

Outstanding Compliance Report.



Home Tools Reports Compliance Workplace Training System

1 Payment Files Need Reviewed

1 Payroll Files Need Reviewed

83 Compliance Checks Required

Get Checks

Get Payroll

Validate

Vendor Monthly Check Counts

Current Yr Previous Yr

Month	Current Yr	Previous Yr
Jan	20	20
Feb	15	15
March	25	25
April	20	20
May	25	25
June	20	20
July	15	15
Aug	25	25
Sept	20	20
Oct	15	15
Nov	20	20
Dec	25	25

Employee Monthly Check Sums

Current Yr Previous Yr

Month	Current Yr	Previous Yr
Jan	\$950,000	\$900,000
Feb	\$980,000	\$850,000
March	\$970,000	\$920,000
April	\$880,000	\$850,000
May	\$900,000	\$820,000
June	\$1,100,000	\$1,050,000
July	\$850,000	\$800,000
Aug	\$820,000	\$800,000
Sept	\$900,000	\$880,000
Oct	\$920,000	\$880,000
Nov	\$950,000	\$920,000
Dec	\$1,150,000	\$1,100,000

2 Uploaded Files

RESET FILTERS

Description	Type	Status	Created Date	Action
File Description	File Type	Work Queue	File Upload Date	View Analysis
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.



The screenshot shows a software interface with a blue header. The 'Compliance' and 'Workplace Training System' dropdown menus are open. Under 'Compliance', 'eVAS Compliance' and 'ePAS Compliance' are selected. The 'Vendor Pre-Check' option is highlighted with a blue background and white text. Other visible options include 'Outstanding Compliance Searches', 'Vendor Audit Report', and 'Business Filings Review'.

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 X[◀ Prev](#) [Back To Analysis](#) [Next ▶](#)

Vendor Number	Check Issued To	Check Number	Check Amount	Check Date	Check Status	Risk Rating	Resources
Q 001079	WILLIAMS BUILDERS	25521	\$4,000.00	12/2/19	ISSUED	28	Q Compliance Search

Check Itemized List

PO Number	Invoice Number	Account Code	Description	Amount
10041	216148162	053004590430000000000000300000	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.	+ Add Comment	9
Payments rounded exactly to the \$1000	+ Add Comment	9
Vendor business name changed	+ Add Comment	7
Payment being sent to a PO BOX	+ Add Comment	3

Outstanding Compliance Report.



Home Tools Reports Compliance Workplace Training System Bonefish Pay

Outstanding Vendor Compliance Searches

Which fiscal year do you want to examine? Current Fiscal Year

EXPORT AS: EXCEL PDF EMAIL

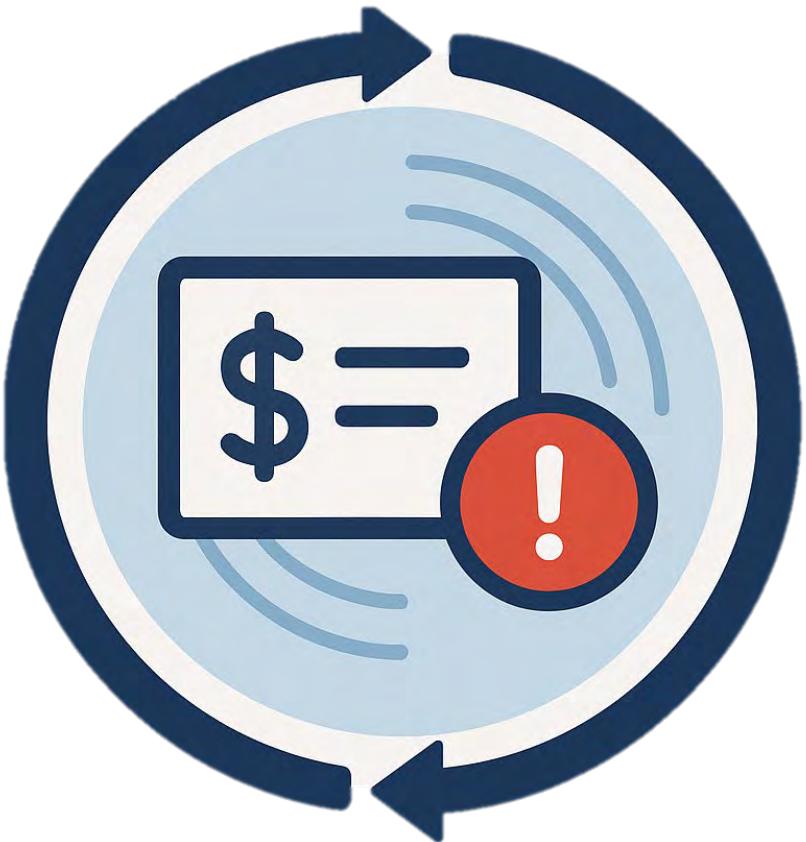
RESET FILTERS

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

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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: X

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Employee Number	Check Issued To	Check Number	Check Amount	Check Date	Check Status	Risk Rating	Resources
Q GERK00100		1017073	\$1,629.57	4/18/25	ISSUED	189	Q 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		001-4527-143-0000-00000-500-00-00	\$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 X

[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)

Problem

Two separate staff members entered the same vendor invoice into the accounting system at different times, resulting in a \$17,000 duplicate payment.



Solution

Bonefish's duplicate detection algorithm flagged this risk before the second payment was approved.



Outcome

- Treasurer was alerted in real time
- Duplicate payment was stopped
- Auditor of State praised the proactive controls

⚠ 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
		999821	\$9,750.00	11/8/19	ISSUED	179	Q Compliance Search
Earnings			Deductions			Payments	
Pay Group	Amount	YTD	Code	Withheld	YTD	Description	
HR	\$10,000.00	\$67,550.00	MEDICARE	\$49.08	\$605.86	Regular wages	
			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
Earnings P		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

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



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

X

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Vendor Number	Check Issued To	Check Number	Check Amount	Check Date	Check Status	Risk Rating	Resources
Q 001100	SCOTT MITCHELL LANDSCAPING	25515	\$522.95	12/2/19	ISSUED	75	Q Compliance Search

Check Itemized List

PO Number	Invoice Number	Account Code	Description	Amount
10120	26242669	0500111051000000000000100000	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

X

Vendor/Employee Last name Matches

X

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	

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?

- Acade my 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
Q 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	00122225120000000000000000000000	
250006	KEYBOARDS	00111305170000000000000000000000	
250007	PAPER/PENS	0012411512000000000000300000	FY2
250314	HEAVY DUTY TAPE	00111308890000000000000000000000	
250589	BATTERY	00124155170000000000000000000000	Replacement

Check Analysis

Analysis Message

Duplicate invoice found for this vendor with the check number: 062677

[Duplicate Invoices](#)

Invoice is dated prior to purchase order. Certificate of fiscal officer is required.

2

[View](#)[Select A Resource](#)

▼

SSN or TIN not available on the Vendor File

[Select A Resource](#)[Authorize Fiscal Officer Cert](#)[View Invoices](#)

Payments made to amazon