

Outstanding Compliance

Report.



1
Payment Files Need Reviewed

Get Checks

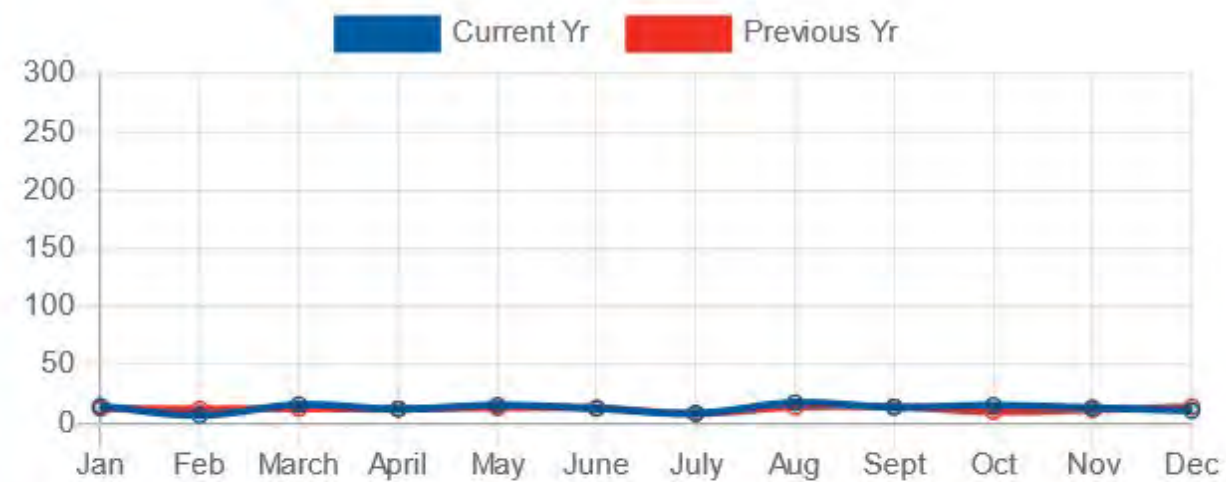
1
Payroll Files Need Reviewed

Get Payroll

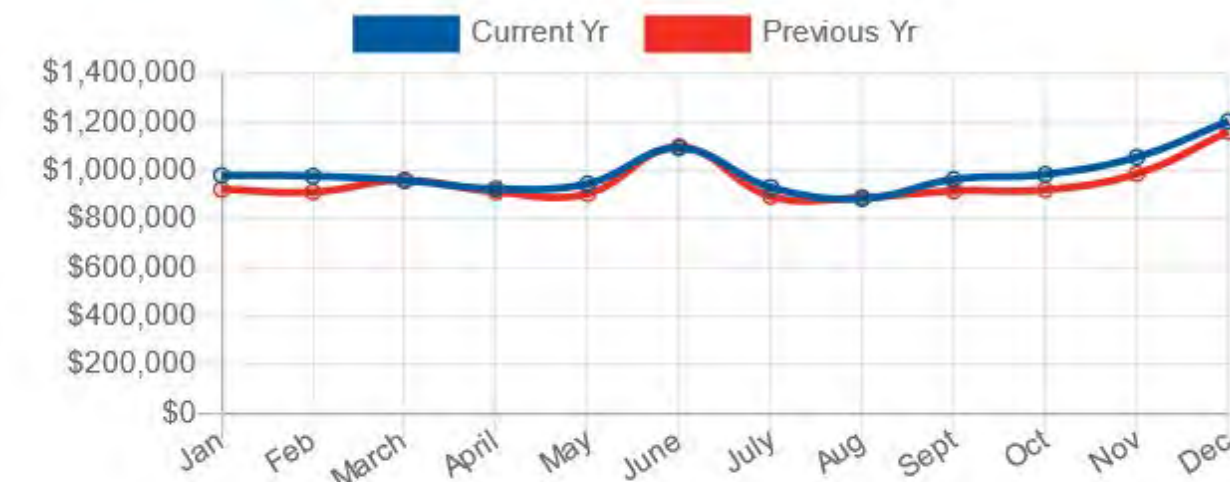
83
Compliance Checks Required

Validate

Vendor Monthly Check Counts



Employee Monthly Check Sums



2 Uploaded Files

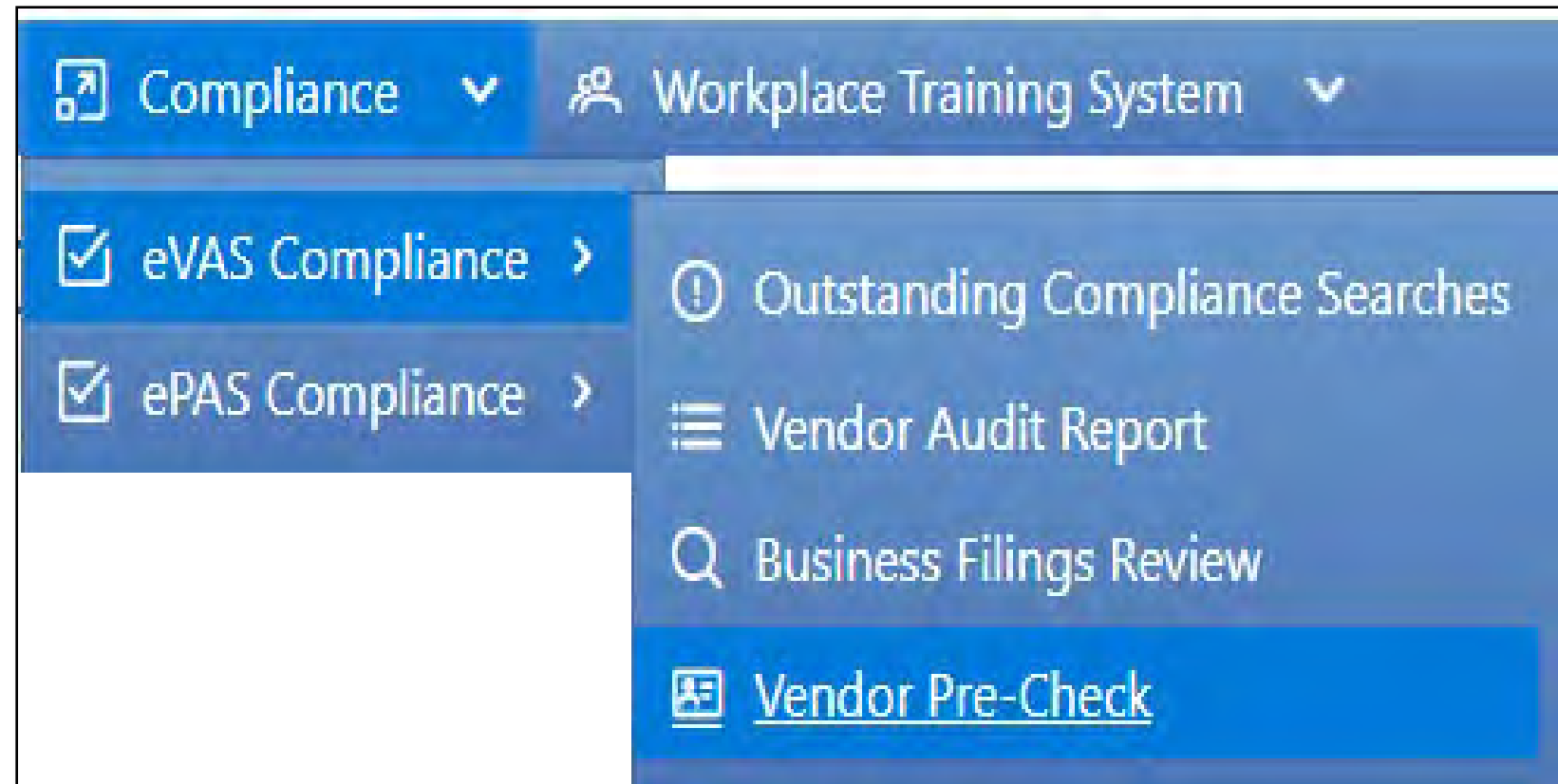
RESET FILTERS

Description	Type	Status	Created Date	Action
<input type="text" value="File Description"/>	<input type="text" value="File Type"/>	<input type="text" value="Work Queue"/>	<input type="text" value="File Upload Date"/>	
USPS Payroll Checks - 2024-02-15	Payroll	Ready for Review	2/15/24	View Analysis
USAS Vendor Checks - 2024-02-14	Payment	Ready for Review	2/14/24	View Analysis

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Compliance Vendor

Pre-Check.



Upfront compliance validation prior to entering vendor into accounting package.

Vendor Pre-Check Form

Please fill in the below information to complete a vendor pre-check.
Use this feature only for vendors you have not yet entered into your system.

Vendor Name

Vendor Address

Vendor City

Select State

Vendor Zip Code

Perform Compliance Search

Check Number: 25521 Paid To: WILLIAMS BUILDERS ✕

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Vendor Number	Check Issued To	Check Number	Check Amount	Check Date	Check Status	Risk Rating	Resources
<input type="text" value="001079"/>	WILLIAMS BUILDERS	25521	\$4,000.00	12/2/19	ISSUED	28	<input type="text" value="Compliance Search"/>

Check Itemized List

PO Number	Invoice Number	Account Code	Description	Amount
10041	216148162	0530045904300000000000000300000	Maintenance Building Addition	\$4,000.00

Check Analysis

Identify compliance requirements . ORC 9.24

Resources	Comment	Factor
Fiscal Year Expenditures have reached \$25,000 for a single PO and External Searches have not been completed. Perform External Search to validate.	<input type="button" value="+ Add Comment"/>	9
Payments rounded exactly to the \$1000	<input type="button" value="+ Add Comment"/>	9
Vendor business name changed	<input type="button" value="Vendor Name Change Log"/> <input type="button" value="+ Add Comment"/>	7
Payment being sent to a PO BOX	<input type="button" value="+ Add Comment"/>	3

Outstanding Compliance

Report.



Outstanding Vendor Compliance Searches

Which fiscal year do you want to examine?

EXPORT AS: [EXCEL](#) [PDF](#) [EMAIL](#)

[RESET FILTERS](#)

Vendor Name	Vendor Number	Compliance Search Reason	Date Of Last Search	Last Paid Date	Action
<input type="text" value="Vendor Name"/>	<input type="text" value="Vendor Number"/>	<input type="text" value="Search Reason"/>	<input type="text" value="Last Search Date"/>	<input type="text" value="Last Paid Date"/>	
BEASECKER CLEANERS	000095	Payment made with Federal Funds	12/22/21	12/20/24	Compliance Search
CITY OF GREENVILLE	000214	Fiscal year expenditures have reached or exceeded \$50,000 in total for this vendor		4/4/25	Compliance Search
GREENVILLE ACE HARDWARE	000342	Payment made with Federal Funds	12/28/21	4/9/25	Compliance Search
HOBART CORPORATION	000559	Payment made with Federal Funds	12/28/21	3/11/25	Compliance Search
HOUGHTON MIFFLIN HARCOURT	000569	Payment made with Federal Funds	12/28/21	11/27/24	Compliance Search
LOUDY OFFICE MACHINES INC	000697	Payment made with Federal Funds	12/28/21	4/9/25	Compliance Search
HARVEST LAND CO-OP, INC	000970	Payment made with Federal Funds	12/22/21	8/26/24	Compliance Search
PEPSI AMERICAS INC	001376	Payment made with Federal Funds	12/28/21	4/14/25	Compliance Search
DARKE COUNTY ESC	001500	Payment made with Federal Funds	12/28/21	2/28/25	Compliance Search
GREENVILLE CITY SCHOOLS	001565	Payment made with Federal Funds	12/28/21	4/14/25	Compliance Search
GREENVILLE WATERWORKS	001578	Fiscal year expenditures have reached or exceeded \$50,000 in total for this vendor	12/28/21	4/9/25	Compliance Search
MONTGOMERY COUNTY ESC	001629	Payment made with Federal Funds		10/18/24	Compliance Search
OHIO BUSINESS PROFESSIONL	001919	Payment made with Federal Funds		2/7/25	Compliance Search
GREENVILLE CITY SCHOOLS	002093	Fiscal year expenditures have reached or exceeded \$50,000 in total for this vendor	12/28/21	4/14/25	Compliance Search
DARKE COUNTY HEALTH DEPT	002187	Payment made with Federal Funds	12/28/21	2/28/25	Compliance Search
Greenville National Bank	002192	Fiscal year expenditures have reached or exceeded \$50,000 in total for this vendor	12/28/21	12/5/24	Compliance Search
CARDINAL BUS SALES INC	002241	Fiscal year expenditures have reached or exceeded \$50,000 in total for this vendor	12/28/21	4/4/25	Compliance Search

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Ongoing Monitoring.



- **Real Time Name Matching:** Every vendor name is validated against federal, state, and internal databases
- **Proactive Alerts:** If an exact match appears, such as newly debarred or restricted entity, you receive an instant message while reviewing payments
- **Beyond Requirements:** Monitoring continues even when checks are not required, ensuring hidden risks are caught early.
- **Audit Ready:** Creates a documented trail of ongoing compliance activity for auditors



CASE STUDY: COMPLIANCE AND FRAUD

(Cuyahoga Heights School District)

Who?

Former IT Director Joseph M. Palazzo and associates, including David Donadeo

What Happened?

- Palazzo submitted false invoices for IT goods/services that never existed
- Shell companies were controlled by him and partners
- Vendors were paid without receiving any products

Losses

- Total alleged loss up to \$3.8 million
- Donadeo sentenced to ~6 years with ~\$2.6 million restitution
- Palazzo sentenced to ~11 years.

Compliance Violations

ORC 1703.04 – Vendor not properly registered to conduct business in Ohio

Lesson Learned

- Always perform vendor compliance checks before payment
- Validate business registrations and cross-check with debarment and AOS findings databases

⚠ Fraud often hides behind legitimate paperwork

— compliance checks are your safety net.

New Hire Reporting.



Check Number: 1017073 Paid To:

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Employee Number	Check Issued To	Check Number	Check Amount	Check Date	Check Status	Risk Rating	Resources
<input type="text" value="GERK00100"/>		1017073	\$1,629.57	4/18/25	ISSUED	189	<input type="text" value="Compliance Search"/>

Earnings			Deductions			Payments		
Pay Group	Gross Amount	YTD	Code	Withheld	YTD	Description	Account Code	Amount
13	\$2,020.00		FIT-TAX	\$66.42	\$0.00	Regular - FY25 - ASST. VARSITY TRACK COACH	001-4527-143-0000-000000-500-00-000	\$2,020.00
			MEDICARE	\$29.29	\$0.00			
			OH SIT	\$39.19	\$0.00			
			SERS-AN	\$202.00	\$0.00			
			WELLGTN	\$35.35	\$0.00			
			WEL-SDT	\$18.18	\$0.00			
			Direct Deposit	\$1,629.57	\$0.00			

Employee New Hire Reporting

[Setup New Hire Reporting](#)

We need information about your organization before you can start submitting New Hires

Check Analysis

Analysis Message	Resources	Comment	Factor
You are paying an employee with active position code: 802 and they do not have any credentials on file.	Credential and Position Info	+ Add Comment	99
You are paying an employee who has not been paid for 336 days. Last paid on 05-17-2024. Since this is more than 60 days, they must be reported as a New Hire.	Report Employee As New Hire	+ Add Comment	90

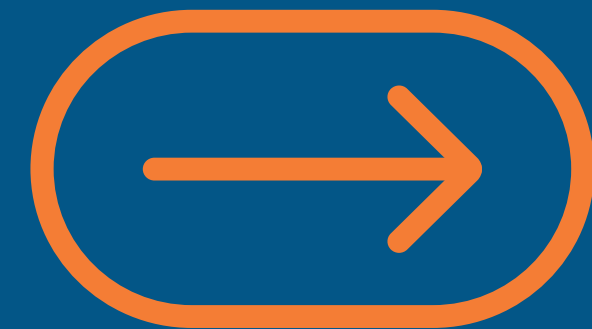
Revised Code Section 3121.89 – 3121.8911

What Happens if out of *Compliance?*

- Who is responsible? Treasurer/CFO of the organization
- Possible consequences of being out of compliance (varying by degree of the issue)
 - A Findings for Recovery
 - Audit findings/Increased Audit Scrutiny
 - Penalties & Fines
 - News/Bad Press



RULES AND ALERTS – Identify Red Flags



CASE STUDY: DUPLICATE PAYMENT FLAGGED

(Mid-size Ohio School District)



⚠ Would have violated: ORC 5705.41(D)(1) – unauthorized expenditure

Payroll Variance Statistical Analysis.



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Employee Number	Check Issued To	Check Number	Check Amount	Check Date	Check Status	Risk Rating	Resources
[REDACTED]	[REDACTED]	999821	\$9,750.00	11/8/19	ISSUED	179	<input type="text"/> Compliance Search

Earnings			Deductions			Payments		
Pay Group	Amount	YTD	Code	Withheld	YTD	Description	Account Code	Amount
HR	\$10,000.00	\$67,550.00	MEDICARE	\$49.08	\$605.86	Regular wages		\$10,000.00
			FSA 125	\$30.27	\$510.28			
			VIS 125	\$25.17	\$475.76			
			HOSP 125	\$25.17	\$475.76			
			DENT 125	\$20.29	\$460.37			
			SIT-TAX	\$100.02	\$2,600.24			

Check Analysis			
Analysis Message	Resources	Comment	Factor
Employee has received a check with a net pay over \$5,000		+ Add Comment	99
Detected a significant variation from past gross payments	Payment History	+ Add Comment	80

Payroll Variance Statistical Analysis.



Employee Payment History

Paid To	Check Number	Check Date	Check Amount	Gross Amount	Payment Status
	999821	11/8/19	\$9,750.00	\$10,000.00	ISSUED
	499933	10/8/19	\$2,000.00	\$2,100.00	ISSUED
	115861	9/15/19	\$5,150.00	\$5,300.00	ISSUED
	599821	9/8/19	\$5,250.00	\$5,500.00	ISSUED
	485861	8/25/19	\$1,950.00	\$2,100.00	ISSUED
	299821	8/15/19	\$2,050.00	\$2,200.00	ISSUED
	398821	8/8/19	\$4,550.00	\$4,800.00	ISSUED
	987561	7/15/19	\$4,000.00	\$4,250.00	ISSUED
	496861	7/8/19	\$3,550.00	\$3,850.00	ISSUED
	985861	6/15/19	\$3,050.00	\$3,300.00	ISSUED
	495861	6/8/19	\$2,050.00	\$2,500.00	ISSUED

Analysis Message	Resources	Comment	Factor
Employee has received a check with a net pay over \$5,000		+ Add Comment	99
Detected a significant variation from past gross payments	Payment History	+ Add Comment	80



CASE STUDY: PAYROLL VARIANCE

(Ohio School District)



What Happened:

- Payroll clerk entered incorrect hours for an employee
- The error caused a significant variance in pay compared to prior pay periods
- This triggered Bonefish's Payroll Variance Rule



System Response:

- Immediate red flag alert sent to Treasurer's Office
- Treasurer reviewed and confirmed the entry error
- Payroll corrected before funds were released



Outcome:

- Prevented overpayment
- No clawback required
- Strengthened payroll review process



Why This Matters:

- Simple data entry errors can cost thousands
- Variance detection catches mistakes before they become losses

Check Number: 25515 Paid To: SCOTT MITCHELL LANDSCAPING

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Vendor Number	Check Issued To	Check Number	Check Amount	Check Date	Check Status	Risk Rating	Resources
<input type="text" value="001100"/>	SCOTT MITCHELL LANDSCAPING	25515	\$522.95	12/2/19	ISSUED	75	<input type="text" value="Compliance Search"/>

Check Itemized List


PO Number	Invoice Number	Account Code	Description	Amount
10120	26242669	050011110510000000000000100000	Fall Cleanup	\$522.95



Check Analysis


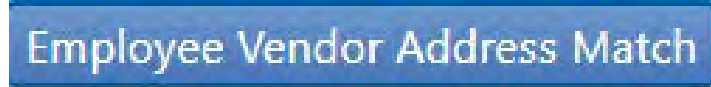

Analysis Message	Resources	Comment	Factor
This is a new vendor being paid for the 1st time		+ Add Comment	50
Employee Address matches a 1099 Vendor Address.	Employee Vendor Address Match	+ Add Comment	25

Check Number: 25515 Paid To: SCOTT MITCHELL LANDSCAPING

Vendor/Employee Last name Matches

Vendor Number	Vendor Name	Vendor Check Name	Vendor Address	Vendor Phone
001100	SCOTT MITCHELL LANDSCAPING	SCOTT MITCHELL LANDSCAPING	2015 JULIA AVE	2169918765 

Employee Number	Employee Name	Employee Address	Employee City	Last Paid Date	Action
		2015 JULIA AVE	AVON	11/8/19	Match Vendor To Empl

Analysis Message	Resources	Comment	Factor
This is a new vendor being paid for the 1st time			50
Employee Address matches a 1099 Vendor Address.			25

CASE STUDY: Employee/Vendor Relationship

(Value Learning and Teaching Academy (Hamilton County, OH))

What happened?

- Academy awarded a \$249,000 janitorial contract, the highest bid submitted.
- Vendor owner was an employee of the academy (conflict of interest)
- Matter referred to the Ohio Ethics Commission

Why it's a problem?

ORC 2921.42 (Public contract interest) ~ prohibits public officials/employees from having an interest in a public contract.

Ohio Ethics Law, Ch. 102 ~ conflict of interest restrictions for school officials and employees

How our rule would catch it:

Employee Vendor Relationship cross-checks:

Shared address, phone, email across HR and vendor files

Matching tax ID, ownership indicators

Prior vendor -master changes tied to internal user accounts

Alert:

“Vendor associated with current employee. Review required before award or payment.”

Lesson Learned

Block/hold payments pending review

Document conflict review; rebid if needed

Train staff on ethics and vendor -master hygiene

ORC 5705.41(D)(1)

Check Number: 063880 Paid To: AMAZON CAPITAL SERVICES, INC.

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Vendor Number	Check Issued To	Check Number	Check Amount	Check Date	Check Status	Risk Rating
<input type="text" value="090502"/>	AMAZON CAPITAL SERVICES, INC.	063880	\$2,333.11	1/3/25	OUTSTANDING	114

Check Itemized List

PO Number	Invoice Number	Account Code	
250004	DEC BOOKS	001222251200000000000000000000	
250006	KEYBOARDS	001113051700000000000000000000	
250007	PAPER/PENS	00124115120000000000000300000	FY2
250314	HEAVY DUTY TAPE	001113088900000000000000000000	
250589	BATTERY	001241551700000000000000000000	Replacement

Check Analysis

Analysis Message	Resources
Duplicate invoice found for this vendor with the check number: 062677	Duplicate Invoices
<div style="border: 2px solid red; padding: 2px;">Invoice is dated prior to purchase order. Certificate of fiscal officer is required.</div>	View <input type="text" value="Select A Resource"/>
SSN or TIN not available on the Vendor File	<input type="text" value="Select A Resource"/>
Payments made to amazon	Authorize Fiscal Officer Cert
	View Invoices