



ATI COMPANY LIMITED

THE NATIONAL FOOD DISTRIBUTION TASK FORCE AGREED-UPON PROCEDURES REPORT



Mr. Simon Wilson
Financial Secretary
The Ministry of Finance
Cecil Wallace-Whitfield Centre
P. O. Box N 3017
Nassau, N.P., The Bahamas

RE: AGREED-UPON PROCEDURES REPORT

ATI Company Limited (“ATI”) has been contracted, pursuant to our engagement letter dated **December 17, 2021**, to conduct an agreed-upon procedures engagement for the office of the Financial Secretary of the Ministry of Finance (the “Ministry”). The Ministry has acknowledged that the agreed-upon procedures are appropriate for the purpose of the engagement.

We conducted the agreed-upon procedures engagement in accordance with the ***International Standard on Related Services (ISRS) 4400 (Revised)***, Agreed-Upon Procedures Engagements issued by the ***International Auditing and Assurance Standards Board (IAASB)***. An agreed-upon procedures engagement involves ATI performing the procedures agreed with the Ministry and reporting the findings. The findings are the factual results of the agreed-upon procedures performed. We make no representations regarding the appropriateness of the agreed-upon procedures.

Our report consists of a detailed listing of the procedures performed and our findings in relation to each procedure, including any errors or exceptions identified regardless of whether those errors or exceptions have since been rectified. The procedures that were executed are solely for the purpose of assisting the Ministry in its examination of the National Food Distribution Task Force (the “Task Force”) and the National Food Distribution Programme (the “Food Programme”). Our report is addressed to the Ministry and our report may not be suitable for another purpose. Use of our report is restricted to the Ministry and all other parties will be excluded from using the report.

This agreed-upon procedures engagement is not an assurance engagement, and we do not express an opinion or an assurance conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported.

ATI is independent of the Ministry in accordance with the ***International Ethics Standards Board for Accountants’ Code of Ethics for Professional Accountants (IESBA Code)***, and we have fulfilled our other ethical responsibilities in accordance with the ***IESBA Code***.

ATI Company Limited
March 29, 2022
Nassau, The Bahamas

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REPORT OVERVIEW

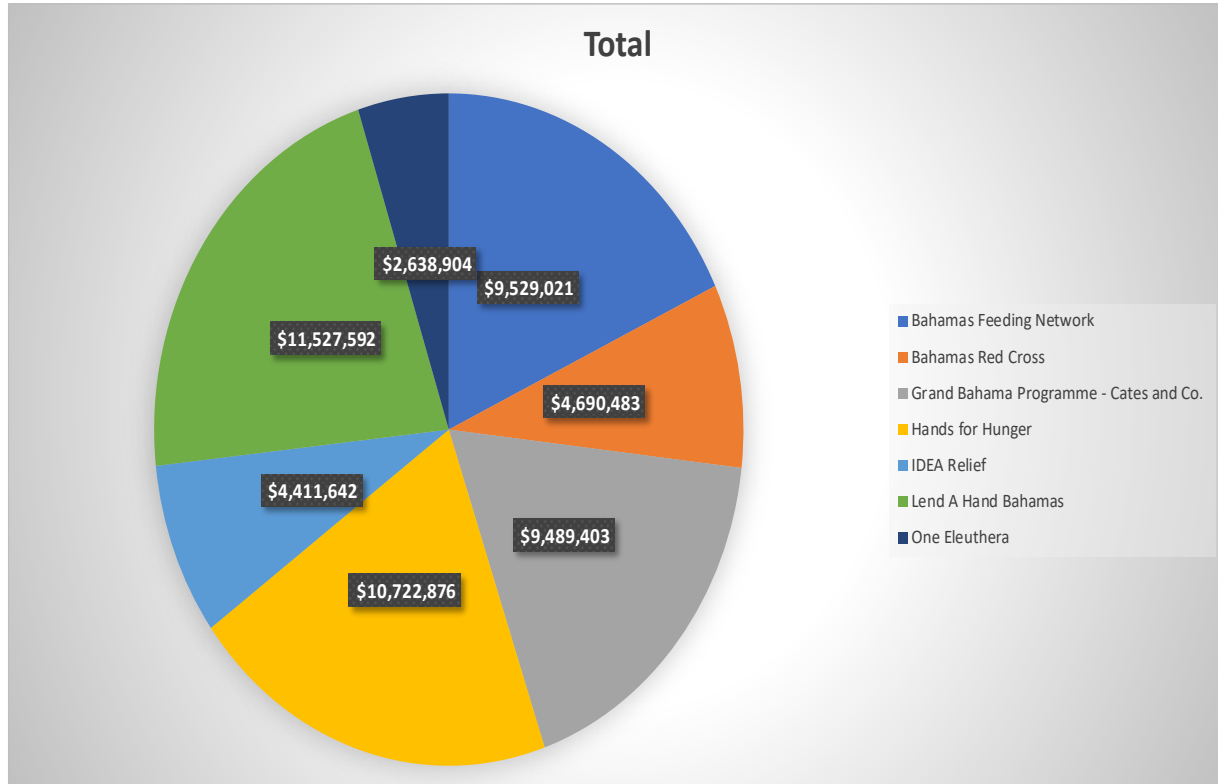
REPORT OVERVIEW

BACKGROUND – THE TASK FORCE AND FOOD PROGRAMME

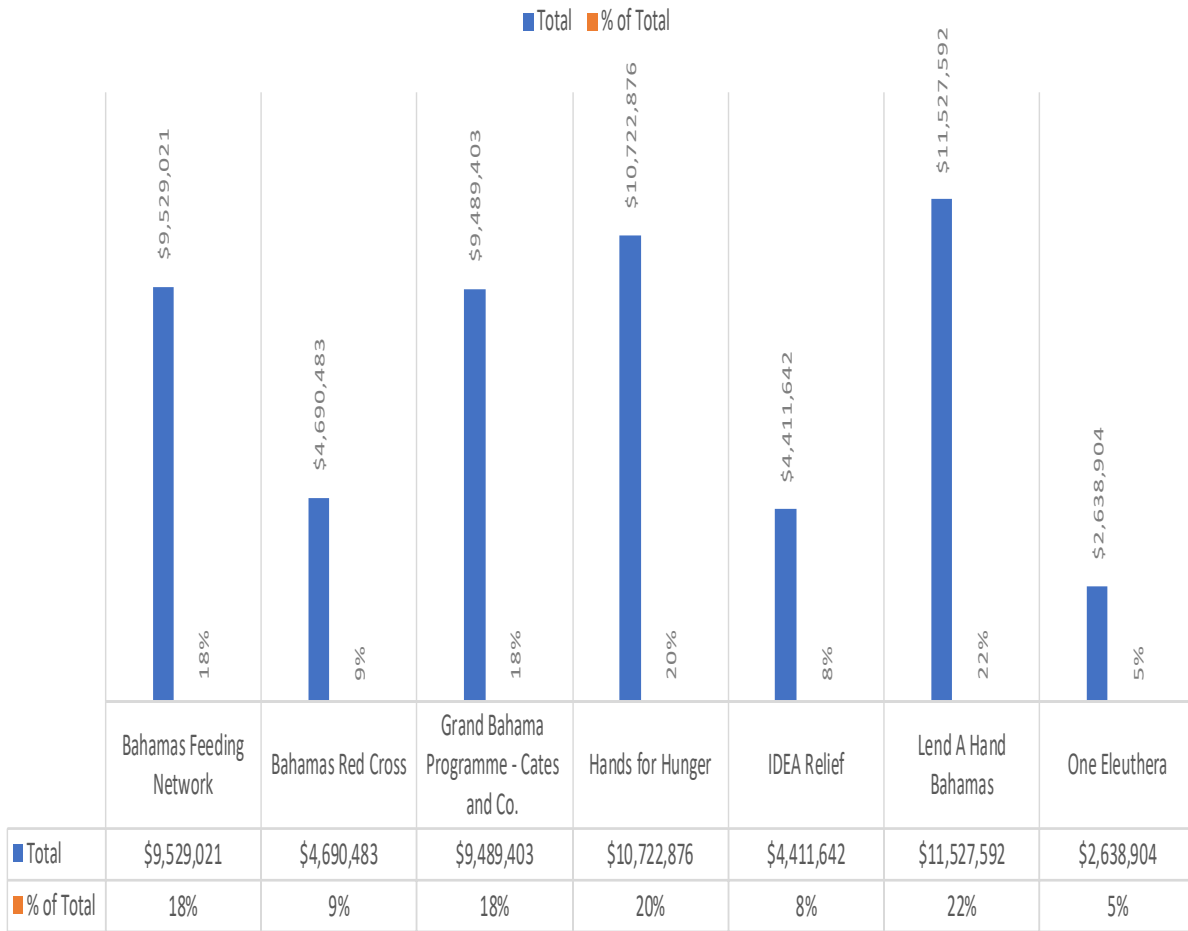
The National Food Distribution Task Force (the “Task Force”) was appointed in early **May 2020** by Cabinet Conclusion **ICC 16 (20) 10** with an initial term set for **April 15, 2020**, through **October 14, 2020**. Its function was to drive the coordination and collaboration of the Public and Private Sector and Non-Governmental Organizations (NGOs) with ensuring vulnerable persons were fed nutritious meals. The appointed Chairperson of the Task Force was Mrs. Susan Larson (“Chairperson”). The Task Force was to include suitable, qualified persons from the Public and Private Sector. All data collected during its operations was to become the property of the Government of The Bahamas (the “GOB”). Additional key points related to the Task Force are detailed below.

- ✚ New Providence and the Family Islands would be divided into zones and the zones would be assigned to a Lead NGO
- ✚ The Lead NGO would be assigned responsibility for purchasing and distributing food packages, food coupons or hot meals
- ✚ The GOB would contribute **85%** of the cost and the private sector **15%**
- ✚ Initially **twelve million dollars (\$12M)** was invested, and funds were to be distributed weekly
- ✚ By **ICC 37 (20) 19**, the mandate of the Task Force was extended to **December 31, 2020**, at a budgeted amount of **ten million dollars (\$10M)** per quarter
- ✚ A further extension was granted to **April 30, 2021**, by **ICC 2 (21) 6** at a budgeted amount of **ten million dollars (\$10M)**
- ✚ The last extension was granted to **October 4, 2021**

Government of The Bahamas Contribution Summary Tables



THE NATIONAL FOOD DISTRIBUTION PROGRAMME



OUTLINE

This Report is outlined in Sections based upon the agreed-upon procedures for the applicable organizations and entities. Sections included in this Report are listed below:

- ✚ The Task Force
- ✚ Participating Organizations
 - ◆ The Bahamas Feeding Network (the “BFN”)
 - ◆ Hands for Hunger (“HFH”)
 - ◆ The Bahamas Red Cross (the “BRC”)
 - ◆ One Eleuthera Foundation (“OEF”)
 - ◆ Grand Bahama Feeding Programme (“Cates & Co.”)
 - ◆ Lend a Hand Bahamas (“LAH”)
 - ◆ IDEA Relief
- ✚ The Department of Social Services (the “Department of SS”)

PERIOD

May 2020 through October 2021

DISCUSSIONS HELD AND FORMAL DATA REQUESTS

1. Meeting With the Financial Secretary

On Wednesday **December 29, 2021**, a meeting was held with Mr. Simon Wilson, Financial Secretary and Ms. Kershala Albury, ATI’s Principal Consultant. During this meeting, the following was discussed:

- ✚ Agreed-upon procedures detailed in our engagement letter dated **December 17, 2021**
- ✚ Information Provided by Entity (the “IPE”) detailed listings
- ✚ Onboarding details related to Mr. Joel Lewis, Permanent Secretary (“PS”) of the Ministry of Social Services and Urban Development (the “Ministry of SS & UD”)

2. Meetings With Mrs. Susan Larson, Chairperson of the Food Programme

Four virtual meetings were held with or included the Chairperson. The minutes from these meetings are included in [Appendix A](#) and the date of each meeting is outlined below.

Date of Meeting

- ✚ **December 15, 2021**
- ✚ **January 17, 2022**
- ✚ **January 24, 2022**
- ✚ **February 17, 2022**

3. Communication With Mr. Joel Lewis (PS of the Ministry of SS & UD)

During the week of **January 4, 2022**, Ms. Kershala Albury was formally introduced to Mr. Joel Lewis, PS of the Ministry of SS & UD. It was noted that Mr. Lewis and his team would be responsible for providing an official letter of instructions (See [Appendix B](#)) from the Ministry of Social Services and Urban Development to the Task Force and the organizations involved in the Food Programme. In addition to this letter, the associated IPE listing would be provided. The IPE listing is a detailed outline of the data and information requested.

4. The Ministry of SS & UD Request for Data, Documents and Relevant Support

During the week of **January 10, 2022**, Mr. Lewis, in an email correspondence, requested that the NGOs who partnered with the GOB, provide the data and documents detailed in the IPE listing, no later than Tuesday **January 18, 2022**.

On Monday, **January 24, 2022**, similar correspondence was provided to the NGO IDEA Relief as the Ministry of SS & UD was delayed in confirming IDEA Relief's contact information. As a result of this delay, the submission deadline for IDEA Relief was set for Friday, **January 28, 2022**.

Additionally, the Bahamas Red Cross, who was included in the initial request sent during the week of **January 10, 2022**, was forwarded a second correspondence on Monday, **January 24, 2022**, due to change in the Bahamas Red Cross' personnel.

Finally, on Wednesday, **January 26, 2022**, similar correspondence was sent for Grand Bahama's Food Programme to Mrs. Raquel Beneby-Hart, who was identified by the Chairperson of the Food Programme as the contact. Mrs. Beneby-Hart noted that she served as the Administrator in her response email dated **January 26, 2022**.

See [Appendix B](#) for details included in the initial request letters.

5. Meeting With the Chairperson of the Task Force, NGO Personnel, and The Ministry of SS & UD

On **January 20, 2022**, the Chairperson made a meeting request, via email correspondence, noting that Task Force NGO representatives had comparable questions. As such, a virtual meeting was held on Monday, **January 24, 2022**.

Refer to [Appendix A](#) for the minutes of the meeting held.

Points of mention are summarized below.

The Chairperson of the National Food Distribution Task Force expressed concerns that the timeline provided in the letters to the NGOs was insufficient and requested an extension of three additional weeks to provide the requested data.

Ms. Albury noted the below in regard to the request for an additional three weeks:

- ✚ A number of the items requested should have already been **completed** and **readily available**.
- ✚ There is a requirement for timely and accurate reporting related to public funds, which plays a role in promoting accountability and transparency.
- ✚ Items should be provided as soon as they are available, and the NGOs and Task Force did not need to provide all requested items at the same time.
- ✚ A three-week extension was not feasible; however, an alternative timeline would be considered and communicated.

Additionally, Ms. Albury requested that the NGOs provide their general ledger details as a matter of priority. The details were requested in **excel** and were to be uploaded to a SharePoint secure site created by Ms. Albury, specifically for the Food Programme. An upload folder was created for each NGO, department, and/or organization to facilitate the secure upload of documents.

Ms. Albury also discussed the scope of the work and stated that the **Ministry of SS & UD** were to be included when providing data as this was noted in the **Ministry of SS & UD's** request letter. Furthermore, Ms. Albury

stated that if there were any further questions, she could be reached by way of email correspondence and mobile communication.

6. The Ministry of SS & UD Extension Granted and Communicated

During the week of **January 24, 2022**, subsequent to the meeting held on **January 24, 2022**, the Ministry of SS & UD, disseminated an extension letter to the organizations involved in the Food Programme, granting a two-week extension, based on their original deadline.

See [Appendix B](#) for details included in the extension letters.

7. Meeting With the Chairperson of The Food Programme, and The Ministry of SS & UD

A virtual status update meeting was held on **February 17, 2022**. Refer to [Appendix A](#) for the meeting minutes.

Points of mention are summarized below.

- ✚ Mrs. Larson discussed the timeline and stated that she was not consulted on the timeline of the audit or the submission dates, including the extension granted and is extremely busy and is working **10 – 12** hours days and therefore finds the due dates to be unattainable.
- ✚ Ms. Albury stated that some documents were already *identified* as being prepared and available by Mrs. Susan Larson and should have been delivered already. All the requested data and documents were past due and considering that they were identified as available, these items should be sent immediately.
- ✚ Mrs. Larson stated that she could supply all documents by **March 18** and has every intention of working fully with the team, however, the time was colliding with her regular work.
- ✚ Ms. Albury highlighted, that it was previously discussed in other meetings¹, that requested items did not need to be provided all at once and some items should have been sent already as these should have been already prepared and available. Ms. Albury stated that the March timeline proposed was not an option.
- ✚ Mr. Lewis discussed NGOs holding excess funds and why the excess was not reported and returned. Mr. Lewis noted that one of the NGOs confirmed having close to two million dollars (**\$2M**) being held in suspense which represented a surplus amount.
- ✚ Mrs. Larson stated that she knew of no organization with a **\$2M** balance and therefore there was some miscommunication.
- ✚ Ms. Albury indicated that the amount was under **\$2M** and was approximately one million, eight hundred thousand dollars in surplus (**\$1.8M**).

8. ATI Communicated (Verbal and Written) With NGO's Representatives Throughout the Execution of the Engagement Procedures

¹ ATI initiated communication with the Chairperson of the Task Force on December 07, 2021 by way of electronic communication. Details relating to areas encompassed in the scope of work that were applicable to the Chairperson of the Task Force were included in the communication.

The first virtual meeting held with the Chairperson of the Task Force was on December 15, 2021. During this meeting, the Chairperson stated that she would begin to provide the requested data/documents at the beginning of the year 2022. Refer to Appendix A for the minutes of the meeting held.

REPORT SUMMARY

REPORT SUMMARY

Design and implementation of appropriate controls, along with the execution and monitoring of these controls, promote operational efficiency, safeguard resources and assets, and encourage compliance with the prescribed policies and procedures, laws and regulations and successful accomplishment of strategic task and goals.

During the conduct of our work, we identified the following deficiencies:

GENERAL FINDINGS

1. Controls detailed in the Draft Emergency Food Distribution Plan (the “Emergency Plan”) **were not appropriately designed and implemented**
2. There **was no evidence that controls operated effectively for financial reporting and monitoring**
3. Key business policies and procedures **were not documented or were not appropriately documented** in order to provide appropriate guidelines, standards, and necessary reference in the performance of the Food Programme’s operations
4. These **was no evidence provided** related to the validation or monitoring of vouchers issued
5. Detailed request for weekly vouchers **remained outstanding as at the date of this Report**
6. Participants **did not appear to have received and/or maintained sufficient and appropriate documentation and support related** to the Task Force’s and the Food Programme’s execution and operations, specifically for:
 - a. Reports monitoring and reconciling beneficiary distributions per their assigned zones (reports requested remained outstanding as at the date of this Report from NGOs)
 - b. Expenditures incurred and settled (insufficient support or no support provided for some samples tested)
 - c. Minutes from meetings held (**No minutes provided**)
7. There **were no minutes maintained**, as such, no **support was provided to corroborate** weekly meetings, instructions given/received, approvals agreed/granted, and changes made throughout the Food Programme
8. **Untimely submission** of data or **no data submission** was pervasive, and items remained outstanding from all entities as at the date of this Report
9. There **was no evidence observed** to support readily available data and documentation. This is detailed in the **Information Prepared by Entity (“IPE”)** listings included in this Report and in applicable sections
10. There **was no evidence of controls in place** to address data accuracy and completeness
11. Weekly Dashboards were to include data for aggregate expenditure amounts per vendor and were to indicate the amount of funds received for the Food Programme. The Weekly Dashboards provided **did not include supporting/underlying documentation or evidence of “random review”** detailed in discussions with the Mrs. Susan Larson, Chairperson of the Task Force
12. **Exceptions were noted** relative to required data inputs for “Weekly Dashboards
13. **Controls related** to the completion and submission of Food Distribution Task Force Request forms **did not operate effectively. Seventy-four percent (74%)** of the forms had **one signature** affixed thereon (count – 50), **Nineteen percent (19%)** had no signature (count – 13), and seven percent (7%) had two signatures affixed thereon
14. Material **inconsistencies were noted** between the Weekly Dashboards when compared with the Food Distribution Task Force Request form
15. **Inconsistencies were noted** between Food Distribution Task Force Request form when compared with the Department of SS’s and NGO’s records
16. There **was no evidence of the Task Force’s policies and procedures** related to the Food Programme. The Emergency Plan submitted and reviewed noted that Task Force objectives were to:
 - a. “Build on” the existing leadership, infrastructure, networks, and effectiveness of the established NGOs

- b. Establish a framework for financial accounting to be executed throughout the Programme
 - c. Establish a framework for analysis, monitoring, and reporting
17. There **was no evidence of the Task Force’s policies and procedures** in relation to vendor selections for the Food Programme
 18. **No evidence was provided to support the proper execution of “Due Diligence”** related to the organizations used during the Food Programme on behalf of the Department of SS

Sufficiency of documentation is often undervalued and overlooked. Sufficient and appropriate documentation coupled with controls that are at a minimum, satisfactory, can result in benefits that may result in increased reliability of financial reporting and related controls.

During the conduct of our work, we identified the following deficiencies:

SPECIFIC FINDINGS

1. **No evidence was provided** to support the provision of weekly reports to the Office of The Prime Minister (“OPM”) as detailed in the Emergency Plan
2. **No evidence was provided** to corroborate financial accounting and reporting submissions to the Government of The Bahamas (“GOB”) as detailed in the Emergency Plan
3. **No evidence was provided** to corroborate the submission of information/reports being provided to the Auditor General subsequent to the request for same made on **August 26, 2020**
4. **No evidence was provided** to validate that there were authorized contracts in existence between “Zone” leaders and supporting zones or other applicable areas/entities
5. **No evidence was provided** to validate that there were non-disclosure agreements in existence
6. We were **not provided with** Food Distribution Task Force Request forms for weeks **four (4)** and **sixty-nine (69)**
7. The structure/makeup of the Task Force **did not align with the GOB’s instruct**
8. Review / reconciliation procedures appeared to be **ineffective/ inadequate** based on errors noted during the work performed. These are summarized below:
 - a. Surplus amounts not known (material amounts – e.g., **\$1.8M**) by Task Force Chairperson and relevant persons in the Department of SS
 - b. **HFH approximately \$588K** erroneously classified
 - c. **OEF approximately \$20K** erroneous classified
 - d. **BFN \$10K** difference which remained outstanding as at the date of this Report
 - e. **\$58K** adjustment to records by the Department of SS
 - f. **\$64K** adjustment to records by the Department of SS
9. NGOs’ expenditures related to the Food Programme was concentrated to a minimal group of vendors and did not appear to be representative of a reasonably proportionate mix (with the exception of One Eleuthera Foundation who had a satisfactory expenditure mix)
 - a. BFN – Sysco accounted for approximately **two million seven hundred thousand dollars (\$2.7M)** or approximately **forty percent (40%)** of the costs during the Food Programme
 - b. HFH – Showman Ebistro accounted for more than **five million dollars (\$5M)** or more than **eighty percent (80%)** of the costs during the Food Programme
 - c. HFH Abaco – Price Right Ltd. (Maxwell’s Supermarket) accounted for approximately **one million five hundred thousand dollars (\$1.5M)** or approximately **thirty-two percent (32%)** of the costs during the Food Programme
 - d. The BRC – Super Value accounted for more than **one million dollars (\$1M)** or more than **fifty-five percent (55%)** of the costs during the Food Programme
 - e. Grand Bahama Food Programme – G B Food Co. accounted for more than **three million, eight hundred thousand dollars (\$3.8M)** or approximately **forty percent (40%)** and Sawyer’s Fresh Market accounted for more than **two million (\$2M)** or approximately **twenty one percent (21%)** of the costs during the Food Programme

- f. LAH – Did not provide requests as at the date of this Report
 - g. IDEA Relief’s submission was not timely; as such no expenditure procedure were performed as at the date of this Report
10. **No corroborating evidence** noted for all NGOs for which expenditure testing was conducted
- a. The BRC did not provide support for **42%** of the selection’s population value
 - b. OEF did not provide support for **6%** of the selection’s population value
11. **Insufficient corroborating evidence** noted for all NGOs for which expenditure testing was conducted
- a. BFN and OEF used emails used to process payments with no underlying support
 - b. BFN had to request support from the vendor used for one sample selected
 - c. HFH provided insufficient support for one of the samples selected
 - d. The BRC provided insufficient support for **2%** of the selection’s population value
 - e. OEF provided insufficient support for **62%** of the selection’s population value
12. Despite our requests, coupled with the Ministry of SS & UD’s requests, the NGOs outlined below did not submit data and documentation on timely basis or the requests remained outstanding as at the date of this Report
- a. ***The NGO Lend a Hand did not submit requested data as at the date of this Report***
 - b. ***The NGO IDEA Relief did not submit timely data (submission March 18, 2022) via email in pdf***
 - c. ***The Task Force did not submit timely data – items remain outstanding as at the date of this Report***
 - d. ***The Department of SS did not submit due diligence data requested***
 - e. ***All remaining NGOs have submitted partial data and have outstanding items as at the date of this Report***

THE NATIONAL FOOD DISTRIBUTION TASK FORCE

A. THE NATIONAL FOOD DISTRIBUTION TASK FORCE – REPORT ON FINDINGS

Overview of Approach During Our Work

- ✚ Conducted meetings with applicable persons to gain an understanding of the Task Force’s mandate, policies and procedures, its composition, and controls
- ✚ Confirmed and/or corroborated information and sources discussed during inquiry
- ✚ Randomly selected sample data/items for appropriate testing
- ✚ Inspected reports and/or other sources of information
- ✚ Recalculated data provided to verify amounts and investigated material differences noted
- ✚ Reviewed documentation provided

We requested the following documents from the Chairperson of the Task Force on **December 15, 2021**:

General Request

- i. Mandate of the Task Force
- ii. Composition of the Task Force
- iii. Amounts paid to the NGOs (e.g., a set amount per household/per person)
 - a. Basis on which payout amount was determined
 - b. Reports/data corroborating distributions
- iv. Reports prepared by the Task Force for the Department of SS
- v. Meeting minutes

Specific Request

- i. Governance policies and procedures
- ii. Beneficiary selection policy and procedure
- iii. Financial controls
- iv. Procurement process utilized
- v. List of vendors utilized for the Food Programme
- vi. Contracts for the Food Programme

The above listings do not represent an exhaustive list as additional documents/items/schedules would have been requested during the course of our work and are referenced throughout this Report.

1. WORK PERFORMED – REVIEW OF ELECTRONIC COMMUNICATIONS

ATI reviewed emails shared by Mrs. Lillian Quant-Forbes, Former Director of (the “Department of SS”) which included the below detailed information. See [Appendix A](#) for copies of the emails.

- i. Development of strict reporting requirements which were to be provided to the GOB indicative of monies spent with supporting documentation. See excerpt below taken from an email from the Chairperson dated **May 31, 2020**.
 - a. *“... we are developing strict reporting requirements to provide GOB with clear and transparent documentation on monies spent by the task force.”*
- ii. Communication/discussion for the weekly deposits made by the GOB to be transferred into a segregated account established specifically for this purpose of the Food Programme. See excerpt below taken from an email from the Chairperson dated **May 31, 2020**.
 - a. *“The task force and UB have entered into a partnership where UB will be assisting the task force with financial management. A segregated account has been established to receive Government deposits and we are developing strict reporting requirements to provide GOB with clear and transparent documentation on monies spent by the task force.”*
- iii. The “GOV Deposit Fund Account” would be used for the Food Programme’s donations and expenditures. See excerpt below taken from an email from Ms. Mary Mitchell, Treasury Department, dated **May 31, 2020**.
 - a. *“We have now opened up a Deposit Fund Account for the use of the National Food Distribution Task Force to deposit donations and make related payments. The deposit fund account will be managed through the Department of Social Services, and it is '044-9341-9999-011-5318297-21 Nat'l Food Distribution Fund.”*
- iv. Email request for reporting information dated **Aug 27, 2020**, from Mrs. Quant-Forbes to the Chairperson – See excerpt below.
 - a. *“Further to our Larson/Quant telephone dialogue of **26, August 2020**, I would be grateful if you will provide the information pertaining to the operation of The National Food Distribution Task Force as requested by the Auditor General, Mr. Terrance Bastian, in the meeting on **7, August 2020**. Mr. Bastian requested that the criteria for approval to receive food assistance from the NFDTF be provided in addition to the weekly lists of recipients from each zone leader to substantiate and support the weekly recipients increases and disbursements for funding to the various zone leaders. The lists could be crossed reference to show if persons were receiving assistance from more than one organization.”*
- v. Final determination of cost related to food packages and food vouchers appeared unclear based on the varying amounts noted in several emails.

FINDINGS:

- ATI requested copies of the policies and procedures documents established by the Task Force from the Chairperson, which were documented as required items to be provided to the GOB and these would indicate how monies were spent along with supporting documentation. See item i above. As at the date of this Report, the requested information remains outstanding.
- ATI requested bank account statements/details for the account referenced in item ii above from the Chairperson and was informed in an email response dated February 17, 2022, that the Task Force was an ad hoc committee and that it did not receive money directly from the Government. Donations made went directly to the NGO Zone Leaders and that the Task Force as an entity did not have a bank account.
- ATI requested account statements/details for the account numbered 044-9341-9999-011-5318297-21 referenced in item iii above from the Department of SS and was informed that GOB’s Treasury Department

executed all related payments and that they were not aware of the use of the account numbered 044-9341-9999-011-5318297-21.

- ATI requested copies of the information/reports that were to be provided to the Auditor General, referenced in item iv above, from the Chairperson and was informed in an email response dated February 17, 2022, that the requested information was “Not Applicable”. We also requested the information from the Department of SS who noted that information requested in the correspondence dated August 27, 2020, referenced in item iv above, was not met and therefore the Department of SS did not have the information.
- ATI noted that communications related to costs estimates changed several times during the Food Programme. Considering the unique nature of COVID-19 and the unpredictability related to the pandemic and its impact, it is reasonable to expect there to be costs changes. However, ATI was not provided with “Meeting Minutes” and/or similar and appropriate documents to verify that changes were appropriately approved. ATI reviewed email communications discussing possible changes. Additionally, ATI noted that the GOB pledged 85% and the Private Sector pledge 15% of the funding for the Food Programme. This split was applied during the Food Programme’s 2020 period but was not applied in 2021.

2. WORK PERFORMED – REVIEW OF EMERGENCY FOOD DISTRIBUTION PLAN, KEY PRIORITIES, AND INDICATORS

ATI performed a review of the Draft Emergency Food Distribution Plan (the “Emergency Plan”) which included the below detailed information. The Emergency Plan was provided by the Chairperson of the Task Force on **January 18, 2022**. See [Appendix D](#), which includes a copy of the Emergency Food Distribution Plan, for additional details.

- i. Situation analysis:
 - a. The availability of food for Bahamians impacted by COVID-19 and Hurricane Dorian
 - b. Social service mandate to aid Bahamian households in need
 - c. Work being done by NEMA and NGOs
 - d. The increase in need for assistance exceeding the response
 - e. The need to immediately respond to the call for assistance
- ii. Response criteria:
 - a. Rapid response required which could be achieved using the existing leadership, infrastructure, networks, and effectiveness of NGOs
 - b. The plan should be scalable and easily adaptable
 - c. The Task Force to provide supporting/coordinating infrastructure (i.e., a national database)
 - d. The Task Force would monitor and gather feedback and respond accordingly
- iii. Emergency response:
 - a. Establish zones and identify zone leaders
 - b. Define national standard and program duration
 - c. Create national database and require use
 - d. Prepare budget and secure funding
 - e. Disburse funds, monitor, and adapt
- iv. Identified national zones and zones leaders for:
 - a. New Providence
 - b. Grand Bahama
 - c. Abaco
 - d. Eleuthera
 - e. Family Islands

TABLE A² – DRAFT EMERGENCY FOOD DISTRIBUTION PLAN NATIONAL ZONES AND ZONE LEADERS

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NATIONAL ZONES & ZONE LEADERS				
NEW PROVIDENCE	GRAND BAHAMA	ABACO	ELEUTHERA	FAMILY ISLANDS
----- ZONE LEADERS -----				
Bah Feeding Network Bah Red Cross Hands for Hunger Lend-a-Hand Bahamas NPCC	National Food Committee GB	IDEA Relief	ONE Eleuthera	Bah Feeding Network Bah Red Cross
----- SUPPORTING NGOs ASSIGNED TO ALL ZONES -----				
All zones and zone leaders will be supported by Social Services, MOE, and other public sector players.				






DRAFT EMERGENCY FOOD DISTRIBUTION PLAN: Page 2 of 9

2 Tables were extracted from the Draft Emergency Food Distribution Plan (the “Emergency Plan”). The Emergency Plan was provided by the Chairperson of the Task Force on January 18, 2022.

ATI also performed recalculations and compared the amounts to the data noted within the Emergency Plan and noted no variances. Recalculations were performed for the examples provided for the methods used to calculate the estimated amount and the twelve-week scenario included in the Emergency Plan.

- i. Method to calculate the donation amount³

TABLE B⁴ – DRAFT EMERGENCY FOOD DISTRIBUTION PLAN CALCULATION METHOD

METHOD TO CALCULATE INVESTMENT					
1	 Zone population 1,000	 % population receiving vouchers 25 (250)	 % population receiving package 75 (750)	=	100%
2	 \$100* per week	 \$50* per week	\$6,250	\$9,375	= \$15,625
Per household (of 4)					
3	One-time scale-up cost to be calculated per zone			=	TBD
<hr/>					
Miscellaneous administrative and support expenses calculated at 8% per week				=	\$1,875
4	85% Government share \$14,875 per week	15% Private sector & NGO share \$2,625 per week	=		\$17,500
5	12 WEEKS @ \$14,875/week \$178,500	12 WEEKS @ \$2,625/week \$31,500	=		\$210,000 per sample zone of 1,000 people
Shared solely for audit purposes					
<p>The ability to accurately cost the national emergency food plan is severely impacted by a lack of reliable data, specifically how many people are in need. The national census is ten years old and estimates on population growth over the last decade vary. Dorian caused widespread displacement of persons in Abaco and Grand Bahama. It is still not known comprehensively who is where. Officially, the number and level of need of undocumented persons in The Bahamas, undoubtedly the most vulnerable sector of society when it comes to lack of food, is unknown, unacknowledged, or ignored. Record-keeping is disjointed and varies in scope and compatibility from agency to agency. Numerous assumptions must be made when bringing data from multiple sources together. This plan combines data from the National Insurance Board, the Department of Social Services, other sources, and data collected by NGOs on the ground. Therefore, the numbers of persons listed herein as “in need” are quite possibly low.</p> <p style="text-align: center;"><small>* National Task Force has agreed on food voucher standard and food package standard of \$100 and \$50 respectively</small></p>					






DRAFT EMERGENCY FOOD DISTRIBUTION PLAN: Page 5 of 9

³ ATI performed recalculations using the data noted thereon and noted no variances.

⁴ Tables were extracted from the Draft Emergency Food Distribution Plan (the “Emergency Plan”). The Emergency Plan was provided by the Chairperson of the Task Force on January 18, 2022.

ii. Estimated need for twelve weeks⁵

TABLE C⁶ – DRAFT EMERGENCY FOOD DISTRIBUTION PLAN ESTIMATED TWELVE WEEK AMOUNT

ANTICIPATED INVESTMENT SCENARIOS				
Estimated need scenario 12 weeks				
	Dept of Statistics 2014 calculation of people at poverty (12.8%). However, note globally, the % of households which experience food insecurity is often noted to be several percentage points higher than those falling below the poverty line.	Estimated 30% increase over the poverty figure during the last 6 years (including impact from Hurricane Dorian). This is 12,900 additional people, bringing total to 55,900.	Estimated 40% increase over the adjusted figure caused solely by COVID-19. This represents 23,100 additional people in need.	= 79,000 people
	Shared solely for audit purposes			
	43,000 people	+ 12,900 people	23,100 people	
	19,750 households 79,000 people (@ 4 persons/household)	 \$493,750 per week (25% of households)	 \$740,625 (75% of households)	= \$1,234,375 per week
	One-time scale-up cost to be calculated per zone			= TBD
	Miscellaneous administrative and support expenses calculated at 8 % per week			= \$98,750 per week
85% Government share \$1,133,156/week	15% Private sector & NGO share \$199,968/week		= \$1,333,125 per week	
12 WEEKS @ \$1,133,156/week \$13,597,872	12 WEEKS @ \$199,968/week \$2,399,625		= \$16,000,000 for 12 weeks	

⁵ ATI re-performed the calculation noted thereon and noted no variances.

⁶ Tables were extracted from the Draft Emergency Food Distribution Plan (the "Emergency Plan"). The Emergency Plan was provided by the Chairperson of the Task Force on January 18, 2022.

iii. Critical dates for implementation and the establishment for operations, monitoring, and reporting

TABLE D⁷ – DRAFT EMERGENCY FOOD DISTRIBUTION PLAN OPERATIONS, MONITORING, & REPORTING TIMELINES

CRITICAL DATES FOR IMPLEMENTATION Please note: due to slow GOB formal decision and cash flow, the dates below are no longer relevant	
Week of May 11	<ol style="list-style-type: none"> 1. Emergency Food Distribution Plan submitted to Cabinet for review. 2. OPM releases \$200,000 to National Food Distribution Task Force as good faith measure of support. Each of the eight NGO leaders receives \$25,000 to assist with outreach. 3. Zone Leaders establish "SINGLE INJECTION NEEDS" = funds to ramp up (in addition to scenario investments shown pages 6-8). 4. Detailed work on defining zones begins (input from relevant entities). 5. Zone leader entities are confirmed. 6. Zone supporting entities are identified. 7. Build quantitative framework for inclusion in plan with input from University of Bahamas. In discussion with Dr. Danny Davis, Assistant Vice President Institutional Strengthening and Accreditation. 8. Draft of written agreements begins to deepen transparency and accountability between zone leader and zone supporting entities. 9. Draft of framework for financial accounting is started. 10. End of week report to OPM on weekly progress.
Week of May 18	<p style="text-align: center;">Shared solely for audit purposes</p> <ol style="list-style-type: none"> 1. Cabinet concludes review and makes decision. 2. OPM releases another \$200,000 to National Food Distribution Task Force as continued good faith measure of support. Each of the eight NGO leaders receives a second \$25,000 to assist with outreach. 3. National Food Distribution Database in completed. 4. Percentage of total of people in need is agreed for each zone. 5. 6. Budget allocation is aligned with zone population size. 7. Framework for financial accounting is executed and submitted for Week of May 11. 8. Begin framework for monitoring "in need" adjust program outreach as required. 9. End of week report to OPM on weekly progress.
Week of May 25	<ol style="list-style-type: none"> 1. PM announces details of National Emergency Food Support Program. 2. OPM releases another \$200,000 to National Food Distribution Task Force as continued good faith measure of support. Each of the eight NGO leaders receives a third \$25,000 to assist with outreach. 3. National Food Distribution Database is in full use. 4. All budget details are confirmed. 5. Framework for financial accounting is executed and submitted for Week of May 18. 6. Finalize framework for monitoring "in need" and adjust program outreach as required. Report trends to OPM. 7. Full page ad appears in newspapers, news outlets, social media, etc. defining zones and zone leader contact information. 8. End of week report to OPM on weekly progress.

7 Tables were extracted from the Draft Emergency Food Distribution Plan (the "Emergency Plan"). The Emergency Plan was provided by the Chairperson of the Task Force on January 18, 2022.

Week of June 1	<ol style="list-style-type: none"> 1. Full weekly budgeted disbursements are made to National Food Distribution Task Force on Monday of each week moving forward and continuing until 12th week. Failure of Government to make payments on Monday will lead to immediate cessation of food distribution. 2. Detailed monitoring of food distribution trends will begin, coupled with on-going analysis with Dept Social Services, Dept Statistics, NIB, etc. 3. Monitoring of National Food Distribution Database and ground-truthing with NGO leaders. 4. Framework for financial accounting is executed and submitted for Week of May 25 and continues weekly until end of initial period. 5. End of week report to OPM on weekly progress. 6. Program implementation continues until end of initial period.
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DRAFT EMERGENCY FOOD DISTRIBUTION PLAN Page 9 of 9

- iv. ATI was also provided with three-scenario drafts related to costs/in need estimates (i.e., high, medium, and low). This was provided by the Chairperson of the Task Force on **January 18, 2022** (See [Appendix E](#) which includes a copy). We performed recalculations and noted no variances.
- v. ATI received and reviewed the Task Force’s key priorities and indicators from the Chairperson on **February 2, 2022**. The Task Force used the key priorities and indicators to identify households that were considered “highly vulnerable” and to assist in the Task Force’s determination of Food Programme recipients (See [Appendix D](#) for further details).

FINDINGS:

- ATI noted that the Task Force did not provide the below listed policy documents and support for procedures. ***Requests were made based on the Task Force’s Draft Emergency Food Distribution Plan which was reviewed during our examination.***
 - a. Framework for financial accounting and reporting (Reports that were to be provided to the GOB, indicating how monies were spent ***along with*** supporting documentation. (See also [Section A Subsection 1 item i](#))
 - b. Framework for monitoring “in need”
 - c. Weekly reports provided to the Office of the Prime Minister on progress
 - d. Copies of authorized agreements between zone leaders and zone supporting entities
- ATI noted no details relating to the monitoring of same. Further, the information received stated that the database did not reflect all the detailed information. See excerpt of the correspondence below.
- See excerpt below taken from an email from the Chairperson dated **February 2, 2022**.

“...It was known that in certain instances the database did not reflect all the detailed information as the households were in the Family Islands with limited internet access etc (this was true especially for Bahamas Feeding Network) so an additional allocation of 500 households was provided there.”

3. ADDITIONAL REQUESTS BASED ON WORK PERFORMED

Subsequent to ATI’s review of the Draft Emergency Food Distribution Plan, which was dated **May 12, 2020**, and provided to ATI on **January 18, 2022**, by the Chairperson of the Task Force, we requested the following data detailed in the excerpt below and the [Table E](#) which follows. The excerpt below was taken from ATI’s email to the Chairperson of the Task Force on **January 18, 2022**.

Excerpt of email dated January 18, 2022

I have reviewed the plan and detailed below are follow up queries/requests.

Throughout the footer of the document, it has “Draft;” is there a final version (that was submitted to Cabinet and approved)?

I noted a cost per household (of 4) of \$100 per food voucher and \$50 per food parcel (not inclusive of administrative expenses); was this the final cost utilized?

*The plan notes **implementation** of the items listed below. Please provide copies of the related documents for review.*

1. *Agreements between zone leader and zone supporting entities*
2. *Framework for financial accounting*
3. *Framework for monitoring in need*
4. *Weekly reports to OPM on weekly progress*

TABLE E – THE NATIONAL FOOD DISTRIBUTION TASK FORCE ADDITIONAL REQUESTS

ADDITIONAL REQUESTS

Name / Description of Document	Date Requested	Due Date	Date Received	Status / Notes
GENERAL REQUESTS -The National Food Distribution Task Force ("NFDT")				
Agreements between zone leader and zone supporting entities	01/18/2022	Past Due		Outstanding
Policies and Procedures For The Following:				
Framework for financial accounting	01/18/2022	Past Due		Outstanding
Framework for monitoring “in need”	01/18/2022	Past Due		Outstanding
Weekly reports to OPM on weekly progress	01/18/2022	Past Due		Outstanding

FINDINGS:

- ATI noted that at the date of this Report, we did not receive **ANY** of the documents requested and listed above. A listing of records, provided by the Chairperson of the Task Force, reviewed in preparation of this Report, is detailed in the Appendices of this Report.

4. WORK PERFORMED – MEETINGS HELD AND INFORMATION PROVIDED BY ENTITY ENGAGEMENT REQUESTS

We held a number of meetings with the Chairperson of the Task Force (see the [Report Overview Section](#) of this Report and [Appendix A](#) for further details) in order to gain an understanding of the Task Force and its operations. Key information discussed during these meetings included:

MEETING HELD ON DECEMBER 15, 2021

- i. The scope of the independent practitioner’s engagement and anticipated timelines
- ii. An overview of the Task Force’s set up and operations
- iii. The initiation of communication between the Office of the Prime Minister and the NGOs
- iv. Emergency plan
- v. Task Force weekly meetings
- vi. Creation of “Weekly Dashboards” for use
 - a. Every week, each NGO would enter data into the Weekly Dashboard. The data included (aggregate data):
 - i. Receipt of Government funding/income
 - ii. Expenditures
 - iii. Amount of food parcels and/or vouchers distributed
- vii. NGO record keeping process:
 - a. Each NGO kept their activity related to the Food Programme separated from the NGOs normal outreach programmes. All files and receipts related to the Food Programme were isolated as they could be randomly selected at any time for review by the Task Force (see note above)
- viii. Use of “Google” documents and spreadsheets to facilitate collaboration within the group
- ix. Overhead costs
- x. Contribution split (**85% GOB** and **15% NGOs**)
- xi. Listed lead NGOs
- xii. Task Force committee members

MEETING HELD ON JANUARY 17, 2022

- i. Scope discussed further – ATI communicated that inspection of documentation related to policies, procedures, revenue, expenditures, and other information deemed relevant would commence upon receipt of the requested items
- ii. ATI clarified onboarding (i.e., to whom should the items be provided). The Dept of SS would have initiated the requests, which provided the NGOs with authorization to provide the requested items to the independent practitioner and also provide the Dept of SS with a copy. Additionally, queries could also be sent to the independent practitioner with a copy to the Dept of SS
- iii. The Chairperson inquired about the completion date/timeline for the review
- iv. ATI noted that the work was to be done timely while maintaining accuracy and integrity in its execution. It was also noted that the timeline would also be dependent upon timely receipt of the requested items and queries and/or requests for additional information once ATI’s team would have reviewed what was provided

- v. The Chairperson inquired about the headlines in the media considering the work was just beginning and also noted that the headline was not favorable
- vi. ATI stated that media communications were not in the scope of ATI's engagement
- vii. The Chairperson asked if she should share what the NGOs had already provided to her as she would have requested data in **December 2021** after the meeting held with ATI on **December 15, 2021**
- viii. ATI answered in the affirmative and advised that they would follow up with any queries after review
- ix. ATI also informed the Chairperson that the IPE list would be provided (specific to the Taskforce)
- x. The parties agreed to meet weekly on Mondays at 2:30pm to address any queries or follow up on requests as deemed necessary. Changes to the agreed upon time and queries would be communicated in advance
- xi. The Chairperson noted the Dept of SS may need to review and amend the administrative head that the Dept of SS would have requested Grand Bahama's information from. The request was to be addressed to Mrs. Raquel Beneby-Hart

MEETING HELD ON JANUARY 24, 2022 (INCLUDED NGOS AND THE MINISTRY OF SS & UD)

Summarized in the [Report Overview Section](#) of this Report, (also see [Appendix A](#) for further details).

- i. Discussed timeline concerns and requested an extension of three additional weeks to provide the requested data
- ii. Response:
 - a. A number of the items requested should have already been completed and readily available⁸
 - b. The requirement for timely and accurate reporting related to public funds
 - c. Items should be provided as soon as they are available, and the NGOs and Task Force did not need to provide all requested items at the same time
 - d. A three-week extension was not feasible; however, an alternative timeline would be considered and communicated
- iii. The scope of the engagement was discussed (i.e., expectations related to inspection of documentation related to policies, procedures, revenue, expenditures, and other information deemed relevant) and onboarding (resources to be used to facilitate the exchange of data and requests and contact details for relevant persons)

MEETING HELD ON FEBRUARY 17, 2022 (INCLUDED THE MINISTRY OF SS & UD)

Summarized in the [Report Overview Section](#) of this Report, (also see [Appendix A](#) for further details).

- i. Reiteration of timeline concerns from the Chairperson and restatement of response based on expectations from the Independent Practitioner (see aforementioned meetings summarized above as communication remained in line with same)
- ii. The PS of the Ministry of SS & UD discussed NGOs holding excess funds and why the excess was not reported and returned.
- iii. The PS of the Ministry of SS & UD discussed an NGOs confirming having close to two million dollars (\$2M) being held in suspense which represented a surplus amount.
- iv. The Chairperson stated that she knew of no organization with a \$2M balance and therefore there was some miscommunication
- v. ATI indicated that the amount was under \$2M and was approximately one million, eight hundred thousand dollars ("\$1.8M") in surplus

REQUESTS FOR DATA AND INFORMATION

Below is an overview of communication and timelines related to the request for data and information. Additionally, the tables that follow detail and outline ATI's requests, the status of requests at the date of this Report, and where applicable, responses received.

⁸ 8 Minutes from the meeting held on January 17, 2022, noted that the Chairperson would share what the NGOs had already provided to her as she would have requested data in Dec 2021 after the meeting held with ATI on Dec 15, 2021. This was not done.

Further, the tables include ATI comments linking our requests to communications (e.g., emails received and reviewed, along with email excerpts from [Section A.1](#) of this Report) and discussions held with relevant parties (e.g., meeting discussions, questions, and answers provided).

On **January 13, 2022**, Mr. Joel Lewis, PS, of the Ministry of SS & UD, in an email correspondence, requested from the Chairperson of the Task Force, that the data detailed in the below [Table A](#) be provided to ATI. Also see excerpt of email below and [Appendix A](#) for additional details.

THE NATIONAL FOOD DISTRIBUTION TASK FORCE IPE REQUEST ELECTRONIC CORRESPONDENCE

Fw: RE: INFORMATION REQUESTED - FOOD DISTRIBUTION TASK FORCE

 JOEL LEWIS <JOELLEWIS@BAHAMAS.GOV.BS>
To: susanhlarsongmail@gmail.com
Cc: Kershala T. Albury

 Reply  Reply All  Forward  

Tue 18/01/2022 10:42 am

 Task Force - Information Provided by Entity Request (1) ATI (4).xlsx
13 KB

(See attached file: Task Force - Information Provided by Entity Request (1) ATI (4).xlsx)

Good Afternoon Mrs. Larson,

Please see form attached and information below from ATI Company requesting certain information regarding the Task Force.

Specific Request

- C. Documentation specific to the Task Force
- i. Governance policies and procedures
- ii. Beneficiary selections
- iii. Financial controls
- iv. Procurement process utilized
- v. List of vendors utilized for the programme

Kind Regards,

Mr. Joel Lewis
Permanent Secretary
Ministry of Social Services and Urban Development
Telephone: 397-8600

On **January 18, 2022**, Mr. Lewis, in an email correspondence, sent a follow up request. See excerpt of the follow up and the related email chain that followed.

THE NATIONAL FOOD DISTRIBUTION TASK FORCE IPE FOLLOW-UP REQUEST ELECTRONIC CORRESPONDENCE

Fw: RE: INFORMATION REQUESTED - FOOD DISTRIBUTION TASK FORCE

 JOEL LEWIS <JOELLEWIS@BAHAMAS.GOV.BS>
To: susanhlarsongmail@gmail.com
Cc: Kershala T. Albury

 Reply  Reply All  Forward  

Tue 18/01/2022 10:42 am

 Task Force - Information Provided by Entity Request (1) ATI (4).xlsx
13 KB

Good Morning Mrs. Larson,

This serves as a follow-up to my email dated 13th January, 2022 relative to the captioned subject matter. Please see email below for ease of reference and advise whether you are now in a position to respond.

Kind Regards,

Mr. Joel Lewis
Permanent Secretary
Ministry of Social Services and Urban Development
Telephone: 397-8600

EXCERPT OF THE CHAIRPERSON'S E-MAIL QUERY DATED JANUARY 18, 2022

"Members of the Task Force met yesterday to discuss the audit that is now underway and being led by Ms Albury and her firm. The meeting followed a brief discussion I had with Ms Albury during which we discussed process and expectations, etc. I relayed to the Task Force the points of my meeting with Ms Albury...."

"The process of the audit needs to be clearly articulated to us. Will both the ministry and the auditor request information? For clarity and minimizing duplication would it be better to have one entity making requests?"

ATI'S RESPONSE DATED JANUARY 18, 2022

"Response: The Department of Social Services' letter was to initiate the process and to provide authorization for the NGOs to share the requested information with me and for the NGOs to copy the Department of Social Services. Moving forward, the expectation is that additional requests and queries will emanate from my end. I will include/copy the Department of Social Services to ensure that they remain up to date and to avoid duplication of effort."

STATUS OF REQUEST FOR DATA AND INFORMATION AS AT THE DATE OF THIS REPORT

TABLE A – THE NATIONAL FOOD DISTRIBUTION TASK FORCE IPE LISTING WITH COMMENTS

THE NATIONAL FOOD DISTRIBUTION TASK FORCE

Name / Description of Document	Date Requested	Due Date	Date Received	Status / Notes
GENERAL REQUESTS -The National Food Distribution Task Force ("NFDT")				
The National Food Distribution Task Force ("NFDT") Organization / Structure Chart	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): Not applicable.</p> <p><i>ATI Comment:</i> Detailed below are notes taken from a virtual meeting held with Mrs. Larson on December 15, 2021. As such, request was made for the provision of documentation supporting the makeup of the Task Force.</p> <p><i>SL noted that the Taskforce's Board was made up of representatives from:</i></p> <ol style="list-style-type: none"> 1. Hands for Hunger 2. The Bahamas Feeding Network 3. Red Cross 4. Lend A Hand 5. IDEA Relief 6. One Eleuthera 7. Multi-Sectorial Committee used for Grand Bahama (SL noted that more details would be provided at a later time) 8. The Lyford Cay Foundation 9. The Organization for Reform 10. UNDP Bahamas 11. The Department of SS
Authorized and documented Task Force Mandate	01/13/2022	Received	01/18/2022	<p>Draft plan received</p> <p>Mrs. Larson's emailed response (dated Feb 17, 2022): This has been provided. I never took the time to update the footer so that it didn't say draft. I can do that if you'd like me to.</p>
Authorized signatory listing	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): Not applicable.</p> <p><i>ATI Comment:</i> Disbursement requests/ documents reviewed included an "authorized signatures" section with an identifier for a member and chairperson signature; as such, an authorized signatory list was requested.</p>

TABLE A – THE NATIONAL FOOD DISTRIBUTION TASK FORCE IPE LISTING WITH COMMENTS (CONTINUED)

Meetings minutes	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): No minutes. To do items were made on Zoom's chat feature that participating members made note of. Further reminders were sent via WhatsApp.</p> <p><i>ATI Comment:</i> <i>Requests for minutes made based on consideration that discussions and decisions made would be documented for future reference and information sharing as deemed necessary. Meeting minutes are considered "Best Practice" and are often considered a reliable verification resource.</i></p>
Procedure/ Process used to calculate and distribute benefits	01/13/2022	Received	01/18/2022	Calculation noted in draft plan received
General Ledger - NFDI	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): The Task Force as an entity did not keep a general ledger as it did not receive money directly. Funds went directly to the NGOs.</p> <p><i>ATI Comment:</i> <i>General ledger request based on the notes taken from the "Draft Emergency Food Distribution Plan" provided and emails reviewed indicative of:</i></p> <ol style="list-style-type: none"> <i>1. The establishment of a segregated account to receive Government deposits</i> <i>2. The implementation and monitoring of a financial accounting framework</i> <i>3. The implementation and execution of strict reporting requirements to provide GOB with clear and transparent documentation on monies spent by the task force</i>

TABLE A – THE NATIONAL FOOD DISTRIBUTION TASK FORCE IPE LISTING WITH COMMENTS (CONTINUED)

Trial Balance - NFDT	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): The Task Force as an entity does not have a Trial Balance as it did not receive money directly. Funds went directly to the NGOs.</p> <p><i>ATI Comment:</i> <i>Trial balance request based on the notes taken from the "Draft Emergency Food Distribution Plan" provided and emails reviewed indicative of:</i></p> <ol style="list-style-type: none"> <i>1. The establishment of a segregated account to receive Government deposits</i> <i>2. The implementation and monitoring of a financial accounting framework</i> <i>3. The implementation and execution of strict reporting requirements to provide GOB with clear and transparent documentation on monies spent by the task force</i>
All reports prepared by the NFDT	01/13/2022	Past Due		Outstanding
General policies and procedures documents	01/13/2022	Past Due		Outstanding
Contracts relating to the Food Programme	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): The Task Force as an entity did not enter into contracts.</p> <p><i>ATI Comment:</i> <i>Request made based on operations and engagement with various NGOs</i></p>
Policies and Procedures For The Following:				
NGO selections	01/13/2022	Past Due		Outstanding
Beneficiary Process/ Criteria and Selections	01/13/2022	Received	02/02/2022	Received

TABLE A – THE NATIONAL FOOD DISTRIBUTION TASK FORCE IPE LISTING WITH COMMENTS (CONTINUED)

Vendor Process/ Criteria and Selections	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): The Task Force as an entity did not develop an overarching vendor process. The strength of the Task Force was it tapped into the existing structures of NGOs already in the food assistance sector.</p> <p>ATI Comment: <i>Request made based on documentation noting monitoring and reporting requirements (i.e., the Task Force would have support for the existing structures relied on with monitoring and reporting of same).</i></p>
Government income received	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): The Task Force as an entity did not have an expenditures policy or procedure. The strength of the Task Force was that it tapped into the existing structures of the NGO Zone Leaders.</p> <p>ATI Comment: <i>Detailed below are notes taken from a virtual meeting held with Mrs. Larson on December 15, 2021. As such, request was made for the provision of documentation supporting the discussed process.</i> <i>SL noted that a "Dashboard" was also created for use, and every week, each NGO would enter data into the Dashboard. The data included</i></p> <ol style="list-style-type: none"> <i>1. Receipt of Government funding/income</i> <i>2. Expenditures</i> <i>3. Amount of food parcels and/or vouchers distribute</i> <p><i>See also notes documented related to general ledger, trial balance and bank account requests</i></p>
Expenditures	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): The Task Force as an entity did not have an expenditures policy or procedure. The strength of the Task Force was that it tapped into the existing structures of the NGO Zone Leaders.</p> <p>ATI Comment: <i>Detailed below are notes taken from a virtual meeting held with Mrs. Larson on December 15, 2021. As such, request was made for the provision of documentation supporting the discussed process.</i> <i>SL noted that a "Dashboard" was also created for use, and every week, each NGO would enter data into the Dashboard. The data included</i></p> <ol style="list-style-type: none"> <i>1. Receipt of Government funding/income</i> <i>2. Expenditures</i> <i>3. Amount of food parcels and/or vouchers distribute</i>
Financial Accounting and Reporting	01/13/2022	Past Due		Outstanding

TABLE A – THE NATIONAL FOOD DISTRIBUTION TASK FORCE IPE LISTING WITH COMMENTS (CONTINUED)

DETAILED REQUESTS				
<i>Weekly</i> Recipients lists disaggregated by <i>zone</i>	01/13/2022	Past Due		Outstanding
Bank account statement/ details for account set up to receive Government Distributions - NFDT	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): The Task Force was an ad hoc committee. It did not receive money directly from Government. Funds went directly to the NGO Zone Leaders. The Task Force as an entity did not have a bank account.</p> <p><i>ATI Comment:</i> <i>Bank account statement/ details for account requested based on email communication noting the establishment of a segregated account to receive Government deposits.</i> <i>Details of email reviewed (forwarded by Lillian Quant-Forbes to Kershala Albury for review)</i> <i>Email sent to: "Marlon Johnson", "Lillian Quant-Forbes" and "Viviana Gardiner"</i> <i>From: "Susan Larson"</i> <i>Date: 05/31/2020 08:43AM</i> <i>Subject: URGENT: Funding for National Food Distribution Program</i></p>
Weekly "Dash Board" reports - NFDT	01/13/2022	Past Due		Partially received on February 22, 2022. See Appendix which details the data provided.
Reports provided to the Auditor General	01/13/2022		See notes	<p>Mrs. Larson's emailed response (dated Feb 17, 2022): Not applicable</p> <p><i>ATI Comment:</i> <i>Report request based on email sent on Aug 27, 2020 from LQF to SL; see excerpt below -</i> <i>"Further to our Larson/ Quant telephone dialogue of 26, August 2020, I would be grateful if you will provide the information pertaining to the operation of The National Food Distribution Task Force as requested by the Auditor General, Mr. Terrance Bastian, in the meeting on 7, August 2020. Mr. Bastian requested that the criteria for approval to receive food assistance from the NFDTF be provided in addition to the weekly lists of recipients from each zone leader to substantiate and support the weekly recipients increases and disbursements for funding to the various zone leaders. The lists could be crossed reference to show if persons were receiving assistance from more than one organization."</i></p>

Subsequent to the meeting held on **January 24, 2022**, we requested the following items detailed in [Table B](#) below.

TABLE B – THE NATIONAL FOOD DISTRIBUTION TASK FORCE ADDITIONAL REQUESTS

ADDITIONAL REQUESTS

Name / Description of Document	Due Date	Date Received	Status / Notes
Non-Disclosure Agreements (Chairperson discussed in meeting held on 01/24/2022)	01/25/2022	Past Due	Outstanding

Note: This is not an exhaustive list and other documents may be requested for further testing. All requested documents will relate to the National Food Programme.

PROVISION OF DATA AND INFORMATION

The Chairperson of the Task Force provided ATI with the documents detailed below. The details of our work related to the documents and data is outlined in [Section A.2](#) of this Report.

1. Task Force Plan
2. Procedure/process used to calculate benefits
3. Beneficiary process/criteria selections
4. Weekly Dashboards – Partially received on **February 22, 2022**

FINDINGS:

- ATI requested copies of the policies and procedures documents established by the Task Force from the Chairperson. This request was based on our communications (e.g., emails received and reviewed) and discussions held with the Chairperson of the Task Force and the Department of SS personnel (e.g., meetings, questions, and answers provided). **Most of the requested items remained outstanding at the date of this Report.** In most instances we were informed by the Chairperson of the Task Force that the Task Force as an entity did not develop an overarching process and the Task Force tapped into the existing structures of NGOs already in the food assistance sector. We were provided with the documents listed in the section labelled “Provision of Data and Information” above. The Emergency Plan reviewed by ATI stated therein that:
 - a. The Task Force was to “build on” the existing leadership, infrastructure, networks, and effectiveness of the established NGOs; and
 - b. That a framework for financial accounting be established and executed throughout the Programme along with a framework for analysis, monitoring, and reporting.
- ATI requested copies of the Weekly “Dashboards” multiple times as we were informed by the Chairperson of the Task Force that these were submitted (with a minor delay at times) by each NGO on a weekly basis throughout the duration of the Food Programme.
 - a. **Considering that these Weekly Dashboards were prepared weekly and used throughout the Food Programme’s operations as per the Chairperson of the Taskforce, these records should have been readily available and able to be submitted in their entirety shortly after the request was made on January 13, 2022. As at the date of this Report, complete submission of all Weekly Dashboards remained outstanding; partial submission of these Weekly Dashboards was provided on February 22, 2022.**
 - b. **No Weekly Dashboard submissions were received for The Bahamas Feeding Network and for The Bahamas Red Cross as at the date of this Report. Weekly Dashboards for Hands for Hunger were partially provided as at the date of this Report.**

- ATI was not able to verify the Task Force’s “random review” outlined in [Section A.4](#) of this Report and noted below, as most of the items requested remained outstanding as at the date of this Report.
- ATI noted instances where the Food Distribution Task Force Request form was not signed or only signed by one person (authorized signatories noted on the form – Matt Aubrey, Member of the Task Force and Susan Larson, Chairperson of the Task Force. Details are included in [Section A.5](#) of this Report.
- ATI reviewed the Weekly Dashboards provided **on February 22, 2022**, by the Chairperson of the Task Force and noted:
 - a. That during the **2020** period of the Food Programme that funding contributions were split with **85%** being provided by the GOB and **15%** being provided by the Private sector. During **2021**, all expenditures related to the Food Programme was funded by the GOB’s contributions (i.e., **100%**); and
 - b. That the overhead cost related to the program ranged from **7% – 10%** for the NGOs reviewed during our work and is discussed further in the applicable Section(s) of this Report.
- ATI was unable to verify weekly meetings as there was no supporting minutes provided for same.
- ATI noted variations when we compared the structure of the Task Force based on our discussion with the Chairperson and the documents reviewed which were provided by the Ministry of SS & UD. We noted that the Department of SS was the only public sector body noted as being represented by the Chairperson. This was in contravention of GOB instructions reviewed (Cabinet documents) and shared with government personnel.
 - a. **Task Force Structure – Based on Ministry Documents⁹**
 - ♦ Inclusion of suitable and qualified persons from the Public Sector
 - An invitation from the Office of the Prime Minister was sent to the Permanent Secretaries at the Ministry of Health, Education, Social Services and Urban Development, National Security, Local Government, and Agriculture, and Marine Resources, to identify senior persons from their respective ministries to serve on the Task Force
 - ♦ Inclusion of suitable, qualified persons from the Private Sector (to be done by the Chairperson)
 - b. **Task Force Structure – Chairperson**
 - ♦ Hands for Hunger
 - ♦ The Bahamas Feeding Network
 - ♦ The Bahamas Red Cross
 - ♦ Lend A Hand
 - ♦ IDEA Relief
 - ♦ One Eleuthera
 - ♦ Multi-Sectorial Committee used for Grand Bahama (Task Force Chairperson noted that more details would be provided at a later time)
 - ♦ The Lyford Cay Foundation
 - ♦ The Organization for Reform
 - ♦ UNDP Bahamas
 - ♦ The Department of SS

⁹ We reviewed files maintained by the Office of the Prime Minister and Financial Secretary

- ATI noted that the Chairperson of the Task Force, on **February 17, 2022**, expressed that she was not aware of several NGOs holding surplus amounts (contribution amounts that exceeded expenditures incurred) at the culmination of the Food Programme on **October 4, 2021**; notwithstanding Weekly Dashboards used by the Task Force for tracking and review.
- ATI noted that contribution and expenditure data included in the Weekly Dashboards represented aggregated amounts and no underlying support such as general ledger details, supporting schedules, and/or other supporting documents were provided. These underlying items form an integral part of substantiating evidence which corroborates the information included in the Weekly Dashboard reports.

5. WORK PERFORMED – REVIEW OF TASK FORCE DISBURSEMENT REQUEST FORMS AND WEEKLY DASHBOARDS

On **February 22, 2022**, we received hard copies of Disbursement Request Forms and Weekly Dashboards from the Chairperson of the Task Force. See the “[Document Index](#)” for an outline of what was received. Data provided was a **partial submission** of the requested items and as at the date of this Report no additional documents were provided.

The Disbursement Form included the following data details:

- ♦ Week Number
- ♦ Week Date (Beginning)
- ♦ Zone Leader
- ♦ Zone Leader’s Banking Account Details
- ♦ Population Size
- ♦ Household Count
- ♦ Fund Amount
- ♦ Totals
- ♦ Authorizing Signatures

The Weekly Dashboards included the following data details:

- ♦ Week Number
- ♦ Week Date (Beginning)
- ♦ Zone Leader
- ♦ National Zone
- ♦ Start Population
- ♦ End Population
- ♦ Estimated Weekly Calculations:
 - Population Size
 - Households
 - Percentage of Vouchers
 - Percentage of Food Parcels
 - GOB Amount
 - NGO Amount
 - Budget vs Actuals Vouchers and Food Parcels and Difference
- ♦ Income
- ♦ Expense
- ♦ Signature

Procedures performed – Disbursement Request Forms:

- ♦ Randomly selected forms for appropriate testing
- ♦ Footed and cross footed balances
- ♦ Reviewed details and traced to the Department of SS’s records (week, date, amount, NGO)

- ◆ Compared Disbursement Request Form total to NGO general ledger total
- ◆ Identified variances

Procedures performed – Weekly Dashboards:

- ◆ Randomly selected forms for appropriate testing
- ◆ Footed and cross footed balances
- ◆ Reviewed prior week’s Weekly Dashboard and compare to data included in the following weeks Disbursement Request Form¹⁰
- ◆ Traced data included in Weekly Dashboard as income received to NGO general ledger details
- ◆ Identified variances

FINDINGS:

We made the following observations:

- ATI noted instances where the Food Distribution Task Force Request form was not signed or only signed by one person. See details below.

Description	Count	% of Total
One Signature	50	74%
No Signature	13	19%
Two Signatures - Per Authorized Signatories Noted on the Form	5	7%
Task Force Distribution Forms Provided	68	100%

- ATI was not provided with Food Distribution Task Force Request forms for weeks four (4) and sixty-nine (69). The percentages in the table above are representative of what was received.
- ATI was not able to match/trace amounts noted in the Food Distribution Task Force Request forms using the “Week and Date Identifiers” to the Department of SS’s workbook (we also used the Week and Date identifiers noted in the Department of SS’s workbook). Weeks assessed are outlined below:
 - Week three (3)
 - Week twenty-five (25)
 - Phase three (3) week (68)
- ATI noted that the Food Distribution Task Force amounts **exceeded** the amounts ATI verified using the Department of SS and the Treasury records (two weeks were also not included per the data details submitted by the Task Force). See details below related to samples assessed:

NGO	Verified Amount (DOSS & Treasury)	Task Force Disbursement Form Amount	Difference
HFH	10,722,876	11,153,731	- 430,855
OEF	2,638,904	2,763,866	- 124,962
GB-FP	9,489,403	9,601,522	- 112,119

¹⁰ Documents reviewed stated that the prior week would be used as an estimate to determine the coming need

- ATI was not able to verify the Task Force’s “random review” outlined in Section A.4 of this Report and noted below, as most of the items requested remained outstanding as at the date of this Report.
 - a. *Underlying supporting information and documents were not included in these weekly submissions. The Chairperson noted that she would randomly select weeks and would request that the NGOs provide her with the support for her selections to be reviewed.*

- ATI noted inconsistencies when comparing the Weekly Dashboards with the Food Distribution Task Force Request form (both provided by the Chairperson of the Task Force). This is discussed below:
 - a. Noted estimates used in the coming week were noticeably more or less than actuals for the previous week per the Weekly Dashboards (ATI considered rounding). This included the amount of funds, the population size, and the number of households
 - b. Weekly Dashboards included a calculated amount for “Administration Cost” along with disaggregated amounts that would be classified as administration cost
 - ATI also reviewed expenditure amounts in NGO general ledgers with descriptive indicating “administration” cost and individual costs amounts for shipping, trucking, packaging, fuel, and similar expenditures that would be classified as administration cost. As such, the cost considered “administration” and covered under the calculated percentage was unclear. See image in [Table A](#) below.
 - c. Various Weekly Dashboards did not include the funds received from the GOB
 - d. Many of the Weekly Dashboard input data points were blank

TABLE A – ADMINISTRATION COST

-----Forwarded by LILLIAN QUANT-FORBES/DOSSF/BAHAMASGOV on 12/14/2021 11:59AM -----
 To: "Susan Larson" <susanhlaron@gmail.com>
 From: "Will Tomlinson" <will@idearelief.org>
 Date: 05/26/2020 08:35PM
 Cc: "Jessica Paton" <jessica@holisticrl.com>, "LillianQuant-Forbes@Bahamas.gov.bs" <LillianQuant-Forbes@bahamas.gov.bs>, "Shelagh Pritchard" <shelagh@lendahandbahamas.org>, "bahamas.nfstf@gmail.com" <bahamas.nfstf@gmail.com>, "directorgeneral@bahamasredcross.org" <directorgeneral@bahamasredcross.org>, "epinder@unicef.org" <epinder@unicef.org>, "fhumblestone@lyfordcayfoundations.org" <fhumblestone@lyfordcayfoundations.org>, "jimrichard@oneeleuthera.org" <jimrichard@oneeleuthera.org>, "keisha@handsforhunger.org" <keisha@handsforhunger.org>, "lucas@lendahandbahamas.org" <lucas@lendahandbahamas.org>, "maubry@orgbahamas.com" <maubry@orgbahamas.com>, "raquelbenebyhart@bahamas.gov.bs" <raquelbenebyhart@bahamas.gov.bs>, "smithsphilip09@gmail.com" <smithsphilip09@gmail.com>
 Subject: Re: Criteria and value of food parcels discussion

Understood I will need to adjust that 8% number.
 Wages ,shipping from Nassau, trucking hire, fuel etc is over 10% even before running/ancillary costs of the business
 I am having to ship over 60 miles currently for our longest runs.
 Will

On Tue, May 26, 2020 at 8:13 PM Susan Larson <susanhlaron@gmail.com> wrote:
 Well isn't packing and distributing covered in admin cost factor?

THE BAHAMAS FEEDING NETWORK

B. THE BAHAMAS FEEDING NETWORK (THE “BFN”) – REPORT ON FINDINGS

Overview Of Approach During Our Work

- ✚ Requested documentation to gain an understanding of policies, procedures, and controls
- ✚ Reviewed documentation provided
- ✚ Confirmed and/or corroborated information and sources discussed during inquiry
- ✚ Randomly selected sample data/items for appropriate testing
- ✚ Inspected reports and/or other sources of information
- ✚ Executed reconciliation procedures using data and information provided
- ✚ Recalculated data provided to verify amounts and investigated material differences noted

The IPE listing was provided to the BFN representative on **January 12, 2022** (see [Appendix B](#) for further details).

General Requests – Included in the IPE Listing

- i. Meetings minutes - relating to the Food Programme
- ii. Procedure/process used to distribute benefits under the Food Programme
- iii. Authorized signatory listing with approval limits

Specific Requests – Included in the IPE Listing

- i. Policies and procedures for the following (specific to the Food Programme):
 - a. Beneficiary process/criteria
 - b. Vendor process/criteria
 - c. Government income received
 - d. Expenditure
 - e. Financial accounting and reporting

The above listings do not represent an exhaustive list as additional documents/items/schedules would have been requested during the course of our work and are referenced throughout this report.

1. REVIEW OF CONTROLS

ATI was not provided with the requested policies and procedure data as at the date of this Report.

FINDINGS:

ATI was not provided with evidence corroborating the successful design and implementation of BFN's controls for the Food Programme.

2. WORK PERFORMED – REVIEW OF GENERAL LEDGER DETAILS & SUPPORTING/OTHER SCHEDULES

On **January 28, 2022**, BFN's representative provided ATI with a copy of BFN's excel Taskforce General Account workbook, along with its related report for the northeast zone for the Food Programme.

During our testing procedures, we received several reports (pdf and excel) with adjusting presentation based on ATI queries. Additionally, BFN provided general ledgers with no vendor information/details included. As a number of the expenditures that were presented without detail were high value expenditures, ATI requested ledgers with the required details needed to perform testing.

At the start of the Food Programme, BFN received funds from the GOB and disbursed these funds to other participating organizations. This was done as a result of some of the NGOs not having existing vendor identification numbers and the urgency of the need for the distribution of funds (time sensitive).

Procedures performed related to BFN's Task Force General Account workbook included:

- ♦ Reviewed transactions and ending balances included in the data provided
- ♦ Footed and cross footed balances
- ♦ Reviewed and agreed amounts recorded as funds received from the GOB
- ♦ Traced and agreed funds received from the GOB and subsequently disbursed to other participating organizations
- ♦ Identified and investigated variances
- ♦ Tested expenditures on a sample basis for accuracy, occurrence, and completeness

FINDINGS:

ATI reviewed the submitted data. The review process included a reconciliation of the amounts recorded as contributions received (specific to the Feeding Programme), from the GOB per the records of BFN and disbursements recorded by the Department of SS, and the Treasury.

ATI also traced and agreed amounts recorded as contributions received (specific to the Feeding Programme), from the GOB and subsequently disbursed by BFN to other participants. We investigated any differences.

We made the following observations:

- ATI noted a reconciliation difference of **ten thousand dollars (\$10K)** that remains unreconciled as at the date of this Report. ATI sent inquiries on the difference, and we were informed that it was still being investigated
- ATI noted a surplus in excess of **nine hundred and sixty-nine thousand dollars (\$969K)** was returned by BFN to the Treasury on **November 5, 2021**

- ATI noted that BFN made disbursements totaling approximately **one million nine hundred thousand dollars (\$1.9M)** during the Food Programme. We traced and agreed these disbursements to BFN banking support and we noted no exceptions
- ATI noted that the BFN received funds and made disbursements to other NGOs during the course of the Food Programme. This was attributed to due diligence delays related to appropriate vendor set up for the receipt of payments from The Bahamas Government. However, we were not provided with the reason for this to continue once payments were being made by the GOB to the individual NGOs. Individual payments started on **June 15, 2020**. BFN disbursed the payment detailed below subsequent to **June 15, 2020**

ATI performed substantive procedures for expenditures on a sample basis and investigated differences noted. We requested underlying supporting documents (e.g., invoices, purchase orders, and disaggregated payment schedules and the like) and evidence supporting the settlement of these expenditures.

We made the following observations:

- ATI noted that the vendor Sysco Bahamas accounted for approximately **two million seven hundred thousand dollars (\$2.7M)** or approximately **forty percent (40%)** of the costs during the Food Programme. See [Table H](#) for details
- ATI noted that a sample selection in the amount of **\$14,725.00** dated **July 29, 2020**, recorded as expenditures, related to vouchers, was not supported by an invoice or similar documentation. ATI was advised that this was an **allocation of cost** related to **vouchers issued to BFN** by the **Task Force**. As per BFN, three sets of vouchers totaling **\$20,000.00**, **\$20,000.00**, and **\$22,500.00** were purchased by BFN based on **instructions from the Task Force** for distribution **by the Task Force**. ATI viewed emails from Susan Larson (Chairperson) dated **July 1, 2020**, and **July 16, 2020**, requesting the purchase of the vouchers for **\$20,000.00** and **\$22,500.00**, respectively. Documentation to support the request for the purchase of the other set of vouchers for **\$20,000.00** was requested but ATI was advised that the communication was not located and was requested from the Chairperson. The communication was not provided as at the date of this Report to ATI
- ATI identified a discrepancy between a sample selection in the amount of **\$18,595.30** dated **September 30, 2020**, recorded as food purchases **2020** and the invoice provided in the amount of **\$24,793.80** dated **September 10, 2020**, from Sysco Bahamas. ATI was advised by BFN that the difference in the amount of **\$6,198.45** related to the value of a pallet of tuna ordered but not received from the vendor. The order was originally checked by BFN personnel and signed as complete with the vendor but subsequently the discrepancy was noted. As a result, BFN advised that **\$6,198.45** was deducted from **\$24,793.80** and the Food Programme was allocated **\$18,595.30**. ATI noted that cheque payment to the vendor was for the full amount of the invoice.
- ATI noted that a sample selection in the amount of **\$70,000** dated **October 9, 2020**, recorded as expenditures related to vouchers was supported by an invoice billed to Bahamas Red Cross by Bahamas International Foods in the amount of **\$69,999.44** (VAT inclusive). As per BFN, an **email** was received from the **Task Force** requesting disbursement of funds allocated to the Bahamas Red Cross in the amount of **\$70,000** to Bahamas International Foods, and that the **email was used** as the formal instruction for the transaction. ATI viewed an email from Susan Larson (Chairperson) dated **October 9, 2020**, requesting disbursement of funds as noted by BFN. Additionally, as per BFN, the invoice submitted to ATI had **to be requested from Bahamas International Food** for this sample selection as part of ATI's review.

- ATI noted sample selections the were recorded as “Expenditures” were not directly **supported by an invoice or similar documentation**. A sample selection noted as Emergency Admin in the amount of **\$8,615.16** dated **May 31, 2021**, was supported by an **email from BFN** to Susan Larson (Chairperson) dated **June 23, 2021**, detailing costs for water in the amount of **\$5,793.00**, groceries in the amount of **\$44,000.00** and meats in the amount of **\$22,000.00** with a grand total in the amount of **\$71,793.00**. Admin costs of **\$12%** was calculated on the grand total in amount of **\$8,615.16**. ATI noted in the Draft Plan provided to us by the Chairperson, that the NGOs were allowed to recover between **10-15%** in administrative costs during the course of the Programme. ATI requested the supporting documentation for the costs for the water, groceries, and meats. As per BFN, the amount for groceries was an **allocation** of the food purchases for the Northeast (zone); a calculation was provided by BFN totaling **\$44,000**. As per BFN, the amount for meats was an **allocation** from BFN meat inventory; no other supporting documentation was provided. The amount for water was supported by invoices from NI Ltd and one quote from Cost Right Nassau Ltd.
- ATI noted three sample selections recorded as food purchases **2021 “Frozen Meats, Fish and Supplies”** dated **May 31, 2021**, in the amount of **\$186,417.76**, **July 31, 2021**, in the amount of **\$208,317.88** and **October 31, 2021**, in the amount of **\$54,768.00**, were not directly supported by an invoice or similar documentation. As per BFN, these sample selections were the value (amount) of items used from BFN inventory (not related to the Food Programme) and expensed to the Food Programme based on the calculation in the BNFN - NFAP Protein Billings **May - Oct 2021** report. ATI viewed the report for **May, July** and **October 2021** and noted the amounts calculated were the same as stated above; the report noted items per cases, pound per case, price per package and the total number of packages the items supplied. “Frozen Meats, Fish and Supplies” accounted for approximately **six hundred and ninety thousand dollars (\$690K)** or **eleven percent (11%)** of the expenditures during the Food Programme. See [Table H](#) for details.
- All other expenditure samples were supported by invoices, credit memos and petty cash slips and were traced to evidence supporting payments settling the expenditures, **excluding those paid through petty cash**.

ATI requested the documents detailed below (See Table A below for further details). These were not received at the date of this Report. Accordingly, we were unable to perform related testing procedures.

- Meetings minutes
- Authorized signatory listing with approval limits
- Weekly recipients list specific to the NGO zone
- Weekly total of food parcels and/or food vouchers distributed

Policies and Procedures relating to:

- Beneficiary process/criteria
- Vendor process/criteria
- Government income received
- Expenditure
- Financial accounting and reporting

STATUS OF REQUEST FOR DATA AND INFORMATION AS AT THE DATE OF THIS REPORT¹¹

TABLE A – BFN’S IPE LISTING WITH COMMENTS

Bahamas Feeding Network ("BFN")

Name / Description of Document	BFN'S COMMENTS	ATI'S COMMENTS
GENERAL REQUESTS -NGOs Used for The National Food Programme		
Meetings minutes - relating to the National Food Programme	Formal meetings were at Task Force level. Informal meetings at the local level were not minuted.	<i>No meeting minutes provided</i>
Procedure/ Process used to distribute benefits under the National Food Programme	Procedure in line with Task Force guidelines (see attached)	<i>No attachment included / Not provided</i>
Authorized signatory listing with approval limits	The former Executive Director signed off on all requisitions, as per Task Force instructions	<i>Authorized signatory listing not provided</i>
Policies and Procedures For The Following (Specific to the National Food Programme):		
Beneficiary Process/ Criteria	Criteria was set by the Task Force (ie. Persons lived in the designated Zone and produced photo ID)	<i>No additional data or document provided</i>
Vendor Process/ Criteria	Vendors which BFN already engaged with were used for Food Distribution, provided they were able to operate under the prevailing emergency orders. Some orders were COD and others were charged to BFN and subsequently settled.	<i>No additional data or document provided</i>
Government Income Received	Submitted	<i>General ledger submitted. No formal policy/procedure submitted</i>
Expenditures	Submitted	<i>General ledger submitted. No formal policy/procedure submitted</i>
Financial Accounting and Reporting	Submitted	<i>No formal policy / procedure submitted</i>

¹¹ The comments detailed below were provided by Mr. Lester Ferguson in an email dated March 1, 2022

TABLE A – BFN’S IPE LISTING WITH COMMENTS (CONTINUED)

DETAILED REQUESTS - RELATING TO THE NATIONAL FOOD DISTRIBUTION PROGRAMME		
Weekly "Dash Board" reports	As Zones no longer have access to Dashboards, we hope to obtain a copy, otherwise this would need to be requested from Task Force	<i>Not submitted / Outstanding</i>
Weekly recipients lists specific to the NGO zone	We are attempting to retrieve the digital file for this, otherwise will we have to scan the significant volume of pages which we have archived. Either way, we will provide same soonest.	<i>Not submitted / Outstanding</i>
Detailed listing or cash ledger for the receipt of disbursements received	Submitted	<i>General ledger initial submission on January 28, 2022</i>
Detailed listing or ledger details for purchases (good or services)	Submitted	<i>General ledger initial submission on January 28, 2022</i>
Approved purchase requisitions and corresponding purchase order (or equivalent document used to request and authorized purchases (goods or services)) from a vendor	Not Applicable	<i>Samples selected and support submitted for same. Exceptions are detailed within this Report in the applicable section</i>
Purchase receipt - relating to the National Food Programme	All receipts on file. As this represents a significant volume of receipts to copy/ scan, would you wish to receive receipts from a specific date range?	<i>Samples selected and support submitted for same. Exceptions are detailed within this Report in the applicable section</i>
Copy of cheque stub or wire instructions	As this represents a significant volume of copying/ scanning, would you wish a specific date range instead?	<i>Samples selected and support submitted for same. Exceptions are detailed within this Report in the applicable section</i>
Reconciliations and reports	Submitted	<i>BFN submitted what they maintained. Submission did not meet "best practice" standards</i>
Weekly total of food parcels and/ or food vouchers distributed	Data contained in dashboard.	<i>Not submitted / Outstanding</i>
Listing or ledger details for expenses (overhead) incurred	Submitted	<i>General ledger initial submission on January 28, 2022</i>
Invoice/ supporting documents relating to expense incurred	All invoices on file. As this represent a significant volume of receipts to copy/ scan, would you wish a specific date range?	<i>Samples selected and support submitted for same. Exceptions are detailed within this Report in the applicable section</i>
Approval for payment	Not Applicable	<i>Reviewed with support provided</i>
Copy of cheque stub or wire instructions	This item is a duplicate of row 24	<i>Noted</i>

TABLE B – BFN NATIONAL PROGRAM REPORT RECONCILIATION 2020 -2021

BFN National Program Report 2020 -2021

	DESCRIPTION	2020	2021
Beginning Balance		\$ -	\$ 962,260.32
Receipts	Treasury Department	5,366,829.00	6,030,407.00
	Vouchers Received	14,725.00	-
Subtotal		<u>5,381,554.00</u>	<u>6,992,667.32</u>
Funds Disbursed / Used	Vouchers for the National Program	- 255,224.68	- 374,598.00
	Funds sent to other NGO's	- 1,230,584.00	- 637,631.00
	Food purchases	- 2,656,758.00	- 4,343,676.00
Expenditures	Admin	- 276,727.00	- 523,106.00
	Admin	-	- 106,711.00
Expenditure Subtotal		<u>- 4,419,293.68</u>	<u>- 5,985,722.00</u>
	Balance	\$ 962,260.32	\$ 1,006,945.32

\$ 1,006,945.32 *Balance*
 -26,950.00 *Invoice noted as O/S*

 979,995.32
 -969,995.00 *Amount Returned - Verified by*
ATI (no difference noted)
\$ 10,000.32 *DIFFERENCE*

TABLE C – DISTRIBUTIONS MADE ON BEHALF OF THE GOVERNMENT OF THE BAHAMAS AFTER JUNE 15, 2020¹²

DISTRIBUTIONS MADE BY BFN TO OTHER ORGANIZATIONS			
BFN - PER GL DETAILS PROVIDED			Organization
BFN	01/07/2020	- 48,327.00	One Eleuthera
BFN	01/07/2020	- 89,505.00	Lend a Hand
BFN	01/07/2020	- 102,558.00	IDEA Relief
BFN	01/07/2020	- 17,093.00	Cates & Co.
BFN	01/07/2020	- 73,656.00	Bahamas Red Cross
BFN	08/07/2020	- 57,007.00	One Eleuthera
BFN	08/07/2020	- 118,422.00	Lend a Hand
BFN	08/07/2020	- 122,041.00	IDEA Relief
BFN	08/07/2020	- 72,579.00	Hands for Hunger
BFN	08/07/2020	- 150,000.00	Cates & Co.
BFN	08/07/2020	- 89,396.00	Bahamas Red Cross
BFN	24/03/2021	- 138,281.00	Cates & Co.
BFN	24/03/2021	- 207,422.00	Hands for Hunger
BFN	24/03/2021	- 115,235.00	Lend a Hand
BFN	24/03/2021	- 153,646.00	IDEA Relief
BFN	24/03/2021	- 23,047.00	One Eleuthera
SUBSEQUENT TO JUNE 15 2020			- 1,578,215.00

TABLE D – DISTRIBUTIONS MADE ON BEHALF OF THE GOVERNMENT OF THE BAHAMAS

DISTRIBUTIONS MADE BY BFN TO OTHER ORGANIZATIONS			
BFN - PER GL DETAILS PROVIDED			Organization
	<i>Date</i>	<i>Amount</i>	<i>Organization</i>
BFN	29/05/2020	- 25,000.00	Lend a Hand
BFN	29/05/2020	- 25,000.00	IDEA Relief
BFN	29/05/2020	- 25,000.00	Cates & Co.
BFN	29/05/2020	- 50,000.00	Bahamas Red Cross
BFN	03/06/2020	- 20,000.00	One Eleuthera
BFN	03/06/2020	- 20,000.00	Lend a Hand
BFN	03/06/2020	- 20,000.00	IDEA Relief
BFN	03/06/2020	- 45,000.00	Hands for Hunger
BFN	03/06/2020	- 20,000.00	Cates & Co.
BFN	03/06/2020	- 40,000.00	Bahamas Red Cross
BFN	01/07/2020	- 48,327.00	One Eleuthera
BFN	01/07/2020	- 89,505.00	Lend a Hand
BFN	01/07/2020	- 102,558.00	IDEA Relief
BFN	01/07/2020	- 17,093.00	Cates & Co.
BFN	01/07/2020	- 73,656.00	Bahamas Red Cross
BFN	08/07/2020	- 57,007.00	One Eleuthera
BFN	08/07/2020	- 118,422.00	Lend a Hand
BFN	08/07/2020	- 122,041.00	IDEA Relief
BFN	08/07/2020	- 72,579.00	Hands for Hunger
BFN	08/07/2020	- 150,000.00	Cates & Co.
BFN	08/07/2020	- 89,396.00	Bahamas Red Cross
BFN	24/03/2021	- 138,281.00	Cates & Co.
BFN	24/03/2021	- 207,422.00	Hands for Hunger
BFN	24/03/2021	- 115,235.00	Lend a Hand
BFN	24/03/2021	- 153,646.00	IDEA Relief
BFN	24/03/2021	- 23,047.00	One Eleuthera
FOOD PROGRAMME DISBURSEMENT			- 1,868,215.00

¹² ATI observed that payments from the Treasury Department started on June 15, 2020.

TABLE E – 2020 DEPARTMENT OF SS COMPARED TO BAHAMAS FEEDING NETWORK

BAHAMAS FEEDING NETWORK ('BFN')					
DEPT. OF SS - RECORDS		NGO - PER GL DETAILS PROVIDED			DIFFERENCE
Date	Amount	NGO	Date	Amount	
25/05/2020	400,000.00	BFN	27/05/2020	400,000.00	-
15/06/2020	74,153.00	BFN	12/06/2020	74,153.00	-
18/06/2020	74,153.00	BFN	19/06/2020	74,153.00	-
29/06/2020	510,000.00	BFN	01/07/2020	510,000.00	-
08/07/2020	750,000.00	BFN	08/07/2020	750,000.00	-
14/07/2020	139,555.00	BFN	15/07/2020	139,555.00	-
21/07/2020	218,135.00	BFN	21/07/2020	218,135.00	-
28/07/2020	175,883.00	BFN	29/07/2020	175,883.00	-
05/08/2020	175,883.00	BFN	06/08/2020	175,883.00	-
10/08/2020	167,091.00	BFN	12/08/2020	167,091.00	-
17/08/2020	163,608.00	BFN	19/08/2020	163,608.00	-
24/08/2020	148,513.00	BFN	27/08/2020	148,513.00	-
31/08/2020	235,303.00	BFN	01/09/2020	235,303.00	-
08/09/2020	235,303.00	BFN	09/09/2020	235,303.00	-
14/09/2020	235,303.00	BFN	16/09/2020	235,303.00	-
21/09/2020	235,303.00	BFN	24/09/2020	235,303.00	-
28/09/2020	235,303.00	BFN	01/10/2020	235,303.00	-
06/10/2020	235,303.00	BFN	07/10/2020	235,303.00	-
13/10/2020	179,325.00	BFN	15/10/2020	179,305.00	20.00
20/10/2020	179,325.00	BFN	22/10/2020	179,325.00	-
		BFN	26/10/2020	20.00	- 20.00
27/10/2020	222,255.00	BFN	28/10/2020	222,255.00	-
03/11/2020	223,650.00	BFN	05/11/2020	223,650.00	-
17/11/2020	52,152.00	BFN	19/11/2020	52,152.00	-
24/11/2020	50,665.00	BFN	26/11/2020	50,665.00	-
01/12/2020	50,665.00	BFN	04/12/2020	50,665.00	-
2020 TOTAL	5,366,829.00			5,366,829.00	-

Difference resolved in entry dated 26/10/2020

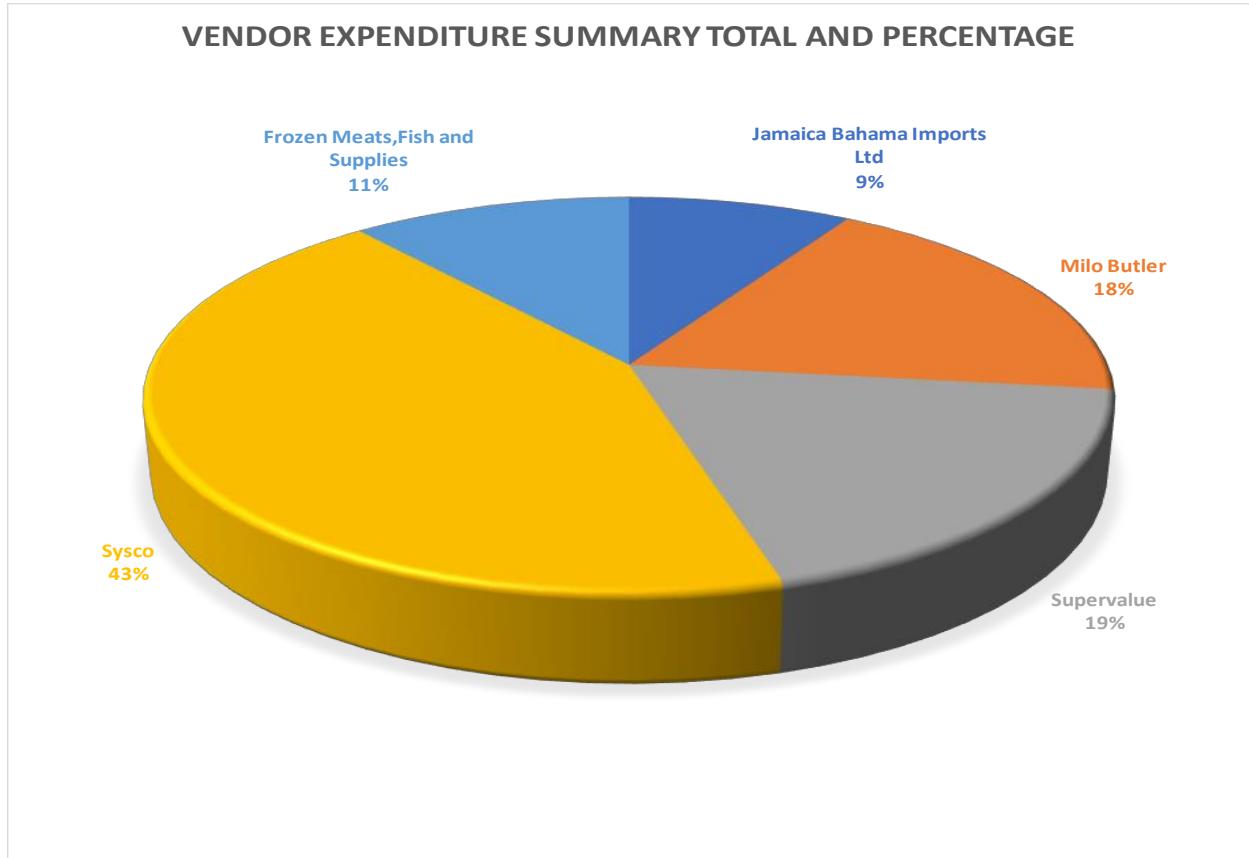
TABLE F – 2021 DEPARTMENT OF SS COMPARED TO BAHAMAS FEEDING NETWORK

BAHAMAS FEEDING NETWORK ('BFN')					
DEPT. OF SS - RECORDS		NGO - PER GL DETAILS PROVIDED			DIFFERENCE
Date	Amount	NGO	Date	Amount	
06/01/2021	130,599.00	BFN	07/01/2021	130,599.00	-
13/01/2021	130,599.00	BFN	14/01/2021	130,599.00	-
19/01/2021	130,599.00	BFN	20/01/2021	130,599.00	-
26/01/2021	130,599.00	BFN	28/01/2021	130,599.00	-
02/02/2021	130,599.00	BFN	03/02/2021	130,599.00	-
01/02/2021	130,599.00	BFN	11/02/2021	130,599.00	-
16/02/2021	130,599.00	BFN	17/02/2021	130,599.00	-
23/02/2021	130,599.00	BFN	24/02/2021	130,599.00	-
03/03/2021	130,599.00	BFN	04/03/2021	130,599.00	-
10/03/2021	130,599.00	BFN	11/03/2021	130,599.00	-
12/04/2021	261,198.00	BFN	14/04/2021	261,198.00	-
21/04/2021	130,599.00	BFN	22/04/2021	130,599.00	-
28/04/2021	187,747.00	BFN	29/04/2021	187,747.00	-
05/05/2021	187,747.00	BFN	04/05/2021	187,747.00	-
14/05/2021	187,747.00	BFN	14/05/2021	187,747.00	-
20/05/2021	187,747.00	BFN	21/05/2021	187,747.00	-
11/06/2021	586,544.00	BFN	15/06/2021	586,544.00	-
17/06/2021	187,747.00	BFN	18/06/2021	187,747.00	-
24/06/2021	375,494.00	BFN	25/06/2021	375,494.00	-
28/06/2021	83,408.00	BFN	29/06/2021	83,408.00	-
08/07/2021	187,747.00	BFN	08/07/2021	187,747.00	-
14/07/2021	187,747.00	BFN	15/07/2021	187,747.00	-
23/07/2021	187,747.00	BFN	23/07/2021	187,747.00	-
04/08/2021	187,747.00	BFN	05/08/2021	187,747.00	-
06/08/2021	187,747.00	BFN	06/08/2021	187,747.00	-
16/08/2021	187,747.00	BFN	17/08/2021	187,747.00	-
18/08/2021	187,747.00	BFN	18/08/2021	187,747.00	-
26/08/2021	187,747.00	BFN	27/08/2021	187,747.00	-
02/09/2021	187,747.00	BFN	03/09/2021	187,747.00	-
09/09/2021	243,998.00	BFN	10/09/2021	243,998.00	-
15/09/2021	243,998.00	BFN	17/09/2021	243,998.00	-
23/09/2021	170,720.00	BFN	24/09/2021	170,720.00	-
2021 TOTAL	6,030,407.00			6,030,407.00	-

TABLE G –BAHAMAS FEEDING NETWORK BALANCE AFTER DISTRIBUTIONS

BALANCE AFTER DISTRIBUTIONS
\$ 9,529,021.00

TABLE H – BAHAMAS FEEDING NETWORK VENDOR EXPENDITURE SUMMARY



HANDS FOR HUNGER

C. HANDS FOR HUNGER (“HFH”) – REPORT ON FINDINGS

Overview of Approach During Our Work

- ✚ Requested documentation to gain an understanding of policies, procedures, and controls
- ✚ Reviewed documentation provided
- ✚ Confirmed and/or corroborated information and sources discussed during inquiry
- ✚ Randomly selected sample data/items for appropriate testing
- ✚ Inspected reports and/or other sources of information
- ✚ Executed reconciliation procedures using data and information provided
- ✚ Recalculated data provided to verify amounts and investigated material differences noted

The IPE listing was provided to HFH representative during the week of **January 10, 2022** (see [Appendix B](#) for further details).

General Requests – Included in the IPE Listing

- i. Meetings minutes - relating to the Food Programme
- ii. Procedure/process used to distribute benefits under the Food Programme
- iii. Authorized signatory listing with approval limits

Specific Requests – Included in the IPE Listing

- i. Policies and procedures for the following (specific to the Food Programme):
 - a. Beneficiary process/criteria
 - b. Vendor process/criteria
 - c. Government income received
 - d. Expenditure
 - e. Financial accounting and reporting

The above listings do not represent an exhaustive list as additional documents/items/schedules would have been requested during the course of our work and are referenced throughout this report.

1. REVIEW OF CONTROLS

ATI was not provided with the requested policies and procedure data as at the date of this Report.

FINDINGS:

ATI was not provided with evidence corroborating the successful design and implementation of HFH's controls for the Food Programme.

2. WORK PERFORMED – REVIEW OF GENERAL LEDGER DETAILS & SUPPORTING/OTHER SCHEDULES:

On **February 6, 2022**, HFH's representative provided ATI with a copy of its profit and loss statement, along with the related general ledger details for the Food Programme using SharePoint.

On **February 14, 2022**, resulting procedures performed and inquiries made by ATI (detailed below), HFH's representative provided an amended profit and loss statement along with the related general ledger details for the Food Programme using SharePoint.

The amended profit and loss statement included the below reclassification.

- ♦ *Reclassified amounts recorded in **April of 2021** (totaling the difference queried by ATI of **\$588,079.00**). The amounts were erroneously classified to HFH's internal COVID 19 program*

Procedures performed related to HFH's profit and loss statement included:

- ♦ Reviewed transactions and ending balances included in the data provided
- ♦ Footed and cross footed balances
- ♦ Reviewed and agreed amounts recorded as funds received from the GOB and BFN (BFN disbursed funds received from the GOB to other NGOs)
- ♦ Identified and investigated variances
- ♦ Tested expenditures on a sample basis for accuracy, occurrence, and completeness

FINDINGS:

ATI reviewed the submitted data. The review process included a reconciliation of the amounts recorded as contributions received (specific to the Feeding Programme), from the GOB per the records of HFH and disbursements or recorded by the Department of SS, the Treasury and BFN (BFN disbursed funds received from the GOB to other NGOs). We investigated any differences.

We made the following observations:

- ATI noted a recorded surplus in excess of **one million, one hundred and eighty-eight thousand dollars (approximately \$1.2M)**
- ATI noted a difference of **five hundred and eighty-eight thousand, seventy-nine dollars (approximately \$589K)** which was acknowledged and subsequently adjusted by HFH (See **Tables A & B** below)
- As a result of the reclassification, the recorded surplus exceeded **one million, seven hundred and seventy-six thousand dollars (approximately \$1.8M)**

- ATI noted that the Department of SS was not aware of the surplus (See [Appendix A](#) for minutes from meeting held on **February 17, 2022**)
- ATI noted a transposition error in the Department of SS's records (resulting in a **\$300.00** difference – See **Tables A & B** below), which was updated and corrected by the Department of SS subsequent to ATI's inquiry and the Department of SS's verification
- ATI noted that HFH's general ledger first payment date recorded was earlier than the recorded date reviewed on the records maintained by the Department of SS (**July 12, 2020**, compared to **July 15, 2020**)
- ATI was informed by Department of SS personnel, that at the commencement of the Food Programme, funds were processed through the BFN. This was done as a result of some of the NGOs not having existing vendor identification numbers and the urgency of the need for the distribution of funds (time sensitive). However, we were unable to determine the reason for occurrences subsequent to Treasury's disbursement processing after vendor identifications were regularized. ATI noted that:
 - a. **\$72,579.00** disbursed by the GOB on **July 14, 2020**, was erroneously recorded in HFH's general ledger as being received from the BFN
 - b. **\$72,579.00** was disbursed by the BFN on **July 8, 2020**, to HFH
 - c. **\$207,422** was disbursed by the BFN on **March 24, 2021**. This was erroneously classified in HFH's general ledger as being received from the GOB
- ATI noted that HFH's general ledger details provided on **February 6, 2022**, did **not** include the amounts detailed below (totaling **\$588,379.00**). These disbursements, which were processed by the GOB's Treasury department, and were agreed to the Department of SS's records and workbook without exception. The records of HFH were subsequently adjusted after ATI's inquiry and HFH's verification and confirmation of receipt of funds. HFH provided an amended general ledger on **February 14, 2022** (see **Tables A – D**).
 - a. **21/04/2021** **\$322,657.00**
 - b. **28/04/2021** **\$265,722.00**

ATI performed substantive procedures for expenditures on a sample basis and investigated differences noted. We requested underlying supporting documents (e.g., invoices, purchase orders, detailed payment schedules and the like) and evidence supporting the settlement of these expenditures.

We made the following observations:

- ATI noted that during the month of **April 2021 (Week 45)**, HFH became the Zone Leader for Abaco, replacing IDEA Relief
- ATI noted that the vendor Showman Ebistro accounted for more than **five million dollars (\$5M)** or more than **eighty percent (80%)** of the costs during the Food Programme ([See Table I](#))
- ATI noted that the vendor Price Right Ltd. (Maxwell's Supermarket) accounted for more than **one million dollars (\$1M)** or more than **fifty-five percent (55%)** of the costs during the Food Programme for HFH's Abaco operations ([See Table J](#))

- ATI noted that a sample selection in the amount of **\$42,804.80** dated **April 12, 2021**, paid to IDEA Relief, was not supported by an invoice or similar documentation. The support provided for the selection was an image with data noting expensing and amounts. ATI footed same and noted no difference. See copy label “Supporting Documentation Examined” below for further information
- All other expenditure samples were sufficiently supported by invoices, purchase orders, receipts, and credit memos (applicable to credit amounts randomly selected) and were traced to evidence supporting payments settling the expenditures and where applicable, reductions in cost.

ATI requested the documents detailed below. These were not received at the date of this Report. Accordingly, we were unable to perform related testing procedures.

- e. Meetings minutes
- f. Authorized signatory listing with approval limits
- g. Weekly recipients list specific to the NGO zone
- h. Weekly total of food parcels and/or food vouchers distributed

Policies and Procedures relating to:

- f. Beneficiary process/criteria
- g. Vendor process/criteria
- h. Government income received
- i. Expenditure
- j. Financial accounting and reporting

TABLE A – HANDS FOR HUNGER INITIAL DATA

ATI - SUMMARY TABLE / WORK PERFORMED

Department/NGO	2020	2021
Department of Social Services - Funds Disbursed	\$ 2,331,423.00	\$ 8,066,152.00
Hands for Hunger - Funds Received	\$ 2,258,844.00	\$ 7,685,495.00
Difference	\$ 72,579.00	\$ 380,657.00

A
B

NGO	2020	2021
Bahamas Feeding Network - Funds Disbursed	\$ 117,579.00	\$ 207,422.00
Hands for Hunger - Funds Received	\$ 190,158.00	\$ -
Difference	-\$ 72,579.00	\$ 207,422.00

C
B

TOTAL PER HANDS FOR HUNGER	\$ 2,449,002.00	\$ 7,685,495.00	\$ 10,134,497.00	SUM OF B
TOTAL PER DEPARTMENT OF SOCIAL SERVICES	2,331,423.00	8,066,152.00	10,397,575.00	SUM OF A
TOTAL PER BAHAMAS FEEDING NETWORK (DISBURSED ON BEHALF OF THE GOVERNMENT)	117,579.00	207,422.00	325,001.00	SUM OF C
	2,449,002.00	8,273,574.00	10,722,576.00	SUM OF A & C
	\$ -	\$ 588,079.00	\$ 588,079.00	DIFFERENCE (A + C) - B

DOSS Treasury Support & Disbursements Worksheet Includes (Not Included in GL Provided by Hands for

Date	Amount
April 21, 2021	\$ 322,657.00
April 28, 2021	\$ 265,722.00

Hands for Hunger's GL includes (Not Included in DOSS Treasury Support or Disbursements Worksheet)

Date	Amount
March 24, 2021	\$ 207,422.00

ATI's Reconciliation

	<i>Adjusted Balance</i>	<i>Per Department of SS</i>	<i>Difference</i>
	\$ 7,685,495.00		
Add	322,657.00		
Add	265,722.00		
Subtract	(207,422.00)		
	\$ 8,066,452.00	\$ 8,066,152.00	\$ 300.00

ATI noted a transposition error (\$154,242 typed s/b \$154,542)

TABLE B – HANDS FOR HUNGER AMENDED DATA

ATI - SUMMARY TABLE / WORK PERFORMED

Department/NGO	2020	2021	
Department of Social Services - Funds Disbursed	\$ 2,331,423.00	\$8,066,452.00	A
Hands for Hunger - Funds Received	\$ 2,258,844.00	\$8,273,874.00	B
Difference	\$ 72,579.00	-\$ 207,422.00	

NGO	2020	2021	
Bahamas Feeding Network - Funds Disbursed	\$ 117,579.00	\$ 207,422.00	C
Hands for Hunger - Funds Received	\$ 190,158.00	\$ -	B
Difference	-\$ 72,579.00	\$ 207,422.00	

TOTAL PER HANDS FOR HUNGER	<u>\$ 2,449,002.00</u>	<u>\$8,273,874.00</u>	<u>\$10,722,876.00</u>	SUM OF B
TOTAL PER DEPARTMENT OF SOCIAL SERVICES	2,331,423.00	8,066,452.00	10,397,875.00	SUM OF A
TOTAL PER BAHAMAS FEEDING NETWORK (DISBURSED ON BEHALF OF THE GOVERNMENT)	117,579.00	207,422.00	325,001.00	SUM OF C
	<u>2,449,002.00</u>	<u>8,273,874.00</u>	<u>10,722,876.00</u>	SUM OF A & C
	<u><u>\$ -</u></u>	<u><u>\$ -</u></u>	<u><u>\$ -</u></u>	DIFFERENCE (A + C) - B

TABLE C – 2020 DEPARTMENT OF SS COMPARED TO HANDS FOR HUNGER

HANDS FOR HUNGER					
DEPT. OF SS - RECORDS		Hands for Hunger			DIFFERENCE
<i>Date</i>	<i>Amount</i>	<i>Hands for Hunger</i>	<i>Date MM/DD/YY</i>	<i>Amount</i>	
15/06/2020	96,318.00	Hands for Hunger	06/12/2020	96,318.00	-
18/06/2020	96,318.00	Hands for Hunger	06/19/2020	96,318.00	-
14/07/2020	72,579.00	Hands for Hunger		-	72,579.00
21/07/2020	92,374.00	Hands for Hunger	07/21/2020	92,374.00	-
28/07/2020	71,064.00	Hands for Hunger	07/28/2020	71,064.00	-
05/08/2020	71,064.00	Hands for Hunger	08/05/2020	71,064.00	-
11/08/2020	116,738.00	Hands for Hunger	08/11/2020	116,738.00	-
18/08/2020	81,701.00	Hands for Hunger	08/18/2020	81,701.00	-
26/08/2020	100,293.00	Hands for Hunger	08/26/2020	100,293.00	-
01/09/2020	142,745.00	Hands for Hunger	09/01/2020	142,745.00	-
08/09/2020	142,745.00	Hands for Hunger	09/09/2020	142,745.00	-
15/09/2020	142,745.00	Hands for Hunger	09/15/2020	142,745.00	-
23/09/2020	142,745.00	Hands for Hunger	09/23/2020	142,745.00	-
30/09/2020	142,745.00	Hands for Hunger	09/30/2020	142,745.00	-
07/10/2020	142,745.00	Hands for Hunger	10/07/2020	142,745.00	-
14/10/2020	114,400.00	Hands for Hunger	10/14/2020	114,400.00	-
21/10/2020	114,400.00	Hands for Hunger	10/21/2020	114,400.00	-
28/10/2020	133,909.00	Hands for Hunger	10/28/2020	133,909.00	-
04/11/2020	53,900.00	Hands for Hunger	11/04/2020	53,900.00	-
11/11/2020	42,420.00	Hands for Hunger	11/11/2020	42,420.00	-
18/11/2020	43,495.00	Hands for Hunger	11/18/2020	43,495.00	-
25/11/2020	43,495.00	Hands for Hunger	11/25/2020	43,495.00	-
03/12/2020	43,495.00	Hands for Hunger	12/03/2020	43,495.00	-
10/12/2020	43,495.00	Hands for Hunger	12/10/2020	43,495.00	-
22/12/2020	43,495.00	Hands for Hunger	12/22/2020	43,495.00	-
2020 TOTAL	2,331,423.00 A			2,258,844.00	72,579.00

TABLE D – 2020 BFN COMPARED TO HANDS FOR HUNGER

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			Hands for Hunger - PER GL DETAILS PROVIDED			DIFFERENCE
	<i>Date</i>	<i>Amount</i>	<i>Hands for Hunger</i>	<i>Date MM/DD/YY</i>	<i>Amount</i>	
BFN	03/06/2020	- 45,000.00	Hands for Hunger	06/03/2020	45,000.00	-
BFN	08/07/2020	- 72,579.00	Hands for Hunger	07/14/2020	72,579.00	-
			Hands for Hunger	07/14/2020	72,579.00	72,579.00
2020 TOTAL		- 117,579.00 B			190,158.00	72,579.00

TABLE E – 2020 HANDS FOR HUNGER TOTAL

(A)+(ABS(B))
2,449,002.00

TABLE F – 2021 DEPARTMENT OF SS COMPARED TO HANDS FOR HUNGER

HANDS FOR HUNGER					
DEPT. OF SS - RECORDS		Hands for Hunger			DIFFERENCE
Date	Amount	Hands for Hunger	Date MM/DD/YY	Amount	
06/01/2021	207,422.00	Hands for Hunger	01/06/2021	207,422.00	-
13/01/2021	207,422.00	Hands for Hunger	01/13/2021	207,422.00	-
19/01/2021	207,422.00	Hands for Hunger	01/19/2021	207,422.00	-
27/01/2021	207,422.00	Hands for Hunger	01/27/2021	207,422.00	-
28/01/2021	43,495.00	Hands for Hunger	01/28/2021	43,495.00	-
02/02/2021	207,422.00	Hands for Hunger	02/02/2021	207,422.00	-
03/02/2021	43,495.00	Hands for Hunger	02/03/2021	43,495.00	-
10/02/2021	207,422.00	Hands for Hunger	02/10/2021	207,422.00	-
16/02/2021	207,422.00	Hands for Hunger	02/17/2021	207,422.00	-
23/02/2021	207,422.00	Hands for Hunger	02/23/2021	207,422.00	-
03/03/2021	207,422.00	Hands for Hunger	03/03/2021	207,422.00	-
10/03/2021	207,422.00	Hands for Hunger	03/10/2021	207,422.00	-
	-	Hands for Hunger	03/24/2021	207,422.00	- 207,422.00
01/04/2021	207,422.00	Hands for Hunger	04/01/2021	207,422.00	-
12/04/2021	645,314.00	Hands for Hunger	04/13/2021	645,314.00	-
21/04/2021	322,657.00	Hands for Hunger		-	322,657.00
28/04/2021	265,722.00	Hands for Hunger		-	265,722.00
05/05/2021	265,722.00	Hands for Hunger	05/05/2021	265,722.00	-
14/05/2021	265,722.00	Hands for Hunger	05/14/2021	265,722.00	-
11/06/2021	797,166.00	Hands for Hunger	06/14/2021	797,166.00	-
17/06/2021	265,722.00	Hands for Hunger	06/17/2021	265,722.00	-
24/06/2021	531,444.00	Hands for Hunger	06/25/2021	531,444.00	-
08/07/2021	265,722.00	Hands for Hunger	07/08/2021	265,722.00	-
14/07/2021	265,722.00	Hands for Hunger	07/14/2021	265,722.00	-
04/08/2021	265,722.00	Hands for Hunger	08/04/2021	265,722.00	-
06/08/2021	265,722.00	Hands for Hunger	08/06/2021	265,722.00	-
16/08/2021	265,722.00	Hands for Hunger	08/16/2021	265,722.00	-
18/08/2021	265,722.00	Hands for Hunger	08/18/2021	265,722.00	-
26/08/2021	111,180.00	Hands for Hunger	08/26/2021	111,180.00	-
02/09/2021	175,199.00	Hands for Hunger	09/02/2021	175,199.00	-
09/09/2021	148,226.00	Hands for Hunger	09/09/2021	148,226.00	-
15/09/2021	149,634.00	Hands for Hunger	09/16/2021	149,634.00	-
23/09/2021	159,780.00	Hands for Hunger	09/23/2021	159,780.00	-
2021 TOTAL	8,066,452.00			7,685,495.00	380,957.00

TABLE G – 2021 BFN COMPARED TO HANDS FOR HUNGER

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			Hands for Hunger - PER GL DETAILS PROVIDED			DIFFERENCE
Date	Amount		Hands for Hunger	Date MM/DD/YY	Amount	
BFN	24/03/2021	- 207,422.00	Hands for Hunger			-207,422.00
	2021 TOTAL	- 207,422.00			-	-

TABLE H – 2021 HANDS FOR HUNGER TOTAL

7,685,495.00	Less than Department of SS Records
8,066,452.00	Records adjusted Feb 14 2022

TABLE I – HANDS FOR HUNGER VENDOR EXPENDITURE SUMMARY (NEW PROVIDENCE)

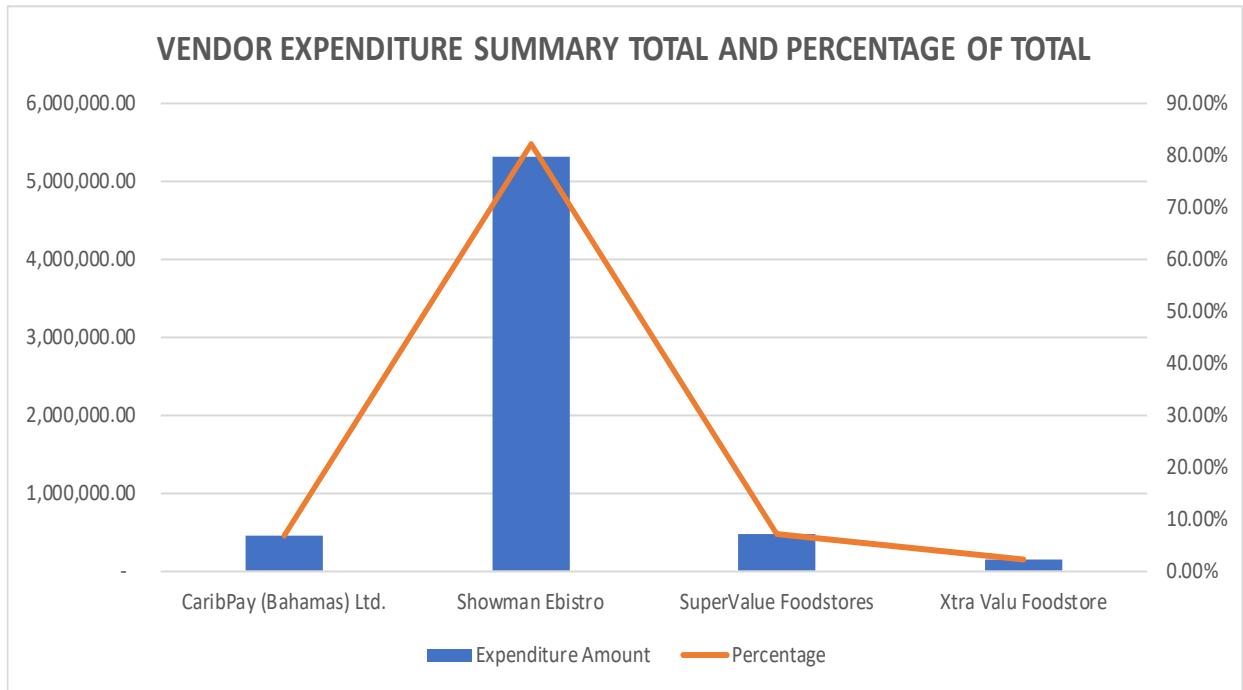
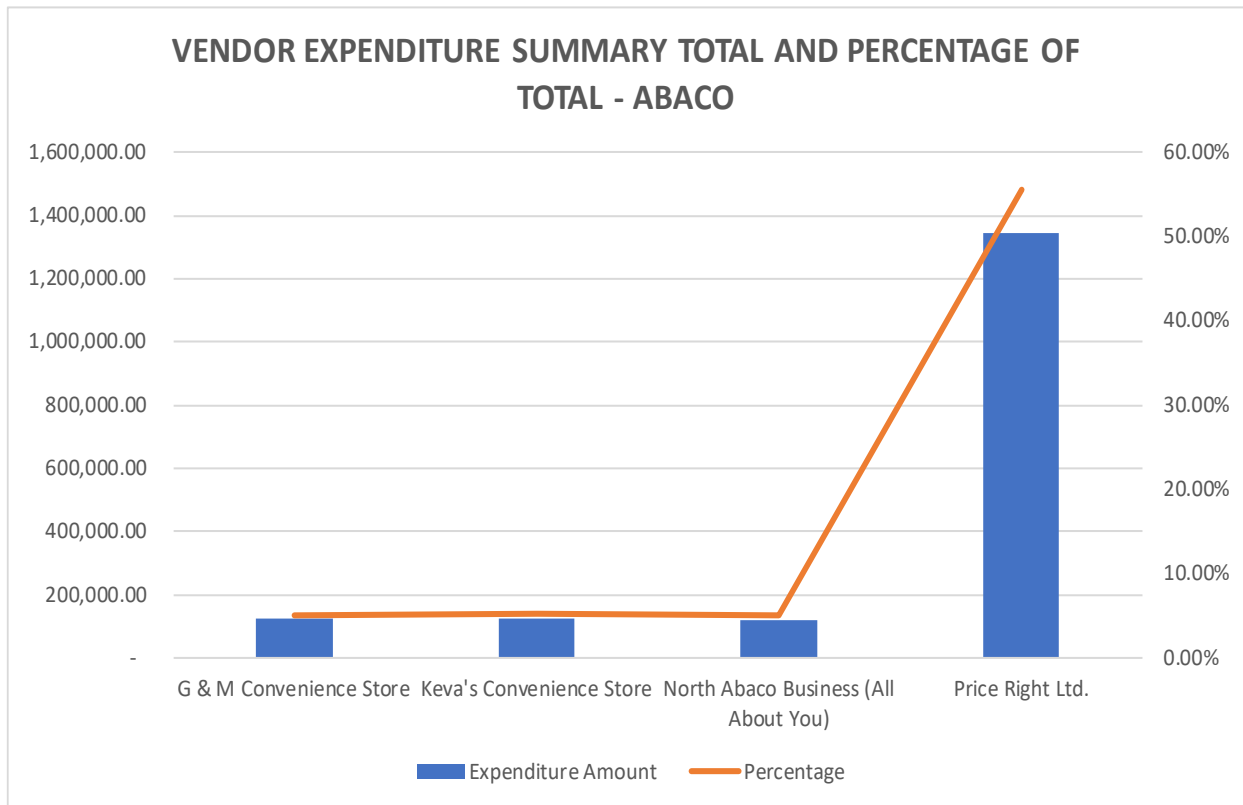


TABLE J – HANDS FOR HUNGER VENDOR EXPENDITURE SUMMARY (ABACO)



SUPPORTING DOCUMENTATION EXAMINED

Discussed in [Section C](#) under “Findings” in this Report

04/12/2021	Expense	L.V. Construction	Crossing Rock	RAPID Food Program:Food Cost	IDEA Relief (CB)	2,920.00
04/12/2021	Expense	Cherokee Food Fair	Cherokee Food Voucher's	RAPID Food Program:Food Cost	IDEA Relief (CB)	1,280.00
04/12/2021	Expense	Rochelle Laroda	Treasure Cay	RAPID Food Program:Food Cost	IDEA Relief (CB)	5,120.00
		Bank Charges				5.60
04/12/2021	Expense	Judy Mae Russell	Fox Town Vouchers	RAPID Food Program:Food Cost	IDEA Relief (CB)	3,080.00
		Bank Charges				5.60
04/12/2021	Expense	Andquone Burrows	Fox Town Vouchers	RAPID Food Program:Food Cost	IDEA Relief (CB)	3,080.00
		Bank Charges				5.60
04/12/2021	Expense	Keva's Convenience Store	Vouchers ending April	RAPID Food Program:Food Cost	IDEA Relief (CB)	5,400.00
04/12/2021	Expense	Edna Swain	Moore's Island Vouchers	RAPID Food Program:Food Cost	IDEA Relief (CB)	3,760.00
04/12/2021	Expense	E&E Department Store	Vouchers	RAPID Food Program:Food Cost	IDEA Relief (CB)	3,480.00
		Bank Charges				5.60
04/12/2021	Expense	Curry's Food Store		RAPID Food Program:Food Cost	IDEA Relief (CB)	2,880.00
		Bank Charges				5.60
04/12/2021	Expense	Vernon Malone	Payment for Food Vouchers: Hope Town	RAPID Food Program:Food Cost	IDEA Relief (CB)	3,440.00
04/12/2021	Expense	Fig Tree & Spirit	Vouchers	RAPID Food Program:Food Cost	IDEA Relief (CB)	2,400.00
		Bank Charges				5.60
04/12/2021	Expense	Man O War Grocery	Payment for Food Vouchers: Man O War	RAPID Food Program:Food Cost	IDEA Relief (CB)	920.00
		Bank Charges				5.60
04/12/2021	Expense	North Abaco Business	Vouchers Cooper's Town	RAPID Food Program:Food Cost	IDEA Relief (CB)	5,000.00
		Bank Charges				5.60
						BS\$ 42,804.80

THE BAHAMAS RED CROSS

D. THE BAHAMAS RED CROSS (THE "BRC") – REPORT ON FINDINGS

Overview of Approach During Our Work

- ✚ Requested documentation to gain an understanding of policies, procedures, and controls
- ✚ Reviewed documentation provided
- ✚ Confirmed and/or corroborated information and sources discussed during inquiry
- ✚ Randomly selected sample data/items for appropriate testing
- ✚ Inspected reports and/or other sources of information
- ✚ Executed reconciliation procedures using data and information provided
- ✚ Recalculated data provided to verify amounts and investigated material differences noted

The IPE listing was provided to the BRC representative during the week of **January 10, 2022**. On **January 24, 2022**, a second correspondence was forwarded to the BRC, due to a change in the BRC's team (See [Appendix B](#) for further details).

General Requests – Included in the IPE Listing

- i. Meetings minutes - relating to the Food Programme
- ii. Procedure/process used to distribute benefits under the Food Programme
- iii. Authorized signatory listing with approval limits

Specific Requests – Included in the IPE Listing

- i. Policies and procedures for the following (specific to the Food Programme):
 - a. Beneficiary process/criteria
 - b. Vendor process/criteria
 - c. Government income received
 - d. Expenditure
 - e. Financial accounting and reporting

The above listings do not represent an exhaustive list as additional documents/items/schedules would have been requested during the course of our work and are referenced throughout this report.

1. REVIEW OF CONTROLS

Timely submission of the requested policies and procedure data did not occur. The BRC submitted one document on March 15, 2022 (See [Appendix F](#) for details).

FINDINGS:

In consideration of the submission timeline and the data submitted, ATI was unable to complete sufficient and appropriate procedures consistent with our agreed-upon procedures.

2. WORK PERFORMED – REVIEW OF GENERAL LEDGER DETAILS & SUPPORTING/OTHER SCHEDULES

On **February 1, 2022**, the BRC’s representative provided ATI with a copy of its “Task Force Report”, containing funds received and expenditure general ledger details for the Food Programme. Subsequent to ATI’s review, we noted that the data provided for fund disbursements received did not include transaction details and requested an updated version on **February 7, 2022**. We received an updated report on **February 10, 2022**.

Procedures performed related to the BRC’s Task Force Report included:

- ♦ Reviewed transactions and ending balances included in the data provided
- ♦ Footed and cross footed balances
- ♦ Reviewed and agreed amounts recorded as funds received from the GOB and BFN (BFN disbursed funds received from the GOB to other NGOs)
- ♦ Identified and investigated variances
- ♦ Tested expenditures on a sample basis for accuracy, occurrence, and completeness

FINDINGS:

ATI reviewed the submitted data. The review process included a reconciliation of the amounts recorded as contributions received (specific to the Feeding Programme), from the GOB per the records of the BRC and disbursements recorded by the Department of SS, the Treasury and BFN (BFN disbursed funds received from the GOB to other NGOs). We investigated any differences.

We made the following observations:

- ATI noted a recorded surplus in excess of **seventy-six thousand (\$76K)**
- ATI noted that the Department of SS was not aware of the surplus
- ATI noted several instances where the BRC’s general ledger dates recorded for receipt of funds was earlier than the recorded date reviewed on the records maintained by the Department of SS
 - a. **June 12, 2020**, compared to **June 15, 2020**
 - b. **September 8, 2020**, compared to **September 9, 2020**
- ATI noted no additional disbursements made to the BRC subsequent to **December 21, 2020**.
- ATI was informed by Department of SS personnel, that at the commencement of the Food Programme, funds were processed through the BFN. This was done as a result of some of the NGOs not having existing vendor identification numbers and the urgency of the need for the distribution of funds (time sensitive). However, we

were unable to determine the reason for occurrences subsequent to Treasury's disbursement processing after vendor identifications were regularized. ATI noted that:

- a. **\$73,656.00** was disbursed by the BFN on **July 1, 2020**
- b. **\$89,396.00** disbursed by the BFN on **July 1, 2020**

ATI performed substantive procedures for expenditures on a sample basis and investigated differences noted. We requested underlying supporting documents (e.g., invoices, purchase orders, detailed payment schedules and the like) and evidence supporting the settlement of these expenditures.

We made the following observations:

- ATI noted expenditures related to the Food Programme was concentrated to a minimal group of vendors. (See [Table E](#) for additional details)
- ATI noted that the BRC was (See [Table D](#) below for additional details):
 - a. Unable to provide **any** of the requested supporting document for **42%** of the sampled population's value
 - b. Unable to provide **sufficient** and/or **appropriate** supporting documents for **2%** of the sampled population's value
- ATI noted a payment in the amount of **\$50,000.00**, for Super Value, with a general ledger transaction date of **July 24, 2020**. The supporting documents were dated approximately two weeks later (i.e., dated **August 8, 2020**)
- All other expenditure samples were sufficiently supported by invoices, purchase orders, receipts, and expense listings, and were traced to evidence supporting payments settling the cost amounts.

ATI requested the documents detailed below that were not receive at the date of this Report. Accordingly, we were unable to perform related testing procedures.

- a. Meetings minutes
- b. Authorized signatory listing with approval limits
- c. Weekly recipients list specific to the NGO zone
- d. Weekly total of food parcels and/or food vouchers distributed

Policies and Procedures relating to:

- a. Vendor process/criteria
- b. Government income received
- c. Expenditure
- d. Financial accounting and reporting

TABLE A – 2020 DEPARTMENT OF SS COMPARED TO THE BAHAMAS RED CROSS

THE BAHAMAS RED CROSS ("BRC")						
DEPT. OF SS - RECORDS		NGO			DIFFERENCE	
<i>Date</i>	<i>Amount</i>	<i>NGO</i>	<i>Date</i>	<i>Amount</i>		
15/06/2020	73,656.00	BRC	12/06/2020	73,656.00	-	Dated earlier than the DOSS/Treasury records
18/06/2020	73,656.00	BRC	19/06/2020	73,656.00	-	
14/07/2020	89,396.00	BRC	14/07/2020	89,396.00	-	
21/07/2020	113,475.00	BRC	21/07/2020	113,475.00	-	
28/07/2020	246,947.00	BRC	28/07/2020	246,947.00	-	
05/08/2020	246,947.00	BRC	05/08/2020	246,947.00	-	
10/08/2020	180,790.00	BRC	11/08/2020	180,790.00	-	
17/08/2020	215,132.00	BRC	18/08/2020	215,132.00	-	
24/08/2020	135,438.00	BRC	26/08/2020	135,438.00	-	
31/08/2020	178,525.00	BRC	01/09/2020	178,525.00	-	
09/09/2020	178,525.00	BRC	08/09/2020	178,525.00	-	
14/09/2020	178,525.00	BRC	15/09/2020	178,525.00	-	
21/09/2020	178,525.00	BRC	23/09/2020	178,525.00	-	
28/09/2020	178,525.00	BRC	30/09/2020	178,525.00	-	
06/10/2020	178,525.00	BRC	07/10/2020	178,525.00	-	
13/10/2020	401,143.00	BRC	14/10/2020	401,143.00	-	
20/10/2020	401,143.00	BRC	21/10/2020	401,143.00	-	
27/10/2020	135,823.00	BRC	28/10/2020	135,823.00	-	
03/11/2020	136,675.00	BRC	04/11/2020	136,675.00	-	
10/11/2020	168,175.00	BRC	11/11/2020	168,175.00	-	
17/11/2020	159,519.00	BRC	18/11/2020	159,519.00	-	
24/11/2020	159,519.00	BRC	25/11/2020	159,519.00	-	
01/12/2020	142,949.00	BRC	03/12/2020	142,949.00	-	
08/12/2020	142,949.00	BRC	10/12/2020	142,949.00	-	
21/12/2020	142,949.00	BRC	22/12/2020	142,949.00	-	
2020 TOTAL	4,437,431.00	A		4,437,431.00	-	

TABLE B – 2020 BFN COMPARED TO THE BAHAMAS RED CROSS

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			NGO - PER GL DETAILS PROVIDED			DIFFERENCE
	<i>Date</i>	<i>Amount</i>	<i>NGO</i>	<i>Date</i>	<i>Amount</i>	
BFN	29/05/2020	- 50,000.00	BRC	29/05/2020	50,000.00	-
BFN	03/06/2020	- 40,000.00	BRC	03/06/2020	40,000.00	-
BFN	01/07/2020	- 73,656.00	BRC	03/07/2020	73,656.00	-
BFN	08/07/2020	- 89,396.00	BRC	14/07/2020	89,396.00	-
2020 TOTAL		- 253,052.00	B		253,052.00	-

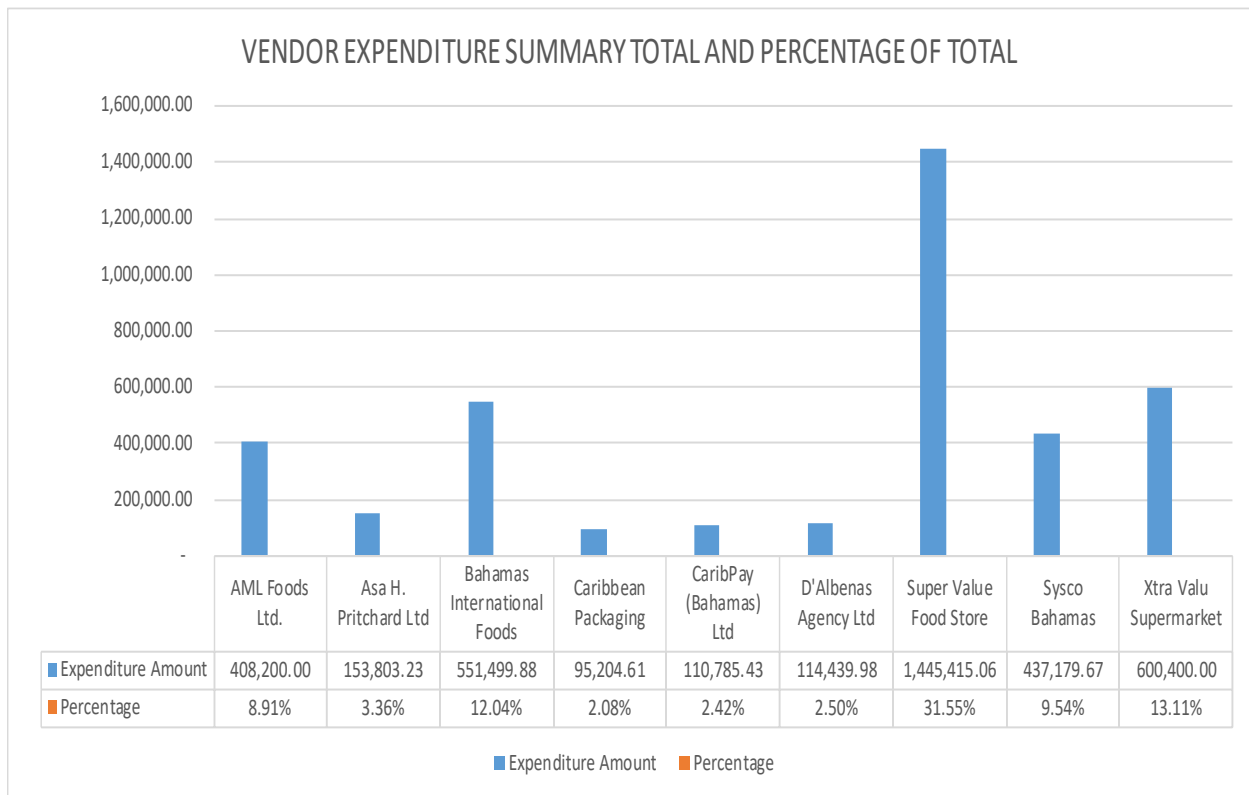
TABLE C – 2020 THE BAHAMAS RED CROSS TOTAL

(A)+(ABS(B))
4,690,483.00
THE BAHAMAS RED CROSS TOTAL

TABLE D – SAMPLE TESTING SUPPORT BREAKDOWN

DESCRIPTION	AMOUNT	%
No Supporting Documents Received	266,301.50	41.84%
Requested Documents Received	357,252.50	56.14%
Requested Documents Partially Received - Missing Proof of Payment	12,857.19	2.02%
SAMPLE POPULATION - TOTAL	636,411.19	100.00%

TABLE E – THE BAHAMAS RED CROSS VENDOR EXPENDITURE SUMMARY



ONE ELEUTHERA FOUNDATION

E. ONE ELEUTHERA FOUNDATION (“OEF”) – REPORT ON FINDINGS

Overview of Approach During Our Work

- ✚ Requested documentation to gain an understanding of policies, procedures, and controls
- ✚ Reviewed documentation provided
- ✚ Confirmed and/or corroborated information and sources discussed during inquiry
- ✚ Randomly selected sample data/items for appropriate testing
- ✚ Inspected reports and/or other sources of information
- ✚ Executed reconciliation procedures using data and information provided
- ✚ Recalculated data provided to verify amounts and investigated material differences noted

The IPE listing was provided to OEF representative during the week of **January 12, 2022** (see [Appendix B](#) for further details).

General Requests – Included in the IPE Listing

- i. Meetings minutes - relating to the Food Programme
- ii. Procedure/process used to distribute benefits under the Food Programme
- iii. Authorized signatory listing with approval limits

Specific Requests – Included in the IPE Listing

- i. Policies and procedures for the following (specific to the Food Programme):
 - a. Beneficiary process/criteria
 - b. Vendor process/criteria
 - c. Government income received
 - d. Expenditure
 - e. Financial accounting and reporting

The above listings do not represent an exhaustive list as additional documents/items/schedules would have been requested during the course of our work and are referenced throughout this report.

1. WORK PERFORMED – REVIEW OF INTERNAL FINANCIAL CONTROLS & PROCUREMENT PROCESS

On **February 4, 2022**, OEF's representative provided ATI with a pdf copy of its "Internal Financial Controls & Procurement Process Document" related to the Food Programme.

Procedures performed related to OEF's Internal Financial Controls & Procurement Process Document included:

- ♦ Reviewed data included therein to gain an understanding of policies, procedures, and controls
- ♦ Inspected reports and/or other sources of information referenced in the document
- ♦ Perform testing to provide an assessment
- ♦ Identified control deficiencies based on documented policies and procedures

FINDINGS:

ATI inspected related documents to confirm the policies and procedures documented in OEF's Internal Financial Controls & Procurement Process document.

We made the following observations:

- All payments reviewed by ATI were settled electronically by way of online banking
- Supporting banking documents reviewed by ATI were approved by two individuals
- ATI reviewed sign offs/indicators of approvals on voucher and disbursement request internal documents used by OEF
- ATI was not able to verify signatures and applicable limits as this requested information was not provide to us as at the date of this Report
- ATI was not provided with the requested weekly recipients list specific to the OEF zone and weekly total of food parcels and/or food vouchers distributed, as at the date of this Report. Consequently, we are unble to verify OEF's reporting and monitoring of same based on OEF controls

2. WORK PERFORMED – REVIEW OF GENERAL LEDGER DETAILS & SUPPORTING/OTHER SCHEDULES

On **February 4, 2022**, OEF's representative provided ATI with a pdf copy of its general ledger details for the Food Programme using SharePoint. The excel version of the general ledger was provided on **February 8, 2022**.

On **February 17, 2022**, resulting procedures performed and inquiries made by ATI (detailed below), OEF's representative provided an amended government income general ledger for the Food Programme.

The amended government income general ledger included the below reclassification.

- ♦ *Reclassified amounts recorded on **September 2, 2021**, in the amount of **\$19,931.00**. The amounts were posted to a header account*

Procedures performed related to OEF's general ledgers included:

- ♦ Reviewed transactions and ending balances included in the data provided
- ♦ Footed and cross footed balances
- ♦ Reviewed and agreed amounts recorded as funds received from the GOB and BFN (BFN disbursed funds received from the GOB to other NGOs)
- ♦ Identified and investigated variances

- ♦ Tested expenditures on a sample basis for accuracy, occurrence, and completeness

FINDINGS:

ATI reviewed the submitted data. The review process included a reconciliation of the amounts recorded as contributions received (specific to the Feeding Programme), from the GOB per the records of OEF and disbursements recorded by the Department of SS, the Treasury and BFN (BFN disbursed funds received from the GOB to other NGOs). We investigated any differences.

We made the following observations:

- ATI noted a difference of **forty-five thousand, six hundred and fourteen dollars (approximately \$46K)**. The difference was primarily due to fund receipt classification (i.e., Funds being identified as being received from the BFN on behalf of the GOB). Differences were investigated and resolved (See Tables A & B below)
- ATI noted input errors in the Department of SS's excel workbook used to record/track disbursements made during the Food Programme. (See Tables A & B below) The Department of SS's workbook was corrected and updated subsequent to ATI's inquiry and the Department of SS's verification
- ATI was not able to reconcile the below outlined amounts using the OEF's general ledger details provided on **February 4, 2022**, and the Department of SS's and Treasury records provided
 - Recorded in One Eleuthera 's GL (Not recorded in the Department of SS Disbursements workbook**
 - One Eleuthera 06/15/2020 48,327.00
 - One Eleuthera 06/16/2020 48,327.00
 - **One Eleuthera 12/31/2020 23,047.00 – Due to cutoff (amount recorded in 2021)**
 - Not Recorded in One Eleuthera's GL (Recorded in the Department of SS Disbursements workbook)**
 - 14/06/2020 58,007.00
 - 18/06/2020 64,330.00
 - **02/09/2021 19,931.00 – Corrected by OEF (recorded in an unrelated account)**
- The records of OEF and the Department of SS's were subsequently adjusted after ATI's inquiry and OEF's and the Department of SS's verification and confirmation of receipt and disbursement of fund amounts, respectively. OEF provided an amended general ledger on **February 17, 2022** (see **Tables A – D**).
- The Department of SS's excel workbook was updated as per the details noted below
 - 14/06/2020 \$58,007.00 - Adjusted by the Department of SS on February 17, 2022 (records adjusted – payment amount of \$48,327.00)**
 - 18/06/2020 \$64,330.00 - Adjusted by the Department of SS on February 17, 2022 (records adjusted – payment amount of \$48,327.00)**
- ATI noted that remaining differences were due to classification issues identified (i.e., recording variances between receipt directly from the Treasury and BFN on behalf of the GOB) which were not updated in OEF's updated general ledger
- ATI was informed by Department of SS personnel, that at the commencement of the Food Programme, funds were processed through the BFN. This was done as a result of some of the NGOs not having existing vendor identification numbers and the urgency of the need for the distribution of funds (time sensitive). However, we

were unable to determine the reason for occurrences subsequent to Treasury's disbursement processing after vendor identifications were regularized. ATI noted that:

- a. **\$48,327.00** was disbursed by the BFN on **July 1, 2020**
- b. **\$57,007.00** disbursed by the BFN on **July 8, 2020**
- c. **\$23,047.00** disbursed by the BFN on **March 24, 2021**

ATI performed substantive procedures for expenditures on a sample basis and investigated differences noted. We requested underlying supporting documents (e.g., invoices, purchase orders, detailed payment schedules and the like) and evidence supporting the settlement of these expenditures.

We made the following observations:

- ATI noted a **reasonable** cost mix amongst vendors used during the Food Programme and the vendors used were consistent with the Vendor Listing provided by OEF (See [Table J](#) for Vendor Summary and [Appendix G](#) for Vendor Listing)
- ATI noted that OEF was:
 - a. Unable to provide **any** of the requested supporting document for **6%** of the sampled population's value
 - b. Unable to provide **sufficient** and/or **appropriate** supporting documents for **62%** of the sampled population's value. See [Table I](#) below for additional details
- ATI noted an error on one of the supporting documents reviewed.
 - a. OEF totals for Jemmak's Drugs and Beauty Supplies included a discrepancy between the amount recorded at the top and the amount footed at the bottom (**\$50.00** vs. **\$950.00**). We noted that all other support agreed to the general ledger and the payment made in the amount of **\$950.00**
- ATI noted vendor and beneficiary account name differences
 - a. The Market Supermarket and Rock Sound Properties Ltd.
 - b. Charles' Place and Charlamae Nixon
 - c. Bargain Busters and Bargain Mart
- All other expenditure samples were supported by invoices, purchase orders, receipts, and applicable payroll expenditure listings and were traced to evidence supporting payments settling the expenditures.

ATI requested the documents detailed below that were not received at the date of this Report. Accordingly, we were unable to perform related testing procedures.

- a. Meetings minutes
- b. Authorized signatory listing with approval limits
- c. Weekly recipients list specific to the NGO zone
- d. Weekly total of food parcels and/or food vouchers distributed

Policies and Procedures relating to:

- a. Beneficiary process/criteria
- b. Government income received
- c. Financial accounting and reporting (partially submitted)

TABLE A – INITIAL DATA

Department/NGO	2020	2021	
Department of Social Services - Funds Disbursed	\$ 1,703,673.00	\$ 812,533.00	A
One Eleuthera Foundation - Funds Received	\$ 1,281,910.00	\$ 792,602.00	B
Difference	\$ 421,763.00	\$ 19,931.00	
NGO	2020	2021	
Bahamas Feeding Network - Funds Disbursed (On Behalf of Gov't)	\$ 125,334.00	\$ 23,047.00	C
One Eleuthera Foundation - Funds Received	\$ 544,461.00	\$ -	B
Difference	-\$ 419,127.00	\$ 23,047.00	
TOTAL PER ONE ELEUTHERA FOUNDATION	\$ 1,826,371.00	\$ 792,602.00	\$ 2,618,973.00 SUM OF B
TOTAL PER DEPARTMENT OF SOCIAL SERVICES	1,703,673.00	812,533.00	2,516,206.00 SUM OF A
TOTAL PER BAHAMAS FEEDING NETWORK (DISBURSED ON BEHALF OF THE GOVERNMENT)	125,334.00	23,047.00	148,381.00 SUM OF C
	1,829,007.00	835,580.00	2,664,587.00 SUM OF A & C
	\$ 2,636.00	\$ 42,978.00	\$ 45,614.00 DIFFERENCE (A + C) - B

TABLE B – AMENDED DATA

ATI - SUMMARY TABLE / WORK PERFORMED

Department/NGO	2020	2021	
Department of Social Services - Funds Disbursed	\$ 1,677,990.00	\$ 812,533.00	A
One Eleuthera Foundation - Funds Received	\$ 1,281,910.00	\$ 792,602.00	B
Difference	\$ 396,080.00	\$ 19,931.00	
NGO	2020	2021	
Bahamas Feeding Network - Funds Disbursed (On Behalf of Gov't)	\$ 125,334.00	\$ 23,047.00	C
One Eleuthera Foundation - Funds Received	\$ 544,461.00	\$ 19,931.00	B
Difference	-\$ 419,127.00	\$ 3,116.00	
TOTAL PER ONE ELEUTHERA FOUNDATION	\$ 1,826,371.00	\$ 812,533.00	\$ 2,638,904.00 SUM OF B
TOTAL PER DEPARTMENT OF SOCIAL SERVICES	1,677,990.00	812,533.00	2,490,523.00 SUM OF A
TOTAL PER BAHAMAS FEEDING NETWORK (DISBURSED ON BEHALF OF THE GOVERNMENT)	125,334.00	23,047.00	148,381.00 SUM OF C
	1,803,324.00	835,580.00	2,638,904.00 SUM OF A & C
	-\$ 23,047.00	\$ 23,047.00	\$ - DIFFERENCE (A + C) - B

TABLE C – 2020 DEPARTMENT OF SS COMPARED TO ONE ELEUTHERA FOUNDATION

ONE ELEUTHERA FOUNDATION						
DEPT. OF SS - RECORDS		One Eleuthera			DIFFERENCE	
Date	Amount	One Eleuthera	Date MM/DD/YY	Amount		
14/06/2020	48,327.00	One Eleuthera		-	48,327.00	419,127.00 In One Eleuthera's GL as being received from BFN - See difference noted above
18/06/2020	48,327.00	One Eleuthera		-	48,327.00	
14/07/2020	58,007.00	One Eleuthera		-	58,007.00	
21/07/2020	64,330.00	One Eleuthera		-	64,330.00	
28/07/2020	75,926.00	One Eleuthera	07/28/2020	75,926.00	-	
05/08/2020	75,926.00	One Eleuthera		-	75,926.00	
11/08/2020	61,813.00	One Eleuthera		-	61,813.00	
18/08/2020	62,397.00	One Eleuthera		-	62,397.00	
26/08/2020	109,600.00	One Eleuthera	08/26/2020	109,600.00	-	
01/09/2020	135,434.00	One Eleuthera	09/01/2020	135,434.00	-	
08/09/2020	135,434.00	One Eleuthera	09/08/2020	135,434.00	-	
15/09/2020	135,434.00	One Eleuthera	09/15/2020	135,434.00	-	
23/09/2020	135,434.00	One Eleuthera	09/23/2020	135,434.00	-	
30/09/2020	135,434.00	One Eleuthera	09/30/2020	135,434.00	-	
07/10/2020	135,434.00	One Eleuthera	10/07/2020	135,434.00	-	
14/10/2020	59,429.00	One Eleuthera	10/14/2020	59,429.00	-	
21/10/2020	59,429.00	One Eleuthera	10/21/2020	59,429.00	-	
28/10/2020	69,563.00	One Eleuthera	10/28/2020	69,563.00	-	
04/11/2020	24,000.00	One Eleuthera	11/04/2020	24,000.00	-	
11/11/2020	11,095.00	One Eleuthera	11/11/2020	11,095.00	-	
18/11/2020	13,893.00	One Eleuthera	11/18/2020	13,893.00	-	
25/11/2020	13,893.00	One Eleuthera	11/25/2020	13,893.00	-	
03/12/2020	9,431.00	One Eleuthera	12/03/2020	9,431.00	-	
	-	One Eleuthera	12/31/2020	23,047.00	- 23,047.00	Posted in Jan 2021
2020 TOTAL	1,677,990.00	A		1,281,910.00	396,080.00	

TABLE D – 2020 BFN COMPARED TO ONE ELEUTHERA FOUNDATION

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			ONE ELEUTHERA - PER GL DETAILS PROVIDED			DIFFERENCE
	Date	Amount	One Eleuthera	Date MM/DD/YY	Amount	
BFN	03/06/2020	- 20,000.00	One Eleuthera	06/04/2020	20,000.00	-
		-	One Eleuthera	06/15/2020	48,327.00	48,327.00
		-	One Eleuthera	06/16/2020	48,327.00	48,327.00
BFN	01/07/2020	- 48,327.00	One Eleuthera	07/03/2020	48,327.00	-
BFN	08/07/2020	- 57,007.00	One Eleuthera	07/14/2020	57,007.00	-
		-	One Eleuthera	07/14/2020	58,007.00	58,007.00
		-	One Eleuthera	07/21/2020	64,330.00	64,330.00
		-	One Eleuthera	08/05/2020	75,926.00	75,926.00
		-	One Eleuthera	08/11/2020	61,813.00	61,813.00
		-	One Eleuthera	08/18/2020	62,397.00	62,397.00
2020 TOTAL		- 125,334.00	B		544,461.00	419,127.00

TABLE E – 2020 ONE ELEUTHERA FOUNDATION TOTAL

(A)+(ABS(B))
1,826,371.00
2020 One Eleuthera

TABLE F – 2021 DEPARTMENT OF SS COMPARED TO ONE ELEUTHERA FOUNDATION

ONE ELEUTHERA FOUNDATION					
DEPT. OF SS - RECORDS		One Eleuthera		DIFFERENCE	
Date	Amount	One Eleuthera	Date Date MM/DD/YY	Amount	
06/01/2021	23,047.00	One Eleuthera	01/06/2021	23,047.00	-
13/01/2021	23,047.00	One Eleuthera	01/13/2021	23,047.00	-
19/01/2021	23,047.00	One Eleuthera	01/19/2021	23,047.00	-
27/01/2021	23,047.00	One Eleuthera		-	23,047.00
28/01/2021	20,000.00	One Eleuthera	01/28/2021	20,000.00	-
02/02/2021	23,047.00	One Eleuthera	02/02/2021	23,047.00	-
03/02/2021	19,000.00	One Eleuthera	02/03/2021	19,000.00	-
10/02/2021	23,047.00	One Eleuthera	02/10/2021	23,047.00	-
16/02/2021	23,047.00	One Eleuthera	02/16/2021	23,047.00	-
23/02/2021	23,047.00	One Eleuthera	02/23/2021	23,047.00	-
03/03/2021	23,047.00	One Eleuthera	03/03/2021	23,047.00	-
10/03/2021	23,047.00	One Eleuthera	03/10/2021	23,047.00	-
	-	One Eleuthera	03/24/2021	23,047.00	- 23,047.00
01/04/2021	23,047.00	One Eleuthera	04/01/2021	23,047.00	-
13/04/2021	23,047.00	One Eleuthera	04/13/2021	23,047.00	-
13/04/2021	23,047.00	One Eleuthera	04/13/2021	23,047.00	-
21/04/2021	23,047.00	One Eleuthera	04/21/2021	23,047.00	-
28/04/2021	13,529.00	One Eleuthera	04/28/2021	13,529.00	-
05/05/2021	19,931.00	One Eleuthera	05/05/2021	19,931.00	-
14/05/2021	19,931.00	One Eleuthera	05/14/2021	19,931.00	-
20/05/2021	19,931.00	One Eleuthera	05/21/2021	19,931.00	-
		One Eleuthera	05/26/2021	19,931.00	- 19,931.00
		One Eleuthera	05/31/2021	-19,931.00	19,931.00
11/06/2021	59,793.00	One Eleuthera	06/14/2021	59,793.00	-
17/06/2021	19,931.00	One Eleuthera	06/17/2021	19,931.00	-
24/06/2021	19,931.00	One Eleuthera	06/24/2021	19,931.00	-
24/06/2021	19,931.00	One Eleuthera	06/24/2021	19,931.00	-
28/06/2021	23,047.00	One Eleuthera	06/29/2021	23,047.00	-
08/07/2021	19,931.00	One Eleuthera	07/08/2021	19,931.00	-
14/07/2021	19,931.00	One Eleuthera	07/14/2021	19,931.00	-
23/07/2021	19,931.00	One Eleuthera	07/23/2021	19,931.00	-
04/08/2021	19,931.00	One Eleuthera	08/04/2021	19,931.00	-
06/08/2021	19,931.00	One Eleuthera	08/06/2021	19,931.00	-
16/08/2021	19,931.00	One Eleuthera	08/16/2021	19,931.00	-
18/08/2021	19,931.00	One Eleuthera	08/18/2021	19,931.00	-
26/08/2021	19,931.00	One Eleuthera	08/26/2021	19,931.00	-
02/09/2021	19,931.00	One Eleuthera	09/03/2021	19,931.00	-
09/09/2021	14,468.00	One Eleuthera	09/09/2021	14,468.00	-
15/09/2021	13,316.00	One Eleuthera	09/17/2021	13,316.00	-
23/09/2021	14,894.00	One Eleuthera	09/23/2021	14,894.00	-
05/10/2021	12,863.00	One Eleuthera	10/05/2021	12,863.00	-
2021 TOTAL	812,533.00	A		812,533.00	-

TABLE G – 2021 BFN COMPARED TO ONE ELEUTHERA FOUNDATION

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			ONE ELEUTHERA - PER GL DETAILS PROVIDED			DIFFERENCE
	Date	Amount	One Eleuthera	Date	Amount	
BFN	24/03/2021	- 23,047.00	One Eleuthera	Date MM/DD/YY	-	- 23,047.00
	2021 TOTAL	- 23,047.00			-	- 23,047.00

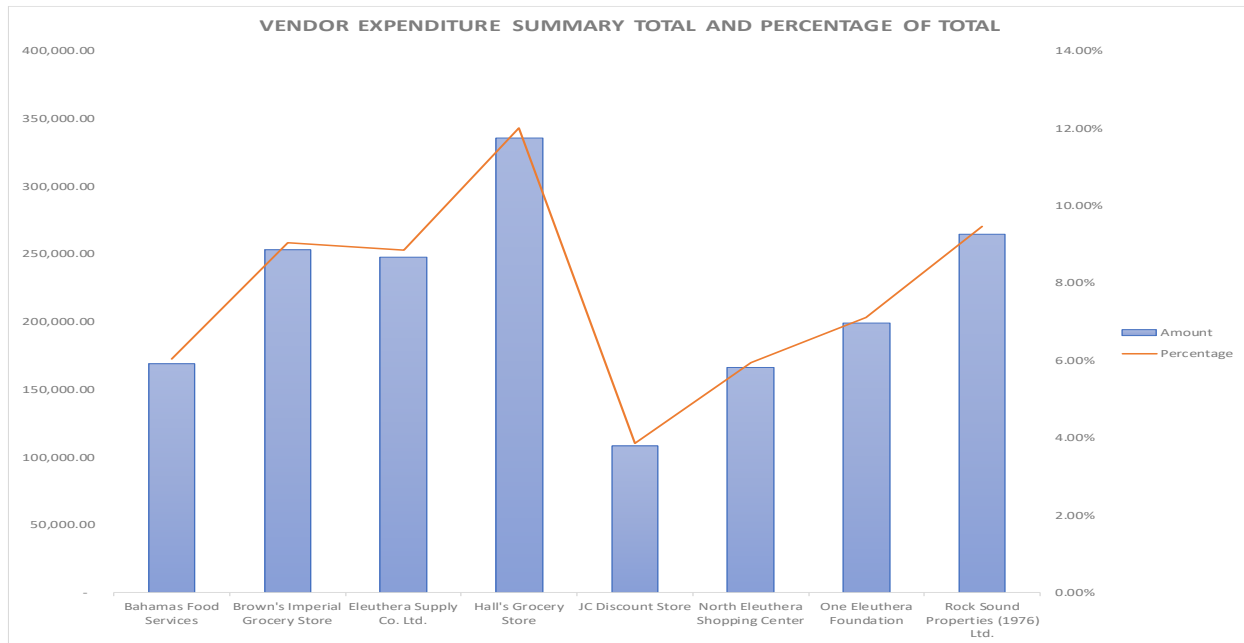
TABLE H – 2021 ONE ELEUTHERA FOUNDATION TOTAL

(A)+(ABS(B))
812,533.00
2021 One Eleuthera

TABLE I – SAMPLE TESTING SUPPORT BREAKDOWN

DESCRIPTION	AMOUNT	%
No Supporting Documents Received	12,600.00	6.19%
Requested Documents Received	63,812.40	31.37%
Requested Documents Partially Received (Support Provided - Email from Jim Richard)	48,077.29	23.63%
Requested Documents Partially Received - Adjusting Journal Entries (AJE)	78,941.68	38.81%
Sample Population - Total	203,431.37	100.00%

TABLE J – ONE ELEUTHERA FOUNDATION VENDOR EXPENDITURE SUMMARY



GRAND BAHAMA FEEDING PROGRAMME

F. GRAND BAHAMA FEEDING PROGRAMME (CATES & CO.) – REPORT ON FINDINGS

Grand Bahamas Food Programme

During a virtual meeting held on **January 17, 2022**, the Chairperson of the Task Force identified Mrs. Raquel Beneby-Hart, Administrative Officer, Public Service Center for Human Resources Development, at the Ministry of Public Service, as the administrator for the Food Programme in Grand Bahama (See [Appendix A](#) for additional details)

In an email response, dated **January 26, 2022**, addressed to Mr. Joel Lewis (PS) of the Department of SS & UD, Mrs. Beneby-Hart noted the following:

- ✚ She served as the Administrator for the Food Programme
- ✚ Mr. Ellison Delva, CPA of Cates & Co and accountant of record would be responsible for providing financials for the review
- ✚ All hard copy documents i.e., invoices, weekly distribution reports, relating to the National Food Distribution Task Force remains at the Ministry of Grand Bahama
- ✚ Mrs. Beneby-Hart was no longer attached to the office and no longer had access to said documents

An unsigned copy of the Project Charter, which served as the Standard Operating Procedure (“SOP”) for the Grand Bahama Food Distribution Committee was attached (Copy included in [Appendix H](#)).

Overview of Approach During Our Work

- ✚ Requested documentation to gain an understanding of policies, procedures, and controls
- ✚ Reviewed documentation provided
- ✚ Confirmed and/or corroborated information and sources discussed during inquiry
- ✚ Randomly selected sample data/items for appropriate testing
- ✚ Inspected reports and/or other sources of information
- ✚ Executed reconciliation procedures using data and information provided
- ✚ Recalculated data provided to verify amounts and investigated material differences noted

The IPE listing was provided to Grand Bahama’s representative during the week of **January 26, 2022** (see [Appendix B](#) for further details).

General Requests – Included in the IPE Listing

- iv. Meetings minutes - relating to the Food Programme
- v. Procedure/process used to distribute benefits under the Food Programme
- vi. Authorized signatory listing with approval limits

Specific Requests – Included in the IPE Listing

- ii. Policies and procedures for the following (specific to the Food Programme):
 - a. Beneficiary process/criteria
 - b. Vendor process/criteria
 - c. Government income received
 - d. Expenditure
 - e. Financial accounting and reporting

The above listings do not represent an exhaustive list as additional documents/items/schedules would have been requested during the course of our work and are referenced throughout this report.

1. REVIEW OF CONTROLS

On **February 14, 2022**, Cates & Co. representative, in an email response, based on ATI's queries provided us with an outline of their operations and the requested support for ATI's queries related to their involvement in the Food Programme. See below overview:

- ATI queried what measures were in place to ensure appropriate accounting for receipt and use of funds, and to ensure there were no errors due to other cash/banking transaction not related to the Food Programme (i.e., reconciliation procedures)
 - a. *“As mentioned, in an effort to assist the Government in having an Account available to receive funds and to properly pay the Vendors, Cate’s & Co. allowed them to use our Clients Account which was also being monitored by First Caribbean International Bank, who regularly called to verify the source of funds being deposited to this Account. Our B\$ Clients Account is reconciled on a regular basis as funds are received. A separate subledger Account is maintained for each Client and this Summary is agreed and reconciled to the Monthly Bank Statement so as to ensure that no such errors occur.”*
- Considering that request for payments to Vendors and Suppliers were submitted by the local Program Coordinator, an outline of the exact document(s) used were requested by ATI along with an example(s). ATI also requested the name of the local program coordinator
 - a. *“On a regular basis, we would receive a request for payment to Vendors and/or Suppliers from the Local Program Coordinator (Mrs. Raquel Beneby – Hart). This request would come by **way of e-mail** where she would attach a copy of the Vendor Invoice. The Vendor Invoice would usually be accompanied by approval from two of the Local (Board/ Committee) Members.”*
- ATI requested details on vendor process, production of cheques and signing authorities. What measures were in place to ensure accuracy, proper authorization, and reconciliation
 - a. *“Vendor Cheques are prepared by one of the Bookkeeper for the Company. Cheques along with supporting documentation are brought to my attention for review, approval and subsequently signing. All Cheques require two Authorized Signatories, one of which will always include one of our two Partners. In the majority of the cases, I was always one of the Cheque Signers. Prior to Cheques being prepared, Invoices were checked for errors, duplication, and accuracy. Also, we ensured that we had received proper approval.*
- ATI queried if a log maintained
 - a. *If you are referring to a Cheque Log, please note that we kept individual files for all Vendors and records kept of Cheques issued. We also have individual cheque Stubs for all payments associated with the Food Program.”*
- Other ATI queries responded to by Mr. Delva are detailed below:
 - a. *Nature of expenditure classification labelled “Misc.,” totaling, \$105,151.00 to IDEA Relief – Abaco “Account labeled Miscellaneous because it was being used for us to just track non-food related expenses without having to create a long Spreadsheet with a heading for each particular item. As you noted, the huge item listed was a Re-imburement to the Organization called “Idea Relief- Abaco.”*

Related procedures performed included:

- ♦ Reviewed e-mail to gain an understanding
- ♦ Inspected supporting and/or other sources of information referenced in the document
- ♦ Perform testing to provide an assessment
- ♦ Identified control deficiencies based on information provided

FINDINGS:

ATI requested a signed copy of the SOP from Mrs. Beneby-Hart, who provided the following response:

“Kindly note the email thread.

The Project Charter was emailed, and an electronic agreement was accepted from the Committee.”

We made the following observations:

- ATI reviewed the email thread provided and related responses and noted agreement related to the SOP from Dr. Robert Lockhart, Mr. Greg Laroda, and Mr. Ian Rolle. These individuals were identified as member of Grand Bahama’s Food Programme.
- ATI reviewed the e-mail thread for the sample and confirmed the details included therein. Details reviewed included:
 - a. Relevant approvals sent by way of e-mail
 - b. Invoice attached and details noted thereon (e.g., vendor, amount, date, invoice number, and purpose)
 - c. Copy of cheque prepared by Cates & Co to settle payment requestWe agreed the copy of the cheque to the invoice and noted no exceptions
- ATI obtained and reviewed the subledger maintained for the Food Programme.
- Considering the nature of the Grand Bahama’s Food Programme’s operations, we were not able to review the Cates & Co’s. “Client Account” as it contained other client details.
- ATI noted that two signatories authorized the copy of the cheque, with one being Mr. Delva.

2. WORK PERFORMED – REVIEW OF GENERAL LEDGER DETAILS & SUPPORTING/OTHER SCHEDULES

On **February 3, 2022**, Cates & Co’s. representative provided ATI with a pdf copy of its general ledger details for the Food Programme using SharePoint. The excel version of the general ledger was provided on **February 8, 2022**.

Procedures performed related to OEF’s general ledgers included:

- ♦ Reviewed transactions and ending balances included in the data provided
- ♦ Footed and cross footed balances
- ♦ Reviewed and agreed amounts recorded as funds received from the GOB and BFN (BFN disbursed funds received from the GOB to other NGOs)
- ♦ Identified and investigated variances
- ♦ Tested expenditures on a sample basis for accuracy, occurrence, and completeness

FINDINGS:

ATI reviewed the submitted data. The review process included a reconciliation of the amounts recorded as contributions received (specific to the Feeding Programme), from the GOB per the records of Cates & Co. and disbursements recorded by the Department of SS, the Treasury and BFN (BFN disbursed funds received from the GOB to other NGOs). We agreed the amounts without exception.

We made the following observations:

- ATI conducted review and reconciliation procedures on data received from Mr. Delva and agreed the amounts recorded as disbursements by the Department of SS, the Treasury and BFN (BFN disbursed funds received from the GOB to other NGOs) to the amounts recorded as received by Cates & Co. See [Tables A – F](#) below.
- ATI was informed by Department of SS personnel, that at the commencement of the Food Programme, funds were processed through the BFN. This was done as a result of some of the NGOs not having existing vendor identification numbers and the urgency of the need for the distribution of funds (time sensitive). However, we were unable to determine the reason for occurrences subsequent to Treasury’s disbursement processing after vendor identifications were regularized. ATI noted that:
 - a. **\$17,093.00** disbursed by the BFN on **July 01, 2020**, to Cates & Co.
 - b. **\$150,000.00** disbursed by the BFN on **July 8, 2020**, to Cates & Co.
 - c. **\$138,281.00** disbursed by the BFN on **March 24, 2021**, to Cates & Co.
- ATI noted that the vendor G B Food Co. accounted for more than **three million, eight hundred thousand dollars (\$3.8M)** or approximately **forty percent (40%)** and Sawyer’s Fresh Market accounted for more than **two million (\$2M)** or approximately **twenty one percent (21%)** of the costs during the Food Programme. See [Table G](#) below for details
- ATI was not provided with data that met “best practices” as at the date of this Report. Boxes of data were sent to the Department of SS in New Providence. The data transferred did not include ANY appropriate records indicative of what was included/transferred, or other pertinent identifying details. See excerpt below of relevant communication shared.

a. -----"Kershala T. Albury" <kershala@aticompanylimited.com> wrote: -----
To: "CLOTHILDA WHYMNS" <CLOTHILDAWHYMNS@BAHAMAS.GOV.BS>
From: "Kershala T. Albury" <kershala@aticompanylimited.com>
Date: 02/03/2022 04:33PM
Cc: "HARCOURT BROWN" <HARCOURTBROWN@bahamas.gov.bs>, "Joel Lewis" <JOELLEWIS@BAHAMAS.GOV.BS>, "Kim Sawyer" <KIMSAWYER@BAHAMAS.GOV.BS>
Subject: RE: AUDIT REVIEW REPORT – THE NATIONAL FOOD DISTRIBUTION

Good evening Ms. Whymns ("CW"),

Thank you for our call this morning (CW and Kershala Albury ("KA")).

We discussed the following points for your record.

- *CW noted that there are several large boxes of documents and scanning the contents of same would require significant resources*
- *KA noted that testing will be conducted on a sample basis and corroborating support for the selections would have to be provided. Scanning and providing the contents of all the documents stored was not required. Scans for samples selected would be required. The SharePoint site was created to facilitate this process*

- CW suggested the transfer of the boxes to New Providence
- CW would want to ensure that they are properly secured and packaged
- KA noted that decisions relative to the transfer would lie within the governmental department(s) and those charged with that authority and all related logistics (security and integrity of the documents)

I will need to know how to proceed soonest so that I provide access to the SharePoint secured site if required.

*Kershala Albury
Principal Consultant
ATI Company Limited”*

- ATI noted that the data received by the Department of SS (New Providence Head Office) was not catalogued according to “best practices” (i.e., no identification relating to the contents of each box, unrelated documents were included, and there appeared to be little to no organization).

In view of reporting timelines, and the disorder in which the data was transferred by The Ministry responsible, ATI was unable to complete sufficient and appropriate procedures consistent with our agreed-upon procedures.

ATI requested the documents detailed below that were not receive at the date of this Report. Accordingly, we were unbalance to perform related testing procedures.

- e. Meetings minutes
- a. Authorized signatory listing with approval limits
- b. Weekly recipients list specific to the NGO zone
- c. Weekly total of food parcels and/or food vouchers distributed

Policies and Procedures relating to:

- d. Beneficiary process/criteria
- a. Vendor process/criteria
- b. Financial accounting and reporting (partially submitted)

TABLE A – 2020 DEPARTMENT OF SS COMPARED TO CATES & CO.

CATES & CO. - GRAND BAHAMA					
DEPT. OF SS - RECORDS		Cates & Co.			DIFFERENCE
Date	Amount	C & Co.	Date	Amount	
15/06/2020	17,093.00	C & Co.	06/06/2020	17,093.00	-
18/06/2020	17,093.00	C & Co.	09/07/2020	17,093.00	-
14/07/2020	150,000.00	C & Co.	15/07/2020	150,000.00	-
21/07/2020	156,188.00	C & Co.	21/07/2020	156,188.00	-
28/07/2020	217,633.00	C & Co.	28/07/2020	217,633.00	-
05/08/2020	217,633.00	C & Co.	09/08/2020	217,633.00	-
11/08/2020	173,975.00	C & Co.	08/08/2020	173,975.00	-
18/08/2020	180,000.00	C & Co.	20/08/2020	180,000.00	-
26/08/2020	150,000.00	C & Co.	26/08/2020	150,000.00	-
01/09/2020	146,250.00	C & Co.	01/09/2020	146,250.00	-
08/09/2020	146,250.00	C & Co.	08/09/2020	146,250.00	-
15/09/2020	146,250.00	C & Co.	16/09/2020	146,250.00	-
23/09/2020	146,250.00	C & Co.	25/09/2020	146,250.00	-
30/09/2020	146,250.00	C & Co.	30/09/2020	146,250.00	-
07/10/2020	146,250.00	C & Co.	08/10/2020	146,250.00	-
14/10/2020	178,286.00	C & Co.	14/10/2020	178,286.00	-
21/10/2020	178,286.00	C & Co.	21/10/2020	178,286.00	-
28/10/2020	290,114.00	C & Co.	28/10/2020	290,114.00	-
04/11/2020	110,000.00	C & Co.	04/11/2020	110,000.00	-
11/11/2020	112,000.00	C & Co.	11/11/2020	112,000.00	-
18/11/2020	95,200.00	C & Co.	18/11/2020	95,200.00	-
25/11/2020	95,200.00	C & Co.	25/11/2020	95,200.00	-
03/12/2020	95,200.00	C & Co.	03/12/2020	95,200.00	-
10/12/2020	95,200.00	C & Co.	11/12/2020	95,200.00	-
22/12/2020	95,200.00	C & Co.	18/12/2020	95,200.00	-
2020 TOTAL	3,501,801.00	A		3,501,801.00	-

TABLE B – 2020 BFN COMPARED TO CATES & CO.

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			Cates & Co. - PER GL DETAILS PROVIDED			DIFFERENCE
	<i>Date</i>	<i>Amount</i>	<i>C & Co.</i>	<i>Date</i>	<i>Amount</i>	
BFN	29/05/2020	- 25,000.00	Cates & Co.	29/05/2020	25,000.00	-
BFN	03/06/2020	- 20,000.00	Cates & Co.	03/06/2020	20,000.00	-
BFN	01/07/2020	- 17,093.00	Cates & Co.	02/07/2020	17,093.00	-
BFN	08/07/2020	- 150,000.00	Cates & Co.	13/07/2020	150,000.00	-
	2020 TOTAL	- 212,093.00 B			212,093.00	-

TABLE C – 2020 CATES & CO. TOTAL

(A)+(ABS(B))
3,713,894.00
2020 CATES & CO. GRAND BAHAMA

TABLE D – 2021 DEPARTMENT OF SS COMPARED TO CATES & CO.

CATES & CO. - GRAND BAHAMA					
DEPT. OF SS - RECORDS		Cates & Co.		DIFFERENCE	
<i>Date</i>	<i>Amount</i>	<i>C & Co.</i>	<i>Date</i>	<i>Amount</i>	
06/01/2021	138,281.00	C & Co.	06/01/2021	138,281.00	-
13/01/2021	138,281.00	C & Co.	13/01/2021	138,281.00	-
19/01/2021	138,281.00	C & Co.	19/01/2021	138,281.00	-
27/01/2021	138,281.00	C & Co.	27/01/2021	138,281.00	-
28/01/2021	95,200.00	C & Co.	28/01/2021	95,200.00	-
02/02/2021	138,281.00	C & Co.	02/02/2021	138,281.00	-
03/02/2021	95,200.00	C & Co.	03/02/2021	95,200.00	-
10/02/2021	138,281.00	C & Co.	11/02/2021	138,281.00	-
16/02/2021	138,281.00	C & Co.	17/02/2021	138,281.00	-
23/02/2021	138,281.00	C & Co.	23/02/2021	138,281.00	-
03/03/2021	138,281.00	C & Co.	03/03/2021	138,281.00	-
10/03/2021	138,281.00	C & Co.	10/03/2021	138,281.00	-
01/04/2021	138,281.00	C & Co.	01/04/2021	138,281.00	-
12/04/2021	276,562.00	C & Co.	01/04/2021	276,562.00	-
21/04/2021	138,281.00	C & Co.	21/04/2021	138,281.00	-
28/04/2021	136,574.00	C & Co.	28/04/2021	136,574.00	-
05/05/2021	136,574.00	C & Co.	05/05/2021	136,574.00	-
14/05/2021	136,574.00	C & Co.	14/05/2021	136,574.00	-
20/05/2021	136,574.00	C & Co.	20/05/2021	136,574.00	-
11/06/2021	409,722.00	C & Co.	14/06/2021	409,722.00	-
17/06/2021	136,574.00	C & Co.	17/06/2021	136,574.00	-
24/06/2021	273,148.00	C & Co.	25/06/2021	273,148.00	-
08/07/2021	136,574.00	C & Co.	08/07/2021	136,574.00	-
14/07/2021	136,574.00	C & Co.	14/07/2021	136,574.00	-
23/07/2021	136,574.00	C & Co.	23/07/2021	136,574.00	-
04/08/2021	136,574.00	C & Co.	05/08/2021	136,574.00	-
06/08/2021	136,574.00	C & Co.	06/08/2021	136,574.00	-
16/08/2021	136,574.00	C & Co.	16/08/2021	136,574.00	-
18/08/2021	136,574.00	C & Co.	18/08/2021	136,574.00	-
26/08/2021	291,116.00	C & Co.	25/08/2021	291,116.00	-
02/09/2021	227,097.00	C & Co.	03/09/2021	227,097.00	-
09/09/2021	236,017.00	C & Co.	09/09/2021	236,017.00	-
15/09/2021	221,506.00	C & Co.	16/09/2021	221,506.00	-
23/09/2021	213,400.00	C & Co.	23/09/2021	213,400.00	-
2021 TOTAL	5,637,228.00 A			5,637,228.00	-

Dated before the Department of SS

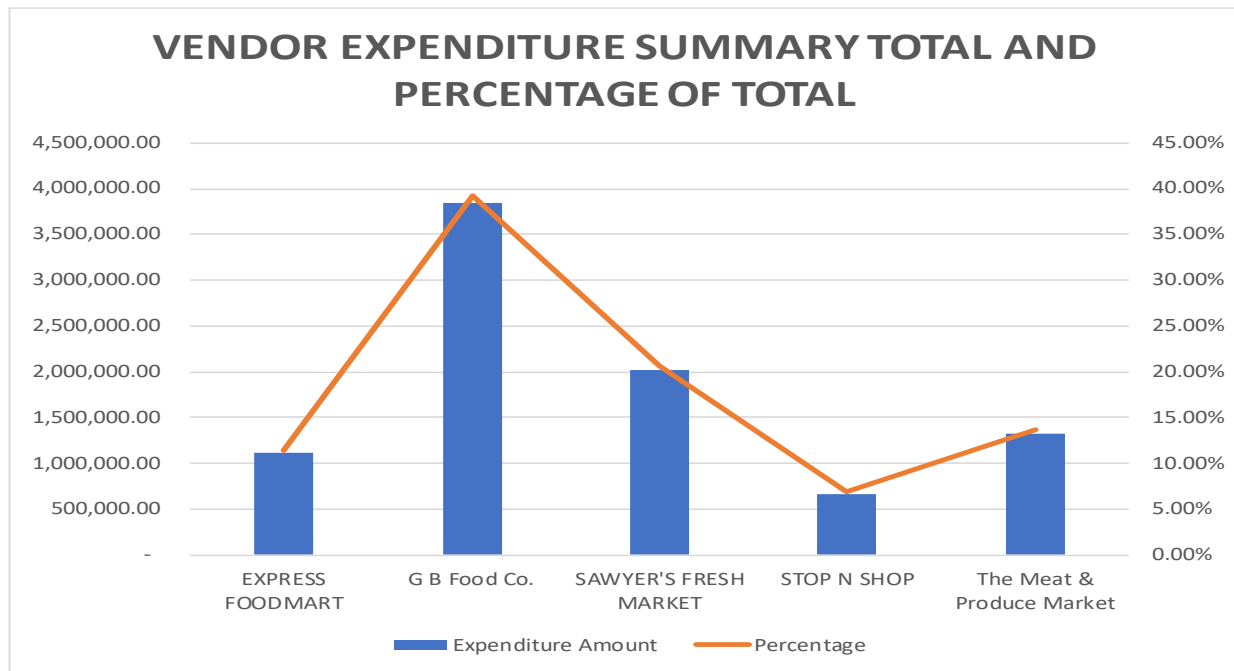
TABLE E – 2021 BFN COMPARED TO CATES & CO.

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			Cates & Co. - PER GL DETAILS PROVIDED			DIFFERENCE
	<i>Date</i>	<i>Amount</i>	<i>C & Co.</i>	<i>Date</i>	<i>Amount</i>	
BFN	24/03/2021	- 138,281.00	Cates & Co.	24/03/2021	138,281.00	-
	2021 TOTAL	-138,281.00 B			138,281.00	-

TABLE F – 2021 CATES & CO. TOTAL

(A)+(ABS(B))
5,775,509.00
2021 CATES & CO. GRAND BAHAMA

TABLE G – CATES & CO. VENDOR EXPENDITURE SUMMARY



LEND A HAND BAHAMAS

G. LEND A HAND BAHAMAS (“LAH”)

Overview of Approach During Our Work

- ✚ Requested documentation to gain an understanding of policies, procedures, and controls
- ✚ Reviewed documentation provided
- ✚ Confirmed and/or corroborated information and sources discussed during inquiry
- ✚ Randomly selected sample data/items for appropriate testing
- ✚ Inspected reports and/or other sources of information
- ✚ Executed reconciliation procedures using data and information provided
- ✚ Recalculated data provided to verify amounts and investigated material differences noted

The IPE listing was provided to Lend a Hand Bahamas’ representative during the week of **January 10, 2022** (see [Appendix B](#) for further details).

General Requests – Included in the IPE Listing

- i. Meetings minutes - relating to the Food Programme
- ii. Procedure/process used to distribute benefits under the Food Programme
- iii. Authorized signatory listing with approval limits

Specific Requests – Included in the IPE Listing

- i. Policies and procedures for the following (specific to the Food Programme):
 - a. Beneficiary process/criteria
 - b. Vendor process/criteria
 - c. Government income received
 - d. Expenditure
 - e. Financial accounting and reporting

The above listings do not represent an exhaustive list as additional documents/items/schedules would have been requested during the course of our work and are referenced throughout this report.

1. REVIEW OF CONTROLS

ATI was not provided with the requested policies and procedure data as at the date of this Report.

FINDINGS:

ATI was not provided with evidence corroborating the successful design and implementation of the Lend a Hand's controls for the Food Programme.

2. WORK PERFORMED – REVIEW OF GENERAL LEDGER DETAILS & SUPPORTING/OTHER SCHEDULES

Lend a Hand Bahamas did not provide timely information. The requested information was not received after over two and a half months of follow ups with Lend a Hand Bahamas' representatives.

See [Appendix B](#) and I for additional details related to communication sent to Lend a Hand Bahamas' representative, related to data request, and follow up requests.

As at the date of this Report, Lend a Hand Bahamas has provided:

- a. A "PDF" document labeled "Weekly Accounting Dashboard," containing **over ten (10) blank pages** and data that did not meet the requirements of the requested data and documentation. See [Appendix I](#) for details
- b. Email correspondences requesting additional time and/or noting submission timelines that have not been met as at the date of this letter

On **March 10, 2022**, the Ministry of SS & UD provided IDEA Relief with a follow up request letter, outlining the timeline of requests made, discussions, extensions granted, assistance provided and a final request for the data. Additionally, possible next steps were outlined in this letter. (See [Appendix I](#) for a copy of the correspondence). As at the date of this Report, the request was not met.

After reviewing Lend a Hand Bahamas' PDF submission, ATI provided Lend a Hand Bahamas with a copy of a **sample** general ledger for their reference; noting that the **sample** general ledger was only a guide as different software systems produced varying formats of similar reports. See [Appendix I](#) for additional details related this communication sent by ATI.

Fund disbursements to Lend a Hand Bahamas totaled approximately **eleven million, five hundred thousand dollars (\$11.5M)**. ATI verified the disbursement recorded using the Department of Social Services, the Treasury and BFN (BFN disbursed funds received from the GOB to other NGOs) records received. See Tables A - D below.

FINDINGS:

ATI was not provided with timely data or data that met "best practices" as at the date of this Report.

In view of reporting timelines, considerations extended from the initiation of the engagement, and the inadequate data provided by Lend a Hand, ATI was unable to complete sufficient and appropriate procedures consistent with our agreed-upon procedures.

TABLE A – 2020 AMOUNT PER DEPARTMENT OF SS

LEND A HAND						
DEPT. OF SS - RECORDS		Lend a Hand			DIFFERENCE	
<i>Date</i>	<i>Amount</i>	<i>Lend a Hand</i>	<i>Date</i>	<i>Amount</i>		
15/06/2020	89,505.00	Lend a Hand			89,505.00	
18/06/2020	89,505.00	Lend a Hand			89,505.00	
14/07/2020	118,422.00	Lend a Hand			118,422.00	
21/07/2020	138,159.00	Lend a Hand			138,159.00	
28/07/2020	105,194.00	Lend a Hand			105,194.00	
05/08/2020	105,194.00	Lend a Hand			105,194.00	
11/08/2020	206,060.00	Lend a Hand			206,060.00	
18/08/2020	197,305.00	Lend a Hand			197,305.00	
26/08/2020	246,845.00	Lend a Hand			246,845.00	
01/09/2020	317,657.00	Lend a Hand			317,657.00	
08/09/2020	317,657.00	Lend a Hand			317,657.00	
15/09/2020	317,657.00	Lend a Hand			317,657.00	
23/09/2020	317,657.00	Lend a Hand			317,657.00	
30/09/2020	317,657.00	Lend a Hand			317,657.00	
07/10/2020	317,657.00	Lend a Hand			317,657.00	
14/10/2020	286,000.00	Lend a Hand			286,000.00	
21/10/2020	286,000.00	Lend a Hand			286,000.00	
28/10/2020	353,034.00	Lend a Hand			353,034.00	
04/11/2020	355,250.00	Lend a Hand			355,250.00	
11/11/2020	126,280.00	Lend a Hand			126,280.00	
18/11/2020	107,338.00	Lend a Hand			107,338.00	
25/11/2020	107,338.00	Lend a Hand			107,338.00	
03/12/2020	114,776.00	Lend a Hand			114,776.00	
10/12/2020	114,776.00	Lend a Hand			114,776.00	
22/12/2020	114,776.00	Lend a Hand			114,776.00	
2020 TOTAL	5,167,699.00			-	5,167,699.00	

TABLE B – 2020 AMOUNT PER BFN

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			Lend a Hand - PER GL DETAILS PROVIDED			DIFFERENCE
	<i>Date</i>	<i>Amount</i>	<i>Lend a Hand</i>	<i>Date</i>	<i>Amount</i>	
BFN	29/05/2020	- 25,000.00	Lend a Hand			25,000.00
BFN	03/06/2020	- 20,000.00	Lend a Hand			20,000.00
BFN	01/07/2020	- 89,505.00	Lend a Hand			89,505.00
BFN	08/07/2020	- 118,422.00	Lend a Hand			118,422.00
	2020 TOTAL	- 252,927.00			-	252,927.00

TABLE C – 2020 LEND A HAND TOTAL

(A)+(ABS(B))
5,420,626.00
2020 LEND A HAND

TABLE D – 2021 AMOUNT PER DEPARTMENT OF SS

LEND A HAND					
DEPT. OF SS - RECORDS		Lend a Hand			DIFFERENCE
Date	Amount	Lend a Hand	Date	Amount	
06/01/2021	153,646.00	Lend a Hand			153,646.00
13/01/2021	153,646.00	Lend a Hand			153,646.00
19/01/2021	153,646.00	Lend a Hand			153,646.00
27/01/2021	153,646.00	Lend a Hand			153,646.00
28/01/2021	114,776.00	Lend a Hand			114,776.00
02/02/2021	153,646.00	Lend a Hand			153,646.00
03/02/2021	114,776.00	Lend a Hand			114,776.00
10/02/2021	153,646.00	Lend a Hand			153,646.00
16/02/2021	153,646.00	Lend a Hand			153,646.00
23/02/2021	153,646.00	Lend a Hand			153,646.00
03/03/2021	153,646.00	Lend a Hand			153,646.00
10/03/2021	153,646.00	Lend a Hand			153,646.00
01/04/2021	153,646.00	Lend a Hand			153,646.00
12/04/2021	307,292.00	Lend a Hand			307,292.00
21/04/2021	153,646.00	Lend a Hand			153,646.00
28/04/2021	164,657.00	Lend a Hand			164,657.00
05/05/2021	158,255.00	Lend a Hand			158,255.00
14/05/2021	158,255.00	Lend a Hand			158,255.00
20/05/2021	158,255.00	Lend a Hand			158,255.00
10/06/2021	18,000.00	Lend a Hand			18,000.00
11/06/2021	474,765.00	Lend a Hand			474,765.00
17/06/2021	158,255.00	Lend a Hand			158,255.00
24/06/2021	316,510.00	Lend a Hand			316,510.00
08/07/2021	158,255.00	Lend a Hand			158,255.00
14/07/2021	158,255.00	Lend a Hand			158,255.00
23/07/2021	158,255.00	Lend a Hand			158,255.00
04/08/2021	158,255.00	Lend a Hand			158,255.00
06/08/2021	158,255.00	Lend a Hand			158,255.00
16/08/2021	158,255.00	Lend a Hand			158,255.00
18/08/2021	158,255.00	Lend a Hand			158,255.00
26/08/2021	158,255.00	Lend a Hand			158,255.00
02/09/2021	158,255.00	Lend a Hand			158,255.00
09/09/2021	125,520.00	Lend a Hand			125,520.00
15/09/2021	139,775.00	Lend a Hand			139,775.00
23/09/2021	156,338.00	Lend a Hand			156,338.00
05/10/2021	158,255.00	Lend a Hand			158,255.00
2021 TOTAL	5,991,731.00			-	5,991,731.00

TABLE E – 2021 AMOUNT PER BFN

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			Lend a Hand - PER GL DETAILS PROVIDED			DIFFERENCE
	<i>Date</i>	<i>Amount</i>	<i>Lend a Hand</i>	<i>Date</i>	<i>Amount</i>	
BFN	24/03/2021	- 115,235.00	Lend a Hand			-115,235.00
	2021 TOTAL	- 115,235.00			-	-115,235.00

TABLE F – 2021 LEND A HAND TOTAL

(A)+(ABS(B))
6,106,966.00
2021 LEND A HAND

IDEA RELIEF

H. IDEA RELIEF

Overview of Approach During Our Work

- ✚ Requested documentation to gain an understanding of policies, procedures, and controls
- ✚ Reviewed documentation provided
- ✚ Confirmed and/or corroborated information and sources discussed during inquiry
- ✚ Randomly selected sample data/items for appropriate testing
- ✚ Inspected reports and/or other sources of information
- ✚ Executed reconciliation procedures using data and information provided
- ✚ Recalculated data provided to verify amounts and investigated material differences noted

The IPE listing was provided to IDEA Relief’s representative during the week of **January 24, 2022** (see [Appendix B](#) for further details).

General Requests – Included in the IPE Listing

- iv. Meetings minutes - relating to the Food Programme
- v. Procedure/process used to distribute benefits under the Food Programme
- vi. Authorized signatory listing with approval limits

Specific Requests – Included in the IPE Listing

- ii. Policies and procedures for the following (specific to the Food Programme):
 - a. Beneficiary process/criteria
 - b. Vendor process/criteria
 - c. Government income received
 - d. Expenditure
 - e. Financial accounting and reporting

The above listings do not represent an exhaustive list as additional documents/items/schedules would have been requested during the course of our work and are referenced throughout this report.

1. REVIEW OF CONTROLS

ATI was not provided with the requested policies and procedure data. We were provided with e-mailed responses. See below [Table A](#) detailed below.

FINDINGS:

See for [Table A](#) for details.

2. WORK PERFORMED – REVIEW OF GENERAL LEDGER DETAILS & SUPPORTING/OTHER SCHEDULES

IDEA Relief did not provide timely information. The requested information was not received after approximately two months of follow ups with IDEA Relief’s representatives.

Please see detailed timeline in [Appendix B](#).

Fund disbursements to IDEA Relief totaled approximately **four million, four hundred thousand dollars (\$4.4M)**. ATI verified the disbursement recorded using the Department of SS, the Treasury and BFN (BFN disbursed funds received from the GOB to other NGOs) records received. See [Tables B – G](#) for details.

*An email correspondence was sent on **March 18, 2022**, from IDEA Relief’s representative, for which we have not conducted any reviews as at the date of this Report.*

FINDINGS:

ATI was not provided with timely data or data that met “best practices” as at the date of this Report.

In view of reporting timelines, considerations extended from the initiation of the engagement, and the inadequate data provided by IDEA Relief, ATI was unable to complete sufficient and appropriate procedures consistent with our agreed-upon procedures.

STATUS OF REQUEST FOR DATA AND INFORMATION AS AT THE DATE OF THIS REPORT

TABLE A – IDEA RELIEF’S IPE LISTING WITH COMMENTS

Name / Description of Document	Date Requested	Due Date	Date Received	Status
NOTE: Period covers May 2020 to October 2021 unless otherwise specified GENERAL REQUESTS -NGOs Used for The National Food Programme	See Letter of Instructions for details	See letter of instructions for details		
Meetings minutes - relating to the National Food Programme	01/24/2022	01/28/2022	See status comment	Mr. Will Tomlinson's response in an e-mail dated February 25, 2022: Not applicable please see Taskforce Chairman <i>ATI's Comment:</i> <i>Minutes were not provided by the Task Force or IDEA Relief</i>
Procedure/Process used to distribute benefits under the National Food Programme	01/24/2022	01/28/2022	See status comment	Mr. Will Tomlinson's response in an e-mail dated February 25, 2022: <u>Procedure / Process used to distribute benefits under the National Food Programme</u> IDEA Relief distributed both Vouchers & Food Parcels. IDEA Relief distributed parcels from April 2020 through Feb 2021 through the distribution points set up across the region by the UN & World Central Kitchen. Food was shipped to Marsh Harbour and packaged in a tent beside the RBDF base before being transported to the Cays & Distribution Centers. Vouchers were distributed from Dec 2020 through the end of March 2021 <i>ATI's Comment:</i> <i>ATI was unable to complete sufficient and appropriate procedures in agreement with our agreed-upon procedures due to untimely receipt of data and general ledger details were not provided by IDEA Relief at the time of the e-mail correspondence.</i>
Authorized signatory listing with approval limits	01/24/2022	01/28/2022	See status comment	Mr. Will Tomlinson's response in an e-mail dated February 25, 2022: I was the sole signatory for all procurement. <i>ATI's Comment:</i> <i>ATI was unable to complete sufficient and appropriate procedures in agreement with our agreed-upon procedures due to untimely receipt of data and general ledger details were not provided by IDEA Relief at the time of the e-mail correspondence.</i>

TABLE A – IDEA RELIEF’S IPE LISTING (CONTINUED)

Policies and Procedures For The Following (Specific to the National Food Programme):				
Beneficiary Process/ Criteria	01/24/2022	01/28/2022	See status comment	Mr. Will Tomlinson's response in an e-mail dated February 25, 2022: Please speak to Task Force Chairman
Vendor Process/ Criteria	01/24/2022	01/28/2022	See status comment	Mr. Will Tomlinson's response in an e-mail dated February 25, 2022: Vendor list provided. See Appendix J for details. <i>ATI's Comment:</i> <i>ATI was unable to complete sufficient and appropriate procedures in agreement with our agreed-upon procedures due to untimely receipt of data and general ledger details were not provided by IDEA Relief at the time of the e-mail correspondence.</i>
Government Income Received	01/24/2022	01/28/2022	See status comment	Mr. Will Tomlinson's response in an e-mail dated February 25, 2022: \$4,257,996.00 <i>ATI's Comment:</i> <i>ATI was unable to complete sufficient and appropriate procedures in agreement with our agreed-upon procedures due to non receipt of any related data and general ledger details were not provided by IDEA Relief at the time of the e-mail correspondence.</i>

TABLE A – IDEA RELIEF’S IPE LISTING (CONTINUED)

Expenditures	01/24/2022	01/28/2022	See status comment	<p>Mr. Will Tomlinson's response in an e-mail dated February 25, 2022: - \$4,730,331</p> <p><u>Procurement Process Utilized</u></p> <p>While supplying the food program from April 2020 through April 2021 price control was done for both the physical food distributed & the vouchers at local stores, also taken into account was supply chain & logistic issues as well as capacity to supply for a community on a weekly basis.</p> <p>Efforts were always made to source from Bahamian suppliers first to keep money & jobs in the country during a very tough time. Many ingredients supplied in the feeding program came solely from Bahamian suppliers due to the lower cost locally than from Florida.</p> <p>International vendors were used when capacity locally was not available and pricing was significantly cheaper. Purchasing internationally rather than through Nassau allowed IDEA to take advantage of duty and VAT exemptions in the Abaco region & purchasing in bulk provided significant savings. The owners of Cheney Brothers have had very strong connections to the Abacos for 20+ years and provided significant discounts on their RRP.</p> <p>Every line item was checked against other vendors for competitive pricing & many other vendors were approached both locally and internationally that IDEA did not procure from due to higher costs.</p> <p>When IDEA moved from food parcels to vouchers, on the ground assessments were done by team members checking for capacity and pricing along with physical distance for recipients.</p> <p><i>ATI's Comment:</i> <i>ATI was unable to complete sufficient and appropriate procedures in agreement with our agreed-upon procedures due to untimely receipt of data and general ledger details were not provided by IDEA Relief at the time of the e-mail correspondence.</i></p>
Financial Accounting and Reporting	01/24/2022	01/28/2022	See status comment	<p>Mr. Will Tomlinson's response in an e-mail dated February 25, 2022:</p> <p><u>Financial Controls</u></p> <ul style="list-style-type: none"> - Bi-Weekly updates of the books by IDEA's Bookkeeper - End of month reconciliation - Monthly Board meetings discussing procurement and new suppliers - All Checks signed & wires initiated by CEO <p><u>Please See Dashboard</u></p> <p><i>ATI's Comment:</i> <i>ATI was unable to complete sufficient and appropriate procedures in agreement with our agreed-upon procedures due to untimely receipt of data and general ledger details were not provided by IDEA Relief at the time of the e-mail correspondence.</i></p>

TABLE A – IDEA RELIEF’S IPE LISTING (CONTINUED)

DETAILED REQUESTS - RELATING TO THE NATIONAL FOOD DISTRIBUTION PROGRAMME				
Weekly "Dash Board" reports	01/24/2022	01/28/2022		<p>Mr. Will Tomlinson's response in an e-mail dated February 25, 2022: <u>Please See Dashboard</u></p> <p><i>ATI's Comment:</i> Dashboards were not provided by IDEA Relief.</p>
Weekly recipients lists specific to the NGO zone	01/24/2022	01/28/2022		<p>Mr. Will Tomlinson's response in an e-mail dated March 02, 2022: The ledger has been submitted by Susan in hard copy as the Dashboard for all weeks IDEA relief was a part of the program. The weekly recipient database has been submitted by Susan Larson and covers all 18000 households. The Dashboard was the weekly expenditure and income.</p> <p><i>ATI's Comment:</i> See general ledger status comments detailed below. Additionally, contribution and expenditure data included in the weekly dashboards should be supported by underlying general ledger details, supporting schedules, and/or documents. These underlying items form an integral part of substantiating evidence which corroborates the information included in the weekly dashboard reports. ATI was unable to complete sufficient and appropriate procedures in agreement with our agreed-upon procedures due to untimely receipt of data and general ledger details were not provided by IDEA Relief at the time of the e-mail correspondence.</p>
Detailed listing or cash ledger for the receipt of disbursements received	01/24/2022	01/28/2022		<p>Mr. Will Tomlinson's response in an e-mails dated January 16, 2022 and February 25, 2022 noted that: The ledger submission would be (01.26.2022) done by and has been submitted (02.25.22) by Susan</p> <p><i>Mrs. Susan Larson's response Emailed response dated February 10, 2022:</i> "Thank you for your email. I am not in possession of IDEA Relief's general ledger. This is a misunderstanding, I am sure.</p> <p><i>ATI's Comment:</i> ATI was unable to complete sufficient and appropriate procedures in agreement with our agreed-upon procedures due to untimely receipt of data and general ledger details were not provided by IDEA Relief at the time of the e-mail correspondence.</p>

TABLE A – IDEA RELIEF’S IPE LISTING (CONTINUED)

Detailed listing or ledger details for purchases (good or services)	01/24/2022	01/28/2022		<p>Mr. Will Tomlinson's response in an e-mails dated January 16, 2022 and February 25, 2022 noted that: The ledger submission would be (01.26.2022) done by and has been submitted (02.25.22) by Susan</p> <p><i>Mrs. Susan Larson's response Emailed response dated February 10, 2022: "Thank you for your email. I am not in possession of IDEA Relief's general ledger. This is a misunderstanding, I am sure.</i></p> <p><i>ATI's Comment: ATI was unable to complete sufficient and appropriate procedures in agreement with our agreed-upon procedures due to untimely receipt of data and general ledger details were not provided by IDEA Relief at the time of the e-mail correspondence.</i></p>
Approved purchase requisitions and corresponding purchase order (or equivalent document used to request and authorized purchases (goods or services)) from a vendor	Based upon receipt of and subsequent selections from NGOs general ledger - Discussed during virtual meeting			
Purchase receipt - relating to the National Food Programme	Based upon receipt of and subsequent selections from NGOs general ledger - Discussed during virtual meeting			
Copy of cheque stub or wire instructions	Based upon receipt of and subsequent selections from NGOs general ledger - Discussed during virtual meeting			

TABLE A – IDEA RELIEF’S IPE LISTING (CONTINUED)

Reconciliations and reports	01/24/2022	01/28/2022		
Weekly total of food parcels and/ or food vouchers distributed	01/24/2022	01/28/2022		
Listing or ledger details for expenses (overhead) incurred	01/24/2022	01/28/2022		
Invoice/ supporting documents relating to expense incurred	Based upon receipt of and subsequent selections from NGOs general ledger - Discussed during virtual meeting			
Approval for payment	Based upon receipt of and subsequent selections from NGOs general ledger - Discussed during virtual meeting			
Copy of cheque stub or wire instructions	Based upon receipt of and subsequent selections from NGOs general ledger - Discussed during virtual meeting			

TABLE B – 2020 AMOUNT PER DEPARTMENT OF SS

IDEA RELIEF					
DEPT. OF SS - RECORDS		IDEA Relief			DIFFERENCE
Date	Amount		Date	Amount	
15/06/2020	102,558.00	IDEA Relief			102,558.00
18/06/2020	102,558.00	IDEA Relief			102,558.00
14/07/2020	122,041.00	IDEA Relief			122,041.00
12/07/2020	129,030.00	IDEA Relief			129,030.00
28/07/2020	107,353.00	IDEA Relief			107,353.00
05/08/2020	107,353.00	IDEA Relief			107,353.00
11/08/2020	93,533.00	IDEA Relief			93,533.00
18/08/2020	99,856.00	IDEA Relief			99,856.00
26/08/2020	109,311.00	IDEA Relief			109,311.00
01/09/2020	144,086.00	IDEA Relief			144,086.00
08/09/2020	144,086.00	IDEA Relief			144,086.00
15/09/2020	144,086.00	IDEA Relief			144,086.00
23/09/2020	144,086.00	IDEA Relief			144,086.00
30/09/2020	144,086.00	IDEA Relief			144,086.00
07/10/2020	144,086.00	IDEA Relief			144,086.00
14/10/2020	81,417.00	IDEA Relief			81,417.00
21/10/2020	81,417.00	IDEA Relief			81,417.00
28/10/2020	95,302.00	IDEA Relief			95,302.00
04/11/2020	100,184.00	IDEA Relief			100,184.00
11/11/2020	91,175.00	IDEA Relief			91,175.00
18/11/2020	80,474.00	IDEA Relief			80,474.00
25/11/2020	80,474.00	IDEA Relief			80,474.00
03/12/2020	77,499.00	IDEA Relief			77,499.00
10/12/2020	77,499.00	IDEA Relief			77,499.00
22/12/2020	77,499.00	IDEA Relief			77,499.00
2020 TOTAL	2,681,049.00			-	2,681,049.00

TABLE C – 2020 AMOUNT PER BFN

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			IDEA Relief - PER GL DETAILS PROVIDED			DIFFERENCE
	<i>Date</i>	<i>Amount</i>	<i>Idea Relief</i>	<i>Date</i>	<i>Amount</i>	
BFN	29/05/2020	- 25,000.00	IDEA Relief		-	25,000.00
BFN	03/06/2020	- 20,000.00	IDEA Relief		-	20,000.00
BFN	01/07/2020	- 102,558.00	IDEA Relief		-	102,558.00
BFN	08/07/2020	- 122,041.00	IDEA Relief		-	122,041.00
	2020 TOTAL	- 269,599.00			-	269,599.00

TABLE D – 2020 IDEA RELIEF TOTAL

(A)+(ABS(B))
2,950,648.00
2020 IDEA RELIEF

TABLE E – 2021 AMOUNT PER BFN

IDEA RELIEF					
DEPT. OF SS - RECORDS		IDEA Relief			DIFFERENCE
<i>Date</i>	<i>Amount</i>		<i>Date</i>	<i>Amount</i>	
06/01/2021	115,235.00	IDEA Relief			115,235.00
13/01/2021	115,235.00	IDEA Relief			115,235.00
19/01/2021	115,235.00	IDEA Relief			115,235.00
27/01/2021	115,235.00	IDEA Relief			115,235.00
28/01/2021	77,499.00	IDEA Relief			77,499.00
02/02/2021	115,235.00	IDEA Relief			115,235.00
03/02/2021	77,499.00	IDEA Relief			77,499.00
10/02/2021	115,235.00	IDEA Relief			115,235.00
16/02/2021	115,235.00	IDEA Relief			115,235.00
23/02/2021	115,235.00	IDEA Relief			115,235.00
10/03/2021	115,235.00	IDEA Relief			115,235.00
01/04/2021	115,235.00	IDEA Relief			115,235.00
2021 TOTAL	1,307,348.00			-	1,307,348.00

TABLE F – 2021 AMOUNT PER BFN

DISTRIBUTIONS RECEIVED FROM BFN (GOVERNMENT DISBURSEMENTS)						
BFN - PER GL DETAILS PROVIDED			IDEA Relief - PER GL DETAILS PROVIDED			DIFFERENCE
	<i>Date</i>	<i>Amount</i>	<i>Idea Relief</i>	<i>Date</i>	<i>Amount</i>	
BFN	24/03/2021	- 153,646.00	IDEA Relief			153,646.00
	2021 TOTAL	- 153,646.00			-	153,646.00

TABLE G – 2021 IDEA RELIEF TOTAL

(A)+(ABS(B))
1,460,994.00
2021 IDEA RELIEF

THE DEPARTMENT OF SOCIAL SERVICES AND URBAN DEVELOPMENT

I. THE DEPARTMENT OF SOCIAL SERVICES AND URBAN DEVELOPMENT (THE DEPARTMENT OF SS AND UD”)

The IPE listing was provided to The Department of SS’s representative on **December 20, 2021** (IPE listing details are note below)

Vendor Requests – Included in the IPE Listing

- i. Regulatory and KYC compliance for NGOs used
- ii. Business License
- iii. Tax Compliance Certificate
- iv. VAT Certificate (where applicable)
- v. Vendor ID Number

Specific Requests – Included in the IPE Listing

- i. Department of Social Services Acct ‘044-9341-9999-011-5318297-21’*
- ii. Bank Statements and Bank Reconciliations

*Department noted that they were not aware of the use of this account

ATI provided discovery services to assist the office of the Financial Secretary of the Ministry of Finance with its review of the National Food Distribution Task Force’s governance structure, controls, and compliance with its mandate. See the related Report, dated **December 13, 2021**, for detailed findings.

See [Appendix B](#) for responses received in relation to abovementioned Report dated **December 13, 2021**

FINDINGS:

Requested Private Organizations Due Diligence documents were not provided at the time of this Report.

We made the following observations:

The Department of SS did not appear to have received and/or maintained sufficient and appropriate documentation and support related to the Task Force’s operations and execution of the Food Programme.

See ATI’s report dated December 13, 2021, for additional information.

DOCUMENT INDEX

APPENDICES

END NOTES

DOCUMENT INDEX¹³

DATE	DESCRIPTION	FILE TYPE	ORGANIZATION	NOTES
02/07/2022	General Ledger Details for Northeast report 2020-2021	Excel	BFN	ATI requested vendor details
02/07/2022	General Ledger Details for Taskforce report 2020-2021	Excel	BFN	ATI requested vendor details
02/07/2022	Northeast Zone Report 2020-2021- Part 2	Excel	BFN	ATI requested vendor details
02/07/2022	NFAP Northeast Zone Report 2020-2021	PDF	BFN	ATI requested excel
02/07/2022	Taskforce General Account 2020-2021- Part 1	Excel	BFN	
02/08/2022	Administration report (portion with cheques) Part 1	Excel	BFN	
02/14/2022	Shipping Report (Petty Cash) 2020 and 2021	Excel	BFN	
02/15/2022	Administration Report Part 2	Excel	BFN	
02/16/2022	Administration Expenses report Part 3	Excel	BFN	
03/09/2022	Salaries and Stipend Report	Excel	BFN	
02/07/2022	Updated Reconciliation Summary Task Force	Excel	BRC	
02/10/2022	Amended Funds Received Tab with GL Info	Excel	BRC	
03/15/2022	NFDTF - Distribution Procedures	PDF	BRC	
01/26/2022	Project Charter -- National Food Distribution Task Force (GBI) v3 (1)	PDF	GB FP	
02/03/2022	National Food Task Force GB September 29	PDF	GB FP	
02/03/2022	National Food Task Force- General Ledger (Detail)	PDF	GB FP	ATI requested excel
02/03/2022	National Food Task Force- General Ledger (Summary)	PDF	GB FP	ATI requested excel
02/08/2022	TEMP NATL FOOD TASK FORCE	Excel	GB FP	
02/06/2022	Hands for Hunger pnl by class _NFC Taskforce 1 Jun 2020 - 31 Oct 2021	Excel	HFH	
02/14/2022	H4H NFC_Transaction+Report 2.14.2022	Excel	HFH	
03/04/2022	LHB CONTRIBUTIONS AND EXPENSES YEAR 2020 (1)	PDF	LAHB	Not GL formatted
02/11/2022	WEEKLY ACCOUNTING DASHBOARD	PDF	LAHB	Approximately 10 blank pages
02/02/2022	Internal Financial Controls & Procurement Process Document	PDF	OEF	
02/02/2022	EFI Vendors List	PDF	OEF	
02/04/2022	Bahamas Feeding Program OEF Income Contribution	PDF	OEF	ATI requested excel
02/04/2022	Bahamas Feeding Program Government Income	PDF	OEF	ATI requested excel
02/08/2022	Bahamas Feeding Program Expenses for the Period 01-Jun-2020 to 31-Oct-2021	Excel	OEF	
01/18/2022	3 scenarios DRAFT NATIONAL EMERGENCY FOOD SUPPORT DISTRIBUTION PLAN	PDF	TASKFORCE	
01/18/2022	APPROVED NATIONAL EMERGENCY FOOD SUPPORT DISTRIBUTION PLAN	PDF	TASKFORCE	
02/02/2022	NFDTF criteria	Excel	TASKFORCE	
02/22/2022	NGO Zone Leaders Reference Guide Example	Hardy Copy	TASKFORCE	
02/22/2022	NFDTF Partnership Agreement between Zone Leaders and Supporting Partners Example	Hardy Copy	TASKFORCE	No completed agreements provided
02/22/2022	Non-Disclosure Agreement Example	Hardy Copy	TASKFORCE	No completed agreements provided
02/22/2022	NFDT - Map of The Bahamas & New Providence with Food Network Legend	Hardy Copy	TASKFORCE	
02/22/2022	Weekly Disbursements Request - Submitted by The Chairperson to the Department of Social Services - Weeks 1 - 3, 5 - 68, and 70	Hardy Copy	TASKFORCE	Weeks 4 & 69 were not provided
02/22/2022	Abaco - IDEA Relief Weekly Dashboards - Weeks 1 - 44	Hardy Copy	TASKFORCE	
02/22/2022	Abaco - Hands for Hunger - Weekly Dashboards - Weeks 45 - 70	Hardy Copy	TASKFORCE	
02/22/2022	NP West Hands for Hunger Weekly Dashboards - Weeks 40 - 70	Hardy Copy	TASKFORCE	Weeks 1 - 39 Not Provided
02/22/2022	Grand Bahama - Weekly Dashboards - Weeks 1 - 70	Hardy Copy	TASKFORCE	
02/22/2022	NFDT - Report to the World Bank - Prepared by Task Force Chair - dated January 19, 2021	Hardy Copy	TASKFORCE	
02/22/2022	LAH - Weekly Dashboards - Week 1 - 70	Hardy Copy	TASKFORCE	
02/22/2022	One-E Foundation Weekly Dashboard - Weeks 1 - 66, 69 & 70	Hardy Copy	TASKFORCE	Weeks 67 & 68 Not Provided
	Bahamas Feeding Network - Weekly Dashboards (None Provided)		TASKFORCE	NOTHING PROVIDED
	Bahamas Red Cross - Weekly Dashboards (None Provided)		TASKFORCE	NOTHING PROVIDED
	NP West Hands for Hunger Weekly Dashboards - Weeks 1 - 39		TASKFORCE	NOTHING PROVIDED

¹³ This document index includes some of the main documents referenced in this Report, but it is not an exhaustive list of documents and support reviewed.

APPENDICES

Appendices provided electronically due to volume and size.

END NOTES

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ⁱ Control Environment – A set of structures, policies, procedures, and activities that provide the basis for the performance of controls across an organization.

ⁱⁱ Control Implementation – The process of putting to use a control that exists.

ⁱⁱⁱ Controls – Structures, policies, procedures, and activities that mitigate risks.

^{iv} Procedures – Actions established in a specific manner. Procedures are often considered the accepted way of executing a task.

^v Review – Refers to procedures such as obtaining an understanding of, inspecting, confirming, and corroborating information and sources as deemed appropriate for the conduct of our scope of work.

^{vi} Work performed and procedures was specific to the Food Programme



ATI COMPANY LIMITED

THE NATIONAL FOOD DISTRIBUTION TASK FORCE REPORT - PHASE I



December 13, 2021

Mr. Simon Wilson
Financial Secretary
Ministry of Finance
Cecil Wallace-Whitfield Centre
P. O. Box N 3017
Nassau, N.P., The Bahamas

ATI Company Limited (“ATI”) has been contracted in an Advisory, Consulting, and Professional Services Agreement (the “Agreement”), dated November 26, 2021, to provide discovery services to assist the office of the Financial Secretary of the Ministry of Finance (the “Ministry”) with its review of The National Food Distribution Task Force (the “Task Force”).

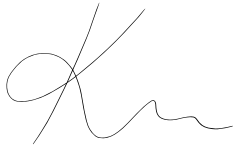
In accordance with the Scope of the Agreement, dated November 26, 2021, ATI has agreed with you, the following scope of work covering the period from the appointment of the Task Force to October 2021:

- A. REVIEW OF THE TASK FORCE’S MANDATE AND AN ASSESSMENT OF COMPLIANCE WITH THE DIRECTIVES INCLUDED THEREIN**
- B. ASSESSMENT OF NATIONAL FOOD DISTRIBUTION TASKFORCE’S:**
 - Governance structure; and
 - Internal controls, policies, and procedures
- C. ASSESSMENT OF THE TASK FORCE’S INTERNAL CONTROLS, POLICIES, AND PROCEDURES RELATED TO BENEFICIARY SELECTION.**
- D. ASSESSMENT OF THE INTERNAL CONTROLS RELATED TO THE TASK FORCE’S:**
 - A. Vendor selections;
 - B. Procurement and payment process; and
 - C. Expenses incurred and settled
- E. REVIEW OF THE CONTRACTS BETWEEN THE GOVERNMENT AND THE NON-GOVERNMENTAL ORGANIZATIONS (THE "NGO'S") EMPLOYED DURING THE DISTRIBUTION PROGRAMME**
- F. OVERALL ASSESSMENT OF THE TASK FORCE’S FINANCIAL CONTROLS**

For clarity, the term review, in the Scope of the Agreement, dated November 26, 2021, refers to procedures such as obtaining an understanding of, inspecting, confirming, and corroborating information and sources.

ATI confirms that the work performed has been duly executed and is in accordance with our scope of work. ATI’s deliverable is provided pursuant to the terms of our engagement and for your information and is not to be used for any other purpose or to be distributed to any other parties without our consent.

If you have any questions or require additional information, please contact Kershala Albury at +1 242-422-1981 or kershala@aticompanylimited.com

A handwritten signature in black ink, appearing to be 'K Albury', with a large loop at the start and a wavy tail.

Kershala Albury
Principal Consultant

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GLOSSARY

Arm's Length Transactions – Transactions between independent parties who are conducting business for their own interest.

Control Environment – A set of structures, policies, procedures, and activities that provide the basis for the performance of internal controls across an organization.

Control Implementation – The process of putting to use a control that exists.

Governance – The system by which an organization operates, is controlled, regulated, and held accountable during the execution of its duties.

Internal Controls – Structures, policies, procedures, and activities that mitigate risks.

Policy – Rules, regulations, laws, principles, or directives that guide how an organization operates.

Procedures – Actions established in a specific manner. Procedures are often considered the accepted way of executing a task.

PROMIS Software – The management information software system being used by the Ministry of Social Services and Urban Development.

Review – Refers to procedures such as obtaining an understanding of, inspecting, confirming, and corroborating information and sources as deemed appropriate for the conduct of our scope of work.

SCOPE AND APPROACH

Objectives

Our objective was to review the Task Force's governance structure, control environment, and compliance with its mandate.

Further, we were to review the control environment in place for the Task Force's operations and assess if these were designed and implemented effectively to manage identified risks during the Task Force's execution of its duties. Specified areas of focus included:

- Beneficiary selection
- Vendor selection
- Procurement and payment
- Expenses incurred and settled
- Financial controls

Finally, we were to review the contracts between the Government of The Bahamas and the NGOs engaged.

Purpose

The reasons for conducting this review are detailed below:

- To obtain a reasonable level of assurance that the design and implementation of the internal controls that surround the objectives, as stated in this Report, and in the Agreement, dated November 26, 2021, were effective.
- To provide an objective and independent assessment for the Ministry with a summary of findings.

Review Period

The Review covered the period from the appointment of the Task Force to October 2021.

Guide

When assessing the effectiveness of the design and implementation of the control environment, including policies and procedures, we identified the general risks detailed below. These general risks were used as a guide for performing the engagement.

- Noncompliance with mandate
- Failure to comply with contractual or other requirements
- Fraud risk resulting in financial loss
 - Non-compliance with policies and procedures
 - Inadequate reconciliation and verification controls
 - Collusion
- Provision of reports
 - Accurate and timely reports
- Arm's length transactions
- Appropriate transparency
- Personal data protection and data integrity
- Inadequate management/operational systems resulting in duplication

Approach

The procedures described below were performed to gain an understanding of the controls in place to mitigate risks identified.

- Conducted interviews with key team members to gain an understanding of the current procedures
- Confirmed and/or corroborated information and sources discussed during inquiry with key team members
- Reviewed documentation (if any) of the policies and procedures relating to the applicable controls in place to mitigate risks identified
- Inspected reports and/or other sources of information related to the Task Force’s management structure and its operations

RESTRICTIONS AND LIMITATIONS

It should be noted that not all risk factors are identified. Further, and in accordance with the Scope of the Agreement, dated November 26, 2021, work performed included assessing whether the controls in place, individually or in combination with other controls, were capable of effectively mitigating risks.

The workbooks, detailed in [APPENDIX A](#) and [APPENDIX B](#), provided by the Department of Social Services (the “Department of SS”) was not assessed and verified for accuracy, occurrence, and completeness as this was not included in ATI’s scope of work. We accept no responsibility if any information, statements, or expressions of opinion provided are inaccurate and/or incomplete. However, taking into account the objectives of our scope of work, we have taken all reasonable steps during our review to consider the information supplied, and assessed whether such information is likely to be reliable.

This report relates only to discovery services executed to assist the office of the Financial Secretary of the Ministry with its review of the Task Force. This report, schedules, documents, or other materials, prepared or provided by ATI are to be used only for the purpose stated in this Report and for your information and should not be disclosed, published, or used, in whole or in part, by the Ministry for any other purpose without ATI’s prior written permission.

DELIVERABLE

Upon completion of the review, ATI will provide a Report to the Ministry of Finance setting forth, among other things:

- The scope of the investigation;
- A listing of documents reviewed;
- The persons interviewed; and
- The facts and findings of the review in accordance with the Agreement, dated November 26, 2021.

DOCUMENTS REQUESTED

We requested the following documents from the Department of SS ‘s leadership team on November 30, 2021:

General Request

- A.** Instructions sent to the Department of SS with respect to:
- i. Mandate of the Task Force
 - ii. Composition of the Task Force

- iii. Directives related to the Department of SS's controls and procedures specific to the Task Force
- iv. Support for amounts paid to the NGOs (e.g., a set amount per household/per person)
 - a. Basis on which payout amount was determined; and
 - b. Reports / data corroborating receipt of donations
- v. Any other relevant reports provided to the Department by the Task Force
- vi. Meeting minutes

B. Contracts between the Government and the NGOs which distributed the food as part of this process

Specific Request

- C.** Documentation specific to the Task Force
- i. Governance policies and procedures
 - ii. Beneficiary selections
 - iii. Financial controls
 - iv. Procurement process utilized
 - v. List of vendors utilized for the programme

At the date of this Report, we did not receive the documents requested above. The interviewed persons from the Department of SS informed us that requested documents either did not exist or could not be located.

A listing of records, provided by the Department of SS, reviewed in preparation of this Report, is detailed in [APPENDIX C](#). Soft copies of these records were reviewed to complete the engagement.

The records we reviewed that are principally referred to in this Report are:

- i. Various emails exchanged between the Task Force's Chairperson, relevant persons from the Ministry of Finance and the Department of SS; and
- ii. Various Food Distribution Task Force Disbursement Request (sent via e-mail)

EXECUTIVE SUMMARY

During the conduct of our work, we identified the following issues:

1. There was no evidence that an internal control environment related to the Food Programme and the Task Force was designed and implemented by the office of the Financial Secretary of the Ministry and the Department of SS.
2. There was no evidence that the office of the Financial Secretary of the Ministry, the Department of SS, and the Task Force collaborated to design policies, procedures and best practices aimed towards the execution of the Task Force's duties, inclusive of **reporting** and **monitoring**.
3. There was no evidence that a formal and documented governance structure was in place (e.g., no documentation on the Task Force's mandate, and composition provided during our review).
4. There was no evidence of authorized contracts in place with the NGOs under the Food Programme.
5. There was no evidence that controls existed for **financial** reporting and monitoring.
6. There was no evidence that the Department of SS obtained an understanding of the Task Force's policies and procedures related to the Food Programme. Specifically, for:
 - NGO selections;
 - Beneficiary selections;
 - Vendor selections;
 - Procurement and payment by the NGOs; and

- Expenses incurred and settled by the NGOs.
7. The Department of SS did not appear to have received and/or maintained sufficient and appropriate documentation and support related to the Task Force’s operations and execution of the Food Programme. Specifically, for:
 - Verification of resource allocation;
 - Beneficiary data;
 - Expenditures incurred and settled; and
 - Minutes from meetings held.
 8. There was no evidence of controls in place to address personal data protection and data integrity.
 9. Duplications of beneficiaries were noted by the Department of SS at the end of the Food Programme. The identification of same was ongoing at the date of this Report. See [APPENDIX B](#) for further details.
 10. We noted payments totaling \$9,139,09.00 to a beneficiary that did not appear to be classified as an NGO. This is documented in our detailed findings.
 11. Bahamas Feeding Network returned funds in the amount of \$969,994.61 via a transfer to the Bank of the Bahamas during the month of November 2021 without verification relating to accuracy of the amount being returned. See [APPENDIX A](#) for further details.
 12. There was no evidence of controls in place to address arm’s length transactions and to promote transparency.

The above issues (alone or a combination of) can adversely affect the Department of SS’s and the Ministry’s ability to achieve its objectives and mitigate risks. The design and implementation of appropriate controls, along with the execution and monitoring of these controls will promote operational efficiency, safeguard resources/assets, and encourage compliance with the prescribed policies and procedures, laws and regulations and successful accomplishment of strategic goals.

DETAILED FINDINGS

We report our findings below:

Discussion with the Department of SS

On November 30, 2021, a meeting was held with Kim Sawyer, Acting Director (“AD”), Patrece Darling, Finance and Accounting Officer (“FO”), and Kershala Albury, ATI Consultant. Minutes from this meeting are further detailed in [APPENDIX D](#).

During this meeting we discussed:

- i. The Department of SS’s role in the National Food Distribution Programme (the “Food Programme”) from its commencement to its culmination
- ii. Controls, policies, and procedures covering the operations of the Department of SS for the Food Programme
- iii. Selection process for the NGOs under the Food Programme
- iv. Contracts in place with the NGOs under the Food Programme
- v. The Department of SS’s policy and/or procedure for the transfer of funds to the NGOs and verification related to the use of these funds
- vi. Reports prepared and/or provided by the Task Force
- vii. Selection of beneficiaries under the Food Programme
- viii. Controls in place to avoid duplication of beneficiaries considering the ongoing Food Assistance Programme operated within the Department of SS and the National Food Programme
- ix. Virtual meeting attendance by the AD or relevant personnel representing the Department of SS
- x. Minutes from meetings held with the Task Force

- xi. Current status of the Food Programme

Additionally, we discussed the Department of SS's existing procedures for distribution of social service benefits to those in need and the software, PROMIS, which is being used.

At the conclusion of the meeting the following issues were identified:

- i. The Department of SS did not appear to have been provided with a mandate or similar instructions for the Task Force
- ii. The Department of SS did not appear to have in place an internal control environment related to their role/responsibilities for the Food Programme
- iii. The Department of SS did not work with the Task Force to design policies, procedures and best practices aimed towards the execution of the Task Force's duties, inclusive of reporting and monitoring
- iv. Safeguards, which should normally be agreed and documented at the beginning, to ensure that resources as used as intended, could not be provided by the Department of SS
- v. The Department of SS did not appear to have an understanding of the Task Force's policies and procedures related to the Food Programme. Specifically, for:
 - NGO selections
 - Beneficiary selections
 - Vendor selections
 - Procurement and payment by the NGOs
 - Expenses incurred and settled by the NGOs
- vi. The Department of SS did not appear to have received and/or maintained sufficient and appropriate documentation and support related to the Task Force's operations and execution of the Food Programme
- vii. Reports relating to verification of resource allocation, beneficiary numbers, and expenditures were not provided to the Department of SS
- viii. An increased potential for financial loss due to inadequate and untimely reporting and verification
- ix. Beneficiary data was not provided to the Department of SS in a timely manner (i.e., beneficiary reports were received during the winding down phase of the Food Programme)
- x. Duplications of beneficiaries were noted by the Department of SS at the end of the Food Programme
- xi. The Department of SS's AD was not in attendance at virtual meetings held by the Task Force
- xii. The Department of SS did not have meeting minutes
- xiii. The Department of SS did not have copies of contracts for the NGOs selected

Discussion with the Former Acting Financial Secretary (the "Actg. FS") of the Ministry

On December 7, 2021, a call was held with Mr. Marlon Johnson, Actg. FS, and Kershala Albury, ATI Consultant. Additionally, a follow up zoom call was held on December 9, 2021 with the Actg. FS, Kershala Albury, and D'Andrea Greenslade, ATI Consultants. Minutes from these meetings are further detailed in [APPENDIX D](#).

During these meetings we discussed:

- i. The Actg. FS's role as it related to the Task Force during the execution of its duties
- ii. The Actg. FS noted that his participation in the Food Programme primarily related to the financial clearance/approval of disbursement amounts to the various NGOs
- iii. The Actg. FS noted that additional information related to the governance and the operations of the Task Force may be provided by the Department of SS's Permanent Secretary ("PS") and Director, in charge at the time that the Food Programme was operational. In addition, the Task Force's Chairperson, was noted as resource

At the conclusion of the meeting the following issues was identified:

- i. The participation of the Actg. FS appeared minimal and specifically related to financial clearance/approval of disbursement amounts to the various NGOs
- ii. The office of the Financial Secretary of the Ministry did not appear to have in place an internal control environment related to their role/responsibilities for the Food Programme

Discussion with the Former Department of SS Personnel

On December 9, 2021, a zoom call was held with Lillian Quant-Forbes, Former Director (“FD”), Phedra Rahming, Former Permanent Secretary (“FPS”), Kershala Albury and D’Andra Greenslade, ATI Consultants. Minutes from this meeting are further detailed in [APPENDIX D](#).

During this meeting we discussed:

- i. The Department of SS’s role in the National Food Distribution Programme (the “Food Programme”) from its commencement to its culmination
- ii. Controls, policies, and procedures covering the operations of the Department of SS for the Food Programme
- iii. A mandate related to and the composition of the Task Force
- iv. Contracts in place with the NGOs under the Food Programme
- v. The Department of SS’s policy and/or procedure for the transfer of funds to the NGOs and verification related to the use of these funds
- vi. Reports prepared and/or provided by the Task Force
- vii. Controls in place to avoid duplication of beneficiaries considering the ongoing Food Assistance Programme operated within the Department of SS and the National Food Programme
- viii. Virtual meeting attendance by the relevant personnel representing the Department of SS
- ix. Minutes from meetings held with the Task Force

At the conclusion of the meeting, the issues identified were consistent with issues previously identified and documented above.

Further, as a result of the meeting held, we noted that arrangements made for Cates and Co. was spearheaded by the Office of The Prime Minister (the “OPM”).

Internal Control Procedures Identified

A. The Department of SS’s policy and/or procedure for the transfer of funds to the NGOs

The National Food Distribution Task Force’s Disbursement Request would have been used to initiate the process and this request was sent via e-mail to the Actg. FS, the PS, and the Director or AD. Review and approval of the request would have been performed by the Director or Acting Director of The Department of SS. Emailed approval from the Director or AD would be sent to the Department of SS’s Financial Officer (the “FO”). The FO would use the email to process the payment amounts to the NGOs included in the request. The FO would complete a duly authorized “Request for Supplies/Equipment/Services” form along with the emailed support, and a copy of the Task Force’s disbursement request. The FO would also input the payment request in the Treasury System along with a Finance Clearance form (due to the amount of funds being paid out). These would then be provided to the Treasury and Business Analyst Department (with an aim towards the proper management of Cash Flow) for review and approval. Final approval would be required from the Acting Financial Secretary. Once approved, the Bank of the Bahamas would subsequently transfer the approved amounts to the various NGO accounts and the Department of SS would be sent a confirmation of payment email from the Treasury.

No other documentation, reports or supports was noted as being utilized.

We reviewed the files and documentation maintained by the FO, in relation to the procedures detailed above. We did not identify any departures from the described procedure.

During our review of the Task Force’s “Disbursement Request” forms and the Department of SS’s “National Food Distribution Task Force Disbursements Covid 19” excel workbook, we noted payments being made to “Grand Bahama Comm Cates & Co.”, which may not be an NGO. Amounts paid per the aforementioned workbook totaled \$9,139,029.00. Further, we were informed by Mrs. Lillian Quant-Forbes, during our meeting held on December 9, 2021, that arrangements made for Cates and Co. was spearheaded by the OPM.

B. The Actg. FS’s policy and/or procedure for the transfer of funds to the NGOs

The National Food Distribution Task Force’s Disbursement Request would have been used to initiate the process and this request was sent via e-mail to the Actg. FS, the PS, and the Director or AD. Upon completion of the procedures executed by the Department of SS (see documented procedure above), relevant soft copies would be provided to the Treasury and Business Analyst Department (with an aim towards the proper management of Cash Flow) for review and approval. Final approval would be required from the Acting Financial Secretary. Once approved, the Bank of the Bahamas would subsequently transfer the approved amounts to the various NGO accounts and the Department of SS would be sent a confirmation of payment email from the Treasury.

We reviewed the files and documentation maintained by the FO, in relation to the procedures detailed above. We did not identify any departures from the described procedure.

APPENDIX A

DATA PERIOD: MAY 25, 2020 – OCTOBER 4, 2021

A. THE NATIONAL FOOD DISTRIBUTION FOOD PROGRAMME EXPENDITURE SUMMARY

Non-Governmental Organization	Total	% of Total
Bahamas Feeding Network	11,397,236.00	21.50%
Bahamas Red Cross	4,437,433.00	8.37%
<i>Grand Bahama Comm Cates & Co.*</i>	<i>9,139,029.00</i>	<i>17.24%</i>
Hands for Hunger	7,868,840.00	14.84%
Hands for Hunger(Abaco)	2,503,481.00	4.72%
IDEA Relief	3,988,397.00	7.52%
Lend A Hand Bahamas	11,159,430.00	21.05%
One Eleuthera	2,516,206.00	4.75%
Grand Total	53,010,052.00	100%

**Unable to verify NGO classification*

The data included in table A, B, and C was produced using the Department of SS's "National Food Distribution Task Force Disbursements Covid 19"¹ excel workbook. The workbook was used to record weekly disbursements by the FO. Based on the data included therein, the first payment made in the amount of \$400,000.00 was transferred to the Bahamas Feeding Network on May 25, 2020. Subsequent payments were made on a weekly basis to the individual NGOs with the final amounts being paid on October 4, 2021, to Lend a Hand and One Eleuthera.

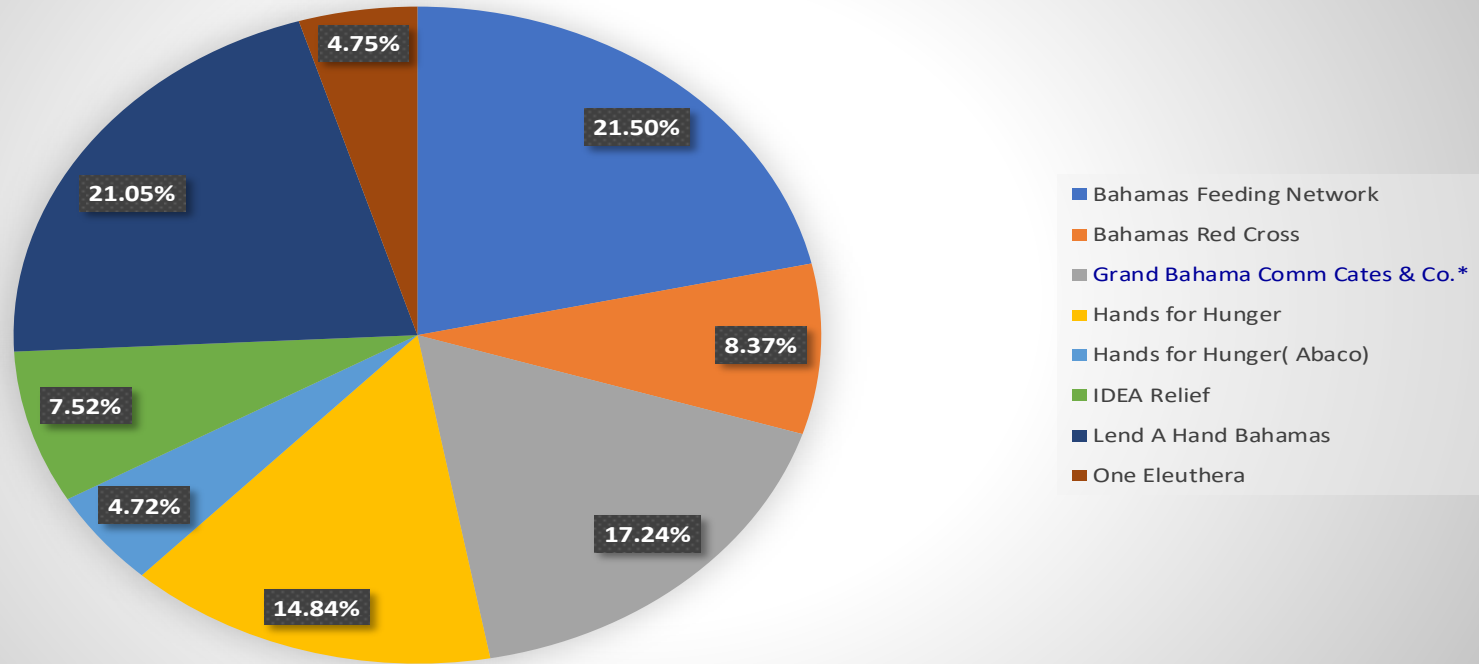
Additionally, we noted that the Bahamas Feeding Network returned funds in the amount of \$969,994.61 via a transfer to the Bank of the Bahamas during the month of November 2021 from our review of an email provided to us by the AD of the Department of SS. Confirmation, from the Treasury, of receipt of funds was included in the same email shared. Further, we noted that there were no procedures executed to verify the accuracy of the amount being returned.

B. THE NATIONAL FOOD DISTRIBUTION FOOD PROGRAMME EXPENDITURE SUMMARY PERCENTAGE ("%) OF TOTAL

¹ ATI did not verify the accuracy, occurrence, and completeness of the data included therein as this was not included in ATI's scope of work. However, reasonable procedures were executed during our review to assess whether such information is likely to be reliable. See below:

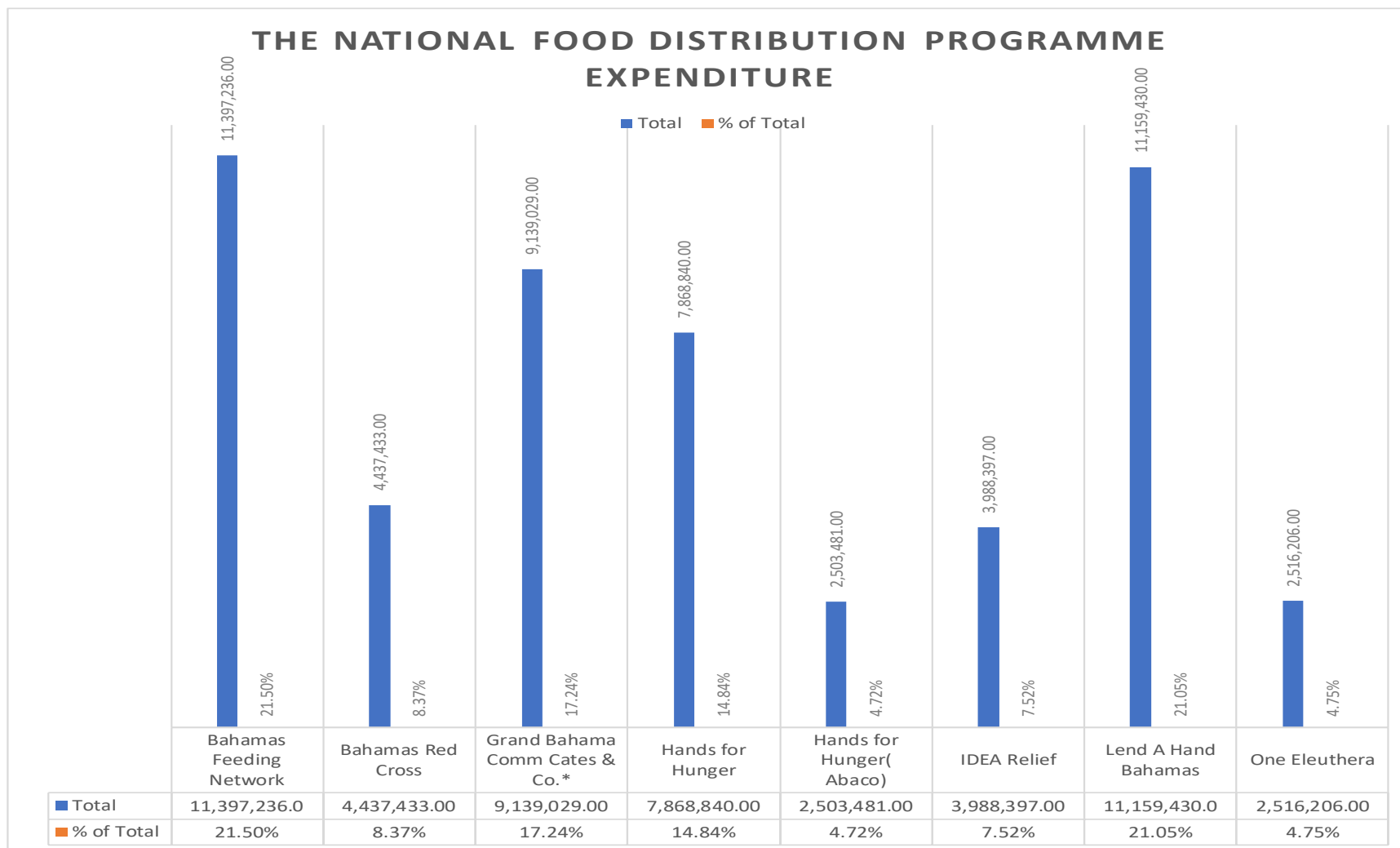
- Confirmed various payment amounts transferred to the NGOs, via review of the "confirmation of payment email" from Treasury the Department of SS;
- Compared the amounts to data included in the workbook reviewed; and
- Noted no exceptions when compared to the data included in the workbook.

% of Total



**Unable to verify NGO classification*

C. THE NATIONAL FOOD DISTRIBUTION FOOD PROGRAMME EXPENDITURE SUMMARY TOTAL AND % OF TOTAL



**Unable to verify NGO classification*

Excerpt From “The National Food Distribution Task Force Brief for Minister Oct 2021” document²

Number of Households by NGO Zone Leaders May to 31 August 2020:

NGO Zone Leader	Number of Households
Bahamas Feeding Network	5,344
Bahamas Red Cross (withdrew in late 2020)	20,029 (data not verified and believed to be less)
Grand Bahama Committee	3,796
Hands for Hunger	6,072
IDEA Relief	3,140
Lend a Hand	14,320
ONE Eleuthera	2,374

**ATI’s calculated total, based on the data noted in the table above equaled 55,075.*

Number of Households by Islands May to 31 August 2020:

Island	Number of Household
Ragged Island	2
Rum Cay	3
Crooked Island	5
Inagua	6
Spanish Wells	43
Long Island	48
San Salvador	96
Cat Island	126
Berry Islands	181
Harbour Island	293
Bimini	496
Exumas	1075
Andros	1479
Eleuthera	2037
Abaco	3137
Grand Bahama	3793
New Providence	42231
Total	55,078**

***ATI’s calculated total, based on the data noted in the table above equaled 55,051, resulting in a difference of **twenty-seven (27)** when compared to 55,078.*

² ATI did not verify this data during our review and cannot confirm its accuracy.

APPENDIX B

A. DUPLICATED BENEFICIERIES PROVIDED BY THE DEPARTMENT OF SS³

LOCATION/ZONE	TOTAL COUNT PER DATA USED BY THE DEPT. OF SS	# OF PERSONS FOUND ON BOTH FEEDING PROGRAMMES BY THE DEPT. OF SS	PERCENTAGE OF PROBABLE DUPLICATIONS
Grand Bahama	4503	781	17%
New Providence (Review is ongoing)	5638	174	3%
<i>Family Islands - Data Outstanding</i>	-	-	-

The Department of SS's review for New Providence was ongoing at the date of this report and its review of the Family Islands was not provided.

³ ATI did not verify this data during our review and cannot confirm its accuracy.

APPENDIX C

LISTING OF RECORDS REVIEWED IN PREPARATION OF THIS REPORT TO ADDRESS THE OBJECTIVES OUTLINED IN THIS REPORT AND IN ACCORDANCE WITH THE SCOPE OF AGREEMENT, DATED NOVEMBER 26, 2021

Document Type	Document Name	Description
Scan	Scan Food Distribution Task Force (1)	Copy of Finance Office scanned documents requested by the Auditor General's Office
Scan	Scan Food Task Force Memo	Copy of Finance Office scanned documents requested by the Auditor General's Office
Scan	Scan National Food Task Force (2)	Copy of Finance Office scanned documents requested by the Auditor General's Office
Scan	Weekly Disbursement Request - Week 58	Copy of Food Distribution Task Force Disbursement Request
Scan	Weekly Disbursement Request - Week 59	Copy of Food Distribution Task Force Disbursement Request
Scan	Weekly Disbursement Request - Week 60	Copy of Food Distribution Task Force Disbursement Request
Excel Workbook	HSDC CLIENTS WHO ARE ON THE FOOD NETWORK LIST. - DECEMBER 2021.	Probable duplicated beneficiaries HSDC
Excel Workbook	HSDC CLIENTS WHO ARE ON THE FOOD NETWORK LIST. - DECEMBER 2021.B	Probable duplicated beneficiaries HSDC
Excel Workbook	Copy of Food Task Force Database for New Providence CK2	Probable duplicated beneficiaries
Excel Workbook	Copy of NFD-Fox Hill cross reference listing	Probable duplicated beneficiaries Fox Hill
Excel Workbook	Food Task Force Abaco Beneficiaries	Beneficiary listing for Abaco
Excel Workbook	Food Task Force FI Beneficiaries	Beneficiary listing for Family Islands
Excel Workbook	Food Task Force NP Beneficiaries	Beneficiary listing for New Providence
Excel Workbook	List of Clients and non Clients from Task Force Feeding Program	Probable duplicated beneficiaries for Grand Bahama
Excel Workbook	NATIONAL FOOD DISTRIBUTION TASK FORCE DISBURSEMENTS COVID 19	Weekly disbursements amounts processed by the FO
Excel Workbook	NATIONAL FOOD DISTRIBUTION TASK FORCE JULY 2021 TO SEPTEMBER 2021	Weekly disbursements amounts processed by the FO
Word Document	THE NATIONAL FOOD DISTRIBUTION TASK FORCE Brief for Minister Oct 2021	Summary of the National Food Distribution Programme
Copies of various electronic messages		

APPENDIX D

MINUTES FROM MEETINGS HELD WITH KEY PERSONS IN PREPARATION OF THIS REPORT TO ADDRESS THE OBJECTIVES OUTLINED IN THIS REPORT AND IN ACCORDANCE WITH THE SCOPE OF AGREEMENT, DATED NOVEMBER 26, 2021

ORGANIZATION: THE DEPARTMENT OF SOCIAL SERVICES (THE "DEPT. OF SS)

LOCATION: THE DEPT. OF SS'S HEAD OFFICE

MEETING MINUTES

DATE: NOVEMBER 30, 2021

TIME: 9:05AM

Present: Kim Sawyer (Acting Director)
Patrece Darling (Finance and Accounting Officer)
Kershala Albury (ATI Consultant)

1. Discussion

- Ms. Kim Sawyer ("KS") introduced Ms. Patrece Darling ("PD) to Kershala Albury ("KTA")
- KTA communicated that she wanted to discuss and document the Dept of SS's role in the National Food Distribution Programme (the "Food Programme") from its commencement to its culmination and to review relevant support after the discussion
- KTA queried if a mandate or documented instructions would have been provided to the Dept. of SS for the Food Programme
- KS stated that at the start of the Food Programme, she was not AD, and she did not have a mandate or documented instructions on the file maintained for the Food Programme
- KS indicated that the Food Programme was a hybrid one (i.e., food parcels and food vouchers were used by the Non-Governmental Organizations (the "NGOs"))
- KTA queried the selection process related to the NGOs
- KS stated that NGOs used for distribution were already established within the applicable islands and communities; however, KS was unable to address the process related to their selection
- KTA queried whether contracts would have been in place between the Government and the NGOs for the Food Programme
- KS noted that no contracts were included on the related file maintained
- KTA asked about reports provided by the National Food Distribution Task Force to the Dept. of SS

- Both KS and PD stated that they did not receive any reports (outside of the disbursement request form). Only data/report received was at the end/winding down of the Food Programme when the National Food Distribution Task Force provided the Dept. of SS with a listing of beneficiaries
- KTA queried controls and procedures in place to avoid duplicated benefits considering both the National Food Distribution Programme and the Dept. of SS's regular Food Assistance Programme were operational
- KS noted that duplicates were identified for the Family Islands and noted that New Providence data was still being compiled
- KS also noted that the Dept. of SS would have requested beneficiary data from the National Food Distribution Task Force to be able to review and identify duplication
- KS further noted the beneficiary data was received at the end/winding down of the Food Programme
- PD added that request for data was made and the timely receipt of same did not occur
- KTA asked about the provision of meeting minutes to review
- KS noted weekly virtual meetings may have been attended by the former Director Lillian Quant-Forbes ("LQF") but no minutes from those meetings were included on the related file maintained
- KS further noted that she did not receive an invite to attend the virtual meetings once onboarded in KS's role as AD
- KTA requested contact information for LQF and KS informed KTA that the former Director demitted office
- KTA queried the Dept. of SS's policy/procedures for the transfer of funds to the NGOs and verification related to the use of the funds transferred
- PD noted that the National Food Distribution Task Force Disbursement Request would be used to initiate the process and the request was sent via e-mail
- PD also noted that no other reports were provided
- PD further noted:
 - Review and approval of the Food Distribution Task Force Disbursement Request would be performed by the Director or Acting Director
 - Emailed instructions would be sent by the Director or Acting Director to the FO to process the settlement of same
 - FO would prepare the payment for processing in the Treasury System along with Finance Clearance Forms (due to the amount of funds being paid out) which

- would be provided to the Treasury Department and Business Analyst (with an aim towards the proper management of Cash Flow)
 - Financial clearance/approval would be required from the Acting Financial Secretary
 - Once approved, Bank of the Bahamas would subsequently transfer the approved amounts to the various NGO accounts
- KTA queried the operational status of the Food Programme
- KS stated that the Food Programme had ended
- PD noted that the last transfer executed was during the week of October 4th, 2021
- KS stated that only the regular Food Assistance Programme was operational along with other smaller/special purpose regular programmes
- KTA queried the existence and communication of policies specific to the National Food Distribution Programme
- KS noted none and that the procedure the Dept. of SS performed under KS's supervision mirrored that of the former Director (LQF)
- KTA asked about additional persons that may be of assistance during the review process
- KS indicated that Phedra Rahming (PS) could be contacted for further assistance
- KTA queried what measures were being taken to address the avoidance of duplication under the regular Food Assistance Programme going forward
- KS explained the automated system being utilized by the Dept. of SS and its design to mitigate the risk of duplication
- KTA requested copies of the duplicated listing that would have been completed

2. Miscellaneous

- KTA queried the current process in place for persons to receive benefits from initiation to distribution
- KS detailed the new PROMIS system being utilized and the related process

3. Action items

- Provide duplicated data compiled to date
- Provide any relevant information/reports that were provided by The National Food Distribution Task Force

Meeting adjourned around 10 am

4. Other notes

- KS informed KTA about the return of funds from the NGO "Bahamas Feeding Network" after the end of the meeting and note that she would send what she had via email
- KTA queried any verification steps taken to confirm the accuracy of the amount being returned – example noted below:
 - Treasury approved a transfer of \$5M
 - NGO utilized \$4M and provided support for the \$4M used
 - Returned \$1M unused
- KS noted that only what would be included in the e-mail was provided and Treasury confirmed receipt of the funds.

ORGANIZATION: THE OFFICE OF THE FINANCIAL SECRETARY OF THE MINISTRY OF FINANCE

VIA MOBILE CALL

MEETING MINUTES

TIME: AROUND 9:15AM

DATE: DECEMBER 7, 2021

Present: Marlon Johnson (Former Acting Financial Secretary)
Kershala Albury (ATI Consultant)

1. Discussion

- Kershala (KTA) communicated that she wanted to discuss and document the Former Acting Financial Secretary's ("Former Actg. FS") role in the National Food Distribution Programme (the "Food Programme") from its commencement to its culmination and to review relevant support subsequent to the discussion.
- The Former Actg. FS noted that his participation in the Food Programme primarily related to the financial clearance/approval of disbursement amounts to the various NGOs.
- KTA queried if a mandate or documented instructions would have been provided that would address governance and controls related to establishment of the National Food Distribution Task Force and the Food Programme.
- The Former Actg. FS reference cabinet papers could be used as a resource.
- The Former Actg. FS noted that additional information related to the governance and the operations of the Task Force could be provided by the Department of SS's Permanent Secretary ("PS") and Director, in charge at the time that the Food Programme was operational. In addition, the Former Actg. FS also noted that he would reach out to the Task Force's Chairperson to be used as a possible resource.
- KTA requested that soft copies of relevant information held be shared.

Call ended around 9:30 am

ORGANIZATION: THE OFFICE OF THE FINANCIAL SECRETARY OF THE MINISTRY OF FINANCE

VIA ZOOM CALL

MEETING MINUTES

DATE: DECEMBER 9, 2021

TIME: 10:00AM

Present: Marlon Johnson (Former Acting Financial Secretary)
Kershala Albury (ATI Consultant)
D'Andra Greenslade (ATI Consultant)

1. Discussion

- KTA followed up on relevant information requested from the last call.
- The Former Actg. FS noted that this was still outstanding and would continue to work on the request.
- The Former Actg. FS reinforced that his participation in the Food Programme was tangential and primarily related to the financial clearance/approval of disbursement amounts to the various NGOs.
- The Former Actg. FS noted additional resources, specifically:
 - Mavis Culmer (Financial Secretary's Assistant), and
 - David Davis (Permanent Secretary).

Zoom meeting adjourned around 10:15 am

FORMER TEAM MEMBERS OF THE DEPARTMENT OF SOCIAL SERVICES (THE "DEPT. OF SS)

LOCATION: VIA ZOOM CALL

MEETING MINUTES

DATE: DECEMBER 9, 2021

TIME: 11:05AM

Present: Phedra Rahming (Former Permanent Secretary)

Lillian Quant-Forbes (Former Director)

Kershala Albury (ATI Consultant)

D'Andra Greenslade (ATI Consultant)

1. Discussion

- Introductions were made between Kershala Albury ("KTA"), Ms. D'Andra Greenslade ("DG"), Ms. Phedra Rahming ("PR) and Lillian Quant-Forbes ("LQF").
- KTA communicated that she wanted to discuss and document the Dept of SS's role in the National Food Distribution Programme (the "Food Programme") from its commencement to its culmination and the governance and structure of the National Food Distribution Task Force (the "Task Force").
- KTA queried if a mandate or documented instructions would have been provided to the Dept. of SS for the Food Programme.
- LQF noted that she no longer had access and would not be able to definitively say where a documented mandate could be found, however, she recalled something being shared and would look to find a copy.
- PR noted that a document would have been created from the "Cabinet Papers/Conclusions" that would have outlined some data that may be useful. Information would have been extrapolated from Cabinet Papers/Conclusions and a paper created that was advanced at the request of the OPM. PR noted that she would inquire about finding a copy of these for review and would arrange a meeting between KTA and the current Permanent Secretary Joel Lewis to review related files that may assist with queries that remain outstanding.
- KTA queried meeting minutes maintained and the sharing of the minutes.
- LQF noted there were weekly meetings held. LQF also noted that she would inquire to see if there are minutes to be shared.
- KTA queried the composition of the Task Force.
- LQF recalled some persons (namely Phil Smith, Keisha Ellis, Sheila Pritchard, Susan Larson, and Sean (no sir name noted)) and that she would look to provide the details subsequent to our meeting (i.e., full name and titles).

- KTA queried any collaboration between the Department of SS and the Task Force related to setting up policies, procedures and controls related to the Food Programme. KTA also queried whether contracts would have been in place between the Government and the NGOs for the Food Programme.
- LQF noted that no contracts were included that she could recall.
- PR also noted that no contracts were executed from her side.
- PR further noted that the Task Force was not sharing data requested by the Department of SS as some of the data was needed for cross referencing to avoid duplication. The Task Force would have indicated that data belonged to Task Force and not the Department of SS.
- PR also expressed some concerns related to the data requests to relevant persons and the Auditor General's office eventually stepped in to assist with requested information.
- KTA queried the *specific* role the Dept of SS's played relative to the Task Force and the Food Programme.
- LQF stated that the Department of SS played the role of an agent facilitating payments to the Task Force, and the Task Force would in turn have the funds disbursed to the NGOs.
 - LQF confirmed the process previously discussed with Patrece Darling (Financial Officer) and Kim Sawyer (Current Acting Director) of the Department of SS.
- LQF noted that approvals for the increases, as the amounts increased over time, came from the Former Actg. FS.
- LQF noted that the OPM spearheaded the details related to Cates and Co.

2. Action items

Ms. Rahming

- The facilitation of meeting arrangements (Ministry of Social Services & Urban Development and Kershala Albury (ATI Consultant))

Mrs. Quant-Forbes

- Meeting minutes
- Composition of the Task Force (Name, Organization, Task Force Role (e.g., Chair, Secretary, and the like))

Kershala Albury

- KTA to share minutes from the meeting upon completion.

Zoom meeting adjourned around 11:40 am

ADDENDUM

NOTES FROM FILE REVIEW

Date: December 14, 2021

For additional background information, we reviewed files maintained by the Office of the Prime Minister and Financial Secretary. Summary notes from our review are detailed below.

- The National Food Distribution Task Force was appointed in early May 2020 by Cabinet Conclusion ICC 16 (20) 10
- Initial term – April 15, 2020 through October 14, 2020⁴
- Function – Drive the coordination and collaboration of the Public and Private Sector and NGOs with ensuring vulnerable persons were fed nutritious meals
- Appointed Chairperson – Mrs. Susan Holowesko-Larson
- Structure – Inclusion of suitable, qualified persons from the Public and Private Sector⁵
- Data – The data collected during the Food Programme was to become the property of the Government of The Bahamas
- Approach
 - New Providence and the Family Islands would be divided into zones and the zones would be assigned to an NGO
 - The NGO would be assigned responsibility for purchasing and distributing food packages, food coupons or hot meals
 - The Government of The Bahamas would contribute 85% of the cost and the private sector 15%
 - Initially twelve million dollars was invested and funds were to be distributed weekly
 - By ICC 37 (20) 19, the mandate of the Task Force was extended to December 31, 2020, at a budgeted amount of ten million dollars per quarter
 - A further extension was granted to April 30, 2021, by ICC 2 (21) 6 at a budgeted amount of ten million
 - The last extension was granted to October 4, 2021

⁴ Several extensions resulted in an October 4, 2021 end date for the Food Programme

⁵ An invite was sent (from the OPM) to the Permanent Secretaries at the Ministry of Health, Education, Social Services and Urban Development, National Security, Local Government, and Agriculture, and Marine Resources, to identify senior persons from their respective ministries to serve on the Task Force.