



OFFICE OF THE  
**City Auditor**

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# Development Securities Review

April 12, 2013

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The Office of the City Auditor conducted  
this project in accordance with the  
*International Standards for the  
Professional Practice of Internal Auditing*

# Development Securities Review

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## ***Executive Summary***

The Development Coordination Section is one of three sections within the Current Planning Branch, which is a part of the Sustainable Development Department. Development Coordination works with various City of Edmonton (City) departments and the private development industry to coordinate and advance the development and servicing of land. A key responsibility is preparing and negotiating terms and requirements for all servicing agreements with private landowners and developers on behalf of the City and private utility companies.

The Manager of the Current Planning Branch requested that the Office of the City Auditor (OCA) provide assistance with evaluating a portion of the servicing agreements process and the securities collected. Our objectives for this project were to identify risks related to the current engineering drawing review process and to determine whether the development securities process is fair and equitable.

### **Existence of risks within the engineering drawing review processes**

We conducted a risk identification and assessment of the engineering drawing review process, and held discussions with Management to determine the impact of those risks and any mitigating controls. Through this assessment we identified risks related to timeliness and quality of the engineering drawing review process.

Management believes that process changes made in the past year will address previously identified issues. The Section has dedicated resources to increase the level of review for each application. Management also believes this will improve the quality of applications and address servicing agreements that have been in existence for at least five years.

### **Fairness and equitability of development securities collected**

We reviewed the historical balance of securities held, the method of calculating security requirements, the forms of security accepted and the administrative controls related to securities.

Overall, we found the development security process to be fair and equitable. We recommended that Management assess the potential to allow additional forms of security to be posted for servicing agreements. We also recommended that duties related to collection, administration and release of securities be further segregated.

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# ***Development Securities Review***

## **1. Introduction**

The Development Coordination Section is one of three sections within the Current Planning Branch, which is a part of the Sustainable Development Department. Development Coordination works with various City departments and the private development industry to coordinate and advance the development and servicing of land. A key responsibility is preparing and negotiating terms and requirements for all servicing agreements with private landowners and developers on behalf of the City and private utility companies.

The Manager of the Current Planning Branch requested that the Office of the City Auditor (OCA) assist with evaluating the servicing agreement process. In response, the OCA included a high-level review of the servicing agreement process in its *2013 Annual Work Plan*.

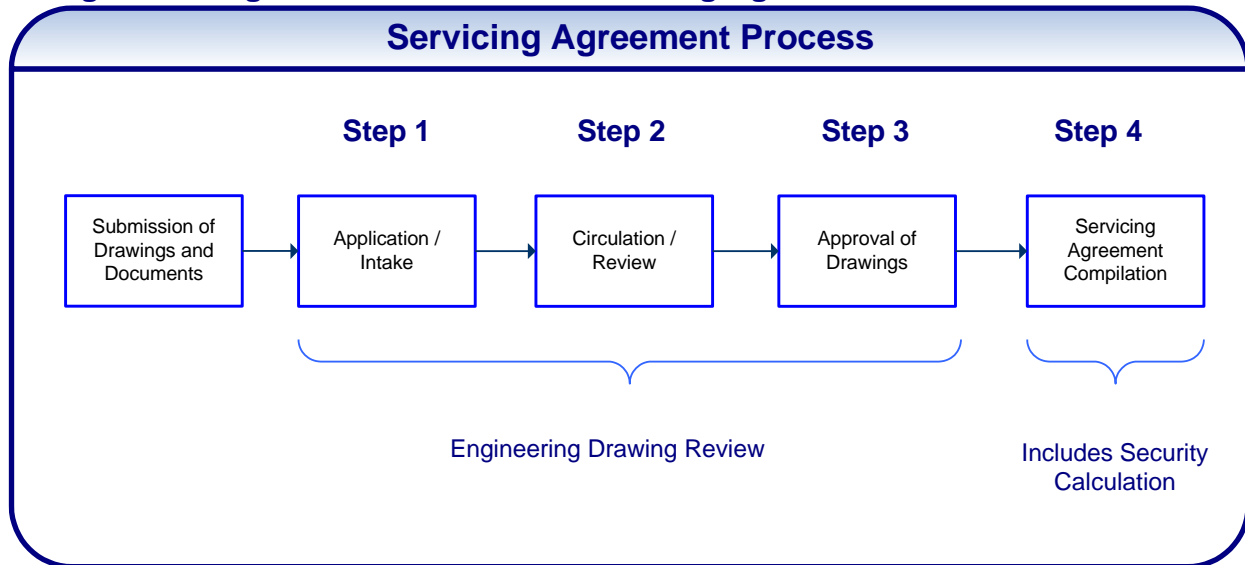
## **2. Background**

### **2.1. Servicing Agreement Process**

After a subdivision plan is approved, a servicing agreement is required to ensure that the infrastructure development is built in accordance with City standards. Servicing agreements provide for construction of municipal improvements such as water mains, storm and sanitary sewers, roads, sidewalks, curbs and gutters, power, street lighting, landscaping and various other items. The servicing agreement process is overseen by the Development Coordination Section of the Current Planning Branch. The authorities for these agreements include Sections 650 and 655 of the *Municipal Government Act* and the *Edmonton Zoning Bylaw 12800*.

One of Development Coordination's primary roles is to oversee development project applications and keep them progressing through the servicing agreement process. The City collects and holds securities from developers to ensure that they construct the subdivision as planned. As at December 31, 2012, the City held \$253 million in development securities.

A high-level overview of the servicing agreement process is included as Figure 1, outlining the primary steps undertaken, with a description of each of those steps following the figure.

Figure 1 – High-Level Overview of Servicing Agreement Process Flowchart<sup>1</sup>

The developer, generally represented by a consultant, will apply to have engineering drawings of the proposed development reviewed and approved. As illustrated above in Figure 1, there are four steps required to obtain a servicing agreement with the City:

- Step 1** – Development Coordination staff review the application to ensure that all the required documentation is included.
- Step 2** – The drawings are circulated to various City and EPCOR areas for review (Reviewing Areas) to ensure compliance with City codes, specifications, and safety requirements. Any issues identified will require the developer to revise the engineering drawings.
- Step 3** – When each of the Reviewing Areas is satisfied with the engineering drawings and no further required revisions are identified, the drawings are approved and ready to be included in the servicing agreement.
- Step 4** – The servicing agreement is compiled, which includes the approved engineering drawings, other fee assessments related to the development, the terms by which the developer agrees to abide, and the amount of security required by the City. The agreement is then reviewed by City Law Branch staff prior to being signed by both the developer and the City.

<sup>1</sup> Figure 1 represents the process flow when there are engineering drawings that require approval.



## **2.2. Development Coordination Changes**

In 2011, Development Coordination contracted with a management consultant (Consultant) to address emerging concerns with the servicing agreement process.

The Consultant issued a report in March 2012, outlining 26 findings. Development Coordination has addressed some of the recommended changes and is currently in the process of implementing others.

In response to the Consultant's recommendations, Development Coordination implemented the following servicing agreement process changes:

- The Application/Intake process was adjusted to increase accountability of developers making applications by implementing a formal Development Coordination checklist to ensure that the submission package is complete prior to accepting and circulating it.
- Development Coordination dedicated resources to addressing delinquent projects, which are those greater than five years old. Based on information provided by staff, 41 delinquent accounts have been closed and securities in the amount of \$5.44 million have been returned to developers.
- Development Coordination is currently conducting a pilot program with a limited number of projects, where the Reviewing Areas meet on a weekly basis to ensure that projects are ready to go through the review process, discuss projects currently going through drawing review, and meet with developers if need be. Reviewing Areas and Developers are also given timelines for drawing review and revisions, as part of the pilot program.

## **3. Project Objective, Scope & Methodology**

### **3.1. Objective**

Our objectives for this project were to:

1. Identify risks related to the engineering drawing review process and any controls or actions being undertaken to mitigate those risks; and,
2. Determine if the development securities process, as part of the larger servicing agreement process, is fair and equitable.

### **3.2. Scope**

Our review focused on the Development Coordination Section and on the engineering drawing review process, which is composed of Application/Intake, Circulation/Review, and Approval of Drawings. Although the circulation and review sub-process involves other areas within the City and EPCOR, we did not specifically review those areas' activities.

With the exception of the methodology to calculate and the forms of securities collected, we did not review the latter part of the servicing agreement process in detail. Our review of the securities collected focused primarily on projects initiated in the past five years, although some projects have been ongoing for longer periods of time.

### **3.3. Methodology**

We conducted a risk identification and assessment of the engineering drawing review process and held discussions with staff to determine the impact of those risks and any controls in place to mitigate those risks.

We reviewed the historical balance of securities held, the method of calculating security requirements, the forms of security accepted, and the controls related to administration of securities.

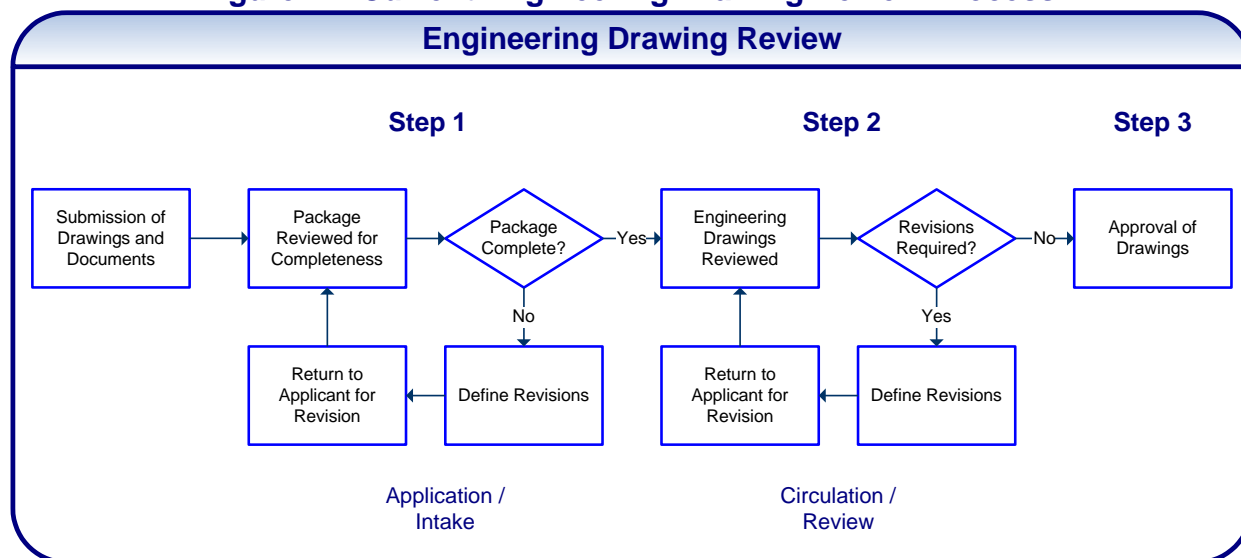
Additionally, we consulted with key stakeholders to the development process.

## **4. Observations and Analysis**

### **4.1. Process Review**

After the report issued by the Consultant in March 2012, we further evaluated the current process to identify any additional risks that could be addressed by Development Coordination. Figure 2 shows a breakdown of the current engineering drawing review process.

Figure 2 – Current Engineering Drawing Review Process



The engineering drawing review process involves detailed reviews by key areas outside of Development Coordination, including Transportation, Drainage, Parks and EPCOR. Once all the areas are satisfied that the drawings meet applicable standards and requirements, the drawings are approved and the project can move forward for the servicing agreement details to be compiled.

While Development Coordination has made some improvements to the engineering drawing review process, more effort is still needed. We met with the Executive Director of the Urban Development Institute, Greater Edmonton Chapter (UDI) to share our project objectives and scope, and to obtain the Director's opinion with respect to the engineering drawing process and securities.

The Director feels that the City and the UDI have a good working relationship that is conducive to furthering the development industry, for the benefit of both the City and developers. While the Director feels that good progress has been made with respect to improving the engineering drawing review process, further improvements can be made by the City and by developers to increase the timeliness of the review process. Development Coordination staff have been keeping the UDI up to date on changes being made or piloted, in an attempt to make further improvements.

#### 4.1.1. Engineering Drawing Review Process – Risk Analysis

We evaluated the current engineering drawing review process and identified key risks to the process. Following is a summary of these risks and Management's efforts to address these risks.

##### Timeline

There are no timeline requirements for Reviewing Areas to complete drawing reviews, or for developers to address changes required by the Reviewing Areas. The absence of timelines reduces the accountability of the parties involved in terms of

moving the development process forward in a timely manner. To address this risk, Management is currently piloting an engineering drawing review program with the stated goal that the drawing review process will be complete within nine weeks.

### **Prioritization**

Once drawings are provided to the Reviewing Areas, it is up to those areas to determine the order of review. Without a consistent way of prioritizing the order in which drawings are reviewed, there may be unnecessary delays in the drawing review process. The fact that the pilot program requires adherence to timelines for each Reviewing Area should address the issues with sequencing, as developers will have their drawings go through the program in a set amount of time. Additionally, Management is looking at the most appropriate way to consistently prioritize drawing reviews.

### **Communication**

Access to information in the current electronic plan review system is limited to City and EPCOR staff. If a developer wants to determine the status of specific drawings, they need to communicate directly with the Review Areas. Development Coordination is currently implementing a new electronic plan review system (“ePlan”), which developers can access. ePlan is expected to add clarity to the process and address developers’ desire to reduce the need to communicate with individual Review Areas because they will be able to check the status at any time.

### **Monitoring**

Currently, there are no formal milestones tracked through the engineering drawing process review. Using milestones would allow future evaluation of delays and bottlenecks within the process and could also be used to design performance measures around. Management is planning to use formal milestones with the implementation of the new ePlan system.

### **Post-Project Evaluation**

There are no consistent evaluations performed after either the engineering drawing review or after the entire project is complete. Performing regular evaluations would provide Development Coordination with an ongoing opportunity to identify any additional areas for improvement. Management attends regular meetings with the Urban Development Institute (UDI), Greater Edmonton Chapter, which does provide a feedback mechanism for developers to voice concerns.

## **4.2. Development Securities Levied**

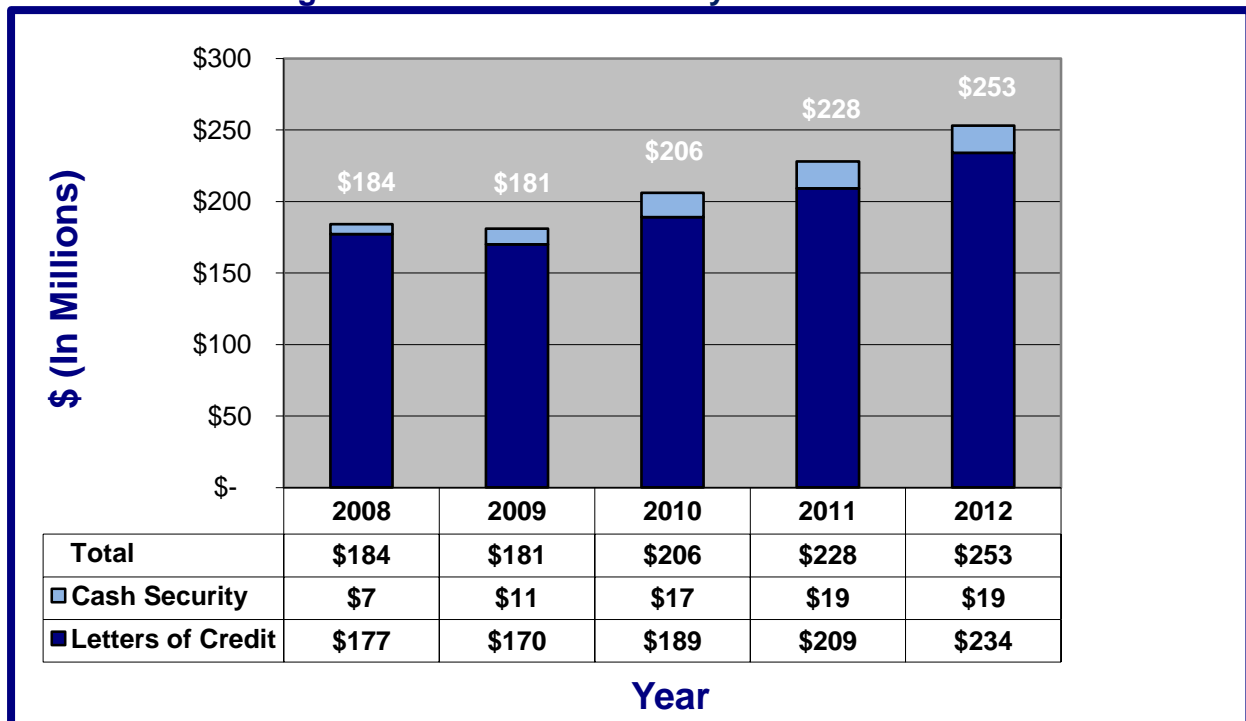
To determine whether the development securities held are fair and equitable, the OCA assessed the methodology for calculating the security amount as well as the different forms of security accepted.

A servicing agreement is considered to be in default when any of the terms within the agreement aren’t met. In the event of a default, the City can use the security to complete the development according to the engineering drawings or to secure the area

and prevent further development. When development securities are collected, the City needs to protect itself against the risk of developer default while not holding an excessive amount of developer security.

The amount of security held has trended upward over the past five years, as shown in Figure 3.

**Figure 3 – Balance of Security Held at Year-End**



The majority of the securities held by the City are in the form of Letters of Credit (92.5 percent of the securities held). The total amount of securities held has increased by \$69 million over the past five years, with cash and letters of credit representing \$12 million and \$57 million increases respectively. We were advised by Development Coordination staff that the change is closely tied to the value of the developments being built.

The City does not have substantial history related to servicing agreements that entered default and the City had to use the security to complete the work. According to Management, of the three agreements that went into default over the past five years, two had enough security in place to cover costs to complete the projects and one had approximately \$80,000 less than needed. Litigation is currently taking place to try to recover the \$80,000 from the developer involved.

There have not been enough instances of default to determine whether the amount of security held for every project was sufficient to cover risks and related costs, or whether the amounts held may be excessive.

#### 4.2.1. Methodology for Calculating Security Amounts

In order to determine the fairness and equitability of how security amounts are levied, we reviewed the security calculation methodology. The City assesses development security by first categorizing a developer based on experience of the developer on prior projects, either with the City or with other jurisdictions, and their performance on those projects. Once the developer category is determined, the amount of security is assessed based on a percentage of the estimated construction cost, with a minimum amount of \$20,000. The categories, criteria, and security percentages are summarized in Table 1 below.

**Table 1 – Developer Categorization and Security Percentages**

Category	Determining Criteria for Developer	Security Percentage
Category A	Was a party to at least two servicing agreements in the past five years where required timelines were met	10%
Category B	Was a party to one servicing agreement in past five years where required timelines were met	25%
Category C	No experience in the past five years or had issues meeting timelines in prior servicing agreements	100%
Category D (Note 1)	Was party to a prior servicing agreement that experienced either a major breach or frequent minor breaches of servicing agreement terms	100% - 200%

Note 1: Management advised that they rarely use Category D assessments (there are currently no developers assessed in this category).

For projects outstanding as at the end of 2012, 81 percent were assessed based on Category A and 19 percent were based on Categories B or C. This shows that the majority of development work in the City is performed by established companies, which are assessed security amounts based on 10 percent of project value.

The methodology for calculating the security is publicly communicated on the City's website, which helps to ensure fairness and equitability. By using categories that reward developers with a strong history of completing their developments, the City is further balancing the risk of developer default against not excessively burdening developers by holding too much security.

We discussed the current methodology for calculating development securities with the Executive Director of the UDI. Overall, they consider the current methodology of calculating development securities to be fair and equitable, and have not received complaints from their membership.

#### 4.2.2. Comparison of Municipalities

We also compared the City's current security assessment methodology with that of other municipalities and counties in the Province, based on information previously compiled by Development Coordination.

Development Coordination contacted nine other jurisdictions within Alberta to obtain their methodology for determining development security requirements for 2012. They found that methodologies vary substantially for different jurisdictions. For comparative purposes, we calculated the amount of security that would be required for a hypothetical project undertaken by an experienced developer in each of those jurisdictions. The results are shown in Table 2 below.

The following assumptions were used in this comparison:

- The estimated construction cost for the project was \$2,000,000
- The project represents a development of 47 lots on 2.88 hectares of land

**Table 2 – Comparison of Security Requirements in Alberta Jurisdictions**

Jurisdiction	Methodology to Calculate	Required Security
Edmonton	10% to 100% <sup>2</sup> of estimated construction costs. Minimum amount of \$20,000.	\$200,000
Calgary	\$3,715 per lot, up to 100% of estimated construction costs, based on developer experience. Minimum amount of \$150,000.	\$174,605
Red Deer	25% of estimated construction costs. Minimum amount of \$30,000.	\$500,000
Summary of seven other jurisdictions	Varies.	\$25,000 - \$1,000,000

As shown in Table 2, the City's development security requirements are not radically different from those of other jurisdictions of similar size. The City's methodology of calculating security requirements is comparatively fair and equitable.

#### 4.2.3. Forms of Security

To assist in determining whether the forms of security that the City allows developers to post are fair and equitable, we compared three types of security: cash, letters of credit, and performance bonds. Currently, the City accepts only cash and letters of credit as forms of security. However, Management has indicated that it plans to explore performance bonds as an alternative.

<sup>2</sup> Based on the rarity of a Category D classification, discussed in Section 4.2.1 above, we listed the high-end of the City of Edmonton methodology as 100%.

## Basis for Comparison

We compared the three forms of security based on four factors:

<i>Liquidity</i>	The ease with which the City would be able to make use of the funds in the event of a developer default.
<i>Administrative Requirements</i>	The need for City staff to track and process securities data.
<i>Developer Capital</i>	The impact of certain types of securities that may reduce developers' access to working capital.
<i>Inflation Risk</i>	The need to address the impact of inflation of construction costs.

If certain types of securities reduce developers' access to capital, they will have less opportunity to start additional projects. While this disadvantages the developer more than it does the City, it can also delay other work the developer could be involved in, thereby delaying future property taxes for the City.

Inflation risk is the risk that the amount of money collected as security, which is of sufficient value to complete a specific amount of work at that time, may not be sufficient to complete the work at a later date.

## Comparison of Forms of Securities

**Cash** is the simplest form of security. The developer writes the City a cheque for the deposit and there is no third party is involved.

- Cash is the most liquid form of security as it resides in the City's bank account.
- The City must calculate and track interest payable on cash securities since it will be paid back with interest to the developer at successful completion of the servicing agreement.
- Cash ties up developer capital, which may be indirectly negative for the City.
- Cash is somewhat exposed to inflation risk, although this is lessened by the fact that the City would have earned interest on the security which should cover a portion of any cost inflation.

**Letters of credit** are issued to the developer by a financial institution as payable to and held by the City. Typically, the developer will be required to keep the same amount of cash in an account with the institution, reducing the developer's ability to use that capital for other purposes. If the letter of credit expires or is returned, that capital is then released by the institution to the developer. However, if the developer were to default, the letter of credit could be called upon by the City, as it is guaranteed by the financial institution.

- Letters of credit are very liquid, as the City is unconditionally guaranteed to be able to collect the funds as long as the letter hasn't expired.



- The primary administrative requirement with letters of credit is to track them to ensure they are renewed prior to expiration.
- Letters of credit tie up developer capital, similar to cash.
- Letters of credit are fully exposed to inflation risk as the value of the letter doesn't ever change.

The City currently does not accept performance bonds as a form of development security. Following is our analysis of performance bonds.

**Performance bonds** are provided by a third-party insurer engaged by the developer who pays a premium for the insurer to guarantee that the developer will complete the work. However, since the bond is a form of insurance, the developer does not have to provide the face amount of the security up front. If the work does not get completed in accordance with the terms of the servicing agreement, the City would need to prove default. The insurer would then be responsible for either completing the work or paying to have it completed.

- Performance bonds are not liquid because the City would have to prove that the developer defaulted on the agreement before the terms of the bond could be enforced. This could involve substantial delays and legal battles with the insurer.
- There are fewer administrative requirements with performance bonds because they should not expire until the terms of the servicing agreement are complete.
- The greatest benefit of performance bonds is that they do not tie up developer capital. Consequently, developers would have additional capital available for other projects if they chose to use it for that purpose.
- Performance bonds are not exposed to inflation risk, as the guarantee provided by the bond is based on performing work to a specified outcome, as opposed to representing a pre-determined dollar value.

According to Development Coordination staff, there is only one other municipality in Alberta that allows forms of security other than cash or letters of credit.

We also discussed the topic of allowable forms of security with the Executive Director of the UDI to obtain his perspective on the currently acceptable forms as well as the potential for the City to allow additional forms. The Director believes that allowing developers to post security through the use of performance bonds could potentially increase the amount of development taking place.

### **Conclusion**

The current forms of security accepted by the City are considered fair. However, we recommend that Management explore the viability of allowing additional forms of security, comparing the related benefits with any associated risks. Not allowing developers to post securities by means other than cash or letters of credit may hinder developers located in other jurisdictions from competing in the Edmonton market. In addition, it may unnecessarily limit the number of projects that current developers are able to work on at any given time.

We believe that many different factors need to be considered as Development Coordination contemplates allowing developers to post securities in the form of a performance bond or similar financial instruments:

1. Cost-benefit analysis needs to be done, taking into account both the direct and indirect benefits as well as the associated risks. For instance, while freeing up developer capital by altering the amount or form of securities doesn't directly benefit the City, there could be an indirect benefit in the form of additional development and earlier collection of property taxes.
2. Securities held at a specific dollar value (cash or letters of credit) are exposed to inflation risk related to construction costs.
3. Securities that are more difficult to collect upon (in other words, the liquidity of the security is poor), such as performance bonds, can result in legal battles.
4. Management indicated that the City has generally been lenient with developers in prior years and has not enforced servicing agreement timelines rigorously. If this approach changes in the future, it could have an impact on the adequacy of securities collected.

### Recommendation 1 – Sufficiency and Form of Securities Held

The OCA recommends that the Manager of the Current Planning Branch assesses the viability of allowing other forms of development security for servicing agreements.

### Management Response and Action Plan

#### Accepted

**Action Plan:** The Current Planning Branch is currently working to assess the viability of using other methods of securing obligations in Servicing Agreements through the document *Guidelines for Establishing Security in Servicing Agreements*. This includes:

- Reviewing the use of performance bonds in other municipalities of similar size to Edmonton as an alternative form of security
- Developing alternative methods of determining security requirements
- Assessing the risks associated with these alternatives
- Assessing the benefits associated with these alternatives

**Planned Implementation Date:** Completed by Q3 – 2013

**Responsible Party:** Lead Development Engineer, Development Coordination, Current Planning Branch

### 4.3. Segregation of Duties

We also reviewed existing controls related to the collection, administration, and release of development securities. We noted that the assigned Client Financial Services Accountant is responsible for or has access to multiple tasks that are incompatible with appropriate segregation of duties. The Accountant handles incoming physical cheques, records payment receipts in the financial system, prepares disbursement requests to release security deposits back to developers, and reconciles the sub-ledger of outstanding security deposits to a self-managed database.

The purpose of segregating specific financial duties is to help protect the City from errors and/or fraud. We discussed the current duties of the assigned Client Financial Services Accountant with Management, who informed us that the issue had been identified through an internal review and steps were being taken to address it.

As a result of this finding, we tested 23 of the 134 cash security deposits held by the City to determine whether the balances listed were accurate. Our testing focused on projects with cash security held for greater than five years and on projects where cash amounts were adjusted during the course of our project work. We did not find any evidence of errors or wrongdoing. Consequently, this observation and recommendation focuses on the potential for an issue to occur, as opposed to any actual issue being observed.

#### Recommendation 2 – Segregation of Duties

The OCA recommends that the Branch Manager, Client Financial Services, ensure that financial duties are adequately segregated to protect against the risk of errors and/or fraud.

#### Management Response and Action Plan

##### Accepted

**Action Plan:** Client Financial Services initiated a review of existing business processes and accounting controls in mid 2012, prior to the Development Securities Review. The Client Financial Services review identified several areas where segregation of duties was not adequate. A number of actions including restructuring of duties have been implemented in order to achieve segregation of duties for collection, administration, and release of development securities. These actions had a staged implementation starting in Q4 2012, with full implementation in early March 2013. Client Financial Services will continue to monitor these enhancements and look for additional improvements which will focus on further automation of existing processes to reduce the possibilities of errors.

**Planned Implementation Date:** Segregation of duties control improvements have been fully implemented as of March 4, 2013. Continuous process improvement is ongoing.

**Responsible Party:** Branch Manager, Client Financial Services

## **5. Conclusion**

The first objective of this project was to identify risks related to the revised engineering drawing review process and any controls or actions being undertaken that would assist in mitigating those risks. We compiled a list of risks that exist within the current process, the impact of those risks, and the controls or actions that management is currently undertaking to mitigate those risks.

The second objective of this project was to determine whether development securities collected as part of the servicing agreement are fair and equitable. Based on the work performed, we concluded that the development securities collected are fair and equitable.

We did, however, recommend that management further explore opportunities to allow developers to post additional forms of security. We also recommended that segregation of duties issues related to securities be resolved.

We also met with the Executive Director of the Urban Development Institute, Greater Edmonton Chapter, and discussed the project. The Director acknowledged the improved communication with the Current Planning Branch, but also supported the OCA position that further changes are needed to improve the timeliness of engineering drawing review. UDI believes that current development securities methodology and forms are fair and equitable; however, an opportunity may exist to improve the process by allowing the use of performance bonds for securities.

We thank the staff and management of the Current Planning Branch and the Client Financial Services Branch for their assistance and cooperation throughout this project.

# Administrative Update on the Development Securities Review

## **Recommendation:**

That the April 22, 2013, Sustainable Development report 2013SCP104, be received for information.

## **Report Summary**

The Manager of the Current Planning Branch requested the office of the City Auditor (OCA) assist with evaluating the servicing agreement process and securities process. In response, the Office of the City Auditor included a high-level review of the servicing agreement process in its 2013 Annual Work Plan.

## **Report**

The Development Coordination section of the Current Planning Branch is committed to meeting the needs of the Corporation to deliver services in an effective and efficient manner. Following its review, the Office of the City Auditor found the overall results showed that the development security process is fair and equitable and provided two recommendations.

### **Recommendation 1**

The Office of the City Auditor recommends that the Manager of the Current Planning Branch assesses the viability of allowing other forms of development security for servicing agreements.

#### *Response*

The Current Planning Branch is currently working to assess the viability of using other methods of securing obligations in Servicing Agreements through the document *Guidelines for Establishing Security in Servicing Agreements*. This includes:

- Reviewing the use of performance bonds in other municipalities of similar size to Edmonton as an alternative form of security
- Developing alternative methods of determining security requirements
- Assessing the risks associated with these alternatives
- Assessing the benefits associated with these alternatives

#### *Planned Implementation Date:*

Completed by third quarter – 2013

*Responsible Party:* Lead Development Engineer, Development Coordination, Current Planning Branch

### **Recommendation 2**

The Office of the City Auditor recommends that the Branch Manager, Client Financial Services, ensure that financial duties are adequately segregated to protect against the risk of errors and/or fraud.

#### *Response*

Client Financial Services initiated a review of existing business processes and accounting controls in mid 2012, prior to the Development Securities Review. The Client Financial Services review identified several areas where segregation of duties was not adequate. A number of actions including restructuring of duties have been implemented in order to achieve segregation of duties for collection,

administration, and release of development securities. These actions had a staged implementation starting in the fourth quarter 2012, with full implementation in early March 2013. Client Financial Services will continue to monitor these enhancements and look for additional improvements which will focus on further automation of existing processes to reduce the possibilities of errors.

*Planned Implementation Date:*

Segregation of duties control improvements have been fully implemented as of March 4, 2013. Continuous process improvement is ongoing.

*Responsible Party:* Branch Manager, Client Financial Services

### **Policy**

City Administration Bylaw 12005

### **Corporate Outcomes**

*The Way Ahead*, City of Edmonton Strategic Plan 2009-2018:

- Ensure Edmonton's Financial Sustainability

### **Others Reviewing this Report**

- L. Rosen, Chief Financial Officer and Treasurer, Financial Services and Utilities