



# Andrew N. Hamilton, CPA Orange County Auditor-Controller



# Internal Audit

## Review of the Treasurer's Schedule of Assets as of December 31, 2022

Audit Manager: Michael Steinhaus  
Auditor II: John C. Lim, CIA

Audit Number 2208  
Report Date: October 31, 2023



OFFICE OF THE  
**ORANGE COUNTY AUDITOR-CONTROLLER**

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**ANDREW N. HAMILTON, CPA**  
AUDITOR-CONTROLLER

DATE: October 31, 2023

TO: Honorable Board of Supervisors

FROM: Michael Steinhaus, Audit Manager

SUBJECT: Review of the Treasurer's Schedule of Assets as of December 31, 2022

Pursuant to GOV Section 26920(a), we have reviewed the Treasurer's Schedule of Assets (Schedule) as of December 31, 2022, and the related notes to the Schedule. We use the term schedule instead of statement because the Schedule only presents the assets in the County Treasury; it does not present the financial position of the County Treasury. A statement fairly presents financial position in conformity with GAAP (e.g., a statement of net position), and a schedule presents data on legally prescribed basis different from GAAP (e.g., GOV Section 26920). Our report is attached for your review.

We appreciate the assistance extended to us by the personnel of the Treasurer-Tax Collector during this engagement. If you have any questions please contact me at 714-834-6106.

Other recipients of this report:

Members, Audit Oversight Committee  
Jason Prole, Director of Investments  
Brian Winn, Investment Accounting/Compliance Manager  
Salvador Lopez, Chief Deputy Auditor-Controller  
John Lim, Auditor II  
Foreperson, Grand Jury  
Robin Stieler, Clerk of the Board of Supervisors  
Eide Bailly LLP, County External Auditor

## **Independent Accountant's Review Report**

We have reviewed the accompanying Orange County Treasurer's Schedule of Assets (Schedule) as of December 31, 2022, and related notes to the Schedule. A review includes primarily applying analytical procedures to management's financial data and making inquiries of management. A review is substantially less in scope than an audit, the objective of which is the expression of an opinion regarding the Schedule as a whole. Accordingly, we do not express such an opinion.

### ***Management's Responsibility for the Schedule***

Management is responsible for the preparation and fair presentation of the Schedule in accordance with the modified cash basis of accounting; this includes determining that the modified cash basis is an acceptable basis for the preparation of the Schedule in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of Schedules that are free from material misstatement, whether due to fraud or error.

### ***Accountant's Responsibility***

Our responsibility is to conduct the review engagement in accordance with Statements on Standards for Accounting and Review Services promulgated by the Accounting and Review Services Committee of the American Institute of Certified Public Accountants. Those standards require us to perform procedures to obtain limited assurance as a basis for reporting whether we are aware of any material modifications that should be made to the Schedule for it to be in accordance with the modified cash basis of accounting. We believe that the results of our procedures provide a reasonable basis for our conclusion.

We are required to be independent of the Orange County Treasurer and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our reviews.

### ***Accountant's Conclusion***

Based on our review, we are not aware of any material modifications that should be made to the Schedule in order for it to be in accordance with the modified cash basis of accounting.

### ***Basis of Accounting***

We draw attention to Note 1 of the Schedule, which describes the basis of accounting. The Schedule is prepared in accordance with the modified cash basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America. Our conclusion is not modified with respect to this matter.

### ***Other Matter***

While performing this review, we noted one finding that we will report to the Board of Supervisors, the Treasurer-Tax Collector, and the Auditor-Controller in a separate management letter. Our conclusion is not modified with respect to this matter.



Michael Steinhaus  
Santa Ana, California  
October 31, 2023

Orange County Treasurer's  
Schedule of Assets as of December 31, 2022  
(Dollar Amounts in Thousands)

	<u>Orange County Treasurer's Pool</u>	<u>Specific Investment Accounts</u>	<u>Bond Proceeds Account</u>
Cash	\$ 26,417	\$ 0	\$ 0
Investments (Fair Value)	\$ 15,131,877	\$ 87,331	\$ 21,311
<b>TOTAL</b>	<b>\$ <u>15,158,294</u></b>	<b>\$ <u>87,331</u></b>	<b>\$ <u>21,311</u></b>

## **Note 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

### The Financial Reporting Entity

The Orange County Treasurer-Tax Collector (TTC) is responsible for tax collection, banking, investment, disbursement and accountability of public funds. The TTC invests the cash of the Orange County Investment Fund (OCIF), which in State law is called the County Treasury, and defined as all monies under the investment authority of the TTC. The OCIF consists of three types of Funds, pooled funds called the Orange County Treasurer's Pool (OCTP), Specific Investment Accounts and a Bond Proceeds Account that are included in the Schedule of Assets. The OCTP is managed on behalf of the pool participants that include the County, local school and community college districts, who are required by State statute to deposit funds with the TTC, and other non-mandatory local agencies and districts. The OCTP is maintained for the County and other non-County entities for the purpose of benefiting from economies of scale through pooled investment activities. Both the Specific Investment Accounts and the Bond Proceeds Account require separate agreements between the County and/or a participant's governing board to invest funds that are set up for a specific requirement and where the investment may extend beyond five years.

The State of California allows the Board of Supervisors (Board) the ability to delegate the investment authority to the TTC in accordance with Section 53607 of the California Government Code (CGC). On an annual basis, the Board delegates the investment authority to the TTC. Pursuant to CGC 27130-27137, the Board has established the Treasury Oversight Committee (TOC) to monitor and review the Investment Policy. The TOC consists of members appointed from the districts or office that they represent and four members of the public, with a majority having expertise or an academic background in public finance.

The OCTP, Specific Investment Account and Bond Proceeds Account funds are not registered with the Securities and Exchange Commission as an investment company and do not have any legally binding guarantees of share values. The accompanying Schedule of Assets Held by the County Treasury (Schedule) is intended to separately report cash and investments in the County Treasury as of December 31, 2022.

### Financial Statement Presentation

The Schedule has been prepared using the modified cash basis, which is a comprehensive basis of accounting other than accounting principles generally accepted in the United States of America. Receipts are recognized when received by the Treasurer and disbursements are recognized when paid by the bank. Investment transactions are recorded on the settlement date, and the value of investments is stated at fair value in accordance with *Governmental Accounting Standards Board (GASB) Statement No. 31, Accounting and Financial Reporting for Certain Investments and for External Investment Pools* and *Statement No. 72, Fair Value Measurement and Application*.

### Cash

As of December 31, 2022, the OCTP maintained accounts at Wells Fargo bank. Demand deposits of public funds at financial institutions that are not covered by the Federal Depository Insurance Corporation (FDIC) are required to be collateralized under CGC Section 53652 et. seq. and the IPS, which also prescribe the amount of collateral at market value that is required to secure these deposits. All such collateral is considered to be held by an agent of depository pursuant to CGC Section 53658. The pledge to secure deposits is administered by the California Department of Financial Protection and Innovation. Obligations pledged to secure deposits must be delivered to an institution other than the institution in which the deposit is made; however, the trust department of the same institution may hold them. Written agreements are required to provide, among other things, that the collateral securities are held separately from the assets of the custodial institution.

Collateral is required for demand deposits at 110% of all deposits not covered by FDIC Obligations of the United States and its agencies, or obligations of the State or its municipalities, school districts, and district corporations are pledged. Collateral of 150% is required if a deposit is secured by first mortgages or first

trust deeds upon improved residential real property located in California. FDIC is available for demand deposits and time saving deposits at any one financial institution up to a maximum of \$250.

### Investments

The TTC invests in securities for the OCTP, the Specific Investment Accounts, and the Bond Proceeds Account. Investments are recorded at the settlement date. Investments held by the TTC are exposed to risks such as interest rate risk, credit risk, concentration of credit risk and custodial credit risk.

### Interest Rate Risk

This is the risk that changes in interest rates will adversely affect the fair value of an investment. Generally, fixed income investments of longer maturities are more sensitive to changes in market interest rates. Declines in the fair value of investments are managed by limiting the length of the maturity of the securities and providing daily and ongoing liquidity in the portfolio. The Treasurer manages its exposure to interest rate risk by carefully matching incoming cash flows and maturing investments to meet expenditures and by maintaining a duration of 1.50 years or less. The duration of OCTP at December 31, 2022 is 0.53 year.

### Credit Risk

This is the risk that an issuer or other counterparty to an investment may not fulfill its obligations or that negative perceptions of the issuer's ability to make these payments will cause the price to decline. The County is not required to disclose the credit of obligations of the U.S. government or obligations explicitly guaranteed, which as of December 31, 2022 represents 23.6% of OCTP. All U.S. Government Agencies, Money Market Mutual Funds and LAIF represent 58.8%, 15.4% and 0.5% of OCTP and have a rating of AA, AAf and Non-rated respectively. The combined Specific Investment Accounts and Bond Proceeds Account are 12.1% in U.S. Treasuries and 87.3% in U.S. Government Agencies, respectively.

### Concentration of Credit Risk

This is the risk of loss attributed to the magnitude of a government's investment in a single issuer. As of December 31, 2022, all OCIF investments were in compliance with applicable state law and/or the IPS single issuer limits.

### Custodial Credit Risk

For an investment, custodial credit risk is the risk that in the event of the failure of the counterparty, the County will not be able to recover the value of its investments or collateral securities that are in possession of an outside party. The IPS does not permit investments in uninsured and unregistered securities not held by the County. The Treasurer utilizes third party Delivery Versus Payment which mitigates any custodial credit risk. Securities purchased by the Treasurer are held by third party custodians in their trust department to mitigate custodial credit risk. At year-end, in accordance with the IPS, the OCIF did not have any securities exposed to custodial credit risk, and the Treasurer did not have any securities lending at December 31, 2022.

### Investment Strategy

The TTC's investment strategy for the OCTP is to preserve principal, provide liquidity to meet the disbursements needs and generate a yield within the parameters of prudent risk management. The cash flow needs of the OCTP participants are monitored daily to ensure that sufficient liquidity is maintained to meet the needs of participants. The TTC's basic investment strategy is to buy and hold, to a designated maturity, high quality fixed income investments.

The Specific Investments Accounts are used to account for the schedule of assets for individual investment accounts. The individual investment strategies are customized to the needs of the requesting participants.

The Bond Proceeds Account is invested according to the bond indenture and are used to account for the schedule of assets for an Educational District and is customized to the needs of the District.

The investments in the accompanying Schedule are reported at fair value. The table below summarizes the investments stated at fair value and cost for OCTP, Specific Investment and the Bond Proceeds Accounts as of December 31, 2022:

	<u>Orange County Treasurer's Pool</u>		<u>Specific Investment Accounts</u>		<u>Bond Proceeds Account</u>
U.S. Treasuries	\$ 3,564,497	\$	9,710	\$	3,466
U.S. Government Agencies	8,892,749		77,405		17,461
Money Market Mutual Funds	2,340,303		216		384
Municipal Debt*	259,477		0		
Local Agency Investment Fund	74,850		0		
	<u>\$ 15,131,876</u>	\$	<u>87,331</u>	\$	<u>21,311</u>

\*County of Orange Municipal Debt