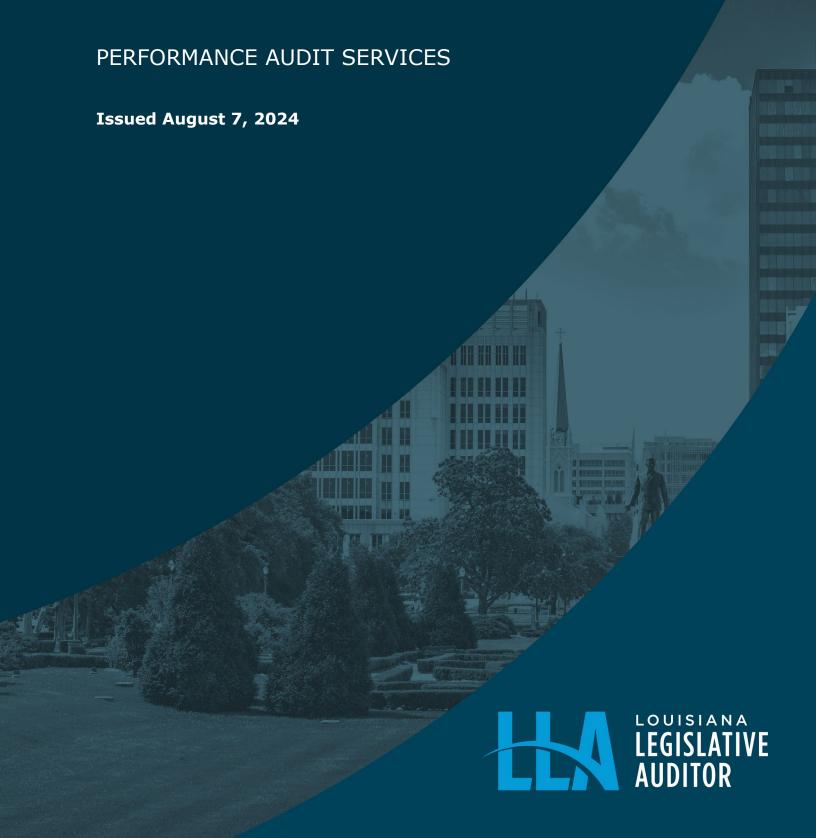
TIMELINESS OF VENDOR PAYMENTS

CITY OF NEW ORLEANS



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August 7, 2024

The Honorable J. Cameron Henry, Jr.,
President of the Senate
The Honorable Phillip R. DeVillier,
Speaker of the House of Representatives

Dear Senator Henry and Representative DeVillier:

This report provides the results of our evaluation of the City of New Orleans' processes related to accounts payable and vendor payments.

We found the City cannot accurately determine how long it takes to pay vendors. While it generally pays invoices within 30 days after vendors submit invoices into the Budget, Requisition, and Accounting Services System (BRASS), the system does not capture the entire invoicing process.

We also found the Accounts Payable department can delete unprocessed invoices in BRASS, which limits the City's ability to determine overall timeliness. In addition, BRASS cannot produce an audit log that tracks deleted invoices.

We found, too, that contracting and purchase order delays prevent vendors from submitting invoices into BRASS, which leads to payment delays. The City also does not track the timeliness of its contract and purchase order processes.

Additionally, we found the City should improve its communication with vendors to ensure they understand the invoicing process, required forms and documentation, and how to contact the City with related issues. The City also should better communicate with department staff to ensure they know the proper processes for contracting, invoicing, and using BRASS.

The report contains our findings, conclusions, and recommendations. I hope it will benefit you in your legislative decision-making process.

We would like to express our appreciation to the City of New Orleans for its assistance during this audit.

Respectfully submitted,

Michael J. "Mike" Waguespack, CPA

Legislative Auditor

MJW/aa NEWORLEANSVENDORS

Louisiana Legislative Auditor

Michael J. "Mike" Waguespack, CPA

Timeliness of Vendor Payments City of New Orleans



August 2024 Audit Control #40230027

Introduction

We evaluated the City of New Orleans' (the City) processes regarding accounts payable and vendor payments. Not paying vendors timely can result in fewer vendors that choose to conduct business with the City and bid on City projects, potentially affecting the quality, timeliness, and price of goods and services. We conducted this audit in response to New Orleans City Council Resolution No. R-23-404, which requested the Legislative Auditor conduct an audit and review of the City's accounts payable and vendor payments.

The City uses the Budget, Requisition, and Accounting Services System (BRASS) to process invoices and payments to vendors. The City also uses BRASS for its contracting process, including receiving bids and approving contracts. Between July 1, 2019

The City implemented **BRASS** as its critical financial infrastructure in June 2019.

and April 18, 2024, the City processed an average of 32,868 invoices per year that totaled an average of \$1.62 billion per year.

City policy requires invoices to be paid within 30 days once a vendor uploads a valid invoice into BRASS. The New Orleans City Council passed an ordinance in April 2024 that codified the 30-day payment requirement and enhanced the City's reporting requirements to the City Council regarding outstanding vendor payments. In addition, state law² requires public entities to pay contractors promptly, and if a public entity fails to make a payment within 45 days following receipt of a certified request for payment without reasonable cause, it is liable for reasonable attorney fees and interest charged at 0.5% accumulated daily, not to exceed 15%.

Invoicing Process. Invoicing begins with the originating department creating a requisition, then continues through the contracting and procurement processes, which vary based on the type of service or good. Once a contract or

¹ Ordinance No. 29884 Mayor Council Series, which added section 70-430 and amended section 2-551 of the Code of the City of New Orleans, effective April 30, 2024.

² Louisiana Revised Statute (R.S.) 38:2191

³ This audit did not include a detailed evaluation of the City's contracting and procurement processes.

requisition request goes through the appropriate approval process in BRASS,⁴ the originating department must create a purchase order in the system before the vendor can invoice for payment. For the purchase of tangible goods, the originating department must designate a receiver in BRASS to confirm that the City received the goods. Once a vendor submits an invoice into BRASS, Accounts Payable staff execute a three-way match for goods and a two-way match for services to verify the purchases before paying an invoice.⁵ In addition, the City requires vendors for certain types of services, such as construction projects or services funded with grant dollars, to email invoices to the originating department for approval prior to uploading the invoice into BRASS.

For the City's Department of Public Works (DPW) and Capital Projects Administration (CPA) contracts, the City may require vendors to email invoices to a third party that is contracted with the City to provide project management services or architect and engineering (A/E) services. For construction contracts, the A/E must verify that the work on the invoice was completed and that the invoice is correct. Once the A/E approves the invoice, the vendor must send the invoice to the originating department, such as DPW, for approval within the City, including the invoice processing team and the project manager. After the department approves the invoice, it instructs the vendor to upload the signed invoice into BRASS. Once the invoice is in BRASS, it again goes through additional layers of review within the City. At any point in the process, errors on the invoice may be identified and the vendor must make corrections and restart the process. Once all approvals are final in BRASS, the City will release payment to the vendor. However, the City has not developed an overall time

Exhibit 1 Comparison of CPA and DPW Responsibilities







Capital Projects Administration
Vertical structures, such as major
renovations and construction of City
buildings, parks, etc.







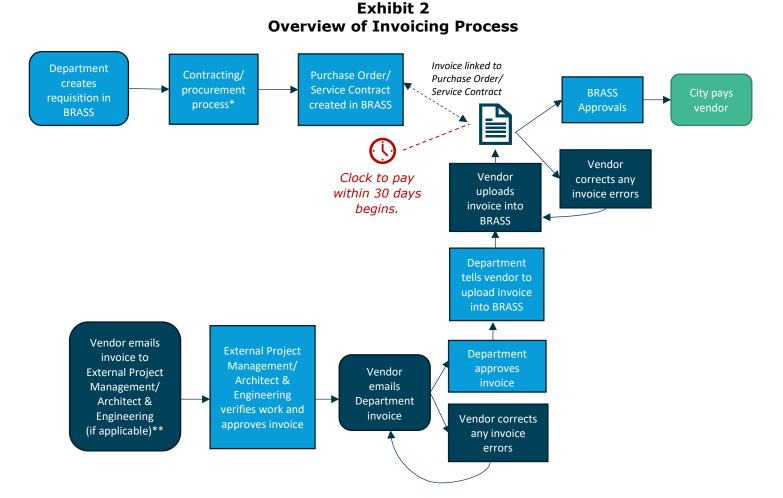
Department of Public WorksHorizontal structures, such as roads, street lights, and traffic lights

Source: Prepared by legislative auditor's staff using information from the City of New Orleans.

frame goal for how long the process should take prior to the vendor uploading the approved invoice into BRASS. Exhibit 1 compares DPW and CPA responsibilities, and Exhibit 2 shows an overview of the invoicing process.

⁴ The approval process varies based on the type of contract, service, or good. For example, the Chief Financial Officer must approve purchases over \$250,000.

⁵ The three-way match is of the purchase order, invoice, and receiver/receipt, while the two-way match is of the approved invoice and service agreement.



*The procurement process varies based on the type of service or goods. For example, some begin with a bidding and contracting process, while others require obtaining quotes, etc.

Source: Prepared by legislative auditor's staff using information from the City of New Orleans.

To conduct this audit, we analyzed invoice data from BRASS, as well as QuickBase, the system CPA and DPW use to manage projects. We reviewed invoices in BRASS from various departments to identify causes for delayed payment. In addition, we interviewed City employees involved with the invoicing process and multiple vendors about their experience invoicing and getting paid by the City. Using feedback from vendors and City employees, as well as BRASS data reports, we judgmentally identified invoices to review to identify causes of delayed payment.⁶

The objective of this audit was:

To evaluate the City of New Orleans' vendor payment process.

^{**}Only certain types of services, such as construction or capital projects, require approval from an external project manager or Architect & Engineering firm.

⁶ See Appendix B for a detailed methodology of our analyses.

Our results are summarized on the next page and discussed in detail throughout the remainder of the report. Appendix A contains the City's response, and Appendix B contains our scope and methodology. Appendix C contains the number of invoices paid more than 30 days after vendors submitted them into BRASS for the 25 City departments with the highest number of late invoices, as well as the outstanding invoices older than 30 days by department. Appendix D contains examples of contract and invoice delays for one vendor.

Objective: To evaluate the City of New Orleans' vendor payment process.

Overall, we found that the City could not accurately determine how long it takes to pay vendors. While the City generally pays invoices within 30 days of a vendor submitting an invoice into BRASS, as required by City policy, the system does not track the entire invoicing process and the associated times. Specifically, we found:

- The City cannot accurately determine how long it takes to pay vendors. While the City generally pays invoices within 30 days after vendors submit invoices into BRASS, the system does not capture the entire invoicing process. For example, some invoices must be approved by the originating department before vendors can submit the invoices into BRASS. However, the City does not capture or monitor the timeliness of these approvals.
- The City's Accounts Payable department can delete unprocessed invoices in BRASS, which limits the City's ability to determine overall timeliness. In addition, BRASS cannot produce an audit log that tracks deleted invoices. Allowing invoices to be deleted and then resubmitted may make it appear that the City met the 30-day requirement to pay some invoices when it did not.
- Contracting and purchase order delays prevent vendors from submitting invoices into BRASS, which leads to delays in payment. The City does not currently track the timeliness of its contract and purchase order processes. According to BRASS data, 38,937 (23.7%) of 164,338 invoices had purchase order dates after the invoice date, which may indicate that there was a delay in executing the contract or creating a purchase order. We identified at least six vendors whose contracts were executed more than 200 days after the effective date of the contract.
- The City should improve communication with vendors to ensure clarity about its invoicing process, forms and documentation required by City departments, and how to contact the City with related issues. In addition, the City should better communicate internally with its departments about the proper processes for contracting, invoicing, and using BRASS. Multiple vendors stated that invoicing the City is often a cumbersome process and that required forms sometimes changed without notice. Others have stated that BRASS is confusing to learn to use.

Our findings and recommendations are discussed in more detail in the sections below.

The City cannot accurately determine how long it takes to pay vendors. While the City generally pays invoices within 30 days after vendors submit invoices into BRASS, the system does not capture the entire invoicing process. For example, some invoices must be approved by the originating department before vendors can submit the invoices into BRASS. However, the City does not capture or monitor the timeliness of these approvals.

The City is required by both the New Orleans Code of Ordinances and City policy to pay invoices within 30 days once a valid invoice⁷ is received from a vendor. Before a vendor is able to upload an invoice into BRASS, the City must have already entered a purchase order or service contract into the system. For goods, Accounts Payable cannot process an invoice unless the originating department has created a receiver in the system to ensure that the goods have been received. However, because the City does not use BRASS to track the entirety of its vendor payment process, it cannot identify all delays associated with the process. As a result, it cannot determine how long it takes for vendors to be paid after work is completed/goods are delivered, only how long it takes once an invoice is entered into BRASS. Payment delays not captured, tracked, or monitored in BRASS include department approvals occurring prior to a vendor submitting an invoice into BRASS, as well as invoice deletions and delays in executing contracts and creating purchase orders, as detailed below.

The City cannot accurately determine how long it takes to pay vendors once work is completed or goods are received. While the City generally pays invoices within 30 days after vendors submit invoices into BRASS, the system does not capture the entire invoicing process to determine the actual time it takes the City to pay vendors and where delays occur. Between July 1, 2019 and April 18, 2024, the City paid 138,022 (84.7%) of 163,036 invoices within 30 days after the vendor uploaded the invoice into BRASS, and 24,9578 (15.3%) invoices were paid after 30 days. Of those paid past 30 days that had comments noted in BRASS, the most common notation was that the originating department had not created a receiver or there was not a

⁷ A valid invoice is a correct, appropriate invoice that has gone through any department approvals, as required by the type of invoice.

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⁸ Fifty-seven (0.03%) of the 163,036 invoices had payment dates prior to the BRASS create date. According to the City, these are manual wire entries and often are new hires receiving their first checks in person.

receipt in the system. Other comments included purchase order errors, budget issues, or the department putting an invoice on hold. As of April 18, 2024, the City had 1,575 outstanding invoices with 1,182 (75.0%) of those in BRASS for 30 days or less. The remaining 394 (25.0%) invoices had been submitted by vendors into BRASS more than 30 days ago. Exhibit 3 shows the top five City departments with the most invoices paid more than 30 days past BRASS submission. See Appendix C for the 25 City departments with the most invoices paid more than 30 days past BRASS submission, as well as unpaid invoices older than 30 days.

Exhibit 3 Top 5 City Department Descriptions with Invoices Paid More than After BRASS Submission Date* July 1, 2019 through April 18, 2024	30 Days
City Department Description	Total
New Orleans Aviation Board	3,784
Capital - Streets	2,633
General Maintenance (Equipment Maintenance Division)	1,450
Technology Programs (Office of Information Technology and Innovation)	1,201
Fuel Supply (Equipment Maintenance Division)	922
*While these invoices were paid more than 30 days after the vendors submitted in BRASS, this analysis does not capture other delays that occur outside of BRASS. It that departments had a higher number of delayed invoices than shown in this exhibitation. Source: Prepared by legislative auditor's staff using information from BRASS.	is likely

Some invoices must be approved by the originating department before vendors can submit the invoices into BRASS. However, the City does not capture or monitor the timeliness of these approvals. During this approval process, City departments ensure that an invoice is accurate, often by reviewing supporting documentation provided by the vendors. Once the invoices are approved, the City notifies the vendor to upload the invoice into BRASS. However, this process is primarily done via email and is not captured in BRASS, so the City is unable to track how long it takes for departments to approve invoices. As a result, delays occurring during this process are not always identified or monitored. While the 30-day payment requirement does not begin at this point in the process, delays in this process affect when vendors can submit invoices into BRASS to start the 30-day payment clock.

DPW and CPA use a program called QuickBase to manage their projects which includes tracking dates regarding the invoice approval process that occurs prior to BRASS. Using QuickBase, we identified instances where the project manager's approval⁹ was significantly delayed, but no explanation for the delay was noted in QuickBase. In one case, it took the project manager 556 days to approve the invoice, which means the vendor was not able to upload the invoice into BRASS to be paid for more than one year. According to BRASS these invoices were paid timely within 30 days, although they were significantly delayed during the approval

⁹ DPW and CPA often have a City employee assigned as the project manager, who oversees the planning, procurement, and execution of the given project.

process occurring before the vendors could upload the invoices into BRASS. Exhibit 4 shows examples of invoices delayed by the project manager.

Exhibit 4 Examples of Invoices with Project Manager Delays Fiscal Years 2020 through 2024*						
Invoice Example	End of Work Period	Date Received by Department	Date Approved by Project Manager	Days between Received by Department and Project Manager Approval	Date Vendor Submitted into BRASS	Date Check Cut
Example #1	7/15/2022	7/15/2022	1/22/2024	556	2/14/2024	2/20/2024
Example #2	7/19/2022	7/19/2022	1/22/2024	552	2/12/2024	2/15/2024
Example #3	12/30/2019	12/30/2019	4/30/2020	122	5/5/2020	5/7/2020
Example #4	10/31/2019	2/28/2020	6/29/2020	122	7/1/2020	7/2/2020
*As of April 18, 2024 Source: Prepared by legislative auditor's staff using information from QuickBase and BRASS.						

In other instances, we identified delays in the project managers' approval due to invoicing errors on the vendor side, plan changes, and contract amendments not yet fully executed. By not including these background approvals in BRASS, the City cannot easily identify delays occurring prior to vendors submitting invoices into BRASS. Multiple vendors stated that the invoicing process is confusing and cumbersome, involves multiple back-and-forth emails prior to BRASS, and that projects with multiple funding streams must be invoiced separately. The City may want to incorporate this approval process into BRASS so that it can be monitored, but still begin the 30-day clock once the invoice is approved by the department. If this process occurs in BRASS, the City could track the timeliness and identify delays and the reasons for delays. For instance, the City may identify vendors with repeated invoice errors that may indicate a need for clearer communication and documentation, additional training, or assistance from the City.

In 2022, the City started moving to a new system, Procore, to assist DPW and CPA in managing large construction projects that often involve multiple funding sources. According to the City, it expects that using Procore will help reduce the number of invoice errors and make the invoicing process smoother. Procore has more functionality than QuickBase, such as streamlined invoice creation. If the City does move pre-BRASS approvals into BRASS, it could use Procore and/or QuickBase to track and monitor timeliness for DPW and CPA invoices. In addition, in July 2023, the City contracted with a vendor to perform a thorough review and analysis of the City's infrastructure program, including reviewing invoices for processing effectiveness and timeliness. The resulting June 2024 report included recommendations for DPW and CPA to streamline their invoicing processes, including reviewing project documents more frequently, creating consistent forms, communicating changes clearly, and increasing project controls management.

Recommendation 1: The City should include all department invoice approvals in BRASS in order to better track and monitor timeliness. The City could begin the 30-day clock after the originating department approves the invoice in BRASS. For DPW and CPA projects, the City should maximize its use of Procore and/or QuickBase to include tracking and monitoring timeliness.

Summary of Management's Response: The City agrees with this recommendation and stated that it will request a gap analysis with INFOR to determine if it can integrate Procore with BRASS, and if this resolution is cost-effective for the City. See Appendix A for the City's full response.

Recommendation 2: Once the City begins collecting, tracking, and monitoring the full invoice process, it should identify causes of delays, whether internal or external, and work to remedy them, which could include better guidance and communication with vendors, ensuring that City departments follow similar processes, etc.

Summary of Management's Response: The City agrees with this recommendation. The City stated that since the inception of this performance audit, it has implemented various processes to assist departments in timely and efficiently approving invoices in BRASS for prompt payment. See Appendix A for the City's full response.

The City's Accounts Payable department can delete unprocessed invoices in BRASS, which limits the City's ability to determine overall timeliness. In addition, BRASS cannot produce an audit log that tracks deleted invoices.

Creating a traceable audit trail is a key component of good oversight and control, including maintaining information and documentation about a given process. Organizations should retain data so that they can trace the review and approval process over business activities. While BRASS has an audit log for many of its processes, including invoice and contract approvals, the system does not include deleted invoices in the audit log.

Accounts Payable can delete unprocessed invoices in BRASS, which limits the City's ability to determine overall timeliness. Once a vendor uploads an invoice into BRASS, the 30-day clock starts for the City to pay the vendor. Because accounts payable processors can delete unprocessed invoices, the City cannot truly determine overall timeliness. While there may be acceptable

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¹⁰ <u>"Achieving Effective Internal Control Over Sustainability Reporting (ICSR): Building Trust and Confidence through the COSO Internal Control – Integrated Framework,"</u> Committee of Sponsoring Organizations of the Treadway Commission (COSO), 2023

reasons for deleting invoices, such as the vendor making an invoicing error that needs correction, the BRASS system nor the database vendor can currently produce a report that shows deleted invoices to ensure that valid invoices are not accidentally deleted or that delayed invoices were deleted and resubmitted. As a result, the City does not know how many invoices were deleted, when they were

deleted, and for what reasons. Since BRASS cannot produce a report of deleted invoices, City employees are only able to view a vendor's deleted invoices by manually looking up each vendor in BRASS. We looked up four vendors in BRASS to determine how many of their invoices were deleted. Exhibit 5 shows the percentage of deleted invoices for a selection of vendors.

Exhibit 5 Deleted Invoices for Example Vendors Fiscal Years 2020 through 2024*				
Vendor	Number of Invoices	Number Deleted	Percent Deleted	
Vendor #1	135	22	16.3%	
Vendor #2	64	9	14.1%	
Vendor #3	509	32	6.3%	
Vendor #4	499	19	3.8%	

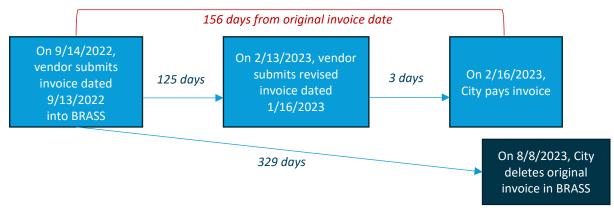
^{*}As of April 25, 2024

Source: Prepared by legislative auditor's staff using information from BRASS.

Multiple vendors noted that

they had to resubmit invoices and the City would delete the previous version. For example, if an invoice sits too long in BRASS without being paid, the City will instruct the vendor to resubmit the invoice with a more current invoice date. We found an instance where the City deleted invoices and the vendor resubmitted them with an invoice date several months after the initial invoice date. The resubmitted invoices were paid within 30 days of final submission; however, originally the vendor submitted the invoices five months prior. According to BRASS, the City paid these invoices within its 30-day goal, but in actuality, these were paid much later. According to City staff, these invoices likely needed revisions, the vendor was not following the invoice process, and there were issues with the department staff assigned to this vendor. However, the City did not know why the invoice sat in BRASS unprocessed for several months. Exhibit 6 shows an example of the processing progression for one of the deleted and resubmitted invoices.

Exhibit 6 Example of Deleted Invoice Processing Progression



Source: Prepared by legislative auditor's staff using information from BRASS.

The City should work with the BRASS database vendor to create a way to track deleted invoices or stop allowing employees to delete invoices. Some invoices in BRASS are labeled "cancelled" or "rejected" and stay visible in the system. The City could reject invoices with errors rather than deleting the record, which would allow the City to track invoice errors in order to identify department delays and determine common reasons vendors make errors. Then, the City could adjust guidance or communications to remedy common errors.

Recommendation 3: The City should not allow for invoices in BRASS to be deleted, and instead assign them a "cancelled" or "rejected" status.

Summary of Management's Response: The City agrees with this recommendation. The City stated that since the inception of this performance audit, it has implemented an internal Accounts Payable Processor policy to cease deleting invoices, and to cancel invoices, instead. The full implementation of this resolution will also include a dashboard on the BRASS Supplier Portal for all vendors to see their canceled invoices, and the reason why they were canceled. See Appendix A for the City's full response.

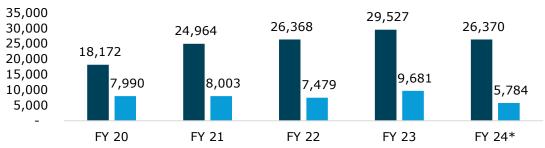
Contracting and purchase order delays prevent vendors from submitting invoices into BRASS, which leads to delays in payment. The City does not currently track the timeliness of its contract and purchase order processes.

The City's processes for contracting and creating purchase orders affect how quickly it can pay vendor invoices because vendors must be able to link their invoices to a contract or purchase order when submitting the invoice into BRASS.

Contracting and purchase order delays prevent vendors from submitting invoices into BRASS, resulting in payment delays. In order for a vendor to submit an invoice into BRASS, it must be able to link the invoice to a purchase order or service contract. However, multiple vendors stated that, at times, they have not been able to submit invoices because either the contract was not yet fully executed or the City had not created the purchase order in BRASS. According to BRASS data, 38,937 (23.7%) of 164,338 invoices had purchase order dates after the invoice date, which may indicate that there was a delay in executing the contract or creating a purchase order. However, the City cannot identify or quantify delays caused by contracting and purchase order delays. Exhibit 7 shows the number of invoices that had a purchase order date after the invoice date during fiscal years 2020 through 2024.

 $^{^{11}}$ Some contracts, such as those with ongoing services, can be set up in BRASS as "service contracts," which do not require a purchase order.





■ Purchase Order Date Before Invoice Date ■ Purchase Order Date After Invoice Date

*Fiscal year 2024 is through April 18, 2024. Source: Prepared by legislative auditor's staff using data from BRASS.

We also found instances where the City did not execute contracts timely, resulting in payment delays. Contracts are not executed until they have been routed through the appropriate approvals, including the department manager; purchasing, finance, and legal departments; and the mayor's office. For example, we identified at least six vendors whose contracts were executed more than 200 days after the effective date¹² of the contract. According to the City, various factors affect contract timeliness, including delays on the vendor's side, City staff not fully understanding the contract routing process, delays in the City's Law Department, turnover, as well as unknown delays. Exhibit 8 shows examples of vendors with untimely contract approvals during fiscal years 2019 through 2024.

Exhibit 8 Examples of Untimely Contract Approvals Fiscal Years 2019 through 2024*				
Vendor Example	Effective Date	End Date	Contract Signed	Days from Effective Date to Signed Date
Vendor #1	7/1/2021	12/31/2022	2/14/2023	593
Vendor #2	4/16/2021	4/15/2023	10/31/2022	563
Vendor #3	1/1/2021	12/31/2021	3/22/2022	445
Vendor #4	9/27/2021	3/26/2023	10/20/2022	388
Vendor #4	9/27/2018	9/26/2020	9/6/2019	344
Vendor #4	9/27/2020	9/26/2021	8/5/2021	312
Vendor #5	6/1/2022	12/31/2023	3/27/2023	299
Vendor #6	7/8/2020	7/7/2021	2/2/2021	209
*As of April 26, 2024 Source: Prepared by legislative auditor's staff using information from BRASS.				

¹² The effective date of the contract is the agreed upon start date of the contract as stated in the contract.

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Delays in executing contracts lead to delays in payment because a vendor cannot submit an invoice into BRASS without an executed contract and/or purchase order. In order for a department to create a purchase order, the related contract has to be executed. Multiple vendors stated that delays in contracting have caused significant delays in payment. For example, one vendor's cooperative endeavor agreement (CEA) was signed 229 days after the CEA's effective date. Once the department created the purchase order in BRASS 16 days later, the vendor was able to invoice for the prior eight months of work, totaling \$1.2 million in delayed payments. However, according to BRASS these invoices show being paid within the 30-day goal. Exhibit 9 summarizes the contract and invoice delays in fiscal year 2024 for this example. This vendor had eight contracts or amendments that were delayed, as shown in Appendix D.

Exhibit 9 Delayed Contract and Invoices Example for One Vendor Fiscal Year 2024*				
Type of Contract	Effective Date	End Date	Contract Signed	Days from Effective Date to Signed Date
CEA	3/1/2023	12/31/2023	10/16/2023	229
Invoice Date	Purchase Order Date	Vendor Upload to BRASS	Paid Date	Amount
3/31/2023	11/1/2023	11/6/2023	11/14/2023	\$154,425
4/30/2023	11/1/2023	11/6/2023	11/14/2023	101,185
5/31/2023	11/1/2023	11/6/2023	11/14/2023	104,081
6/30/2023	11/1/2023	11/6/2023	11/14/2023	193,922
7/31/2023	11/1/2023	11/6/2023	11/14/2023	102,163
8/31/2023	11/1/2023	11/6/2023	11/14/2023	191,552
9/30/2023	11/1/2023	11/6/2023	11/14/2023	172,443
9/30/2023	11/1/2023	12/20/2023	12/28/2023	9,618
10/31/2023	11/1/2023	12/28/2023	1/25/2024	132,943
Total Dollars Delayed \$1,162,332				
*As of April 26, 2024 Source: Prepared by legislative auditor's staff using information from BRASS.				

 13 According to the City, at times, it has followed "micro purchase" rules, allowing the City to pay invoices under \$1,000 until the contract could be fully executed.

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The City does not currently monitor the timeliness of its contracting process. Contract approvals and dates are captured in BRASS, but the City does not currently use BRASS's reporting capabilities to monitor how long it takes to approve contracts. Monitoring timeliness by department and at various points in the process can help the City identify where it should streamline the process and which departments may need additional training or assistance. The City should work with the BRASS database vendor to develop reports that show each contract's effective date, end date, each approval in the process, and what department owns the contract. We analyzed the basic contracts report available in BRASS, and this report

showed that the overall contract process from the creation date to the contract leaving the mayor's office as an executed contract takes 64 days on average. However, 263 (17.4%) of 1,512 contracts took more than 90 days to be executed. Exhibit 10 shows the number of days it took the City to complete the contract process for contracts created from July 1, 2022 to May 24, 2024.

BRASS's current report does not include a contract's effective date, which is important when determining contract timeliness. As shown in Exhibit 8 on

Exhibit 10 Number of Days Between Creation and Execution of Contracts July 1, 2022 through May 24, 2024			
Number of Days	Number of Contracts	Percent	
Within 30 days	286	18.9%	
31-45 days	409	27.1%	
46-90 days	554	36.6%	
91-150 days	149	9.9%	
151-250 days	88	5.8%	
251-350 days	26	1.7%	
Total	1,512	100.0%	
Source: Prepared by legislative auditor's staff using data			

Source: Prepared by legislative auditor's staff using data from BRASS.

page 12, we identified examples where it took the City more than 200 days to complete the contract process. For two of these contracts, the departments did not initiate the contracting process until 347 and 371 days, respectively, after the contract's effective date. Including the contract's effective date in a BRASS report would help the City identify instances where departments did not initiate contracts timely.

Recommendation 4: The City should work with its BRASS database vendor to create reports for tracking and monitoring the timeliness of its contract approvals and purchase orders.

Summary of Management's Response: The City agrees with this recommendation. The City stated that it will request a cost analysis from its vendor INFOR to create this report, which will increase the timeliness for contract approvals and purchase orders. See Appendix A for the City's full response.

The City should improve communication with vendors to ensure clarity about its invoicing process, forms and documentation required by City departments, and how to contact the City with related issues. In addition, the City should better communicate internally with its departments about the proper processes for contracting, invoicing, and using BRASS.

Establishing clear communication channels for vendors, defining communication protocols, and fostering transparent communication significantly impacts the success of supply chain management.¹⁴ In addition, best practices state that communication is essential for developing effective controls over accounting and financial reporting, and a well-designed and properly maintained system of documenting policies and procedures increases accountability and consistency.¹⁵

The City should improve communication with vendors to ensure they understand its invoicing process, forms and documentation required by City departments, and how to contact the City with related issues. Multiple vendors stated that invoicing the City is often a cumbersome process, required forms sometimes changed without notice, and BRASS is confusing to learn to use. And as mentioned previously, vendors also stated that they have to email City departments back and forth to get invoices approved prior to submitting them into BRASS. However, vendors have stated that the City has been receptive and met with them to clarify the invoicing process.

A clear, centralized channel for vendors to use to contact the City with issues that is monitored and tracked could help the City improve communication with vendors. For example, we identified a feature in BRASS that allows vendors to send messages to the City through the supplier portal. As of May 2024, BRASS contained 592 messages, some going back to 2021, from vendors, often asking about the status of payment or other invoice questions. However, the City was not aware that vendors were using this function, as BRASS was not configured to notify the City of these messages or allow City employees to respond. According to the City, vendors usually call or email the City using contact information on the City's website. The vendors that submitted messages through BRASS may have also communicated with the City through other avenues, especially if the vendors did not receive a response to the BRASS messages. Using BRASS functionality for vendors to communicate issues could help the City ensure that someone responds to requests for assistance because the City could easily track responses and response time. When communication is primarily through phone calls and emails, it is difficult to

¹⁴ <u>"The Write Way to Optimize Your Supply Chain: Effective Communication in Supply Chain Management,"</u> Institute of Supply Chain Management, May 24, 2023

15 <u>Best Practices: Policies and Procedures Documentation</u>, Government Finance Officers Association of the United States and Canada, October 1, 2021

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ensure timely responses. Exhibit 11 provides examples of messages and the dates vendors submitted them through BRASS.

	Exhibit 11 Examples of Messages in BRASS As of May 16, 2024
Message Date	Message Contents
8/11/2021	"I have been trying for some time to get this invoice submitted. I appear to run into problem after problem with this. My business partner tried to upload something but it appears to be wrong. I tried to delete and start over and it keeps telling me I have errors."
11/12/2021	"We have not received the funds yet, the event is tomorrow. We have called multiple times and sent emails. [] it's frustrating that we can't get a response."
11/24/2021	"Please pay this invoice. It is extremely past due. I have emailed Ms. [] numerous times since 12/16/2020 about payment for this invoice."
2/1/2022	"It seems y'all have changed the system a little bit and I'm not sure how to input my invoice."
7/26/2022	"I do not have a purchase order for this invoice. Please advise."
2/22/2023	"We have left multiple messages and emailed [] eight times now concerning this invoice with no response. The attached invoice is now over 200 days old. Please contact our office [] to make payment arrangements."
7/31/2023	"Trying to figure out why this has not been paid yet? It has been over a year ago."
4/22/2024	"Hi, This invoice is way overdue. We have tried to communicate via email to get this resolved but have not had any luck."
Source: Prepared by leg	gislative auditor's staff using information from BRASS.

The City should better communicate internally with its departments about the proper processes for contracting, invoicing, and using BRASS. While the City has policies and procedures for procurement processes, it does not have a policies and procedures manual for the Purchasing and Accounts Payable Departments, including how to use BRASS. The New Orleans Office of Inspector General recommended in its April 2022 audit of BRASS that the City develop a policies and procedures manual for these departments. According to the City, it has contracted with two consultants to assist in creating a policies and procedures manual and expects the manual to be complete by December 2024.

In addition, City departments may have their own internal policies and procedures about approving invoices, such as the Department of Public Works¹⁷ and the Office of Community Development. Once the City completes a policies and

¹⁶ https://nolaoig.gov/wp-content/uploads/2022/12/BRASS-Final-Report-4.7.2022.pdf

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¹⁷ As part of the City's contract with a consultant reviewing its infrastructure program, the consultant will draft project management office policies and processes.

procedures manual for purchasing and accounts payable, it should ensure that other departments' policies are consistent and in line with the updated manual.

Defined policies and procedures, clear guidance, and in-depth training on procurement and accounts payable processes could help ensure that City employees understand the overall procurement and accounts payable processes, their role in these processes, how to use BRASS, and who to contact about questions. Both vendors and City employees noted frequent City turnover as one reason for delays in vendor payments. For example, the City cited turnover in the legal department and other departments as one reason for contract delays because staff did not understand the contract routing process.

During calendar years 2020 through 2023, City-wide turnover was 14.9% per year, on average. During that same timeframe, the Law Department had 15.4% turnover, on average, per year, and the Department of Public Works had 16.6% turnover.

Recommendation 5: The City should develop a centralized channel for vendors to communicate with the City about invoice issues, such as using the BRASS functionality that currently exists.

Summary of Management's Response: The City agrees with this recommendation. The City stated that it will send all BRASS Dialog Box messages, except those tied to a procurement event, to its BRASS Vendor Support Division. This division will field those questions and ensure a 48-hour response to the vendors. See Appendix A for the City's full response.

Recommendation 6: The City should continue to develop a policies and procedures manual for purchasing, accounts payable, and BRASS.

Summary of Management's Response: The City agrees with this recommendation. The City stated that the standard operating procedure manual for Purchasing, Accounts Payable (Division of Accounting), and BRASS are slated for completion in December 2024. See Appendix A for the City's full response.

Recommendation 7: Once the City develops a policies and procedures manual for purchasing, accounts payable, and BRASS, it should ensure that all City departments' internal policies and procedures are consistent and in line with the new manual.

Summary of Management's Response: The City agrees with this recommendation. The City stated that it will implement this recommendation in 2025, after the standard operating procedure manuals are completed in December 2024. See Appendix A for the City's full response.

APPENDIX A: MANAGEMENT'S RESPONSE

LATOYA CANTRELL, MAYOR

CITY OF NEW ORLEANS

August 1, 2024

Mr. Michael J. "Mike" Waguespack, CPA Legislative Auditor Louisiana Legislative Auditor's Officer Post Office Box 94397 Baton Rouge, LA, 70804

RE: RESPONSE TO VENDOR PAYMENTS REPORT

Dear Mr. Waguespack:

Please accept this letter as the response to the performance audit report on the City of New Orleans' Timeliness of Vendor Payments.

I want to thank the Louisiana Legislative Auditor's Office for performing such a thorough and robust audit on our new ERP System, INFOR, also known as BRASS (Budget, Requisition, and Accounting Services System). This performance audit addressed the process sensitivities and roadblocks that we have continually reviewed and were in the midst of enhancing. With that being said, the City of New Orleans agrees with all the recommendations listed below.

Recommendation 1: The City should include all department invoice approvals in BRASS in order to better track and monitor timeliness. The City could begin the 30-day clock after the originating department approves the invoice in BRASS. For DPW and CPA projects, the City should maximize its use of Procore and/or QuickBase to include tracking and monitoring timeliness.

Management Response: The City obtained a construction management platform, Procore, to capture and monitor timeliness of construction invoice approvals, and the system went live in 2023. All new Department of Public Works construction contracts have gone through Procore, and the City has just onboarded Capital Projects Administration and other infrastructure departments. The City is working to expand Procore to include design and testing services. Procore will allow the City to generate reports and closely monitor invoice approvals prior to BRASS. We will request a gap analysis with INFOR to determine if we can integrate Procore with BRASS, and if this resolution is cost-effective for the City of New Orleans.

Recommendation 2: Once the City begins collecting, tracking, and monitoring the full invoice process, it should identify causes of delays, whether internal or external, and work to remedy them, which could include better guidance and communication with vendors, ensuring that City departments follow similar processes, etc.

Management Response: The City, since the inception of this performance audit, has implemented the following to assist departments in timely and efficiently approving invoices in BRASS for prompt payment.

- Automatic emails to the department managers when an invoice is submitted in BRASS by the vendor and a required Receipt is not present; the emails are sent daily until the department enters a receipt for the invoice in BRASS.
- Automatic emails go to the originator of a contract or requisition whenever a new invoice has been submitted so the originator can take the appropriate action.

1300 PERDIDO STREET | SUITE 2E04 | NEW ORLEANS, LOUISIANA | 70112 PHONE 504.658.4900 | FAX 504.658.4938 | WWW.NOLA.GOV

- Accounts Payable processors email their departments on a bi-weekly basis to enlist their assistance
 in resolving unprocessed invoices that have budget errors, purchase order errors, non-receipt of
 invoices, etc. During this time, the AP Processor receives invoice comments from the department
 to add in BRASS as to the disposition of the invoice, which is visible internally to all BRASS
 department leaders.
- Monthly the department heads are emailed a listing of invoices from the Deputy Director of Finance for their department that haven't been processed for payment and are over 30 days old of being a valid invoice.

Recommendation 3: The City should not allow for invoices in BRASS to be deleted, and instead assign them a "cancelled" or "rejected" status.

Management Response: The City, since the inception of this performance audit, has implemented an internal Accounts Payable Processor policy to cease deleting invoices, and to cancel invoices, instead. The full implementation of this resolution will also include a dashboard on the BRASS Supplier Portal for all vendors to see their canceled invoices, and the reason why they were canceled.

Recommendation 4: The City should track and monitor its contract and purchase order timeliness. The City should work with its BRASS vendor to create reports to show overall timeliness for contract approvals and purchase orders.

Management Response: The City will request a cost analysis from our vendor INFOR to create this report, which will increase the timeliness for contract approvals and purchase orders.

Recommendation 5: The City should develop a centralized channel for vendors to communicate with the City about invoice issues, such as using the BRASS functionality that currently exists.

Management Response: The City learned of this functionality, BRASS Dialog Box, through this performance audit, which shows the breadth and depth of our system, and how we are continually learning, growing, and maturing BRASS. We have learned that the dialog box messages were not landing in anyone's mailbox, except those tied to a procurement event, which currently goes to the Buyer. These messages weren't visible to them, so they did not know of their existence. So, the City will send all BRASS Dialog Box messages, except those tied to a procurement event, to our BRASS Vendor Support Division. They will field those questions and ensure a 48-hour response to the vendors. This is another metric we can use to ensure promptness of vendor issues in BRASS.

Recommendation 6: The City should continue to develop a policy and procedure manual for purchasing, accounts payable, and BRASS.

Management Response: As cited in the performance audit, before the Louisiana Legislative Auditor's Office started their fieldwork, the City contracted with a consultant to assist in creating standard operating procedure manuals for Purchasing, Accounts Payable (Division of Accounting), and BRASS. The SOPs are slated for completion in December 2024.

Recommendation 7: Once the City develops a policy and procedure manual for purchasing, accounts payable, and BRASS, it should ensure that all City departments' internal policies and procedures are consistent and in line with the new manual.

Management Response: The City accepts this recommendation and will implement it in 2025, after the standard operating procedure manuals for Purchasing, Accounts Payable (Division of Accounting), and BRASS are completed in December 2024.

Lastly, I would like to express my sincerest gratitude to your staff for their professionalism, cooperation, and insight throughout this entire performance audit period. Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

LaToya Cantrell

Mayor, City of New Orleans



Agency: City of New Orleans

Audit Title: Timeliness of Vendor Payments

Audit Report Number: 40230027

Instructions to Audited Agency: Please fill in the information below for each recommendation. A summary of your response for each recommendation will be included in the body of the report. The entire text of your response will be included as an appendix to the audit report.

Finding 1: The City cannot accurately determine how long it takes to pay vendors. While the City generally pays invoices within 30 days after vendors submit invoices in
BRASS, the system does not capture the entire invoicing process. For example, some
invoices must be approved by the originating department before vendors can submit
the invoices to BRASS. However, the City does not capture or monitor timeliness
regarding these approvals.
Recommendation 1: The City should include all department invoice approvals in
BRASS in order to better track and monitor timeliness. The City could begin the 30-
day clock after the originating department approves the invoice in BRASS. For DPW
and CPA projects, the City should maximize its use of Procore and/or QuickBase to
include tracking and monitoring timeliness.
Does Agency Agree with Recommendation? Agree Disagree
Agency Contact Responsible for Recommendation:
Name/Title: Romy Samuel, Director of Finance
Address: 1300 Perdido Street, Suite 3E06
City, State, Zip: New Orleans, LA, 70112
Phone Number: 504-658-1520
Email: <u>romy.samuel@nola.gov</u>
Recommendation 2: Once the City begins collecting, tracking, and monitoring the full
invoice process, it should identify causes of delays, whether internal or external, and
work to remedy them, which could include better guidance and communication with
vendors, ensuring that City departments follow similar processes, etc.
Does Agency Agree with Recommendation? Agree Disagree
Agency Contact Responsible for Recommendation:
Name/Title: Romy Samuel, Director of Finance
Address: 1300 Perdido Street, Suite 3E06
City, State, Zip: New Orleans, LA, 70112
Phone Number: 504-658-1520

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Email: romy.samuel@nola.gov
Finding 2: The City's Accounts Payable department can delete unprocessed invoices
in BRASS, which limits the City's ability to determine overall timeliness. In addition,
BRASS cannot produce an audit log that tracks deleted invoices.
Recommendation 3: The City should not allow for invoices in BRASS to be deleted,
and instead assign them a "cancelled" or "rejected" status.
Does Agency Agree with Recommendation? Agree Disagree
Agency Contact Responsible for Recommendation:
Name/Title: Romy Samuel, Director of Finance
Address: 1300 Perdido Street, Suite 3E06
City, State, Zip: New Orleans, LA, 70112
Phone Number: 504-658-1520
Email: romy.samuel@nola.gov
Finding 3: Contracting and purchase order delays prevent vendors from submitting
invoices in BRASS, which leads to delays in payment. The City does not currently
track timeliness of its contract and purchase order processes.
Recommendation 4: The City should track and monitor its contract and purchase order
timeliness. The City should work with its BRASS vendor to create reports to show
overall timeliness for contract approvals and purchase orders.
Does Agency Agree with Recommendation? Agree Disagree
Agency Contact Responsible for Recommendation:
Name/Title: Romy Samuel, Director of Finance
Address: 1300 Perdido Street, Suite 3E06
City, State, Zip: New Orleans, LA, 70112
Phone Number: 504-658-1520
Email: romy.samuel@nola.gov
Finding 4: The City should improve communication with vendors to ensure clarity
about its invoicing process, forms and documentation required by City departments,
and how to contact the City with related issues. In addition, the City should better
communicate internally with its departments about the proper processes for
contracting, invoicing, and using BRASS.
Recommendation 5: The City should develop a centralized channel for vendors to
communicate with the City about invoice issues, such as using the BRASS
functionality that currently exists.
Does Agency Agree with Recommendation? Agree Disagree
Agency Contact Responsible for Recommendation:
Name/Title: Romy Samuel, Director of Finance
Address: 1300 Perdido Street, Suite 3E06
City, State, Zip: New Orleans, LA, 70112
Phone Number: 504-658-1520

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Email: romy.samuel@nola.gov
Recommendation 6: The City should continue to develop a policies and procedure
manual for purchasing, accounts payable, and BRASS.
Does Agency Agree with Recommendation? Agree Disagree
Agency Contact Responsible for Recommendation:
Name/Title: Romy Samuel, Director of Finance
Address: 1300 Perdido Street, Suite 3E06
City, State, Zip: New Orleans, LA, 70112
Phone Number: 504-658-1520
Email: romy.samuel@nola.gov
Recommendation 7: Once the City develops a policies and procedure manual for
purchasing, accounts payable, and BRASS, it should ensure that all City departments'
internal policies and procedures are consistent and in line with the new manual.
Does Agency Agree with Recommendation?
Agency Contact Responsible for Recommendation:
Name/Title: Romy Samuel, Director of Finance
Address: 1300 Perdido Street, Suite 3E06
Address: 1300 Perdido Street, Suite 3E06 City, State, Zip: New Orleans, LA, 70112

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APPENDIX B: SCOPE AND METHODOLOGY

This report provides the results of our performance audit of the City of New Orleans' (the City) processes regarding accounts payable and vendor payments. We conducted this performance audit under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended. This audit covered July 1, 2019 through June 3, 2024. Our audit objective was:

To evaluate the City of New Orleans' vendor payment process.

We conducted this performance audit in accordance with generally-accepted *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We obtained an understanding of internal control that is significant to the audit objective and assessed the design and implementation of such internal control to the extent necessary to address our audit objective. We also obtained an understanding of legal provisions that are significant within the context of the audit objective, and we assessed the risk that illegal acts, including fraud, and violations of applicable contract, grant agreement, or other legal provisions could occur. Based on that risk assessment, we designed and performed procedures to provide reasonable assurance of detecting instances of noncompliance significant to those provisions.

To answer our objective, we performed the following audit steps:

- Met with City leadership and staff, including those in Accounts Payable, Department of Public Works (DPW), Capital Projects Administration (CPA), and Project Delivery Unit.
- Reviewed City policies, procedures, and other documentation from various City departments regarding contracting, procurement, and invoicing processes.
- Met with a variety of City vendors and stakeholders to understand their experiences with the City's payment processes.
- Obtained and analyzed BRASS invoice data from July 1, 2019 through April 18, 2024 to determine timeliness of payment.
- Obtained access to the BRASS system to review invoices, contracts, supporting documentation, and approvals.

- Obtained access to QuickBase and Procore to review DPW and CPA invoices and projects, as well as run data reports.
- Conducted data reliability testing on BRASS data reports used in our analyses.
- Using results from our data analysis and interviews with vendors, we judgmentally selected 22 vendors and their invoices of the approximately 3,700 vendors in BRASS for further review in BRASS and QuickBase/ Procore. The selection included a cross section of vendors from different departments and different types of goods and services. Of these, we reviewed invoices of varying dollar amounts, as well as invoices with long payment delays. We conducted this review to provide examples of delayed payments and identify causes for delay. This review was not intended to be a representative sample or be projected to the population of invoices.
- Obtained and analyzed BRASS contract approval data from July 1,
 2019 through May 24, 2024 to determine contract approval timeliness.
- Obtained and analyzed BRASS vendor message data as of May 16, 2024.
- Obtained and analyzed staffing and separation data for the City to calculate turnover for January 1, 2020 through June 3, 2024.
- Provided our results to the City to review for accuracy and reasonableness and incorporated edits throughout the report.

APPENDIX C: BRASS PAYMENT TIMELINESS BY CITY DEPARTMENT DESCRIPTION Fiscal Years 2020 through 2024

Top 25 City Departments with Invoices Paid More than 30 Days After BRASS Submission Date*

As of April 18, 2024

	Number of Invoices					
City Department Description	FY 20	FY 21	FY 22	FY 23	FY 24	Total
New Orleans Aviation Board	619	884	921	914	446	3,784
Capital - Streets	304	1,134	923	208	64	2,633
General Maintenance (Equipment						
Maintenance Division)	140	189	275	311	535	1,450
Technology Programs (Office of Information	4.22	242		705		1 201
Technology and Innovation)	133	343		725		1,201
Fuel Supply (Equipment Maintenance Division)	164	131	122	338	167	922
Library Administration	72	331	149	213	37	802
Information Systems Management	89	41	600	54	16	800
Emergency Medical Service	78	91	181	229	89	668
Property Management Directors Office	218	101	111	91	111	632
Office of Community Development Grant	210	101				- 032
Operations	122	63	154	208	75	622
New Orleans Recreation Development						
(NORD) Maintenance	131	71	76	130	135	543
Grant Operations - Health Department	94	61	98	51	216	520
Youth Study Residential Life	192	106	112	69	26	505
Management Services (New Orleans Police						
Department)	124	73	105	133	40	475
Grounds Maintenance (Parks and Parkways)	58	72	68	167	13	378
Firefighters	58	59	111	136	12	376
Director's Office (Finance)	82	5	27	160	81	355
Office of Homeland Security	133	75	91	48	2	349
Executive Office (Chief Administrative Officer)	67	37	22	150	49	325
Joe Bartholomew Golf Course	54	58	69	117	6	304
Code Enforce Revolving	90	60	48	26	54	278
NORD Administration	32	24	91	53	76	276
Capital - Property Management	45	50	64	65	51	275
Mosquito Control Unit	53	36	47	45	71	252
Signal Shop (DPW)	10	23	124	42	21	220

^{*}While these invoices were paid more than 30 days after the vendors submitted invoices into BRASS, this analysis does not capture other delays that occur outside of BRASS. It is likely that departments had a higher number of delayed invoices than shown in this exhibit.

Source: Prepared by legislative auditor's staff using data from BRASS.

Top 25 City Departments with Outstanding Invoices Submitted into BRASS and Unpaid for More than 30 Days

As of April 18, 2024

7.0 C. 7.p	Number of Invoices		
City Department Description	FY 23	FY 24	Total
New Orleans Aviation Board	1	61	62
General Maintenance (Equipment			
Maintenance Division)		50	50
NORD Administration		25	25
Emergency Medical Service		22	22
Law Administration		20	20
Treasury		19	19
Revenue		18	18
Fleet Acquisitions (Equipment			
Maintenance Division)		16	16
NORD Recreation Centers		16	16
Grant Operations - Health Department		15	15
NORD Maintenance		13	13
Noise Sound Project (Health			
Department)		11	11
Clerk Pre-Court		9	9
NORD Special Program		8	8
Purchasing		8	8
Grants - Mosquito Control		7	7
NORD Aquatics		6	6
NORD Athletics		6	6
N/A - field blank in BRASS		6	6
Mosquito Control Unit		6	6
Employees Retirement System		5	5
Accounting Administration		5	5
Director's Office (Finance)		4	4
Office of Community Development		4	4
Grant Operations		4	4
Executive Office (Chief Administrative		3	3
Officer)		5	3

Source: Prepared by legislative auditor's staff using data from BRASS.

APPENDIX D: DELAYED CONTRACT AND INVOICE EXAMPLES FOR ONE VENDOR

					Days from
Example	Туре	Effective Date	End Date	Contract Signed	Effective Date to Signed Date
LXample	Grant Amendment	3/1/2019	2/29/2020	5/13/2019	73
	Grant Amenament	Purchase	Created in	3/13/2013	73
	Invoice Date	Order Date	BRASS	Paid Date	Amount
	5/31/2019	9/26/2019	9/30/2019	10/1/2019	\$60,263
Example	6/30/2019	9/26/2019	9/30/2019	10/1/2019	117,270
#1	7/1/2019	9/26/2019	10/7/2019	10/8/2019	107,559
	8/1/2019	9/26/2019	10/14/2019	10/15/2019	147,305
	9/1/2019	9/26/2019	1/17/2020	1/31/2020	99,087
	9/1/2019	9/26/2019	2/28/2020	3/3/2020	16,359
			Total Dol	lars Delayed	\$547,843
					Days from
	_	Effective		Contract	Effective Date
	Туре	Date	End Date	Signed	to Signed Date
	Grant Amendment	3/1/2021 Purchase	2/28/2022 Created in	6/28/2021	119
Example	Invoice Date	Order Date	BRASS	Paid Date	Amount
#2	3/31/2021	7/26/2021	7/29/2021	8/5/2021	\$96,967
	4/30/2021	7/26/2021	7/29/2021	8/5/2021	127,195
	5/31/2021	7/26/2021	7/29/2021	8/5/2021	104,219
	6/30/2021	7/26/2021	8/5/2021	8/26/2021	125,780
			Total Dol	lars Delayed	\$454,161
					Days from
	Torres	Effective Date	End Date	Contract	Effective Date
	Type Grant Amendment	3/1/2022	2/28/2023	Signed 8/12/2022	to Signed Date 164
	Grant Amendment	Purchase	Created in	0/12/2022	104
	Invoice Date	Order Date	BRASS	Paid Date	Amount
Example #3	3/31/2022	8/31/2022	9/7/2022	9/15/2022	\$118,321
π 3	4/30/2022	8/31/2022	9/7/2022	9/15/2022	130,495
	5/31/2022	8/31/2022	9/7/2022	9/15/2022	130,028
	6/30/2022	8/31/2022	10/12/2022	10/18/2022	120,260
	7/31/2022	8/31/2022	10/12/2022	10/18/2022	127,948
			Total Dol	lars Delayed	\$627,052

					Days from
		Effective		Contract	Effective Date
	Туре	Date	End Date	Signed	to Signed Date
	CEA	3/1/2023	12/31/2023	10/16/2023	229
	Invoice Date	Purchase Order Date	Created in BRASS	Paid Date	Amount
	3/31/2023	11/1/2023	11/6/2023	11/14/2023	\$154,425
Example	4/30/2023	11/1/2023	11/6/2023	11/14/2023	101,185
#4	5/31/2023	11/1/2023	11/6/2023	11/14/2023	104,081
	6/30/2023	11/1/2023	11/6/2023	11/14/2023	193,922
	7/31/2023	11/1/2023	11/6/2023	11/14/2023	102,163
	8/31/2023	11/1/2023	11/6/2023	11/14/2023	191,552
	9/30/2023	11/1/2023	11/6/2023	11/14/2023	172,443
	9/30/2023	11/1/2023	12/20/2023	12/28/2023	9,618
	10/31/2023	11/1/2023	12/28/2023	1/25/2024	132,943
			Total Dol	lars Delayed	\$1,162,332
					Days from
	_	Effective		Contract	Effective Date
	Type	Date	End Date	Signed	to Signed Date
	Subrecipient Agreement	1/1/2022	12/31/2022	6/17/2022	167
	Invoice Date	Purchase Order Date	Created in BRASS	Paid Date	Amount
Example	1/31/2022	8/5/2022	10/12/2022	11/15/2022	\$572
#5	2/28/2022	8/5/2022	10/12/2022	11/15/2022	3,024
	3/31/2022	8/5/2022	10/12/2022	11/15/2022	9,783
	4/30/2022	8/5/2022	10/12/2022	11/15/2022	74,698
	5/31/2022	8/5/2022	10/12/2022	11/15/2022	60,144
	6/30/2022	8/5/2022	10/12/2022	10/20/2022	57,444
	7/31/2022	8/5/2022	12/14/2022	12/22/2022	72,400
			Total Dol	lars Delayed	\$278,065
					Days from
	Type	Effective Date	End Date	Contract Signed	Effective Date to Signed Date
	Type Amendment to	Date	Lift Date	Signed	to Signed Date
	Subrecipient	1/1/2023	12/31/2023	5/11/2023	130
	Agreement	, ,	, ,	, ,	
Example		Purchase	Created in		_
#6	Invoice Date	Order Date	BRASS	Paid Date	Amount
	1/31/2023	6/28/2023	7/11/2023	7/18/2023	\$70,613
	2/28/2023	6/28/2023	7/11/2023	7/18/2023	67,431
	3/31/2023	6/28/2023	10/17/2023	10/24/2023	115,251
	4/30/2023	6/28/2023	10/17/2023	10/24/2023	113,772
	5/31/2023	6/28/2023	10/17/2023	10/24/2023	121,874
			Total Dol	lars Delayed	\$488,941

	Туре	Effective Date	End Date	Contract Signed	Days from Effective Date to Signed Date
Evample	Subrecipient Agreement	5/1/2023	4/30/2024	8/9/2023	100
	Invoice Date	Purchase Order Date	Created in BRASS	Paid Date	Amount
Example #7	5/31/2023	11/16/2023	11/27/2023	12/5/2023	\$22,550
# /	6/30/2023	11/16/2023	11/27/2023	12/5/2023	72,983
	7/31/2023	11/16/2023	11/27/2023	12/5/2023	36,471
	8/31/2023	11/16/2023	11/27/2023	12/5/2023	74,883
	9/30/2023	11/16/2023	11/27/2023	12/5/2023	40,270
	10/31/2023	11/16/2023	12/20/2023	1/4/2024	42,378
		\$289,535			
		Effective		Contract	Days from Effective Date
	Туре	Date	End Date	Signed	to Signed Date
	Type Subrecipient Agreement		2/28/2023		
	Subrecipient	Date		Signed	to Signed Date
Example	Subrecipient Agreement	Date 3/1/2022 Purchase	2/28/2023 Created in	Signed 7/28/2022	to Signed Date 149
Example #8	Subrecipient Agreement Invoice Date	3/1/2022 Purchase Order Date	2/28/2023 Created in BRASS	Signed 7/28/2022 Paid Date	to Signed Date 149 Amount
	Subrecipient Agreement Invoice Date 3/31/2022	3/1/2022 Purchase Order Date 10/13/2022	2/28/2023 Created in BRASS 11/15/2022	Signed 7/28/2022 Paid Date 12/8/2022	to Signed Date 149 Amount \$20,060
	Subrecipient Agreement Invoice Date 3/31/2022 4/30/2022	3/1/2022 Purchase Order Date 10/13/2022 10/13/2022	2/28/2023 Created in BRASS 11/15/2022 11/15/2022	Signed 7/28/2022 Paid Date 12/8/2022 12/8/2022	149 Amount \$20,060 4,912
	Subrecipient Agreement Invoice Date 3/31/2022 4/30/2022 5/31/2022	3/1/2022 Purchase Order Date 10/13/2022 10/13/2022 10/13/2022	2/28/2023 Created in BRASS 11/15/2022 11/15/2022 11/15/2022	Signed 7/28/2022 Paid Date 12/8/2022 12/8/2022 12/8/2022	to Signed Date 149 Amount \$20,060 4,912 484
	Subrecipient Agreement Invoice Date 3/31/2022 4/30/2022 5/31/2022 6/30/2022	3/1/2022 Purchase Order Date 10/13/2022 10/13/2022 10/13/2022 10/13/2022	2/28/2023 Created in BRASS 11/15/2022 11/15/2022 11/15/2022 12/1/2022	Signed 7/28/2022 Paid Date 12/8/2022 12/8/2022 12/8/2022 12/8/2022	149 Amount \$20,060 4,912 484 15,653
	Subrecipient Agreement Invoice Date 3/31/2022 4/30/2022 5/31/2022 6/30/2022 7/31/2022	3/1/2022 Purchase Order Date 10/13/2022 10/13/2022 10/13/2022 10/13/2022 10/13/2022	2/28/2023 Created in BRASS 11/15/2022 11/15/2022 11/15/2022 12/1/2022 12/1/2022	Signed 7/28/2022 Paid Date 12/8/2022 12/8/2022 12/8/2022 12/8/2022 12/8/2022	to Signed Date 149 Amount \$20,060 4,912 484 15,653 64,662
#8	Subrecipient Agreement Invoice Date 3/31/2022 4/30/2022 5/31/2022 6/30/2022 7/31/2022 8/31/2022	7/1/2022 Purchase Order Date 10/13/2022 10/13/2022 10/13/2022 10/13/2022 10/13/2022 10/13/2022 10/13/2022 10/13/2022	2/28/2023 Created in BRASS 11/15/2022 11/15/2022 11/15/2022 12/1/2022 12/1/2022 12/1/2022 12/1/2022 Total Dol	Signed 7/28/2022 Paid Date 12/8/2022 12/8/2022 12/8/2022 12/8/2022 12/8/2022 12/8/2022 12/8/2022 12/13/2022 lars Delayed	149 Amount \$20,060 4,912 484 15,653 64,662 25,855