May 20, 2014

Mr. Joseph P. Pennachetti  
City Manager  
Toronto City Hall, 11th Floor East  
100 Queen Street West  
Toronto, Ontario  
M5H 2N2

Re: Integrity Commissioner’s Office of the City of Toronto  
Report on the Results of Applying Specified Auditing Procedures to  
Financial Information Other Than Financial Statements for the Year  
Ended December 31, 2013

To the City Manager of the City of Toronto:

This letter has been prepared at the request of Toronto City Council to obtain assurance that expenditures incurred by the Integrity Commissioner’s Office of the City of Toronto (ICO) are in compliance with the applicable policies and procedures, including appropriate exercise of delegated authorities as set by the City of Toronto.

We have performed the auditing procedures as described below. This agreed-upon procedures engagement was performed in accordance with standards published by Chartered Professional Accountants of Canada. The sufficiency of these policies, procedures and delegated authorities is solely the responsibility of the City of Toronto. Consequently, we make no representation regarding the sufficiency of the City of Toronto policies, procedures and delegated authorities described below.

For the purpose of this letter, the financial information to which the auditing procedures were applied was included within the City of Toronto SAP report, “Detailed Expense Report for the Year 2013” for the ICO. This report is essentially a General Ledger detailing the transactions that have been posted under the cost elements which in turn comprise the scope of the transactions subject to audit. The report was provided directly to us by staff of the City Clerk’s Office.

To clarify, the Quotation Request identified the following Cost Elements to be tested:

1025 Permanent - Overtime SAP  
1050 Permanent - Vacation Pay  
2010 Stationery and Office Supplies  
2020 Books and Magazines  
2040 Photo Fax & Print Supplies  
2080 Photo & Video Supplies  
2082 Health and Safety Supplies  
2090 Graphic Design Supplies  
2099 Other Office Material  
2260 Gasoline  
2570 Janitorial Supplies  
2610 Kitchen Supplies  
2650 Computer & Printer Supplies  
2710 General Hardware  
2741 Food Cost  
2790 Presentation Items  
2999 Misc Materials  
3020 M&E Communications  
3030 M&E Office  
3032 M&E Photographic  
3033 M&E Printing & Binding  
3050 M&E Kitchen  
3099 General Equipment  
3310 Furnishings  
3410 Computers - Hardware  
3420 Computers - Software  
4010 Professional Services - Legal  
4038 Professional & Technical Services (IT)  
4078 Cons Svs Tech  
4079 Cons Svs IT  
4082 Photo/Video Systems  
4086 Tech Services - Translations & Interpreters  
4089 Cons Svs Mgmt/R&D  
4091 Cons Svs Ext Lawyers  
4093 Cons Svs Creative Communications  
4110 Honoraria  
4118 Tickets  
4130 Process Server Fees  
4132 Conduct Money  
4144 Investigative Expenses
We were provided directly from the City Clerk's Office, the Policy Applicability Matrix (Matrix) that linked each Cost Element above with the applicable City of Toronto policies and procedures below:

- Business Expense Policy
- Vacation
- Kilometrage Reimbursement for use of Personal Vehicle for City Business
- Lieu Time
- Training and Development
- Attendance Management
- Leave without Pay
- Tuition Reimbursement
- Blanket Contract Procedures
- Divisional Purchase Orders (DPOs)
- Long Distance Telephone
- Payment Requisition Procedures
- Petty Cash Policy and Procedures
- Purchasing Card (PCard) Program
- Selection and Hiring of Consulting Services
- Sole Source or Non-Competitive Procurement Procedures
- Using an Established Roster to Obtain Professional, Consultant or Other Services

To further clarify, the Quotation Request identified the delegated authorities as follows:

- Chapter 71, Financial Control
- Chapter 195, Purchasing
- Chapter 217, Records, Corporate (City)
- Chapter 257, Signing Authority (spending authority set at the level of a Division Head)
In addition, the Quotation Request identified the policy framework for the City’s Accountability Officers, codified in the Toronto Municipal Code, Chapter 3, “Accountability Officers”, which reinforces both their arms-length relationship to the City and their independent status within the City’s governance system. As part of the implementation of Chapter 3, Accountability Officers are required to comply with all applicable City-by laws, policies and procedures while maintaining their balance between accountability and independence.

Copies of the above City of Toronto policies and procedures and web-links to the City of Toronto related delegated authorities were provided by the City Clerk’s Office.

We selected a statistical sample of transactions to be tested based on the number of entries in each Cost Element and examined those transactions for compliance with the applicable policies and procedures of the Matrix, including appropriate exercise of delegated authorities with underlying supporting documents for adherence to the policies, procedures and delegated authorities noted above.

As a result of applying the above procedures, we found no exceptions to the adherence to the policies, procedures and delegated authorities as they applied to our test sample.

It should be understood that we make no representations as to the sufficiency for your purposes of the procedures as described in the preceding paragraphs. Further we have addressed ourselves solely to the report, which we received directly from the City Clerk’s Office of the City of Toronto and make no representations as to whether any material items were omitted. Our procedures do not constitute an audit of the report and therefore we express no opinion on the report.

This letter is provided solely for the purpose of determining compliance with the Section 3-8B of the City of Toronto’s Municipal Code and should not be used for any other purpose.

Any use that a third party makes of this letter, or any reliance or decisions made based on it, are the responsibility of such third party. We accept no responsibility for loss or damages, if any, suffered by any third party as a result of decisions made or actions taken based on this letter.

Yours very truly,

I.B. MacKenzie\dc

HILBORN LLP
Appendix

In compliance with section 6.3 b. of the Quotation Request, the following are items set forth in Appendix 3 for the year ended December 31, 2013.

List of Annual Sole Source Purchasing Activity

The City Clerk’s Office provided us a list of Annual Sole Source Purchasing Activity incurred by the Accountability Offices which noted there were no such transactions incurred by the ICO.

List of Annual Consulting Services Expenditures

During our engagement, we inquired with the City Clerk’s Office regarding Annual Consulting Services Expenditures incurred by the Accountability Offices. The City Clerk’s Office noted there were no such transactions incurred by the ICO.