is ongoing employees are the backbone of our organization.
 - o The Board plans to continue annual training.
 - o Customer service is promoted on a daily basis.
 - The Board has implemented new policies to create a uniform system we have had four employee meetings involving Board Members, Employees and the General Manager in the past 14 months and continue to do so. The first meeting outlined the new policies suggested and obtained from Mr. Uzzell recommended by the ABC Commission which everyone signed and agreed to. During all meetings the employees are given a chance to express their concerns, go over new and old policies, and discuss business at hand. While the Board understands that not everyone will agree with the policies we feel that it is in the best interest of the organization to have set rules and guidelines that everyone must follow that is the

only way to have a justified successful system. While some employees want to refer to the past and the way things were we feel that we are moving towards the future. When the need arises we do make policy amendments noted in the minutes, usually this comes about because a policy is not completely stated or management gave the employees the benefit of doubt. However, all policies follow the state ABC Commissions suggestions and guidelines and in doing so, the policies and policy amendments are presented to the employees and they are given time to review and respond. In regards to management employee relationship: Mr. Uzzell makes routine trips to the stores usually one to three times a week and asks are there any concerns or questions about anything in general. Also, Board members make routine stops at all locations. In response to morale we have to say it has improved over the past year and a half. Mr. Uzzell has provided all employees with his cell phone number and they all understand that they may contact him day or night with problems or concerns and most employees' exercise this right; a memo with this information was sent out on day one of Mr. Uzzell taking over from Mr. Hill and is now posted in all stores. The Board would recommend that the Commission talk to all employees at the Lenoir County ABC Board rather than taking opinions from a select few. In addition since Ms. McLean's visit Mr. Uzzell conducted an employee satisfaction survey with all employees. The survey was done anonymous so that employees would not be persuaded to answer the questions a certain way, it was found that all but a select few were very satisfied with improvements and changes. Morale at the Lenoir County ABC Board scored around 87% and the board feels that while it is not a 100% the Board will continue to work at making the organization better by continuing to implement State Law, ABC Commission rules, and our own set policies approved by the Commission. We understand in doing so not everyone within the organization will be satisfied.

Internal Control

- The Board strives to have more internal control over inventory and cash. While nothing is out of line when our Auditor does physical counts and reconciliations quarterly we will implement a way to spot check inventories and petty cash prior to the monthly board meetings.
 - Have board member spot check random codes.
 - o Have a board member count petty cash.

Sincerely,

The Lenoir County ABC Board 110 S. Herritage St. Kinston, NC 28501

Submitted By: Brantley Uzzell, General Manager

RECEIVE

JAN 17 2012

NC ABC COALL.

LENOIR COUNTY ALCOHOL BEVERAGE CONTROL BOARD

Recommendation Follow-Up

	REQUIRED	
RECOMMENDATION	BY	IMPLEMENTATION
	STATUTE	STATUS
Policies and Procedures: Adopt a credit card policy.	□ Yes ☑ No	(Please provide documentation supporting implementation status.) ☑ Fully Implemented □ Partially implemented% complete. (Explain below.) □ Not implemented (Explain below.) The Board has adopted a credit card policy and has submitted to the Commission.
Administrative Compliance: **Update board member appointment dates on the Commission website. Use purchase orders when ordering all store and office supplies. Affix the pre-audit certificate to all orders to LB&B. Audit all shelf tags with the register to ensure accurate pricing. Have controls in place so that one family member does not supervise the work of the other family member.	✓ Yes □ No Note: Required by Rule.	(Please provide documentation supporting implementation status.) ☑ Fully Implemented □ Partially implemented% complete. (Explain below.) □ Not implemented (Explain below.) Management has updated the Commission website to reflect current board member appointment dates and implemented procedures to comply with statutes.

LENOIR COUNTY ALCOHOL BEVERAGE CONTROL BOARD

Recommendation Follow-Up

	REQUIRED	
DECOMMEND ATTION	_	INADI PRAFRIMATIONI
RECOMMENDATION	BY	IMPLEMENTATION
	STATUTE	STATUS
Personnel/Training Compliance: Continue to provide training to		(Please provide documentation supporting
employees on key functions regarding customer service, policy changes,		implementation status.)
and store functions.	□ Yes	☐ Fully Implemented
		☐ Partially implemented% complete.
	☑ No	(Explain below.)
		☐ Not implemented (Explain below.)
		Not implemented (Explain below.)
		The Board and employees has attended training
		session from the Commission pertaining to the
		mandatory ethics and the Responsible Alcohol Sellers
		Program. The Board continues to provide training to
		employees on key functions.
Internal Control: Appoint a deputy finance officer.		(Please provide documentation supporting
internal control. Appoint a deputy infance officer.		implementation status.)
Implement additional recommendations to ensure stronger internal	☑ Yes	*
controls and to provide a proper checks and balances.	w ies	☑ Fully Implemented
controls and to provide a proper enecks and balances.	_ ,,	☐ Partially implemented% complete.
	□ No	(Explain below.)
		☐ Not implemented (Explain below.)
		The Board has appointed a board member as the
		deputy finance officer. Whenever possible, board
		members are encouraged to spot check inventories
		and specific funds as time permits.