Office of Independent Internal Audit

LAVOIS CAMPBELL, CHIEF AUDIT EXECUT IV E

August 13, 2026

Deborah Sherman, Assistant Director
Grants and Compliance Department

Dianne McNabb, Chief Financial Officer
Finance Department

RE: 1st Follow-up Report on the Status of the Audit of DeKalb County COVID-19 Vaccination Incentive Gift Card Program, Audit Report No. IA-2023-150-FN.

Dear Deborah and CFO McNabb,

As required by DeKalb County, Georgia – Code of Ordinances/Organizational Act Section 10A - Independent Internal Audit, the Office of Independent Internal Audit (OIIA) has completed a follow-up of the audit noted above. I have attached OIIA's report on the status of management actions taken to address the findings contained in the referenced audit report. The conclusions in this follow-up report are limited to the status of the implementation and not the effectiveness of the completed action plans, which may be assessed in a future audit.

Status of Audit Findings

Based on our review of management's corrective actions and supporting documentation, **Findings 1 through 6 remain partially complete.** Management developed a draft Gift Card Policy that addresses several of the original audit's recommendations, including gift card purchase authorization, tracking, safeguarding, distribution, recordkeeping, segregation of duties, and training requirements. **However, the policy remains in draft form, and management described it as applicable to the one-time COVID-funded program administered by the Capital and Grants Division rather than as a comprehensive countywide policy.**

Additionally, no further gift card signature logs were found; management indicated that the vendor declined to issue a refund or credit, but did not provide documentation to verify that communication; and documentation showing that the Board of Commissioners ratified the more than $4 million in gift card purchases was not provided. Evidence that the policy was formally approved, implemented, distributed, or supported by employee training was also not submitted for OIIA review. Therefore, additional corrective actions and supporting documentation are needed before Findings 1 through 6 can be considered fully resolved. Management did not provide a firm completion date for these remaining actions; accordingly**, OIIA will follow up on the status of corrective actions in six months.**

Finance Department management is responsible for implementing the recommendations stated in this report and for assigning the responsibilities and actions necessary to ensure their implementation. See **Figure 1 below**.

Figure 1 - Status of Management Action Plans

Finding No.	Report Finding	Status of Management Action Plans – July 2026	Key Gaps / Outstanding Items
1	Lack of Documented Evidence to Support the Distribution of Gift Cards to Eligible Recipients in Some Cases	**Partially Complete**	No additional signature logs located; no documentation of vendor refund/credit response; no evidence of employee training; policy still in draft and limited to the COVID-funded program.
2	Incentive Gift Card Purchases Were Made Without Adherence to Current Purchasing Policy	**Partially Complete**	No documentation that the Board of Commissioners ratified the $4M+ in gift card purchases; policy not finalized or implemented countywide.
3	Inadequate Written Documentation and Controls Over Gift Card Inventory and Distribution of Cards at Covid-19 Vaccination Events	**Partially Complete**	Draft policy lacks detailed inventory reconciliation and custody-transfer procedures; no evidence of employee training.
4	Improvements Were Needed in Safeguarding Monetary Gift Cards	**Partially Complete**	No evidence of employee training on safeguarding requirements; policy still in draft and limited to the COVID-funded program.
5	Segregation of Duties Needed to be Strengthened in the Gift Card Program Management	**Partially Complete**	No evidence of employee training; segregation-of-duties controls not implemented countywide; policy still in draft.
6	The County Needs a Written Policy for Gift Card Management	**Partially Complete**	Policy not formally approved, implemented, distributed, or supported by training; lacks detailed reconciliation/review procedures.

Please see the detailed status update per the finding starting on page 4 of this document.

Please contact me if you require additional information.

Regards,

Lavois Campbell

Lavois Campbell, CIA, CISA, CFE, CGA
Chief Audit Executive

Action Distribution

Name	Title	Department
Dianne McNabb	Chief Financial Officer	Finance

Statutory Distribution

Name	Role
Lorraine Cochran-Johnson	Chief Executive Officer
Robert Patrick	Board of Commissioners, District 1
Michelle Long Spears	Board of Commissioners, District 2
Nicole Massiah	Board of Commissioners, District 3
Chakira Johnson	Board of Commissioners, District 4
Mereda Davis Johnson	Board of Commissioners, District 5
Ted Terry	Board of Commissioners, Super District 6
LaDena Bolton	Board of Commissioners, Super District 7
Tanja Christine Boyd-Witherspoon	Chairperson, Audit Oversight Committee
Adrienne T. McMillion	Vice-Chairperson, Audit Oversight Committee
Lisa Earls	Audit Oversight Committee
Michael Lopata	Audit Oversight Committee
Petrina Bloodworth	Audit Oversight Committee

Information Distribution

Name	Role
Dr. G. Leah Davis	Chief of Staff to the Chief Executive Officer
Zachary L. Williams	Chief Operating Officer / Executive Assistant

Attachments:

Office of Independent Internal Audit

LAVOIS CAMPBELL, CHIEF AUDIT EXECUT IV E

Dekalb County Government

Office of Independent Internal Audit

Date: August 12, 2026 **Prepared by:** Kesha Hall

Audit Findings Status Update Form

Status Date	Report #	Report Title	
8/6/2026	IA-2023-150-FN	Audit of COVID-19 Vaccination Incentive Gift Card Program	
Contact Person	**Title**	**Phone No.**	**Email Address**
Dianne McNabb	Chief Financial Officer	404-371-2000	dmcnabb@dekalbcountyga.gov
Activity	**Responsible Area**	**Repeat Finding**	**Anticipated Completion Date (OIIA)**
1st Follow-up	Grants & Compliance Division	No	TBA

Finding		Finding Detail
No.	1	
Date	12/23/24	
Finding		**Lack of Documented Evidence to Support the Distribution of Gift Cards to Eligible Recipients in Some Cases**
Recommendations		We recommend that Finance management: • Address the recommendations detailed in findings 3 through 6 of this audit report before future gift card distribution programs. • Locate any additional signature logs and work with the vendor to determine the specific card numbers that are not accounted for. If possible, recover funds **IF** it is determined that eligible recipients did not receive the cards. • Work with the vendor to determine if a refund or vendor credit can be provided for expired gift cards. This process also includes storing and eventually disposing of cards that cannot be returned. We recommend that Finance management implement the following to be better prepared for any future incentive gift card programs managed by Finance or other departments that may procure gift cards for distribution: i. A comprehensive countywide policy and procedures for the management of gift cards: • Management should collaborate with relevant stakeholders to establish a comprehensive County policy and procedures addressing the purchase, safeguarding, distribution, inventory, and reconciliation of monetary gift cards. • The written policies should outline roles, responsibilities, and controls at each stage of the gift card lifecycle to address, at a minimum, the findings in this report. Review Appendix II for the minimum recommended topics to include in the written policy and procedures. ii. Provide training to relevant employees on the implemented policy and procedures.
Management Response		**Treasury Management Agreement:** ☒ Agree ☒Disagree A. Management will address findings #3 through #6 before future gift card distribution programs. B. The Capital and Grants Division will continue to search for additional signature logs. C. The department will contact the vendor again and try to negotiate a partial refund. The new procedures will highlight the responsibility for monitoring the expiration dates and vest that responsibility with the department holding the cards. **Estimated Timeline to Implement Action Plan** A. Management plans to develop and document those procedures during 2025. B. Management currently plans to wrap up this process by June 30, 2025. C. Management will attempt to renegotiate a refund by March 31, 2025.
Status Update Questions 7/17/2026		**<u>Current Status of Action Plan (Management's Responses):</u>** Please answer the questions below and provide documentation to support the response. • A gift card policy related to the COVID funding, which was a one-time situation for the Capital and Grants team and pertains to federal funding requirements. • No additional card logs were found. • The vendor was contacted by one of the Deputy Directors of Finance regarding a refund. The County was informed that no refund will be issued.
For OIIA Use Only		
Status Update		• The Finance Department developed a draft Gift Card Policy addressing several deficiencies identified in Findings 3 through 6. The draft sets requirements for authorization, tracking, secure storage, distribution, recordkeeping, segregation of duties, and employee training. However, management described the policy as applicable only to the one-time COVID-funded program administered by the Capital and Grants Division. However, the policy remains in draft form and lacks detailed procedures for inventory reconciliation, independent reviews, discrepancy investigations, and documenting changes in gift card custody. Therefore, it does not fully satisfy the recommendation for comprehensive countywide policies and procedures applicable to all departments that purchase or distribute gift cards. • No additional gift card signature logs were located. Management indicated that they contacted the vendor regarding a refund or credit for expired or unaccounted-for gift cards and stated that the vendor declined to issue a refund. However, management did not provide supporting documentation to verify the communication with the vendor. • Evidence demonstrating that the required training was developed or provided to relevant employees was not submitted to OIIA for review. • Some corrective action has been taken, but the recommendations have not been fully implemented, so Finding 1 is considered Partially Complete.
	Open	
	Management/Agency Assumes Risk	
X	Partially Complete	
	Complete Pending Verification by OIIA	
	Closed	

Office of Independent Internal Audit

LAVOIS CAMPBELL, CHIEF AUDIT EXECUT IV E

Dekalb County Government				
Office of Independent Internal Audit				
Date: August 12, 2026			**Prepared by: Kesha Hall**	
Audit Findings Status Update Form				
Status Date	**Report #**	**Report Title**		
8/6/2026	IA-2023-150-FN	Audit of COVID-19 Vaccination Incentive Gift Card Program		
Contact Person	**Title**		**Phone No.**	**Email Address**
Dianne McNabb	Chief Financial Officer		404-371-2000	dmcnabb@dekalbcountyga.gov
Activity	**Responsible Area**		**Repeat Finding**	**Anticipated Completion Date (OIIA)**
1st Follow-up	Grants & Compliance Division		No	TBA
Finding	**Finding Detail**			
No. 2				
Date 12/23/24				
Finding	**Incentive Gift Card Purchases Were Made Without Adherence to Current Purchasing Policy**			
Recommendations	We recommend that Finance managemen obtain ratification from the BOC for the more than $4 million worth of gift cards purchased from the same vendor.			
Management Response	**Treasury Management Agreement:** ☒ Agree ☒Disagree The department will seek ratification of the gift card purchases. **Estimated Timeline to Implement Action Plan** The ratification should be achievable by June 30, 2025.			
Status Update Questions 7/17/2026	**Current Status of Action Plan (Management's Responses):** • Client Response: Regardign wether BOC ratification was obtained for the $4 million in gift cards purchases, I am unable to respond to any questions related to ratification, as this responsibility falls under Administration rather than Capital and Grants. • A gift card policy related to the COVID funding, which was a one-time situation for the Capital and Grants team and pertains to federal funding requirements was drafted.			
For OIIA Use Only				
Status Update [ ] Open [ ] Management/Agency Assumes Risk [X] Partially Complete [ ] Complete Pending Verification by OIIA [ ] Closed	• The draft Gift Card Policy includes written authorization requirements for future gift card purchases, addressing the recommendation in Appendix II, Section II—Gift Card Purchases, subsection A, “Authorization to Purchase.” However, the draft policy remains limited to the COVID-funded program administered by the Capital and Grants Division and has not been finalized or implemented as a countywide policy. • Documentation demonstrating that the Board of Commissioners ratified the more than $4 million in gift card purchases was not submitted for OIIA review. Capital and Grants stated that ratification falls under Administration and did not provide the OIIA with any other information concerning its status. Therefore, OIIA could not verify implementation of the recommendation to obtain BOC ratification. • Although the draft policy establishes an authorization control for future purchases, it does not resolve the outstanding ratification of the prior purchases. • Finding 2 is considered Partially Complete pending finalization and countywide implementation of the policy and receipt of documentation demonstrating BOC ratification.			

Office of Independent Internal Audit

LAVOIS CAMPBELL, CHIEF AUDIT EXECUT IV E

Dekalb County Government

Office of Independent Internal Audit

Date: August 12, 2026 **Prepared by:** Kesha Hall

Audit Findings Status Update Form

Status Date	Report #	Report Title
8/6/2026	IA-2023-150-FN	Audit of COVID-19 Vaccination Incentive Gift Card Program

Contact Person	Title	Phone No.	Email Address
Dianne McNabb	Chief Financial Officer	404-371-2000	dmcnabb@dekalbcountyga.gov

Activity	Responsible Area	Repeat Finding	Anticipated Completion Date (OIIA)
1st Follow-up	Grants & Compliance Division	No	TBA

Finding		Finding Detail
No.	3	
Date	12/23/24	

Finding	**Inadequate Written Documentation and Controls Over Gift Card Inventory and Distribution of Cards at Covid-19 Vaccination Events**
Recommendations	• We recommend Finance management implement countywide policies and procedurs for the management of gift cards. • Management should collaborate with relevant stakeholders to establish comprehensive County policy and procedures addressing the purchase, safeguarding, distribution, inventory, and reconciliation of monetary gift cards. • The written policies should outline roles, responsibilities, and controls at each stage of the gift card lifecycle to address, at a minimum, the findings in this report. Review Appendix II for the minimum recommended topics to include in the written policy and procedures.
Management Response	**Treasury Management Agreement:** ☒ Agree ☒Disagree A. The department will develop a comprehensive policy addressing the issues noted in your report and using the appendix you provided for guidance. B. The department will work with the training division of the human resources department to develop gift card training for employees. **Estimated Timeline to implement Action Plan** A. The department will develop this policy by June 30, 2025. B. The department will strive to complete the training by December 31, 2025.
Status Update Questions 7/17/2026	**<u>Current Status of Action Plan (Management's Response):</u>** • A gift card policy related to the COVID funding, which was a one-time situation for the Capital and Grants team and pertains to federal funding requirements.

For OIIA Use Only

Status Update	• The Finance Department developed a draft Gift Card Policy that sets requirements for tracking, securing, distributing, and maintaining records for gift cards. These provisions address several concerns identified in Finding 3, including the need for gift card tracking logs, supporting distribution documentation, assigned responsibilities, and controls over gift card custody. However, the policy remains in draft form, and management described it as applicable only to the one-time COVID-funded program administered by the Capital and Grants Division, rather than as a comprehensive countywide policy. • The draft does not provide sufficiently detailed procedures for reconciling gift card inventory, documenting transfers of custody, conducting periodic independent reviews, or investigating and resolving discrepancies. Evidence demonstrating that these controls were implemented or that relevant employees received training was not submitted for OIIA review. • The recommendation has not been fully implemented, and Finding 3 is considered Partially Complete.

	Open
	Management/Agency Assumes Risk
X	Partially Complete
	Complete Pending Verification by OIIA
	Closed

Office of Independent Internal Audit

LAVOIS CAMPBELL, CHIEF AUDIT EXECUT IV E

Dekalb County Government			
Office of Independent Internal Audit			
Date: August 12, 2026		**Prepared by: Kesha Hall**	
Audit Findings Status Update Form			
Status Date	**Report #**	**Report Title**	
8/6/26	IA-2023-150-FN	Audit of COVID-19 Vaccination Incentive Gift Card Program	
Contact Person	**Title**	**Phone No.**	**Email Address**
Dianne McNabb	Chief Financial Officer	404-371-2000	dmcnabb@dekalbcountyga.gov
Activity	**Responsible Area**	**Repeat Finding**	**Anticipated Completion Date (OIIA)**
1st Follow-up	Grants & Compliance Division	No	TBA

Finding		**Finding Detail**
No.	**4**	
Date	**12/23/24**	
Finding		**Improvements Were Needed in Safeguarding Monetary Gift Cards**
Recommendations		• We recommend Finance management implement countywide policies and procedurs for the management of gift cards. • Management should collaborate with relevant stakeholders to establish comprehensive County policy and procedures addressing the purchase, safeguarding, distribution, inventory, and reconciliation of monetary gift cards. • The written policies should outline roles, responsibilities, and controls at each stage of the gift card lifecycle to address, at a minimum, the findings in this report. Review Appendix II for the minimum recommended topics to include in the written policy and procedures.
Management Response		**Treasury Management Agreement:** ☒ Agree ☒Disagree A. The department will develop a comprehensive policy addressing the issues noted in your report and using the appendix you provided for guidance. B. The department will work with the training division of the human resources department to develop gift card training for employees. **Estimated Timeline to implement Action Plan** A. The department will develop this policy by June 30, 2025. B. The department will strive to complete the training by December 31, 2025.
Status Update Questions 7/17/2026		**Current Status of Action Plan (Management's Response):** A gift card policy related to the COVID funding, which was a one-time situation for the Capital and Grants team and pertains to federal funding requirements, was drafted.

For OIIA Use Only		
Status Update		• The draft Gift Card Policy sets requirements for securing gift cards and limiting access to authorized personnel, addressing the safeguarding concerns identified in Finding 4. However, the policy remains in draft form, and management described it as applicable only to the one-time COVID-funded program administered by the Capital and Grants Division, rather than as a countywide policy applicable to all departments that purchase or distribute gift cards. • Evidence that relevant employees received training on the safeguarding requirements was not provided. • The recommendation has not been fully implemented, and Finding 4 is considered Partially Complete.
	Open	
	Management/Agency Assumes Risk	
X	Partially Complete	
	Complete Pending Verification by OIIA	
	Closed	

Office of Independent Internal Audit

LAVOIS CAMPBELL, CHIEF AUDIT EXECUT IV E

Dekalb County Government

Office of Independent Internal Audit

Date: August 12, 2026 **Prepared by:**

Audit Findings Status Update Form

Status Date	Report #	Report Title	
8/6/26	IA-2023-150-FN	Audit of COVID-19 Vaccination Incentive Gift Card Program	
Contact Person	**Title**	**Phone No.**	**Email Address**
Dianne McNabb	Chief Financial Officer	404-371-2000	dmcnabb@dekalbcountyga.gov
Activity	**Responsible Area**	**Repeat Finding**	**Anticipated Completion Date (OIIA)**
1st Follow-up	Grants & Compliance Division	No	TBA

Finding		Finding Detail
No.	**5**	
Date	**12/23/24**	
Finding		**Segregation of Duties Needed to Be Strengthened in the Gift Card Program Management**
Recommendations		cards. • Management should collaborate with relevant stakeholders to establish comprehensive County policy and procedures addressing the purchase, safeguarding, distribution, inventory, and reconciliation of monetary gift cards. • The written policies should outline roles, responsibilities, and controls at each stage of the gift card lifecycle to address, at a minimum, the findings in this report. Review Appendix II for the minimum recommended topics to include in the written policy and procedures.
Management Response		**Treasury Management Agreement:** ☒ Agree ☒Disagree A. The department will develop a comprehensive policy addressing the issues noted in your report and using the appendix you provided for guidance. B. The department will work with the training division of the human resources department to develop gift card training for employees. **Estimated Timeline to implement Action Plan** A. The department will develop this policy by June 30, 2025. B. The department will strive to complete the training by December 31, 2025.
Status Update Questions 7/17/2026		**Current Status of Action Plan (Management's Response):** A gift card policy related to the COVID funding, which was a one-time situation for the Capital and Grants team and pertains to federal funding requirements, was drafted.

For OIIA Use Only

Status Update		
	Open	• The draft Gift Card Policy sets requirements for securing gift cards and limiting access to authorized personnel, addressing the safeguarding concerns identified in Finding 4. However, the policy remains in draft form, and management described it as applicable only to the one-time COVID-funded program administered by the Capital and Grants Division, rather than as a countywide policy applicable to all departments that purchase or distribute gift cards. • Evidence that relevant employees received training on the safeguarding requirements was not provided. • The recommendation has not been fully implemented, and Finding 5 is considered Partially Complete.
	Management/Agency Assumes Risk	
X	Partially Complete	
	Complete Pending Verification by OIIA	
	Closed	

Office of Independent Internal Audit

LAVOIS CAMPBELL, CHIEF AUDIT EXECUT IV E

Dekalb County Government			
Office of Independent Internal Audit			
Date: August 12, 2026		**Prepared by: Kesha Hall**	
Audit Findings Status Update Form			
Status Date	**Report #**	**Report Title**	
8/6/26	IA-2023-150-FN	Audit of COVID-19 Vaccination Incentive Gift Card Program	
Contact Person	**Title**	**Phone No.**	**Email Address**
Dianne McNabb	Chief Financial Officer	404-371-2000	dmcnabb@dekalbcountyga.gov
Activity	**Responsible Area**	**Repeat Finding**	**Anticipated Completion Date (OIIA)**
1st Follow-up	Grants & Compliance Division	No	TBA

Finding — **No.** 6 — **Date** 12/23/24	**Finding Detail**
Finding	**The County Needs a Written Policy for Gift Card Management**
Recommendations	• We recommend Finance management implement countywide policies and procedurs for the management of gift cards. • Management should collaborate with relevant stakeholders to establish comprehensive County policy and procedures addressing the purchase, safeguarding, distribution, inventory, and reconciliation of monetary gift cards. • The written policies should outline roles, responsibilities, and controls at each stage of the gift card lifecycle to address, at a minimum, the findings in this report. Review Appendix II for the minimum recommended topics to include in the written policy and procedures.
Management Response	**Treasury Management Agreement:** ☒ Agree ☒Disagree A. The department will develop a comprehensive policy addressing the issues noted in your report and using the appendix you provided for guidance. B. The department will work with the training division of the human resources department to develop gift card training for employees. **Estimated Timeline to implement Action Plan** A. The department will develop this policy by June 30, 2025. B. The department will strive to complete the training by December 31, 2025.
Status Update Questions 7/17/2026	**Current Status of Action Plan (Management's Response):** A gift card policy related to the COVID funding, which was a one-time situation for the Capital and Grants team and pertains to federal funding requirements, was drafted.

For OIIA Use Only

Status Update		• The Finance Department developed a draft Gift Card Policy that establishes requirements related to the authorization, purchase, tracking, storage, distribution, recordkeeping, segregation of duties, and training associated with gift card management. However, management described the policy as applicable to the one-time COVID-funded program administered by the Capital and Grants Division. Therefore, the draft does not fully satisfy the recommendation for a comprehensive countywide policy applicable to all departments that purchase or distribute gift cards. • The policy also remains in draft form and does not include sufficiently detailed procedures for inventory reconciliation, periodic independent reviews, discrepancy investigations, or documenting changes in gift card custody. • Evidence demonstrating that the policy was formally approved, implemented, distributed, or supported by employee training was not submitted for OIIA review. •The recommendation has not been fully implemented, and Finding 6 is considered Partially Complete.
	Open	
	Management/Agency Assumes Risk	
X	Partially Complete	
	Complete Pending Verification by OIIA	
	Closed	