



AUDITOR GENERAL'S REPORT ACTION REQUIRED

Toronto Community Housing Corporation - Results of Follow-up of Previous Audit Recommendations

Date:	April 16, 2012
To:	Board of Directors of the Toronto Community Housing Corporation
From:	Auditor General
Wards:	All
Reference Number:	

SUMMARY

This report provides the results of the follow-up of audit recommendations for two reports issued by the City's Auditor General to the Board of Directors of the Toronto Community Housing Corporation (TCHC) in 2011. The reports are:

- Toronto Community Housing Corporation – Procurement Policies and Procedures Are Not Being Followed
<http://www.toronto.ca/audit/2011/procurement-feb25.pdf>
- Toronto Community Housing Corporation – Controls Over Employee Expenses Are Ineffective
<http://www.toronto.ca/audit/2011/employeeexpense-feb25.pdf>

The result of our review indicates that TCHC staff have fully implemented 10 out of the 41 recommendations made in the two audit reports issued by the Auditor General's Office. Audit recommendations fully implemented are listed in Attachment 1. The implementation of the remaining recommendations is in progress.

Audit recommendations not fully implemented, as well as management's comments and action plan, are included in Attachment 2 and will be carried forward to our next follow-up review. The next follow-up review will take place in approximately 12 months.

RECOMMENDATIONS

The Auditor General recommends that:

1. This report be forwarded to the City's Executive Committee for information.

Financial Impact

The Auditor General reports have resulted in significant changes to the day-to-day operating environment at the TCHC. The benefits of these changes have profound and far-reaching effects that cannot all be quantified in financial terms.

Conservatively, we originally estimated that cost savings as a result of increased competition pertaining to the procurement process could be anywhere from \$4 million to \$10 million. At the present time we are not in a position to quantify the extent of any savings relating to this matter.

Further, we indicated that additional savings were likely possible through increased coordination of operations between the TCHC and the City. In this regard, in November 2011, the General Manager of the TCHC advised the Board that according to the results of a pilot project an estimated annual savings between \$5 million and \$7 million could be achieved by leveraging the City's purchasing arrangements.

Finally, we were also advised by the former Chief Executive Officer that expenses of the nature identified in the "Toronto Community Housing Corporation – Controls Over Employee Expenses Are Ineffective" report would be discontinued. At the time, it was estimated that this action had the potential to save at least \$200,000 on an annual basis. Based on work performed during our follow-up of audit recommendations, we estimate that closer scrutiny of employee expenses as well as improved controls has resulted in over \$1.2 million in savings annually.

ISSUE BACKGROUND

The Auditor General conducts an annual follow-up process of all audit reports issued to City Divisions, Boards, Agencies, Commissions and Corporations to ensure management has taken appropriate action to implement recommendations.

In accordance with the Auditor General's Work Plan, we have reviewed the status of outstanding audit recommendations previously made by the City's Auditor General to the Board of Directors of the Toronto Community Housing Corporation in 2011.

We conducted this follow-up audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained

provides a reasonable basis for our findings and conclusions based on our audit objectives.

COMMENTS

In response to the audit reports issued in 2011, TCHC also took the following actions:

- Developed an Enterprise Risk Management framework;
- Established an ethics and compliance structure and process;
- Created a Fraud Prevention Directive, and launched the “Do What’s Right” hotline – first for staff, and then for tenants starting January 1, 2012;
- Revised its Directives for expenses, purchasing cards, cash advances, and its policies and procedures for procurement; and
- Appointed a Senior Director of Strategic Procurement, a new position, to provide procurement leadership across the enterprise.
- Engaged an external resource to complete a full review of its procurement policies and practices, develop document templates, governance structures and provide training to key personnel.

As a result of the follow-up of certain recommendations contained in the report and in particular the review of employee related expenses, TCHC also took the following action:

- Issued 55 “Warning Letters” to various employees;
- Suspended two employees; and
- Terminated three employees.

In addition, TCHC recovered over \$25,000 in situations where expenses were inappropriate. We understand that the recovery will likely increase.

The follow-up review process for all audit reports requires that management provide the Auditor General a written response on the status of each recommendation contained in our audit reports. For those recommendations noted as implemented, audit work was conducted by audit staff to ensure the accuracy of management assertions. Where management indicated that a recommendation was not implemented, audit work was not performed.

Table 1 represents the results of our current follow-up on audit recommendations for the TCHC.

Table 1:

RESULTS OF THE CURRENT REVIEW

Report Title and Date	Total No. of Recs.	Reported By Management		Results of Current Review By Auditor General	
		Fully Implemented	Not Fully Implemented	Fully Implemented	Not Fully Implemented
Toronto Community Housing Corporation – Procurement Policies and Procedures Are Not Being Followed, February 2011.	31	11	20	3	28
Toronto Community Housing Corporation – Controls Over Employee Expenses Are Ineffective, February 2011.	10	9	1	7	3
Total	41	20	21	10	31

The initial response by management to our follow-up review indicated that 20 of the 41 recommendations had been implemented. As previously indicated, we conduct audit work to verify management’s assertions and concluded, based on this audit work, that only 10 of the recommendations had been fully implemented.

The results of our review were discussed in detail with management in order to clarify our expectations for each audit recommendation. Many of the recommendations identified as being fully implemented were in the process of being addressed through the review being performed by the external resource but in our view required further work. This includes two recommendations where new processes have been recently implemented. Although these new processes may be working effectively, the time elapsed since implementation is insufficient to allow us to confirm that the recommendations have been effectively implemented into practice on a regular and ongoing basis. Subsequent to our discussions, management concurred with our conclusions.

A list of audit recommendations implemented by the TCHC is included in Attachment 1.

Recommendations not fully implemented, together with management’s comments and action plan, are listed in Attachment 2 and will be carried forward to the next follow-up review. All recommendations reported in Attachment 2 will be included in subsequent follow-up reviews until fully implemented.

A consolidated report will be tabled at the July 4, 2012 meeting of the City's Audit Committee on the results of the current follow-up of audit recommendations relating to the City's Agencies, Boards, Commissions and Corporations for reports issued by the Auditor General's Office. The results of the current follow-up review for the TCHC will be included in that report.

CONTACT

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SIGNATURE

Jeffrey Griffiths, Auditor General

ATTACHMENTS

Attachment 1: Audit Recommendations – Fully Implemented
Attachment 2: Audit Recommendations – Not Fully Implemented

**TORONTO COMMUNITY HOUSING CORPORATION
AUDIT RECOMMENDATIONS - FULLY IMPLEMENTED**

Report Title: TORONTO COMMUNITY HOUSING CORPORATION –
PROCUREMENT POLICIES AND PROCEDURES ARE
NOT BEING FOLLOWED

Report Date: FEBRUARY 25, 2011

Recommendations:

- (3) The Chief Executive Officer, give consideration to the hiring of outside expertise to address all recommendations, including those contained in this report, as well as to provide ongoing advice on the management of the procurement process. Resources at the City be used where possible.
- (23) The Chief Executive Officer ensure that tender documents are complete and prepared in accordance with procedure. Complete evaluation criteria information should be included in all tender documents.
- (25) The Chief Executive Officer maintain on file documentation supporting the results of the vendor selection process including information pertaining to disqualified respondents, evaluation results of each individual on the evaluation team and information pertaining to any conflicts of interest declared by staff.

Report Title: TORONTO COMMUNITY HOUSING CORPORATION –
CONTROLS OVER EMPLOYEE EXPENSES ARE
INEFFECTIVE

Report Date: FEBRUARY 25, 2011

Recommendations:

- (1) The Chief Executive Officer review the current expense policy in detail to ensure that it is comprehensive and very clearly articulates expenditures which are not appropriate. Expenses which serve no direct business purposes such as those incurred on staff celebrations be immediately discontinued.
- (4) The Chief Executive Officer review the ongoing use of purchasing cards in order to determine whether or not their issue to current staff is appropriate. Purchase cards be cancelled where appropriate.

- (5) The Chief Executive Officer ensure that expenses which are recoverable from third parties are followed up on a timely basis.
- (6) The Chief Executive Officer review audit reports previously issued by the Auditor General, particularly those related to the use of purchasing cards and employee expenses in order to ensure that the recommendations contained in those reports are addressed and implemented at the Toronto Community Housing Corporation.
- (7) The Chief Executive Officer ensure that recommendations contained in this report are also implemented at the Toronto Community Housing Corporation's subsidiary companies.
- (8) The Chief Executive Officer follow up on all expenditures which appear to be inappropriate and:
 - a. recover any Toronto Community Housing Corporation funds which were used for non TCHC business purpose;
 - b. review with legal and other appropriate staff a proposed course of action towards those employees who have knowingly used purchase cards inappropriately; and
 - c. discontinue the use of purchase cards until appropriate policies and oversight processes are put in place.
- (10) The Chief Executive Officer take immediate action to recover expenditures which are non business related and in consultation with the Legal Division take appropriate action towards those staff responsible for incurring such expenditures.

**TORONTO COMMUNITY HOUSING CORPORATION
AUDIT RECOMMENDATIONS – NOT FULLY IMPLEMENTED**

**Report Title: TORONTO COMMUNITY HOUSING CORPORATION –
PROCUREMENT POLICIES AND PROCEDURES ARE
NOT BEING FOLLOWED**

Report Date: FEBRUARY 25, 2011

Recommendations:

No.	Recommendation	Management’s Comments and Action Plan/Time Frame
(1)	The Chief Executive Officer in consultation with the City Manager review areas where opportunities exist to consolidate or coordinate operations at the TCHC and the City in order to achieve cost savings. The Chief Executive Officer be required to report to the Board of Directors by September 30, 2011 on the results of these consultations. Further, the City Manager be requested to report to City Council at the same time.	Toronto Community Housing and the City have worked together on projects to improve efficiencies and cost savings. Two examples include: the pilot project to use City Stores for the purchase of goods; and using the City’s computer room storage facility for Toronto Community Housing IT servers. In addition, TCH management is working with City’s Director of Fleet to use the City’s fleet management services. Further efficiencies are being explored with the City’s procurement department. Since the pilot projects have not been completed, no formal reports have been provided to the Board or City Council. This reporting will be made upon completion of the pilot projects. Planned completion by: Q312
(2)	The Chief Executive Officer review the 2005 Report of Madame Justice Bellamy and the Auditor General’s report entitled “Procurement Processes Review.” The purpose of the review should be to develop a work plan to implement all appropriate recommendations.	A project team is working with a third party on a procurement review of TCH practices, procedures and policies. The consultant has the background on public procurement and has extensive experience with these identified reports. This review is expected to continue to early Q3 at which time a work plan will be tabled, however, during this period, new practices will be incrementally implemented.

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(4)	The Chief Executive Officer ensure that all of the issues identified in this report are addressed during any external review of the procurement process.	As part of the Procurement Review, the new procedures and processes will address all issues identified in the Auditor General's review of the procurement process. Planned completion by: Q212
(5)	The Chief Executive Officer be required to report to the Board of Directors on a quarterly basis the progress made in implementing all such recommendations.	In addition to the review identified in (2) above, a detailed procurement plan based on 2012 budget is near completion (end of May) and is consolidating TCH and subsidiaries procurement calls and rosters.
(6)	The Chief Executive Officer in consultation with the Internal Audit Unit review all major procurement decisions to determine whether contracts were awarded appropriately and in the best interest of the TCHC. Where this is not the case, consultation be held with legal counsel to determine an appropriate course of action.	The Corporate Affairs and Audit Committee (CAAC) approved the Internal Audit Revised 2012 Work Plan which included a review of major procurement decisions. In addition, the CAAC directed that this review should include major procurement decisions since 2008 and report back with recommendations. Planned Completion: Q2/12
(7)	The Chief Executive Officer review all reports issued by the Auditor General in order to determine the applicability of the recommendations contained in the reports. The reports to be reviewed include, but not be limited to those contained in Exhibit 1.	A Risk and Compliance workgroup has been formed of senior staff from TCH and its subsidiaries Housing Connections and hsi . to oversee the implementation of the recommendations including barriers and costs of implementation. Its scope will include items not related to expenses and procurement. Planned Completion Q113
(8)	The Chief Executive Officer report back to the Board of Directors by September 30, 2011 on the implementation progress of all relevant recommendations contained in each one of the reports included in Exhibit 1.	A report will be provided to the Board of Directors following the completion of the Procurement Review (2) above. Planned completion by: Q312 The Risk and Compliance Workgroup will report its status to the CEO monthly and the CAAC at regular intervals in 2012. Planned Completion Q113

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(9)	The Chief Executive Officer ensure that any revision of Board approved policies and procedures take into account current policies and procedures at the City.	As part of the Procurement Review (2) above, the new procedures and processes will take into account the current policies and procedures at the City. Planned completion by: Q312
(10)	The Chief Executive Officer review the management structure, reporting relationships, the roles and responsibilities of the Strategic Procurement Unit and assign clear accountability for each step in the procurement process, including the responsibility for ensuring compliance with various policies and procedures.	Senior Procurement Manager was hired in July 2011 with the task of reviewing and improving TCH procurement policies and procedures function. Included in this task was the development of the appropriate procurement management structure to ensure clear accountability and compliance responsibilities. Consolidation of procurement within TCHC and across subsidiaries completed in October 2011 and initial management structure has been set up to help manage day to day and begin implementing changes. The final procurement management structure and responsibilities therein, is being evaluated as part of the Procurement Review. Planned completion by: Q312

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(11)	The Chief Executive Officer, as required by the Board approved Policy, implement a structured and ongoing program of procurement reviews. Such reviews should address ongoing compliance with policies and procedures and where instances of non-compliance are identified appropriate action be taken.	<p>The Procurement Review will include a structured program of procurement reviews. The procurement review program will include (i) internal monitoring of compliance with policies and procedures and (ii) an ongoing procurement review cycle in conjunction with Internal Audit.</p> <p>The Internal Audit Revised 2012 Work Plan that has been approved by the Corporate Affairs and Audit Committee (“the Internal Audit Revised 2012 Work Plan”) includes a number of procurement reviews, subsequent to the implementation of revised procurement policies and procedures.</p> <p>Planned completion by: Q312</p>
(12)	The Chief Executive Officer direct all staff to comply with procurement policies and procedures and advise them that non-compliance will result in disciplinary action. If necessary, training be provided to staff involved in the procurement process.	<p>Though there has been communication to staff to comply with existing procurement policies and procedures, a more formal CEO directive with revised policy/procedures will be sent to all staff in Q312 in conjunction with the roll out of the revised procurement policies and procedures (“CEO Directive”).</p> <p>Follow up workshops and communication to support refinement of procurement policies and procedures are planned.</p> <p>Planned completion by: Q312</p>
(13)	The Chief Executive Officer amend the tender requirements contained in the procedures document particularly as they pertain to transactions below \$10,000.	<p>As part of the Procurement Review, the new procurement procedures and processes will include tender provisions pertaining to transactions below \$10,000.</p> <p>Planned completion by: Q312</p>

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(14)	<p>The Chief Executive Officer direct staff that all future tenders be required to comply with the TCHC's open tender policy. The Internal Audit Unit conduct regular and random reviews of all future tenders to ensure compliance. Where instances of non-compliance are identified appropriate disciplinary action be taken.</p>	<p>The open tendering practice has been in place since Q311. The open tendering practice will be reinforced in the CEO Directive.</p> <p>Audits of the open tender process will be completed based on consultation between Internal Audit and the Senior Procurement Manager.</p> <p>The Internal Audit Revised 2012 Work Plan includes a number of procurement reviews, subsequent to the implementation of revised procurement policies and procedures.</p> <p>Planned completion by: Q412</p>
(15)	<p>The Chief Executive Officer review all instances where the open tendering process has been circumvented. In instances where value for money has not been obtained consultations be held with legal counsel to determine an appropriate course of action.</p>	<p>The 2012 Internal Audit Revised Work Plan includes the review of purchases greater than \$100,000 to determine if open tendering processes were used.</p> <p>Planned completion by: Q212</p>

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(16)	<p>The Chief Executive Officer review all major single tendered contracts to ensure that they represent value for money. Future single tender procurements should be approved by the Chief Executive Officer.</p> <ul style="list-style-type: none"> • Single tendering be approved only under the circumstances contained in TCHC policy. • Detailed documentation be made available in support of any single tender procurement. • The extent and details of single tendered contracts be tracked in the financial information system and be reported to the Board of Directors on an annual basis. 	<p>Policies and procedures with respect to single tendered contracts will be included in the Procurement Review.</p> <p>Report of all single tendered contracts for 2011 to be presented to the Board in Q112 with ongoing quarterly reporting.</p> <p>Planned completion by: Q212</p>
(17)	<p>The Chief Executive Officer review the propriety of current arrangements related to the overseas procurement of products such as kitchen and bathroom fixtures. Competitive pricing be obtained to determine whether the current procurement arrangements represent the best value for money taking into account all ancillary costs including brokerage, agency fees, transportation, storage, security and warranty fees.</p>	<p>Report prepared for Managing Director on April 1, 2011.</p> <p>The CAAC directed the Chief Internal Auditor to further review and report back for direction from the CAAC and CEO.</p> <p>Planned completion: Q2/12</p>

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(18)	The Chief Executive Officer communicate to staff the requirement to comply with the TCHC Conflict of Interest Policy. Conflicts be declared prior to and not subsequent to procurements. All declarations be in writing.	<p>The CEO Directive will include staff's requirement to comply with TCHC Conflict of Interest Policy.</p> <p>In addition, as part of Performance Management processes, staff are required to confirm their reading and understanding of policies including Conflict of Interest, Code of Conduct, Procurement and Expense Management</p> <p>Planned completion by: Q212</p>
(19)	The Chief Executive Officer review the City policy pertaining to unsolicited quotations or proposals and give consideration to the development of such a policy.	<p>As part of the Procurement Review, the City's policy pertaining to unsolicited quotations or proposals will be considered for adoption. In the interim, all unsolicited quotations or proposals are to be forwarded to Sr. Director of Procurement (to date none have been proceeded).</p> <p>Planned completion by: Q312</p>
(20)	The Chief Executive Officer direct staff that procurement or purchase order transactions not be "split" in order to circumvent procedures. Staff be advised that failure to comply will be subject to discipline.	<p>In advance of the results of the Procurement Review, large contracts are being procured through centralized Procurement Unit to mitigate potential for splitting. Smaller contracts will be addressed through new work order process.</p> <p>The prohibition against 'splitting' purchase transactions will be included in the Procurement Review.</p> <p>The policy will be reinforced in the CEO Directive.</p> <p>Planned completion by: Q312</p>

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(21)	<p>The Chief Executive Officer establish a process whereby unusual procurement transactions are identified and reviewed on a regular basis. Appropriate action be taken on those items identified. The financial information system be adapted to provide ongoing exception reports.</p>	<p>Exception reporting is being developed in all transaction systems. IT upgrades to be completed by Q312 with key interim reports and manual processes in place until IT upgrades are completed.</p> <p>The review of unusual procurement transactions is included in the 2012 Internal Audit Work Plan.</p> <p>Planned completion by: Q312</p>
(22)	<p>The Chief Executive Officer direct all staff to comply with TCHC procedures regarding tender openings. Tenders should be opened in public and in the presence of tenderers or their representatives who wish to attend. The name of the tenderer and the total amount of each tender should be read aloud and recorded when opened. A complete record of the tender opening should be maintained. Consideration be given to recording the results of tender openings on TCHC's Web site.</p>	<p>In advance of the results of the Procurement Review, the tendering openings process recommended by the Auditor General has been in place since Q411.</p> <p>The policy and procedures to be followed, and the public disclosures to be made, for the opening of tenders will be formalized in the Procurement Review.</p> <p>As part of the Procurement Review, procedures for website disclosure will be developed.</p> <p>This opening of tenders process will be reinforced in the CEO Directive.</p> <p>Planned completion by: Q312</p>

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(24)	<p>The Chief Executive Officer in consultation with Legal Counsel develop protocols and procedures for addressing bid irregularities such as correction of mathematical errors. The Chief Executive Officer communicate with vendors on a regular basis to emphasize the importance of ensuring tender responses are accurate and complete and include all mandatory information.</p>	<p>Though a new set of practices have been adopted with respect to addressing bid irregularities and centrally managed and reviewed by the Sr. Director Procurement, the Procurement Review will result in formalized protocols and procedures for bid irregularities.</p> <p>Vendor outreach strategies continue and are built into updated practices.</p> <p>Formal Procedures with respect to bid irregularities will be included in the CEO Directive.</p> <p>Planned completion by: Q312</p>
(26)	<p>The Chief Executive Officer develop protocols in connection with circumstances when the Strategic Procurement Unit or a third party Fairness Commissioner should be involved in the tender evaluation process.</p>	<p>The Procurement Review will develop protocols when the Strategic Procurement Unit or a third party Fairness Commissioner are involved in the tender evaluation process. Discussion with the City's procurement department may help with this as well.</p> <p>Planned completion by: Q312</p>
(27)	<p>The Chief Executive Officer review the process relating to TCHC's Fair Wage Policy in order to ensure that the policy is enforceable.</p>	<p>As part of the Procurement Review, the Fair Wage Policy and its enforceability will be reviewed.</p> <p>Planned completion by: Q312</p>
(28)	<p>The Chief Executive Officer, direct all staff that financial security requirements in all tender documents must be complied with. Where required financial security is not provided in response to a tender then the tender should be disqualified. Under no circumstances should staff be allowed to negotiate terms and conditions which are different from the tender document.</p>	<p>Standard "General Terms and Conditions for Public and Invitational Tenders" were adopted in Q411.</p>

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(29)	The Chief Executive Officer review the current process for establishing and maintaining the current vendor list. Where significant purchases are made from one supplier an open competitive tender process be initiated. Consideration be given to establishing common terms and conditions and pricing for the duration of the contract and the regular monitoring of vendor performance.	As part of the 2012 Budget/Spending plan, refresh of procurement rosters to be completed through enterprise procurement planning cycle. All other vendors will be deleted from lists and transaction systems. Vendor management strategies to be rolled out as part of the CEO Directive. Planned completion by: Q212
(30)	The Chief Executive Officer, during her review of the procurement process ensure that an appropriate level of attention is also given to the Accounts Payable system. In particular, internal control deficiencies relating to the payment of invoices be immediately addressed.	As part of a system enhancement and roll-out of an enterprise job, work-order / purchase order process, the accounts payable function will further be updated with stronger controls. Planned completion by Q312
(31)	The Chief Executive Officer take appropriate steps to ensure compliance with the Corporate Finance Policy and Procedures. Supplier invoices be recorded in the financial information system on a timely basis.	Accounts Payable was centralized at the end of Q311 to ensure that supplier invoices are recorded on a timely basis.

**Report Title: TORONTO COMMUNITY HOUSING CORPORATION –
CONTROLS OVER EMPLOYEE EXPENSES ARE
INEFFECTIVE**

Report Date: FEBRUARY 25, 2011

Recommendations:

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(2)	Senior Management be directed to ensure that all expenses incurred by staff are in compliance with policy. Under no circumstances should expenses be approved and processed without supporting, appropriate, sufficient documentation. Further, employees should not approve their own expenditures.	Revised Employee Expense Guidelines and Tenant Expense Guidelines were developed and issued in 2011. In Q2/12 both documents are to be reviewed for further clarification, signing authorities and a pre approval form to be developed. Completed by Q2/12
(3)	The internal audit unit be directed to conduct ongoing audits of all expense claims and report any instances of non-compliance to the Chief Executive Officer. The Chief Executive Officer take appropriate action when instances of non-compliance are identified.	From Q111-Q311 Internal Audit conducted and coordinated audits of TCH P-Card expenses for the same period as that covered by the Auditor General's report. Where instances of non compliance were determined, TCH staff reimbursed amounts to TCH where appropriate. In addition, after receiving advice from outside counsel, applicable sanctions were applied ranging from warning letter in employee file to termination of employment. The Internal Audit Revised 2012 Workplan included random audits planned for Q212 and Q412

No.	Recommendation	Management's Comments and Action Plan/Time Frame
(9)	The Chief Executive Officer review the controls relating to the issue of cash advances and make appropriate changes as required.	<p>Tenant Expense Guidelines were amended effective April 2011. As a result of the changes, there has been reduced demand for cash advances (e.g. cancellation of child care expenses).</p> <p>Though cash advance procedures have been amended, a more detailed review of cash advance controls will be completed in Q212 as part of the Internal Audit 2012 work plan, as approved by the TCHC Corporate Affairs and Audit Committee.</p> <p>Planned completion by: Q212</p>

