



**A Report to the
Audit Committee**

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Audit of Metropolitan Nashville General Government Benefits

October 16, 2019

Metropolitan
Nashville
Office of
Internal Audit

EXECUTIVE SUMMARY

October 16, 2019



Why We Did This Audit

The audit was initiated due to the significant amount of funding involved in medical and pension benefits and the significant impact these benefits have on recruitment and the well-being of Metropolitan Government Nashville employees.

What We Recommend

- Conduct periodic audits of dependent eligibility and insurance claims processed by insurance carriers.
- Ensure that overpayments do not occur when a pension benefit is transferred to a survivor.
- Monitor supporting documentation from applicable charter schools to ensure the information provided is complete and accurate.

Audit of Metropolitan Nashville General Government Benefits

BACKGROUND

The Metropolitan Nashville Government offers a number of benefits to its employee including health insurance, dental insurance, vision insurance, life insurance, and disability insurance. The Metropolitan Nashville Government is self-insured for health insurance through the Employees' Medical Benefit Fund.

A service pension is available to prior and current vested employees that meet age and length of service requirements. Medical disability pensions are available for employees that have over ten years of service and can no longer perform their job duties.

OBJECTIVES AND SCOPE

The objectives of this audit are to determine if:

- Controls are in place to ensure that payments made to insurance carriers are only for eligible participants.
- Payroll deductions are accurate compared with current rate schedules.
- Controls are in place to ensure pension payments are correctly calculated, accurately paid, and stopped in a timely manner after pensioner death.
- Controls are in place for adherence to Metropolitan Nashville Code and policies regarding Injury on Duty pay and Medical/Injury-on-Duty disability compliance.

The scope of this audit included financial transactions from July 1, 2016, to October 31, 2018.

WHAT WE FOUND

The Human Resources Department has controls in place to ensure that employees are receiving enrolled benefits. However, dependent eligibility verification audits and insurance claims audits should be conducted periodically to ensure only eligible participants are receiving benefits and according to plan rules.

Service pensions are being processed accurately and disability pensions are being monitored. However, overpayments were identified in instances where a pension benefit was transferred to a survivor after pensioner death. In addition, verification of payroll information provided by charter schools could be improved.

GOVERNANCE

The Metropolitan Employee Benefit Board, established under Article 13 of the Metropolitan Nashville Charter, administers, manages, and coordinates employee benefit plans of the Metropolitan Nashville Government. The board consists of ten members, including the Director of Finance, three members appointed by the mayor, and five elected members including one from the Metropolitan Police Department, one from the Metropolitan Fire Department, two from other General Government departments, and one from retired employees.

The Metropolitan Employee Benefit Board relies on the Benefits division within the Human Resources department to assist with the implementation and administration of employee benefits.

BENEFITS OFFERED TO ACTIVE EMPLOYEES

Health Insurance

Currently there are two options available for health insurance coverage, BlueCross BlueShield Preferred Provider Organization (PPO) and CIGNA Choice Fund. Coverage is available at Individual, Family, or Employee plus Child(ren) levels. Both of these health plans are self-insured with Metro Nashville paying 75 percent of the premium and the employee paying 25 percent of the premium.

Dental Insurance

There are two dental plans available, Flexible or Limited, both provided by BlueCross BlueShield. The Metropolitan Nashville Government pays 100 percent of coverage at the individual level while employees pay the difference for family coverage.

Life Insurance

Active employees are provided with basic life insurance through Prudential. Coverage is \$50,000 for active employees under age 65 and \$32,500 for active employees over age 65. The cost of life insurance is covered entirely by the Metropolitan Nashville Government.

Service Pension

Employees are eligible to receive service pension benefits once they have reached the vesting period of five years if hired by January 1, 2013 or ten years if hired after January 1, 2013. Contributions towards the employee's pension are paid entirely by the Metropolitan Nashville Government. The employee's pension benefit is based on salary and years of service. Pension benefits may also be affected if pension benefits are left to the employee's survivor. An employee is eligible for a normal service pension based on their years of service and age. There are different age requirements for public safety employees and general government employees.

Disability Pension

Under the Metropolitan Nashville Government disability plan, there are two types of disability benefits;

1. Injury-on-Duty disability benefit for employees injured during the course of employment. The Metropolitan Nashville Government is not covered by Worker's Compensation Insurance but is self-insured with a substantially equal program.

2. Medical disability benefit for employees with an injury or medical condition that prohibits the employee's ability to perform their job duties. To qualify for a medical disability pension, employee must have ten years of service with the Metropolitan Nashville Government.

An employee who qualifies for a medical pension will receive 50 percent of their previous 12-months salary. An extra 10 percent is provided to employees with at least one qualified dependent child.

ADDITIONAL BENEFITS OFFERED TO ACTIVE EMPLOYEES

Vision Insurance

Vision insurance is available with a basic or enhanced plan through National Vision Administrators. The cost is paid entirely by the employee.

Short-Term Disability

Short-term disability insurance replaces a portion of an employee's pay of up to 180 days if disability occurs from injury, illness, or medical condition, including pregnancy and mental illness. The cost of the insurance is dependent on employee salary and is paid entirely by the employee.

Long-Term Disability

Long-term disability insurance provides a portion of an employee's pay should they become disabled by an injury, illness, or medical condition and cannot work. The cost of this benefit is based on employee salary and paid entirely by the employee.

Supplemental Life Insurance

Employees may sign up for additional life insurance in increments of \$10,000 up to \$200,000 when first eligible. Employees have the opportunity to increase up to \$500,000 with proof of good health at annual enrollment.

Flexible Spending Accounts

Flexible Spending Accounts allow employees to set aside tax-free dollars to use towards medical expenses incurred during the year.

Deferred Compensation 457 Plan

This program, governed by the Internal Revenue Service, allows employees to invest a portion of their earnings into a tax deferred account to use towards future retirement needs.

BENEFITS OFFERED TO PENSIONERS

Pensioners have the option of continuing their enrollment in health, dental, and vision benefits. However, pensioners who elect to opt out of health insurance without proof of coverage may not re-enroll at a future date. In order to preserve future rights to opt back in to Metropolitan Nashville insurance, the pensioner must show proof of other non-Medicare coverage at the time of the opt out and opt back into coverage within 60 days of an eligible change in status.

The Metropolitan Nashville government requires pensioners and their covered dependents to take Medicare Part A and Part B as soon as it is offered by the Social Security Administration.

Health Insurance

Pensioners have three options available for health insurance coverage, BlueCross Preferred Provider Organization, Humana, and CIGNA Choice Fund.

Humana is a Medicare Advantage Preferred Provider Organization and is only available to pensioners and their covered dependents that have Medicare Part A and Part B coverage. Humana is not a Medicare Supplement plan.

Dental Insurance

There are two dental plans available, Flexible or Limited, both provided by BlueCross BlueShield. The Metropolitan Nashville Government pays 100 percent of coverage at the individual level while employees pay the difference for family coverage.

Vision Insurance

Vision insurance is available with a basic or enhanced plan through National Vision Administrators. The cost is paid entirely by the employee.

Life Insurance

Pensioners are provided with \$10,000 in basic life insurance. This benefit is paid entirely by the Metropolitan Nashville Government.

FINANCIAL INFORMATION

Exhibit A contains benefits available to Metropolitan Nashville employees and the associated costs of the benefit. The cost is either paid entirely by the Metropolitan Nashville Government, paid entirely by the employee, or shared between the employee and the government depending on the benefit type.

Exhibit A – Benefit Costs by Fiscal Year

Benefit	FY2017	FY2018
Health Insurance*	\$231,985,305	\$237,408,190
Medicare Advantage Plan*	8,702,653	9,669,558
Dental Insurance*	10,500,147	11,295,048
Vision Insurance**	1,326,871	1,381,515
Basic Life Insurance***	4,838,359	4,904,105
Supplemental Life Insurance**	2,587,155	2,730,681
Injury-on-Duty***	15,482,238	15,875,022
Short-Term and Long-Term Disability Insurance**	2,358,115	2,530,512
Pension Payments***	165,678,870	172,745,433
Total	\$443,459,713	\$458,540,064

Source: Metropolitan Nashville Government's EnterpriseOne Financial System

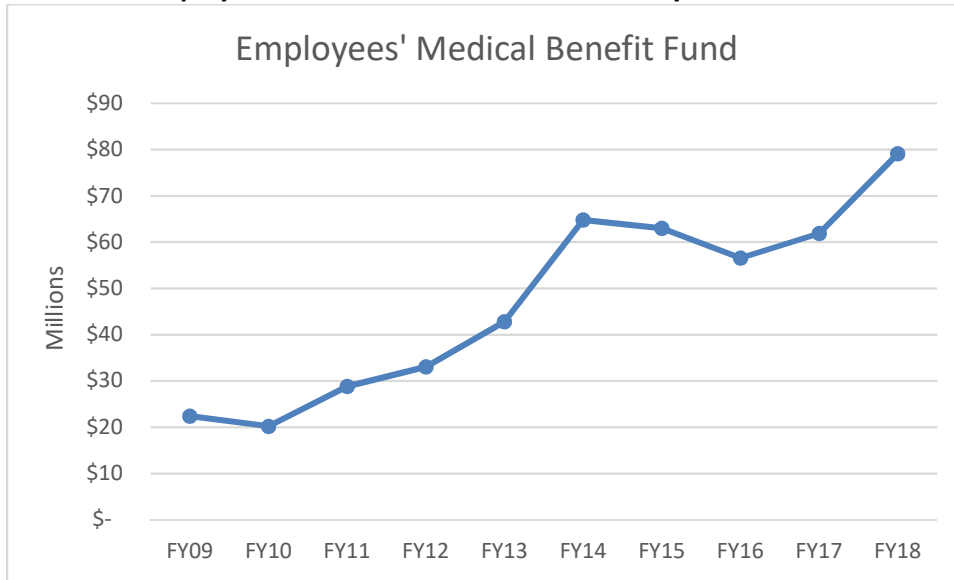
**Benefit cost shared between Metropolitan Nashville Government and employee.*

***Benefit paid entirely by employee.*

****Benefit paid entirely by the Metropolitan Nashville Government.*

Exhibit B illustrates the Employees' Medical Benefit Fund balance over the last ten fiscal years. The fund accumulates assets for the payment of self-insured medical claims. Contributions to the fund are made by insurance premiums. The cost of the premiums is shared between the employee/pensioner and the Metropolitan Nashville Government.

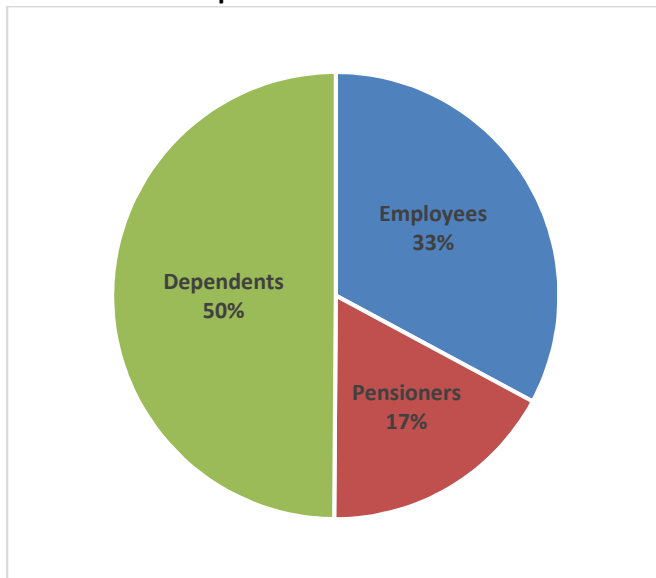
Exhibit B – Employees' Medical Benefit Fund Balance by Fiscal Year



Source: Metropolitan Nashville Comprehensive Annual Financial Report

Exhibit C illustrates a breakdown of the 35,394 individuals covered by the self-insured medical plans of the Metropolitan Nashville Government as of 10/31/2018.

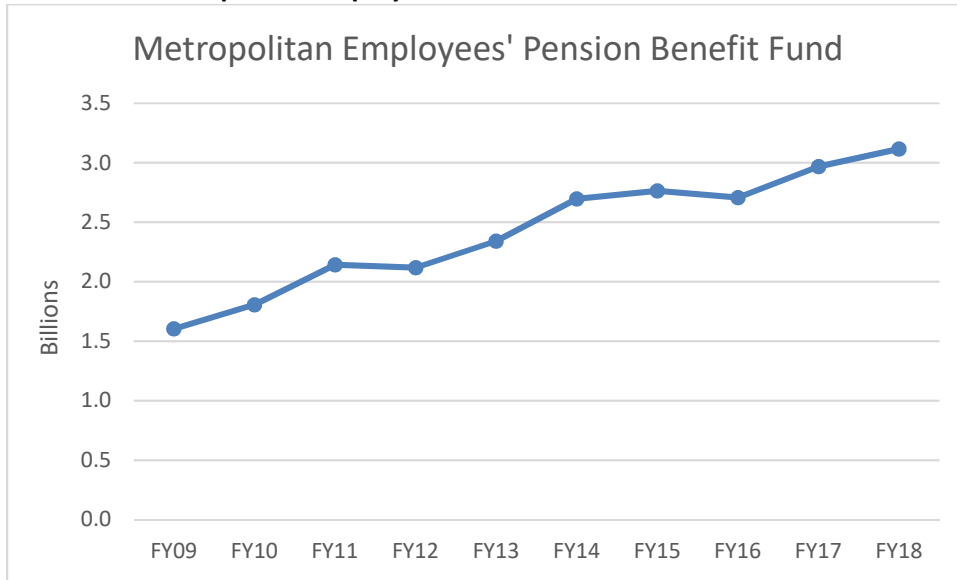
Exhibit C – Metropolitan Nashville Medical Plan Participants as of 10/31/2018



Source: Compiled by the Office of Internal Audit from medical plan carrier feeds provided by Metropolitan Nashville Human Resources.

Exhibit D illustrates the Metropolitan Employees' Benefit fund balance over the last ten fiscal years. The fund accumulates assets towards the payment of service and disability pensions. Contributions based on an actuarially determined percentage of employees' salaries are made into the fund. The current employer contribution rate is 12.340 percent.

Exhibit D – Metropolitan Employees' Pension Benefit Fund



Source: Metropolitan Nashville Comprehensive Annual Financial Report

OBJECTIVES AND CONCLUSIONS

1. *Are controls in place to ensure that payments made to insurance carriers are only for eligible participants as established by Metropolitan Nashville guidelines?*

Generally, yes. Terminated employees and dependents that reach the age of twenty-six are being removed from Metropolitan Nashville Government medical insurance. However, controls should be established to ensure only eligible dependents are participating in Metropolitan Nashville Government benefits. A dependent eligibility verification audit was conducted for a sample of 47 general government employees, 47 Metropolitan Nashville Public School employees, 36 charter school employees, and 47 pensioners. While no dependents were found to be ineligible for the employees/pensioners that responded to the audit, 21 out of 177 (12 percent) employees/pensioners did not respond to the audit. Accordingly, the eligibility of 49 dependents could not be determined.

Dependent eligibility documentation is not collected from newly hired employees. Per current Metropolitan Employee Benefit Board policy, employees will sign an affidavit certifying that benefit information is correct. The last dependent eligibility audit was conducted in 2014. The Human Resources department should commit to conducting a dependent eligibility audit every five years. (See Observation A.)

The Human Resources department uses a vendor to perform an audit of insurance claims to ensure that insurance carriers are processing claims according to plan rules and for eligible participants. Insurance claims have not been audited since 2013 and approximately \$1 billion in insurance claims have been paid out since the last audit. (See Observation A.)

Under Tennessee Codes Annotated § 49-13-119, charter schools have the option of participating in the group health insurance plans afforded Metropolitan Nashville Public Schools employees. As a result, charter schools can participate in the Metropolitan Nashville benefit plans like the support staff of Metropolitan Nashville Public Schools. The autonomy of charter schools makes the verification of personnel and payroll information difficult and increases the risk that ineligible employees will be included in the Metropolitan Nashville Government benefit plan. The Office of Internal Audit performed a review in order to verify the support status of 133 charter school employees that were included in the Metropolitan Nashville benefit plan. All 133 charter school employees on the Metropolitan Nashville benefit plan were found to be support personnel. However, there was one employee that had overstated earnings on a monthly billing for the employer pension contribution. (See Observation B.)

2. *Are payroll deductions for benefits deducted properly as compared with current rate schedules and employee election forms?*

Yes. Employee payroll deductions for benefits for a sample of 47 employees were accurate compared to current rate schedules. Benefits assigned to the sample of employees in the EnterpriseOne Financial System were reconciled to employee benefit enrollment forms on file with Human Resources department without exception.

3. *Are controls in place to ensure pension payments are correctly calculated, accurately paid, and stopped in a timely manner after pensioner death?*

Generally, yes. A sample of 47 service pensions initiated during the audit period were reviewed. Forty-seven out of 47 (100 percent) were approved by the Metropolitan Employee Benefit Board and the unreduced pension benefit was calculated correctly based on years of service and the average salary of the employee. Human Resources uses a vendor, Pension Benefit Information, to perform quarterly death audits to ensure pension payments are being stopped in a timely manner. The January 2019 Pension Benefit Information report was reviewed to ensure that payments for deceased pensioners were stopped timely.

Each month, Metropolitan Nashville Public Schools will bill charter schools for the employer portion of pension contributions. The Office of Internal Audit was able to review payroll records of 134 charter school employees and found that one employee had overstated earnings on a monthly billing for pension contributions.

A duplicate payment analysis was performed on pension payments made during the audit period. A total of \$18,212 in pension over/duplicate payments were discovered and were mostly connected to instances where a pension benefit transitioned to a survivor after pensioner death. (See Observation C.)

4. *Are controls in place for adherence to Metropolitan Nashville Code and policies regarding Injured-on-Duty pay and disability pension compliance?*

Yes. A sample of 47 injured-on-duty pay entries were reviewed. Injured-on-Duty pay was only paid to employees that had approved claims from Alternative Services Concepts, the administrator for the injured-on-duty claim process. Eight medical pensions initiated during the audit period were reviewed. Eight out of 8 (100 percent) of medical pensions were approved by the Metropolitan Employee Benefit Board, calculated correctly, and reduced when the medical pensioner was approved for Social Security Disability Insurance as required by the Metropolitan Nashville Code of Laws. Additionally, disability compliance was tested for 47 medical pensioners. Forty-seven out of 47 (100 percent) medical pensioners submitted annual questionnaires which allowed the Human Resources department to assess the medical condition of the pensioner and verify outside earnings with the Internal Revenue Service.

AUDIT OBSERVATIONS

Internal control helps entities achieve important objectives to sustain and improve performance. The Committee of Sponsoring Organizations of the Treadway Commission (COSO), Internal Control – Integrated Framework, enables organizations to effectively and efficiently develop systems of internal control that adapt to changing business and operating environment, mitigate risks to acceptable levels, and support sound decision-making and governance of the organization. See **Appendix B** for a description of the observation *Assessed Risk Rating*.

Observation A – Dependent Eligibility and Insurance Claims Audits

Dependent eligibility and insurance claims should be audited on a recurring basis. In 2000, KPMG performed a review of the Metropolitan Benefit Board processes and policies. The review noted that the process of collecting dependent eligibility documentation was burdensome for both employees and the board. A recommendation was made to the Metropolitan Benefit Board to stop the collection of dependent eligibility documentation and require new employees to sign affidavit that dependent information is accurate. This recommendation was approved by the board in 2001. A dependent eligibility audit was conducted in 2013 and 2014 which included every employee with dependents on Metropolitan Nashville Government medical insurance. An audit has not been conducted since that time and there is currently no policy in place that addresses how often a dependent eligibility audit will be conducted.

Human Resources management stated that a control to ensure the accuracy of claims paid by Metropolitan Nashville Government is to use a vendor to conduct a triennial audit of claims processed by insurance carriers. An audit of claims processed by Cigna and BlueCross BlueShield has not been performed since fiscal year 2013. Since the last audit, the Metropolitan Nashville Government has paid over \$1 billion in medical insurance claims.

As a best practice for strategic health-care plan design, the Government Finance Officers Association recommends the determination of cost containment measures which include conducting audits of dependents and insurance claims.

Criteria:

COSO, Control Activities—Principle 10—The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.

Government Finance Officer Association, Best Practices – Strategic Health-Care Plan Design

Assessed Risk Rating:

Medium

Recommendations for management of the Human Resources Department to:

1. Conduct a dependent eligibility verification audit every five years.
2. Conduct an audit of claims processed by insurance carriers on a triennial basis.

Observation B— Charter School Support Personnel

The process in which charter schools supply and Metropolitan Nashville Public Schools verify benefit and payroll information to be provided to the Human Resources Department needs improvement. Support personnel for charter schools are included in Metropolitan Nashville General Government benefits. The autonomy of charter schools creates a situation where the Human Resources department cannot monitor the eligibility of charter school employees nor the accuracy of salary information used for pension contribution calculations. As participants from the school district, the Human Resources department must rely on Metropolitan Nashville Public Schools to supply the necessary information on these charter school participants.

Charter school employees attend employee orientation with the Metropolitan Nashville Public Schools benefits division where insurance enrollment forms will be completed by the charter school employee. Each month, Metropolitan Nashville Public Schools will bill the charter schools for insurance premiums and the employer portion of pension contributions. This information is communicated on a spreadsheet. The spreadsheet is reconciled to the benefits administration system to ensure that changes in charter school personnel are accurately reflected in the benefits system. However, currently no controls are in place to ensure that ineligible certificated positions are included as support personnel. Additionally, no controls are in place to ensure that salary information is not overstated or understated which could lead to inaccurate employer contributions into the Metropolitan Employees' Benefit Trust or inaccurate pension calculations years in the future when the employee applies for a service pension.

The Office of Internal Audit received a legal opinion from the Metropolitan Nashville Law Department which stated that requesting and reviewing payroll records from charter schools was under the authority of the Metropolitan Nashville Government under the Charter School Contract. There are currently eight charter schools and academies that are participating in both Metropolitan Nashville General Government benefits and the pension plan. Each charter school was contacted in order to reconcile payroll information on the monthly billing spreadsheets to the charter school's payroll records and also verify that only support personnel were receiving Metropolitan Nashville General Government benefits.

The Office of Internal Audit was able to review payroll records and support status of 134 charter school employees. All the reviewed employees were found to be support personnel. There was one employee that had overstated earnings on a monthly billing for the employer pension contribution.

Management of the Human Resources Department believes the upcoming implementation of Oracle R12 will allow options for an interface between charter schools' systems and Oracle R12 which will allow the charter schools' payroll and benefits data to be readily available and accurate. The option would need to be further explored by appropriate parties including Metropolitan Nashville Information Technology Services who supports this platform. In the interim, the Human Resources Department has established procedures with Metropolitan Nashville Public Schools to collect this information but needs the assistance of Metropolitan Nashville Public Schools and the Office of Charter Schools to enforce the supply of accurate, complete, and timely data as required by the Metropolitan Nashville Human Resources Department.

Criteria:

- *COSO, Control Activities—Principle 10—The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.*

Assessed Risk Rating:

High

Recommendations for management of the Human Resources Department to:

Explore the possibility of having charter schools' human resources and payroll systems interface with Oracle R12 to ensure that accurate benefits and pension information is communicated to Metropolitan Nashville Human Resources Department.

Observation C – Overpayments Resulting from Survivor Pension Benefit Transfers

A total of \$18,212 in pension over/duplicate payments were made during the audit period. Twelve out of 13 overpayments were connected to instances where a pension benefit transferred to a survivor after a pensioner death.

A pension will be terminated on the date of pensioner death with the survivor's pension starting the next day. The deceased pensioner will receive the final pension payment on the last day of the month of death and the survivor will receive the initial pension payment the last day of the following month. Overpayments during this transition involved overlap where the deceased pensioner and the survivor would both receive payments on the same month.

Criteria:

- COSO, Control Activities—Principle 10—The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.

Assessed Risk Rating:

Medium

Recommendations for management of the Human Resources Department to:

Establish an extra layer of review when a pension benefit transfers from a pensioner to a survivor to ensure that the deceased pensioner's benefit stops on the correct date and the survivor's pension benefit begins on the correct date and no overlap occurs.

GOVERNMENT AUDITING STANDARDS COMPLIANCE

We conducted this performance 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 observations and conclusions based on our audit objectives.

METHODOLOGY

To accomplish our audit objectives, we performed the following steps:

- Interviewed key personnel within the Human Resources department.
- Reviewed and analyzed documentation for compliance with the Tennessee Code Annotated, Metropolitan Nashville Code of Laws, and other applicable laws, regulations, and policies.
- Evaluated internal controls currently in place.
- Reviewed sample selections to determine the effectiveness of internal controls.
- Considered risk of fraud, waste, and abuse.

AUDIT TEAM

Seth Hatfield, CPA, CIA, CFE, In-Charge Auditor

Bill Walker, CPA, CIA, CFE, Principal Auditor

Gina Pruitt, CPA, CITP, CISA, CHFP, CQA, CEMB, CGMA, CRISC, CCSFP, CHCO, Interim Metropolitan Auditor

John Cooper
MAYOR



Metropolitan Government of Nashville and Davidson County

Human Resources
Department
404 James Robertson Pkwy.
Suite 1000
Nashville, TN 37219

October 14, 2019

Metropolitan Nashville Office of Internal Audit
Attention: William Walker
404 James Robertson Parkway, Suite 190
Nashville, TN 37219

Dear Mr. Walker:

This letter is to inform you that the Metropolitan Nashville Human Resource Department has received the Draft Audit Report of General Government Benefits issued by the Office of Internal Audit. We have completed the Management Response Matrix, which is attached.

Our staff appreciates the findings in the report and anticipate a timely implementation of the recommendations contained within the report. We acknowledge the discoveries of your team and have begun the process of implementing the recommendations as noted in the Management Response Matrix. Please note that some of these findings and responses should also be addressed by other responsible Metro parties as outlined in the report and our responses including Finance and Metro Nashville Public Schools and their respective Charter partners.

The audit has been a positive experience for Metropolitan Government of Nashville & Davidson County Human Resource Department.

If further information is needed, please advise.

Thank you,

A handwritten signature in black ink, appearing to be "Shannon Hall".

Shannon Hall
Human Resources Director
Metropolitan Government of Nashville & Davidson County

APPENDIX A – MANAGEMENT RESPONSE AND CORRECTIVE ACTION PLAN

We believe that operational management is in a unique position to best understand their operations and may be able to identify more innovative and effective approaches, and we encourage them to do so when providing their response to our recommendations.

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
<i>Risk</i>	<i>Recommendations for the management of the Human Resources Department to:</i>		
M	A.1 – Conduct a dependent eligibility verification audit every five years.	Accept.	January 2021
M	A.2 – Conduct an audit of insurance claims processed by insurance carriers on a triennial basis.	Accept.	January 2021
M	C.1 – Establish an extra layer of review when a pension benefit transfers to a survivor to ensure that the deceased pensioner’s benefit stops on the correct date and the survivor’s pension benefit begins on the correct date and no overlap occurs.	Accept. The Human Resources Department and the Finance Department have established procedures to manage these manual processes in the current enterprise wide system which does not have systematic controls. We have also confirmed that there are systematic controls in place for the new enterprise wide Oracle e-Business Suite going live effective 9/1/2019. These controls will avoid situations from occurring in the future.	July 2019 and September 2019
<i>Risk</i>	<i>Recommendations for the management of Metropolitan Nashville Public Schools to:</i>		
H	B.1 - Explore the possibility of having charter schools’ human resources and payroll systems interface with Oracle R12 to ensure that accurate benefits and pension information is communicated to Metropolitan Nashville Human Resources Department.	Accept	December 31, 2020

APPENDIX B – MANAGEMENT RESPONSE AND CORRECTIVE ACTION PLAN

Observations identified during the course of the audit are assigned a risk rating, as outlined in the table below. The risk rating is based on the financial, operational, compliance or reputational impact the issue identified has on the Metropolitan Nashville Government. Items deemed “Low Risk” will be considered “Emerging Issues” in the final report and do not require a management response and corrective action plan.

Rating	Financial	Internal Controls	Compliance	Public
HIGH	Large financial impact >\$25,000 Remiss in responsibilities of being a custodian of the public trust	Missing, or inadequate key internal controls	Noncompliance with applicable Federal, state, and local laws, or Metro Nashville Government policies	High probability for negative public trust perception
MEDIUM	Moderate financial impact \$25,000 to \$10,000	Partial controls Not adequate to identify noncompliance or misappropriation timely	Inconsistent compliance with Federal, state, and local laws, or Metro Nashville Government policies	The potential for negative public trust perception
LOW/ Emerging Issues	Low financial impact <\$10,000	Internal controls in place but not consistently efficient or effective Implementing / enhancing controls could prevent future problems	Generally complies with Federal, state, and local laws, or Metro Nashville Government policies, but some minor discrepancies exist	Low probability for negative public trust perception
Efficiency Opportunity	An efficiency opportunity is where controls are functioning as intended; however, a modification would make the process more efficient			