

**Auditor General's Office  
2012 Budget**

**June 13, 2011**

 **Auditor General's Office**

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## THE AUDIT FRAMEWORK AT THE CITY OF TORONTO

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In May 2002, City Council approved an independent Auditor General's Office for the City of Toronto in conjunction with the implementation of a new audit framework. The *City of Toronto Act, 2006* (the *Act*) subsequently formalized the establishment of the Auditor General. Section 177 of the *Act* requires that "The City shall appoint an Auditor General".

The 2002 audit framework established three levels of audit services for the City of Toronto. This framework is consistent with best practices in most major cities.

- (1) The Auditor General's Office was created in order to report directly to and provide assurance strictly for City Council. The *Act* has not changed this requirement.
- (2) A separate Internal Audit Division reporting to the City Manager was established to provide assurance and management consulting advice for the City's Executive Management Team.
- (3) As required by the *Act*, an external auditor is appointed by City Council to perform the annual statutory audit of the City's financial statements including Agencies, Boards and Commissions and provide an opinion on the fairness of the information presented in these financial statements.

In addition to the audit framework within the City, there are separate and distinct audit functions in two of the City's major local Boards; the Toronto Transit Commission and the Toronto Police Service. Both of these audit functions operate in much the same way as the City's Internal Audit Division and report directly to the Chief General Manager of the TTC and the Chief of Police respectively.

In addition, an internal audit function has recently been established at the Toronto Community Housing Corporation. The reporting relationship of this function is currently under review.

## **The Auditor General's Office**

### ***City of Toronto Act and the Auditor General***

City of Toronto Bylaw 1076-2002 enacted in 2002, and set out in Chapter 169 of the Municipal Code, established the Auditor General's Office, duties and responsibilities. In 2009, Chapter 169 of the Municipal Code was amended and a new Chapter 3 was enacted which sets out duties and responsibilities of the Accountability Officers. As indicated above, the *City of Toronto Act* mandates the appointment of an Auditor General who reports to City Council. Under Section 178 (1) of the *Act* "the Auditor General is responsible for assisting City Council in holding itself and city administrators accountable for the quality of stewardship over public funds and for achievement of value for money in city operations."

## **The Internal Audit Division – City Manager's Office**

### ***Internal audit function***

The Internal Audit Division reports to the City Manager and is responsible for providing internal audit services and support to senior management in the City. The internal audit function provides consulting services designed to improve the administration of municipal operations and promotes compliance with City policies and procedures.

## **External Annual Financial Audits**

### ***Annual audit of City's financial statements***

Under Section 139 of the *Act*, the City is required to appoint an auditor licensed under the Public Accounting Act 2004, who is responsible for annually auditing the accounts and transactions of the City and its local boards and expressing an opinion on the financial statements of these bodies based on the audit. Also in accordance with the *Act*, the auditor shall not be appointed for a term exceeding five years and shall not be a City employee or an employee of a local board of the City. The auditor reports to City Council.

### ***Auditor General oversees external audit contract***

PricewaterhouseCoopers, an external public accounting firm, is responsible for the annual statutory audit of the City's financial statements under a five-year term contract starting January 1, 2010. The Auditor General is responsible for issuing the request for proposal to secure the external audit services required by the City and maintains an oversight role for these statutory audits.

***Other financial statement audits***

Separate external auditors have been appointed for the City Community Centres, City Arenas and a number of other City entities (Heritage Toronto, Yonge-Dundas Square, the Toronto Atmospheric Funds and the Clean Air Partnership). In May 2008, City Council approved a five year contract with Grant Thornton LLP to perform the financial statement audits for these entities.

**Internal Audit Functions at the Toronto Transit Commission and the Toronto Police Service**

Separate internal audit functions exist at both the Toronto Transit Commission and the Toronto Police Service. The internal audit function at the Toronto Transit Commission and the Toronto Police Service each report directly to management in a similar manner to the City's Internal Audit Division.

**Internal Audit Function at the Toronto Community Housing Corporation**

An internal audit function has recently been established at the Toronto Community Housing Corporation. The reporting relationship of this function is currently under review.

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**THE AUDITOR GENERAL'S OFFICE**

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*As outlined under Section 178 of the Act, "The Auditor General is responsible for assisting city council in holding itself and its administrators accountable for the quality of stewardship over public funds and for the achievement of value for money in city operations."*

The audit process is an independent, objective assurance activity designed to add value and improve an organization's operations. The audit process assists an organization in accomplishing this objective by bringing a systematic, disciplined approach in evaluating and improving the effectiveness of risk management, control and governance processes.

## **Responsibilities of the Auditor General**

### ***Auditor General's independence, authority and reporting***

In carrying out its audit activities, the Auditor General's Office is independent of management, and has the authority to conduct financial, operational, compliance, information systems, forensic and other special reviews of City divisions, and those local boards provided for under the *Act* and such City-controlled corporations and grant recipients as City Council may specify. The Auditor General reports to Council through the Audit Committee.

Specific responsibilities of the Auditor General include:

1. Conduct audit projects identified by the Auditor General through the Auditor General's risk assessment process. Such projects are included in the Auditor General's annual work plan.
2. Conduct forensic investigations including those involving suspected fraudulent activities.
3. Conduct special assignments identified by the Auditor General, or approved by a two-thirds majority resolution of Council.
4. Manage the Fraud and Waste Hotline Program as well as the referral of certain concerns and issues to divisional management.
5. Oversee the work and the contract of the external auditors performing annual financial statement audits.
6. The follow up of recommendations contained in previous audit reports.

***Coordination and consultation with other audit functions***

Audit work at the City requires coordination with the City Manager's Internal Audit Division, as well as audit groups at the Toronto Transit Commission and the Toronto Police Service. The Auditor General has also conducted work at the Toronto Community Housing Corporation in consultation with the newly established audit function.

The Auditor General meets with each of these groups on a regular basis in order to ensure that he is aware of any audit concerns and to ensure that there is no duplication of audit work.

***Coordination and consultation with external auditors, other Accountability Officers and City Manager***

The Auditor General also meets on a regular basis with both the external auditor and the City's other Accountability Officers to discuss any issues of mutual concern.

Finally, the Auditor General meets with the City Manager on a regular basis to discuss a wide range of issues, including the annual work plan and upcoming audit reports.

***City of Toronto Municipal Code and Accountability Officers***

In April 2009, City Council adopted a policy framework for Toronto's four Accountability Officers. The policy provisions included in the framework form the basis of a separate Toronto Municipal Code chapter for the Accountability Officers. This new chapter, Chapter 3, "Accountability Officers" was enacted by City Council in October 2009. This chapter reinforces the Accountability Officers arm's length relationship to the City administration and their independent status within the City's governance system.

***Budget Protocol for Toronto's Accountability Officers***

A budget protocol for the Accountability Officers was developed to establish a process to guide their budget submissions through City Council's annual operating budget process and to provide clarity for the City administration's role with respect to the Accountability Officer's budget process. This protocol requires that a Budget Request Overview be appended to the Accountability Officer's Budget Transmittal Report.

## **Professional Audit Standards**

### ***Audits conducted in compliance with Government Auditing Standards***

The Auditor General's Office conducts its audit work in accordance with generally accepted Government Auditing Standards. Audits are conducted in accordance with these standards, which relate to independence, objectivity, professional proficiency, scope and performance of work.

### ***Staff bound by professional standards and ethics***

Staff are also bound by the standards and ethics of their respective professional organizations, which include the Institute of Chartered Accountants of Ontario, the Certified General Accountants Association, the Society of Management Accountants, the Information Systems Audit and Control Association, the Institute of Certified Fraud Examiners, and the Institute of Internal Auditors. All professional members of the Auditor General's Office have at least one professional designation. Details of staff qualifications are provided on the following web site:

[http://www.toronto.ca/audit/about\\_audit.htm#staffing](http://www.toronto.ca/audit/about_audit.htm#staffing)

## **Independent Quality Assurance Review of the Auditor General's Office**

### ***Government Auditing Standards require an independent review***

A requirement of Government Auditing Standards is that audit organizations undergo an external independent quality assurance review at least once every three years. The objective of a quality assurance review is to determine whether an audit organization's internal quality control system is in place and operating effectively. A quality assurance review provides assurance that established policies and procedures and applicable auditing standards are being followed.

### ***Auditor General's second quality assurance review***

The Auditor General's Office underwent its second quality assurance review during 2009. No other municipal audit office in Canada has undergone such a process. Two reports were issued by representatives from the Association of Local Government Auditors (ALGA), an independent professional body which conducts a significant number of quality assurance reviews throughout the US. The reports issued by ALGA are attached to this report as Exhibit 2.



## **Annual Compliance Audit**

### ***Auditor General in compliance with all appropriate City policies***

The Auditor General's Office undergoes an annual compliance audit by a separate and independent external auditor, appointed by and reporting to City Council. The annual compliance audit provides Council assurance that the Auditor General's Office is carrying out its operations within delegated authorities and in compliance with applicable City bylaws and policies. The annual compliance report for the year ended December 31, 2010 will be presented to Audit Committee at the same time as this report.

## **Staff Training**

### ***Auditor General's commitment to staff training***

The Auditor General's Office is committed to ensuring that staff maintain professional proficiency through continuing professional education (CPE) in accordance with Government Auditing Standards. These standards require that each auditor complete 80 hours of CPE every two years with at least 24 hours directly related to government auditing, the government environment, or the specific or unique environment in which the audited entity operates.

### ***Auditor General's staff training program***

The Auditor General's Office establishes a training program each year to assist staff in meeting these requirements. An internal Training Committee oversees the training program of the Office. Staff must prepare an annual training plan outlining the courses or activities to be undertaken to meet the CPE hourly requirements described above, to retain professional certification, or to meet staff's professional needs. These plans are approved by senior management. The vast majority of training is conducted internally. The Office maintains a record of each staff member's training in accordance with Government Auditing Standards.

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## THE AUDITOR GENERAL'S OFFICE – 2012 BUDGET REQUEST

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### 2012 Budget Request

Details relating to the 2012 budget request for the Auditor General's Office are as follows:

	<b>2012 Budget Request</b>	<b>2011 Approved Budget</b>	<b>2011 Projected Actual</b>
Salaries	2,919,250	3,075,700	3,045,745
Employee Benefits	799,600	762,400	755,255
Services, Materials and Supplies	106,850	116,700	110,252
Interdepartmental Charges	22,300	22,300	22,300
<b>Sub Total</b>	<b>3,848,000</b>	<b>3,977,100</b>	<b>3,933,552</b>
External Audit Fees	328,200	306,048	306,048
<b>Total</b>	<b>4,176,200</b>	<b>4,283,148</b>	<b>4,239,600</b>

#### *Budget request*

The amount of \$4,176,200 is the Auditor General's budget request for 2012. This amount includes \$328,200 relating to external audit fees. The Auditor General has no control over the external audit fees as they are based on a separate contractual agreement with the City's external auditors PricewaterhouseCoopers. The budget represents the Auditor General's analysis of audit resource requirements including the operation of the Fraud and Waste Hotline Program.

#### *2.5% decrease From 2011 to 2012 budget*

The budget request of the Auditor General for 2012 has decreased by \$107,000 from the 2011 level. The decrease in the Auditor General's budget from 2011 to 2012 is 2.5 per cent.

#### *External audit fee*

PricewaterhouseCoopers, an external public accounting firm, is responsible for the annual statutory audit of the City's financial statements under a five-year term contract starting January 1, 2010. Audit fees are adjusted, during the 2012 budget process, based on the contract fee schedule. For the 2011 external financial audit, fees increased from \$306,048 to \$328,200, an increase of 7.2 per cent.

***97% of budget is salaries and benefits***

The majority of the Auditor General's 2012 budget request consists of salaries and benefits. If the amount of \$328,200 for external audit fees is excluded from the budget of the Auditor General's Office, the percentage of salaries and benefits to the total budget is just under 97 per cent. Consequently any reduction in the budget of the Auditor General will impact the level of staff.

## **Consequences of Decrease in Budget**

***10% budget decrease would result in termination of staff***

The Auditor General's staff complement consists of 26 professional staff and three administrative staff. One professional position has been vacant since September 2010. Two additional professional positions will be vacant as of January 1, 2012 due to the retirement of two incumbents.

In 2011 the Auditor General's budget included onetime gapping of \$171,700 for one vacancy and part of an expected vacancy in 2011.

To achieve a 10 per cent reduction, on the 2011 approved net operating budget, the budget would have to be reduced by \$428,320 to \$3,854,880. In order to meet this target, we would have to delete two upcoming vacancies which are expected to occur in January 2012 and further reduce staff by two positions. Consequently, this reduction in the budget would result in the termination of existing staff.

The proposed 2012 budget reflects the continued gapping of the 2011 vacancy plus the gapping of the two anticipated vacancies in early 2012.

A budget of \$3,854,880 would require that the Auditor General's Office operate with a staff of 24.

In addition to the Auditor General's statutory requirements, since 2002, the Auditor General has operated the City's Fraud and Waste Hotline. When the hotline was initiated no further staff was allocated even though there were significant additional resources required to operate the program. Since the inception of the Hotline the number of complaints continues to increase. In 2011 it is anticipated that the volume of complaints will increase from 570 in 2010 to over 1,000 in 2011.

It should be noted that many complaints contain more than one allegation. Consequently, we estimate the number of complaints to be in the range of 2,000.

It is becoming increasingly more difficult to act on each of these complaints on a timely basis.

Further, on a City wide basis it is anticipated that the 2012 budgets of City Divisions will result in staff decreases throughout the City. Staff reductions have the potential to impact internal management controls particularly where segregation of duties and an adequate level of supervision is compromised. In order to compensate for such situations audit resources should be increased and not decreased.

In terms of value for money the Auditor General's Office over the years has very clearly demonstrated that the cost savings/revenue increases identified through its audit work are significantly in excess of its annual budget.

Appendix 2 attached to this report lists the audit reports issued by this office since 2006. Additional reductions to the budget of the Auditor General's Office will have a future impact on the number of reports produced by the office and will increase the backlog of audit projects.

## **The Benchmarking of Audit Costs – Comparisons With Other Municipalities**

The Auditor General's Office has benchmarked City audit costs with those of major municipalities across Canada, as well as those of a number of municipalities in the United States. Due to the requirement to complete the 2012 budget at such an early stage, it was not possible to obtain 2011 audit costs from other municipalities. Consequently, the following table is based on 2010 information.

**Table 2: Comparison of Audit Costs**

	2010 Municipal Budget (in \$000s)	2010 Audit Costs (in \$000s)	Audit Costs as a % of Municipal Budget
	\$	\$	%
<b>Canadian Jurisdictions</b>			
Vancouver	<b>959,800</b>	<b>548</b>	<b>0.06</b>
Ottawa	<b>2,500,000</b>	<b>1,765</b>	<b>0.07</b>
<b>Toronto</b>	<b>9,214,000</b>	<b>6,557</b>	<b>0.07</b>
Calgary	<b>2,527,677</b>	<b>2,277</b>	<b>0.09</b>
Halifax	<b>731,000</b>	<b>660</b>	<b>0.09</b>
Edmonton	<b>1,900,000</b>	<b>2,043</b>	<b>0.11</b>
Montreal	<b>3,985,381</b>	<b>4,686</b>	<b>0.12</b>
Quebec City	<b>1,127,500</b>	<b>1,400</b>	<b>0.12</b>
<b>U.S. Jurisdictions</b>			
Chicago	<b>5,887,521</b>	<b>5,442</b>	<b>0.09</b>
Philadelphia	<b>7,353,010</b>	<b>7,425</b>	<b>0.10</b>
Detroit	<b>2,909,646</b>	<b>3,477</b>	<b>0.12</b>
San Francisco	<b>6,586,788</b>	<b>12,396</b>	<b>0.19</b>
San Jose	<b>954,095</b>	<b>2,128</b>	<b>0.22</b>
Phoenix	<b>976,332</b>	<b>2,679</b>	<b>0.27</b>

***Toronto Audit  
Costs***

In determining the total audit costs of the City, a certain portion of costs of the Internal Audit Division, and the audit functions at the TTC and the Toronto Police Service have been added to the costs of the Auditor General's Office as outlined in the following table:

	2010 Audit Costs
Auditor General's Office	3,982,445
Internal Audit	415,509
TTC	1,430,000
Toronto Police	728,750
<b>Total</b>	<b>6,556,704</b>

Internal Audit costs exclude costs recovered through Interdepartmental Recoveries for services provided directly to certain Divisions. Toronto Police costs exclude estimated costs related to certain mandated program reviews.

***Difficult to make exact comparisons***

It is difficult to make specific comparisons with other municipalities due to a number of factors such as:

- The budgets of municipalities included in Table 2 include an Auditor General function only. There may be other internal audit entities in these organizations which have not been accounted for. We are aware that Quebec City for example, has a separate internal audit function.
- The City of Toronto operates a Fraud and Waste Hotline, whereas a number of other municipalities do not (e.g., Quebec City and Vancouver).

Consequently, it is likely that the audit costs as percentage of the municipal budget indicated on Table 2 are very likely understated.

***Audit costs significantly below other municipalities***

In spite of the difficulties in comparing audit budgets, the budget of the Auditor General's Office is comparable with other major cities throughout Canada and the US. When compared with other municipalities, the budget of the Auditor General's Office is at the low end of the scale.

***Mayor's Fiscal Review Panel recommendations***

The Mayor's Fiscal Review Panel report was issued on February 21, 2008. Recommendations in this report speak to the strengthening of the Auditor General's Office. The report recommends that *"the City should increase the budget for the Auditor General's Office to enable it to complete more efficiency audits."*

***City Internal Audit Functions Review***

On June 14, 2011 City Council adopted the following:

*"City Council request the City Manager to review, and report to the Audit Committee on October 20, 2011, on the operations of each one of the internal audit functions that report to management, and ascertain whether there may be benefits to consolidating those functions, such a review to consider the reporting structure particularly in the context of ensuring that all functions are able to operate independently from management."*

*City Council request that, during the review, the City Manager review the level of resources for each entity in order to ensure that levels are commensurate with responsibilities and make recommendations for reallocation of staff if appropriate. In consultation with the Auditor General, such a reallocation give consideration to the resource requirements of the Auditor General's Office."*

***Recognize the financial constraints***

We recognize the financial restraints under which the City operates and over the past number of years our budget requests have reflected this reality. Nevertheless, it is important to recognize that the audit work conducted by this Office is not at a level commensurate with the size and complexity of the City. In order to address the audit projects which have been deferred as well as to accommodate the increased volume of complaints received by the Fraud and Waste Hotline, it is anticipated that the positions currently gapped should be filled and additional estimated resources in the range of \$500,000 would be required.

Our annual work plan is based on the resources available. There are a significant number of audits which continue to be deferred because of limited resources. In addition, the Auditor General is now at the stage where audits previously conducted over the years should be the focus of a second review. Resources are not available to allow for this.

## **Predetermined Audit Costs in Certain Jurisdictions**

***Quebec legislation mandates allocation of audit fees as a percentage of the total City budget***

Of significance in the comparison of audit costs between municipalities is current legislation in Quebec. The Quebec Cities and Towns Act in Section 107.5 requires that, "*The budget of the municipality shall include an appropriation to provide for payment of a sum to the chief auditor to cover the expenses relating to the exercise of the chief auditor's duties.*"

The amount legislated for audit services in municipalities with a budget in excess of \$1 billion is 0.11 per cent of the total City budget. If the equivalent percentage of 0.11 per cent was applied to the City of Toronto, the City's total audit budget would be in the range of \$10 million.

***Quebec model  
would increase  
City audit budget  
by over \$3.6  
million***

Using the Quebec model as a guide, it would not be unreasonable to suggest that the audit budget at the City should increase by over \$3.6 million. We are not suggesting that such an increase be considered without significant additional deliberation or analysis, nor are we suggesting that these additional resources be exclusively allocated to the Auditor General's Office.

The above analysis does, however, demonstrate that audit resources at the City are not excessive and likely should be increased to a level commensurate with the size of the City.

## **Additional Workload Pressures**

***Annual follow-up  
of audit  
recommendations***

An extremely important component of any audit process is the requirement that there be a follow-up of audit recommendations made. There is little benefit to an audit unless recommendations resulting from the audit are implemented. In order to address this issue, we have established an annual process to follow-up on all previously issued audit reports. The resources devoted to this process have been significant. However, such a process enables us to ensure that all previously approved recommendations have been implemented.

***Increase in Fraud  
and Waste Hotline  
activity***

In addition, the activity relating to the Fraud and Waste Hotline has increased significantly since its inception. It was recognized and acknowledged that during its initial phase the Hotline could be accommodated with existing resources until the extent of activity was determined



The following illustrates the increase in complaint volume in the Fraud and Waste Hotline program since its inception.

**Fraud and Waste Hotline Program  
Number of Complaints by Year**

<b>Year</b>	<b>Number of Complaints</b>
2002	157
2003	238
2004	347
2005	577
2006	503
2007	523
2008	619
2009	677
2010	570
2011	1032*

\* number of complaints estimated to year end.

***City Wide Risk  
Assessment  
conducted in 2009***

The Auditor General’s Office conducted a City wide risk assessment in 2009. The results were communicated to the City Manager on May 21, 2010. The results of this review will figure prominently in the development of the Auditor General’s Office annual work plans over the next five years.

Senior audit staff identified 157 audit units in the City’s organizational structure and gathered relevant information. The results were shared with divisional staff for confirmation and additional input. The audit units were ranked from the highest to the lowest level of risk for the entire City. Three categories for level of risk were created with the results distributed as follows:

<b>Level of Risk</b>	<b>Audit Units</b>	<b>Per Cent</b>
High Risk	48	31 %
Medium Risk	85	54 %
Low Risk	24	15 %
<b>Total</b>	<b>157</b>	<b>100 %</b>

## **Benefits of an Effective Audit Process**

An effective audit process can result in a significant payback to the City in terms of:

- increased revenues
- reduced costs
- improved internal controls
- operational efficiencies
- enhanced protection of City assets.

The costs savings generated by the Auditor General's Office since amalgamation, while difficult to quantify precisely, have been significant and far outweigh the costs to operate the office. Many of the savings generated are not one-time savings. In many cases they represent on-going annual savings.

***Cost savings over last five years are in the range of \$97 million***

In a report to the Audit Committee dated January 24, 2011 entitled "Annual Report - Auditor General's Office - Benefits to the City of Toronto", it was reported to Audit Committee that the actual potential net savings for the period 2006 to 2010 were in the range of \$97 million. At the request of the Audit Committee, this report will be updated and tabled with the Committee during the first quarter of 2012.

## **The Impact of the *City of Toronto Act***

The *City of Toronto Act* has had an impact on the Auditor General's ability to audit certain of the City's local boards. Prior to the *Act*, the Auditor General had access to all records at each of the City's local boards and was able to conduct audit work based on his analysis of risk.

***City of Toronto Act limits Auditor General's authority to audit "restricted" local boards***

The *Act* states, in Section 178 (3) under Powers and Duties of the Auditor General's Office, that "*the Auditor General may exercise the powers and shall perform the duties as may be assigned to him or her by city council in respect of the City, its local boards (restricted definition) and such city controlled corporations and grant recipients as city council may specify.*"

Under the *Act*, “local boards (restricted definition)” is defined as a local board other than the Toronto Police Services Board, the Toronto Public Library and the Board of Health. In essence, the Auditor General of the City of Toronto, under the new legislation, has no authority to access records or conduct audit work at those “restricted” local boards.

***Auditor General  
working with  
“restricted” local  
boards***

The Auditor General met with both the City Manager and the City Solicitor to further address this matter. The City Solicitor has advised that Council may extend the mandate of the Auditor General to include audits of the “restricted” local boards based upon specific requests of these boards. City Council subsequently approved that the Auditor General, at his discretion, may undertake financial (excluding attest) compliance and performance audits of the “restricted” local boards upon request by the boards. This arrangement has worked satisfactorily, particularly, in the case of the Toronto Police Services Board. Since the *Act*, a significant amount of work has been conducted at the Toronto Police Service.

It is anticipated that the Province of Ontario will be requested to amend the *Act* to include the “restricted” boards in those entities subject to audit by the Auditor General.

**The Statutory Accountability Officers - Working Together With the Integrity Commissioner, the Lobbyist Registrar and the Ombudsman**

Over the past number of years, there has been on-going communication between the Auditor General and the Integrity Commissioner. Regular meetings were held to discuss issues or concerns and when appropriate, specific complaints were referred to the responsible official. In his final report to the City Council, the former Integrity Commissioner stated that “*Within the City, I continued to have an excellent relationship with Jeffrey Griffiths, the Auditor General*”. The Auditor General has on-going dialogue with the current Integrity Commissioner.

On-going meetings have also been held with the Lobbyist Registrar and the Ombudsman to discuss areas of interest and concern.

## **A Policy Framework for Toronto’s Accountability Officers**

On March 20, 2009, City Council approved a report entitled “A Policy Framework for Toronto Accountability Officers”. The report contains a number of Guiding Principles as follows:

- The offices will be established by bylaw in Toronto’s Municipal Code.
- The officers are appointed by and have direct accountability to City Council.
- The appointment, renewal, and removal processes will be defined and transparent.
- The officers will have a fixed term of office.
- The officers will have budgetary, operational, and staffing independence.

### ***New Municipal Code Chapter for Toronto’s Accountability Officers***

The provisions included in the Policy Framework for Toronto Accountability Officers form the basis of a separate Toronto Municipal Code chapter for the Accountability Officers. This new chapter, Chapter 3, “Accountability Officers” was enacted, by City Council in October 2009. This chapter reinforces their arm's length relationship to the City administration and their independent status within the City’s governance system.

## **The Auditor General’s Annual Audit Work Plan**

The 2011 Audit Work Plan of the Auditor General was considered at Audit Committee on February 22, 2011 and was adopted at City Council on March 8, 2011 with amendments. It is available at:

<http://www.toronto.ca/audit/2011/auditworkplan-jan12.pdf>

## Summary

The budget to operate the Auditor General's Office for 2012 is projected to be \$4,176,200. Included in this amount are audit fees paid to an external accounting firm for the annual statutory audit of the financial statements of the City.

As indicated previously, 97 per cent of the Auditor General's budget request consists of salaries and benefits. Reducing the Auditor General's 2011 approved budget by 10 per cent would require decreasing staff by two persons and elimination of three vacant positions.

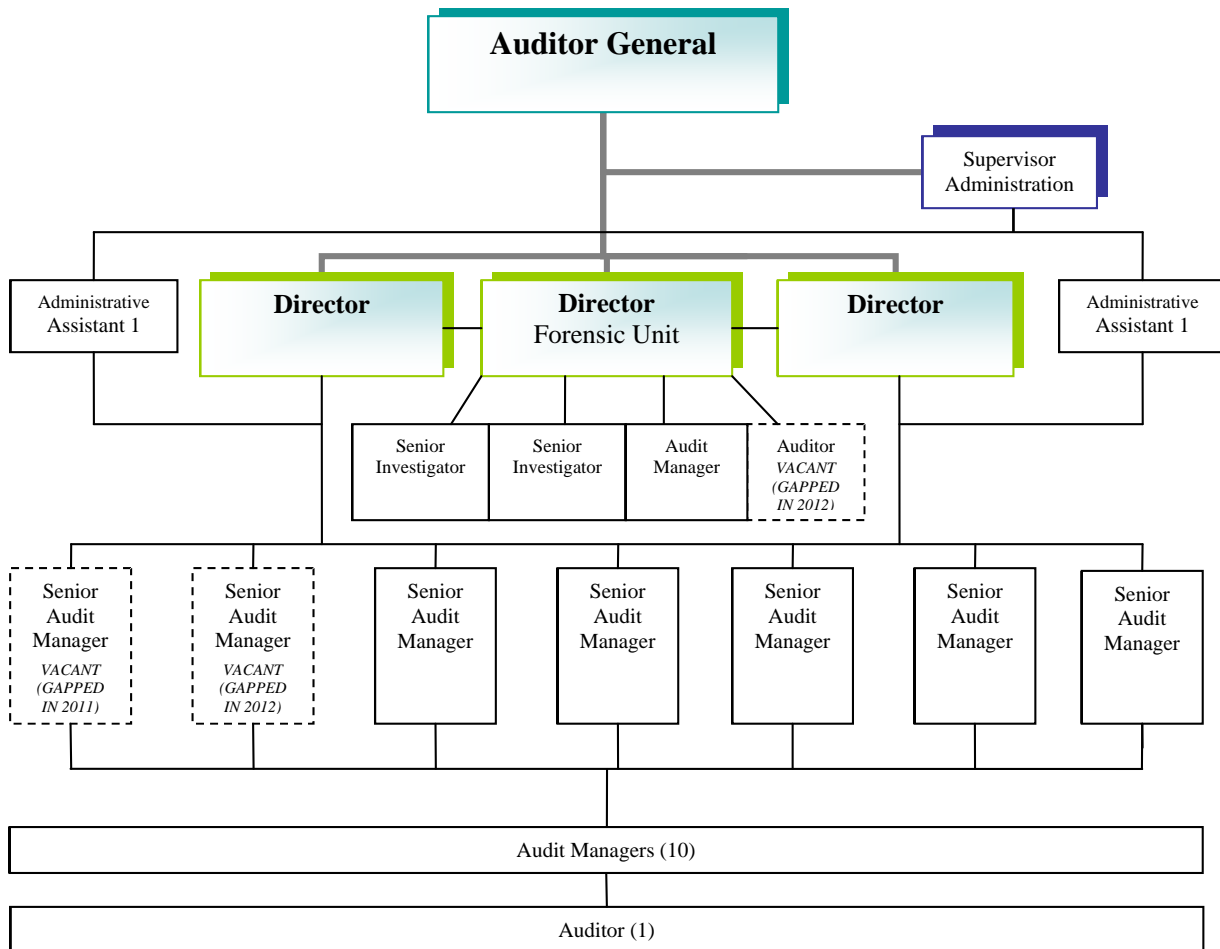
The Auditor General's Office is not adequately resourced. While appreciative of the financial constraints at the City the current staffing levels and in particular the staffing levels in 2012 under which the Office may be forced to operate are not appropriate.

Under all available yard sticks whether it be legislative requirements in other jurisdictions or comparisons with other municipalities the level of staff in the Auditor General's office in relation to the audit work required is inadequate. Based on the cost savings identified in this report, which are examples only, the return on the investment of funds in the Auditor General's Office is significant. The recent Benefits Report indicates that for each \$1 invested in audit costs the return in relation to cost savings is over \$5.

Finally, in validation of the views of the Auditor General the Mayors Fiscal Review Panel in its report entitled "Blueprint for Fiscal Stability and Economic Prosperity- a Call to Action", dated February 2008 independently stated that "the City should increase the budget for the Auditor General's Office to enable it to complete more efficiency audits and drive more savings".

This recommendation has not been acted upon.

**THE AUDITOR GENERAL'S OFFICE –  
ORGANIZATIONAL CHART AND WORKFORCE  
as at December 31, 2011**



# Association of Local Government Auditors



February 27, 2009

*President*  
Jerry Shaubel  
Director, Auditor General's Office  
Toronto, Ontario, Canada

*President Elect*  
Amanda Noble  
Deputy City Auditor  
Atlanta, GA

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Phoenix, AZ

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Chief Deputy City Auditor  
Oakland, CA

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George McGowan  
Manager, Audit Services  
and Management Support  
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Jeffrey Griffiths  
Auditor General  
City of Toronto  
Auditor General's Office

Dear Mr. Griffiths,

We have completed a peer review of the City of Toronto Auditor General's Office for the period January 2006 through December 2008. In conducting our review, we followed the standards and guidelines contained in the *Peer Review Guide* published by the Association of Local Government Auditors (ALGA).

We reviewed the internal quality control system of your audit organization and conducted tests in order to determine if your internal quality control system operated to provide reasonable assurance of compliance with *Government Auditing Standards* issued by the Comptroller General of the United States. Due to variances in individual performance and judgment, compliance does not imply adherence to standards in every case, but does imply adherence in most situations.

Based on the results of our review, it is our opinion that the City of Toronto Auditor General Office's internal quality control system was suitably designed and operating effectively to provide reasonable assurance of compliance with *Government Auditing Standards* for audits and attestation engagements during the period January 2006 through December 2008.

We have prepared a separate management letter offering one suggestion to further strengthen your internal quality control system.

Sincerely,

Alan R. Gutowski  
City of Albuquerque, NM

Renata Khoshroo  
City of San Jose, CA

Antonio Bianchi  
The Regional  
Municipality of York

# Association of Local Government Auditors



February 27, 2009

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Jeffrey Griffiths  
Auditor General  
City of Toronto  
Auditor General's Office

Dear Mr. Griffiths,

We have completed a peer review of the City of Toronto Auditor General's Office for the period January 2006 through December 2008 and issued our report thereon dated February 27, 2009. We are issuing this companion letter to offer certain observations and one suggestion stemming from our peer review.

We would like to mention some of the areas in which we believe your office excels:

- The entire audit team has great synergy.
- Your office's policies and procedures are well written and substantially exceed the requirements under *Government Auditing Standards*. They also promote consistency among the work papers across audits.
- The staff is highly qualified and diverse with a broad range of subject area expertise.
- Your approach to the electronic automation of audit recommendation follow-up is an innovative and excellent idea, and makes the process much more efficient. Perhaps it is something you can share at an annual ALGA conference.
- The internal committees that focus on quality assurance and critical issues are an excellent idea.
- Your system for electronically distributing reports minimizes paper consumption and is environmentally friendly.
- The Administrative Support Staff is gracious and efficient.



We offer the following observation and suggestion to enhance your organization's demonstrated adherence to *Government Auditing Standards*:

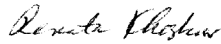
- In one of the six engagements we examined neither the survey checklist nor the audit program addressed the risk of fraud. In our determination the risk of fraud was not likely for this particular engagement. *Government Auditing Standards* direct that when planning the audit, auditors should assess risks of fraud occurring that is significant within the context of the audit objectives. Consequently, the Fraud and Abuse section should be included in the work papers, and the auditor should indicate N/A if the standard is not applicable.

We extend our thanks to you, your staff and the city officials we met for the hospitality and cooperation extended to us during our review.

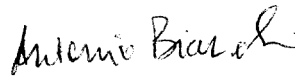
Sincerely,



Alan R. Gutowski  
City of Albuquerque, NM



Renata Khoshroo  
City of San Jose, CA



Antonio Bianchi  
The Regional  
Municipality of York



Jeffrey Griffiths, C.A., C.F.E.  
Auditor General

Auditor General's Office  
9th Floor, Metro Hall  
55 John Street  
Toronto ON M5V 3C6

Tel: 416 392-8461  
Fax: 416 392-3754

March 10, 2009

Alan Gutowski  
Audit Manager  
Office of Internal Audit  
City of Albuquerque  
P.O. Box 1293  
Albuquerque, New Mexico 87103

Dear Mr. Gutowski,

Thank you for participating in the External Quality Control Review of the City of Toronto Auditor General's Office. Your review is a valuable part of our continuing efforts to improve the quality of audits, and we are pleased you found that audits performed by the Toronto Auditor General's Office comply with *Government Auditing Standards*.

The Auditor General's Office is committed to continuously improving the quality of our audit work. We appreciate your thoughtful comments regarding the areas where you found our Office excels, including the quality of our policies, procedures, working papers, staff qualifications and diversity. We also appreciate your recognition of our audit recommendation follow-up system.

We also appreciate your observation related to the engagement where audit planning documentation should have included our consideration of fraud risk. As indicated in your management letter comment, you agreed with our determination that the risk of fraud was not likely for this particular engagement which was an audit of the City's performance in Achieving Access, Equity and Human Rights Goals. For the record, our assessment of fraud was not included in the documentation because of a timing issue related to the internal release of revised planning templates during our transition from the 2003 *Government Auditing Standards* to the 2007 *Government Auditing Standards* (for audits effective January 1, 2008). The 2008 planning templates were not available to audit staff at the time this engagement was initiated. As a result, the 2004 version was used which did not include the new requirement to document auditor consideration of fraud risk. The revised version was released shortly after the completion of the planning phase of this engagement and is currently in place.

Our entire office found the peer review to be a valuable and constructive process. We appreciate the professionalism with which you carried out your responsibilities as peer reviewers, as well as the insights gained from your own organizations.

I would like to extend my personal thanks to you, Renata Khoshroo and Antonio Bianchi for taking the time to review our operations, and for your participation in the ALGA peer review program.

Sincerely,

Jeffrey Griffiths, CA, CFE  
Auditor General  
Toronto ON