

Audit Report

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**Comptroller of Maryland  
Compliance Division**

April 2017

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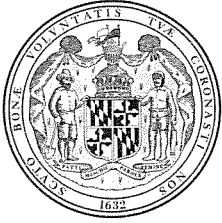
**OFFICE OF LEGISLATIVE AUDITS**  
DEPARTMENT OF LEGISLATIVE SERVICES  
MARYLAND GENERAL ASSEMBLY

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DEPARTMENT OF LEGISLATIVE SERVICES  
OFFICE OF LEGISLATIVE AUDITS  
MARYLAND GENERAL ASSEMBLY

Warren G. Deschenaux  
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Legislative Auditor

April 10, 2017

Senator Craig J. Zucker, Co-Chair, Joint Audit Committee  
Delegate C. William Frick, Co-Chair, Joint Audit Committee  
Members of Joint Audit Committee  
Annapolis, Maryland

Ladies and Gentlemen:

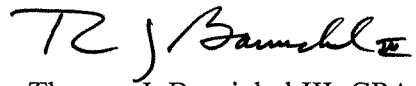
We have conducted a fiscal compliance audit of the Comptroller of Maryland – Compliance Division for the period beginning January 9, 2013 and ending March 15, 2016. The Division is primarily responsible for enforcement of all tax laws administered by the Comptroller of Maryland, including those relating to individual income taxes and business taxes such as corporate income, withholding, and sales and use taxes. The Division is also responsible for administering the Uniform Disposition of Unclaimed Property Act.

Our audit disclosed that the Division did not consistently perform one of its tax compliance programs and did not document the reasons or management approval for the related decisions. At the time of our review, the program to identify and pursue certain individuals, such as those who filed extensions but never actually filed the related income tax returns, was not performed for three of the last six tax years for which data were available. The two most recent tax years for which this program had been completed resulted in tax assessments totaling approximately \$75 million, although actual collections on assessments are normally less than the initial assessments.

Our audit also disclosed that tax assessments required when business taxpayers failed to file required tax returns were not always prepared and recorded timely. Furthermore, we identified certain internal control deficiencies with respect to cash receipts and adjustments to taxpayer accounts in the automated tax system.

The Comptroller of Maryland's response to this audit, on behalf of the Division, is included as an appendix to this report. We wish to acknowledge the cooperation extended to us during the course of this audit by the Division.

Respectfully submitted,

Handwritten signature of Thomas J. Barnickel III in black ink.

Thomas J. Barnickel III, CPA  
Legislative Auditor

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\* Denotes item repeated in full or part from preceding audit report

## **Background Information**

### **Agency Responsibilities**

The Compliance Division's primary responsibilities include enforcement of all tax laws administered by the Comptroller of Maryland, including those relating to individual income taxes, as well as business taxes such as corporate income, withholding, and sales and use taxes. Primary functions include conducting taxpayer audits and investigations, collecting delinquent taxes, and performing other taxpayer compliance activities. In conjunction with these functions, the Division levies tax assessments and processes tax appeals. Collection tools used by the Division include filing tax liens, issuing bank attachments, employing independent collection agencies, and other steps such as preventing the renewal of an individual's driver's license. The Division uses the Comptroller of Maryland's automated State of Maryland Tax (SMART) system to access, retrieve, and record tax data and other information as necessary. The Division is also responsible for administering the Uniform Disposition of Unclaimed Property Act.

According to the Division's records, as of June 30, 2016, outstanding individual income taxes (excluding interest and penalties) and business taxes that were subject to collection by the Division totaled approximately \$592 million and \$321 million, respectively. According to the State's records, during fiscal year 2016, the Division's operating expenditures totaled approximately \$33 million, and collections from its enforcement programs totaled \$618 million.

### **Status of Findings From Preceding Audit Report**

Our audit included a review to determine the status of the six findings contained in our preceding audit report dated January 14, 2014, including one finding relating to a function that was transferred during our audit period to the Comptroller of Maryland – Revenue Administration Division. We determined that the Division satisfactorily addressed four of these findings. The remaining two findings are repeated in this report.

# Findings and Recommendations

## Taxpayer Compliance Programs

### **Finding 1**

**The Compliance Division did not consistently perform one of its annual compliance programs to identify and pursue certain individuals who failed to file required income tax returns, and there was a lack of documentation of the reasons and management's approval for the related decisions.**

### **Analysis**

The Division did not consistently perform one of its annual tax compliance programs designed to identify and pursue certain individuals who failed to file required income tax returns. Specifically, our review of six effective tax compliance programs disclosed that one of the programs targeting certain non-filers had not been performed for tax years 2008, 2009, and 2011 as of August 2016. In addition, there was no documented explanation or management approval for not performing this program.

As a result, the Division lacked assurance that individuals specifically targeted by the program, such as those who filed extensions but had not yet filed the related income tax returns, eventually complied with the filing requirements and paid any resulting tax liabilities.

The Division has advised us that its intention is to perform this compliance program for each tax year; however, the program was not performed for these three tax years because available resources were allocated to other priorities, including compliance programs considered to be more successful in generating collections. Division management advised us that it does not intend to go back and conduct the program for those three tax years. While we recognize the need to consider available resources and potential collection results, other considerations, such as the need to enforce compliance with filing requirements, are important as well. Therefore, decisions to forgo programs should be formally justified, including with supporting data analyses, and approved by management.

The Division completed the non-filer program procedures for tax year 2010 in January 2015, and tax years 2012 and 2013 had been completed as of August 2016. (Data used for its compliance programs are typically not available for up to two years after the end of a tax year.) The program identified approximately 8,000 non-filers for 2012 and 2013, and resulted in assessments of \$75 million for those two years. During fiscal years 2013, 2014, and 2015, collections associated with the program totaled \$2.3 million. Collections may be less than assessments

for several reasons, including because the same tax liabilities could have been collected through other compliance program initiatives.

### **Recommendation 1**

**We recommend that the Division conduct this non-filer program each year or prepare and maintain adequate documentation containing the Division's analysis and reasoning, and management approval, when an established compliance program is not completed for a particular tax year.**

## **Business Tax Assessments**

### **Finding 2**

**The Division did not ensure that tax assessments for businesses that failed to file required tax returns were prepared and recorded timely in accordance with its procedures.**

### **Analysis**

The Division's business tax collection unit did not ensure that tax assessments were prepared, recorded in SMART, and billed on a timely basis to businesses who failed to file required business tax returns, such as for sales and use taxes and withholding taxes. During fiscal year 2015, assessments against businesses who failed to file required returns for those two tax types totaled approximately \$6.0 million, according to the Division's records. However, collection efforts cannot begin until tax assessments are prepared and posted to taxpayer accounts.

The Division's procedures specify that, when these accounts are identified, a notice and demand letter for each outstanding return is sent to the taxpayer who is provided 10 days to respond. If the taxpayer fails to satisfactorily respond to the demand letter within 10 days, the account is flagged for a tax assessment and, within 30 days, an assessor should calculate and prepare the assessment, including penalties and interest, based on historical data for the delinquent business or industry-wide data for like companies. Subsequently, the tax assessment is approved by supervisory personnel, which serves as authorization to post the assessment to the taxpayer's account in SMART and automatically bill the taxpayer.

Our test of 16 large dollar assessments totaling approximately \$6.4 million and prepared during fiscal years 2014 through 2016 disclosed that, for 12 assessments totaling \$5.1 million, the assessments were prepared 2 to 16 months after the notice and demand letters had been sent to the taxpayers. Also, for 7 assessments totaling \$1.6 million, the assessments were not posted to SMART until 47 to 141



days after the assessment calculations were prepared. A similar condition was commented upon in our preceding audit report.

**Recommendation 2**

**We recommend that the Division adequately monitor to ensure that business tax assessments are prepared and recorded on a timely basis (repeat).**

**Cash Receipts**

**Background**

In February 2014, the Comptroller of Maryland transferred the responsibility for operating the Compliance Division’s cash office in Baltimore to the Comptroller’s Revenue Administration Division (RAD), which has its main office in Annapolis. Our preceding audit report on the Compliance Division included a finding regarding certain control weaknesses pertaining to collections received in its cash office. Although responsibility for the cash office has been transferred to RAD, we addressed this prior finding during our current audit of the Division.

During calendar 2015, the Baltimore cash office received collections, consisting primarily of tax receipts, totaling approximately \$107 million, of which \$104 million was received in the form of checks, and the remainder in cash. Checks were endorsed, recorded in an automated check log, and then transferred to RAD’s office in Annapolis for processing and deposit. Cash received was recorded and deposited directly by the cash office.

**Finding 3**  
**Controls in the cash office were not sufficient to ensure collections were properly accounted for and deposited.**

**Analysis**

Controls over collections received in the cash office located in Baltimore were not sufficient. We noted the following conditions under which errors or other discrepancies could occur without timely detection:

- An employee responsible for processing collections, including recording collections on the automated check log, also had the capability to record payments in taxpayer accounts. Recording payments to taxpayer accounts was not this employee’s primary responsibility, but the employee had been granted this user access capability to assist in posting payments during the tax season.

- Independent verifications were not performed to ensure that all check collections were forwarded to RAD’s Annapolis office for deposit or, in the case of cash, were deposited directly. Although employees at the Annapolis office provided the cash office employees with documentation confirming receipt of the checks, that documentation was not compared to the cash office’s record of checks initially received and forwarded. Similarly, there was no verification performed of the record of cash received to validated deposit documentation received from the bank. As of December 31, 2016, the cash office no longer accepted cash as a form of payment.

Similar conditions were commented upon in our preceding audit report. The Comptroller of Maryland’s *Accounting Procedures Manual* requires the establishment of sufficient internal controls over collections, including adequate separation of cash receipt processing duties and independent verification of collections to deposit.

### **Recommendation 3**

**We recommend that the Comptroller of Maryland**

- a. ensure that employees who have access to collections in the Baltimore cash office do not have the capability to post payments to taxpayer accounts (repeat); and**
- b. ensure that an independent employee verifies, through an examination of appropriate documentation, that all collections recorded in the cash office were received by RAD’s Annapolis office for deposit (repeat).**

## **Adjustments to Taxpayer Accounts**

### **Finding 4**

**Critical adjustments to taxpayer accounts were not always reviewed and documented in accordance with the Division’s procedures.**

### **Analysis**

Certain critical adjustments to taxpayer accounts processed by one Division unit were not reviewed by supervisory personnel in accordance with the Division’s procedures, and we found that adequate supporting documentation was not always on file for adjustments made. There were primarily two types of direct adjustments: adjustments affecting taxpayer collections, such as a change in the tax year to which a taxpayer’s payment is applied, and adjustments to a taxpayer’s tax liability to increase or decrease the amount due. As a result, there was a lack of assurance that these critical adjustments were proper.

The Division's procedures specify certain parameters, such as dollar thresholds, as well as other requirements for the supervisory review and documentation of adjustments processed by the unit in SMART. Although output reports of both types of adjustments processed were generated for verification purposes, direct adjustments to a taxpayer's liability amount were not being reviewed. During the period from July 2013 through May 2016, adjustments that resulted in increases and decreases to taxpayer liabilities totaling \$2.3 million and \$3.4 million, respectively, were not subject to review.

In addition, the Division did not always have adequate documentation on file, such as an approved request form or documented supervisory review, to support both types of adjustments processed by the unit. Our review of 940 adjustments, processed over 18 days during fiscal years 2014 through 2016, disclosed that the Division did not have certain supporting documentation for 124 adjustments (13 percent), including 33 adjustments each over \$2,500. These 124 adjustments directly increased and decreased tax liabilities by \$760,872 and \$1,531,340, respectively, and increased and decreased collections by \$82,679 and \$60,148, respectively. Our review of 17 of the 124 adjustments disclosed the adjustments appeared to be appropriate based upon explanations provided by the Division as well as informal notes in SMART.

#### **Recommendation 4**

**We recommend that the Division ensure that all adjustments processed by the aforementioned unit are reviewed and approved in accordance with its procedures, and that adequate documentation supporting the adjustments and their review and approval is maintained.**

## **Audit Scope, Objectives, and Methodology**

We have conducted a fiscal compliance audit of the Comptroller of Maryland – Compliance Division for the period beginning January 9, 2013 and ending March 15, 2016. The audit was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

As prescribed by the State Government Article, Section 2-1221 of the Annotated Code of Maryland, the objectives of this audit were to examine the Division’s financial transactions, records, and internal control, and to evaluate its compliance with applicable State laws, rules, and regulations.

In planning and conducting our audit, we focused on the major financial-related areas of operations based on assessments of significance and risk. The areas addressed by the audit included the identification, assessment, and collection of individual income taxes and various business taxes; the identification, collection, and distribution of unclaimed property; and payroll. We also determined the status of the findings contained in our preceding audit report, including one finding related to certain cash receipt functions that were performed by the Compliance Division until being transferred to the Comptroller of Maryland – Revenue Administration Division in February 2014.

Our audit did not include certain support services (such as processing of invoices, maintenance of accounting records, and related fiscal functions) provided to the Division by the Comptroller of Maryland – Office of the Comptroller. These support services are included in the scope of our audits of the Office of the Comptroller. In addition, our audit did not include certain support services provided to the Division by the Comptroller of Maryland – Information Technology Division related to the procurement and monitoring of information technology equipment and services and the operation of the Annapolis Data Center. The operation of the Annapolis Data Center includes the development and maintenance of Division applications and maintenance of the operating system and security software environment. These support services are included in the scope of our audits of the Information Technology Division.

To accomplish our audit objectives, our audit procedures included inquiries of appropriate personnel, inspections of documents and records, observations of the Division’s operations, and tests of transactions. Generally, transactions were

selected for testing based on auditor judgment, which primarily considers risk. Unless otherwise specifically indicated, neither statistical nor non-statistical audit sampling was used to select the transactions tested. Therefore, the results of the tests cannot be used to project those results to the entire population from which the test items were selected.

We also performed various data extracts of pertinent information from the State's Financial Management Information System (such as revenue and expenditure data) and the State's Central Payroll Bureau (payroll data), as well as from the contractor administering the State's Corporate Purchasing Card Program (credit card activity). The extracts are performed as part of ongoing internal processes established by the Office of Legislative Audits and were subject to various tests to determine data reliability. We determined that the data extracted from these sources were sufficiently reliable for the purposes the data were used during this audit. We also extracted data from the Comptroller's SMART system, and the systems used by the Division to account for and monitor unclaimed property and business tax collections for the purpose of testing certain areas, such as collection activity and the disposition of unclaimed property. We performed various tests of the relevant data and determined that the data were sufficiently reliable for the purposes the data were used during the audit. Finally, we performed other auditing procedures that we considered necessary to achieve our audit objectives. The reliability of data used in this report for background or informational purposes was not assessed.

The Division's management is responsible for establishing and maintaining effective internal control. Internal control is a process designed to provide reasonable assurance that objectives pertaining to the reliability of financial records, effectiveness and efficiency of operations including safeguarding of assets, and compliance with applicable laws, rules, and regulations are achieved.

Because of inherent limitations in internal control, errors or fraud may nevertheless occur and not be detected. Also, projections of any evaluation of internal control to future periods are subject to the risk that conditions may change or compliance with policies and procedures may deteriorate.

Our reports are designed to assist the Maryland General Assembly in exercising its legislative oversight function and to provide constructive recommendations for improving State operations. As a result, our reports generally do not address activities we reviewed that are functioning properly.

This report includes findings relating to conditions that we consider to be significant deficiencies in the design or operation of internal control that could

adversely affect the Division's ability to maintain reliable financial records, operate effectively and efficiently, and/or comply with applicable laws, rules, and regulations. Our report also includes findings regarding significant instances of noncompliance with applicable laws, rules, or regulations. Other less significant findings were communicated to the Division that did not warrant inclusion in this report.

The response from the Comptroller of Maryland, on behalf of the Division, to our findings and recommendations is included as an appendix to this report. As prescribed in the State Government Article, Section 2-1224 of the Annotated Code of Maryland, we will advise the Comptroller of Maryland regarding the results of our review of its response.

APPENDIX



**Peter Franchot**  
*Comptroller*

**Sharonne R. Bonardi**  
*Deputy Comptroller*

April 4, 2017

Mr. Thomas J. Barnickel III, CPA  
Legislative Auditor  
Department of Legislative Services  
Office of Legislative Audits  
301 West Preston Street, Room 1202  
Baltimore, MD 21201

Dear Mr. Barnickel:

Enclosed is the Comptroller's response to your report on the Compliance Division for the period beginning January 9, 2013 and ending March 15, 2016.

We have carefully reviewed each finding, and we believe that our responses fully address each recommendation contained in the report. Should you need additional information or clarification, please contact Lindsay Welsh, Acting Director, Office of Risk Management by email at [lwelsh@comp.state.md.us](mailto:lwelsh@comp.state.md.us) or by telephone at 410-260-6156.

The Comptroller appreciates your objective appraisal of our operations and your recommendations for continuous improvement, and commends your auditors for their professionalism and thorough review.

Very truly yours,

Sharonne R. Bonardi  
Deputy Comptroller

Daniel C. Riley, Jr.  
Director, Compliance Division

cc: Honorable Peter Franchot, Comptroller

## **Finding 1**

**The Compliance Division did not consistently perform one of its annual compliance programs to identify and pursue certain individuals who failed to file required income tax returns, and there was a lack of documentation of the reasons and management's approval for the related decisions.**

The Division is nationally recognized for its compliance program initiatives. Since Fiscal Year 2009, these programs have generated more than \$440 million dollars in revenue for the state of Maryland. The Maryland Comptroller's Office has recaptured more than \$5 billion in delinquent taxes over the last ten years. In comparison, the specific compliance program identified in this finding, the Maryland Extension Non-Filer project, has generated only \$7 million since its implementation. Generally, the resources necessary to administer this project are greater than other similar projects due to the large number of phone calls received and correspondence that is generated. It must also be noted that with the existence of other non-filer projects in the State of Maryland, Maryland Extension non-filers are picked up in the routine course of the processing of other non-filer cases. The Division notes that with the exception of the years noted, the Maryland Extension Non-filer project has been run through the 2013 Tax Year.

The Division agrees that every effort should be made to follow up on any taxpayers that may not have properly filed returns or properly paid Maryland income taxes. However, the Division must be allowed to determine the best manner in which to allocate resources to address challenges in administering its projects. In the Compliance Programs Section of the Compliance Division, there are currently thirteen income tax matching projects, of which there are six projects that address non-filers through various sources of information.

At any given time, due to the number of projects that the Compliance Programs Section oversees, management decisions are made concerning when to run projects based on a number of key factors. These include the number of notices to be sent to taxpayers, statute of limitations, volume of taxpayer calls expected to be received, volume of correspondence which the Section expects to receive, and the potential tax revenue that may be collected. Projects for which little or no revenue is generated may be discontinued. It is the intention of the Division to run all of its projects each year, and based on the resources available, the Division will continue to work diligently to recover as much unremitted tax revenue as possible, but Management must have the discretion to determine where to allocate its resources for the benefit of the State and its taxpaying citizens.

*The Compliance Division agrees to OLA's recommendation to maintain documentation concerning the Division's determination and reasoning for the approval for **not** completing an established compliance program. This documentation will include factors that ensure that the determination factors in available resources and other constraints.*



## **Finding 2**

**The Division did not ensure that tax assessments for businesses that failed to file required tax returns were prepared and recorded timely in accordance with its procedures.**

The Division wants to emphasize that the assessments in question were issued well within the time required by Maryland law; therefore, there was no loss of revenue to the State of Maryland. The Division has voluntarily set standards that are greater than those that are statutorily required, and agrees that estimated tax assessments need to be closely monitored to ensure that tax assessments are prepared and posted in a manner consistent with established procedures.

It is also important to note that of the 12 large dollar assessments mentioned, only two had not been processed prior to the start of the audit by OLA, but were resolved prior to the completion of the audit. All of these assessments were issued in accordance with the standards set forth in state law.

*To continue with its commitment to excellence, the Division will ensure that established procedures will be followed so that estimated tax assessments are prepared and posted timely.*

### **Finding 3**

#### **Controls in the cash office were not sufficient to ensure collections were properly accounted for and deposited.**

The Comptroller's Office is pleased to note that the legislative audit did not identify any evidence of impropriety, fraud, or abuse on the part of the Revenue Administration Division (RAD) personnel. As noted by OLA, the responsibility for the administration of the cash office in the Baltimore Complex was transferred to the RAD in February 2014. The Compliance Division referred this finding to the RAD for a response.

RAD concurs with Recommendation 3a. Appropriate action has been taken such that employees who have access to collections do not have the capability to post payments to taxpayer accounts. The Division has also proactively initiated a management review of employee duties within the cash office and a segregation of responsibilities so that individual employees do not have the ability to both post payments to the check register and the ability to post payments to taxpayer accounts in the SMART system.

RAD has already taken steps to comply with Recommendation 3b. Collections received in the Baltimore cash office will be remotely deposited within that office and no longer sent to the Revenue Administration Division's Annapolis office for subsequent deposit. The Revenue Administration Division has instituted the use of the Trip 21/Fairfax system which allows for remote deposits. The Baltimore cash office ceased accepting cash payments as of July 1, 2016.

#### **Finding 4**

#### **Critical adjustments to taxpayer accounts were not always reviewed and documented in accordance with the Division's procedures.**

The Division notes that OLA did not find any instances of employee fraud, theft, or impropriety.

The Division found that, in each of the identified cases, the supervisor performing the adjustment review matched the automated output reports to the source documents, or to case notes in the SMART system when no physical documentation existed. For adjustment review purposes, supervisors and managers usually attach a "Collection Section Adjustment Request" sheet to the adjustment printout. However, in cases where there was no written documentation received, an online review of the adjustment is done based on the case notes.

The Division will review and revise current procedures to ensure that critical adjustments to taxpayer accounts are subject to review as recommended by OLA.

*The Division will update Personal Income Tax collections procedures relative to supervisory reviews to ensure that critical adjustments to taxpayer accounts are subject to review as recommended by OLA.*

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