



Shire of Dardanup

APPENDICES

AUDIT COMMITTEE MEETING

To Be Held

Wednesday, 18 September 2019
Commencing at 1.30pm

At

Shire of Dardanup
ADMINISTRATION CENTRE EATON
1 Council Drive - EATON

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Western Australian Auditor General's Report



Verifying Employee Identity and Credentials



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ISSN: 2200-1931 (Print)
ISSN: 2200-1921 (Online)

The Office of the Auditor General acknowledges the traditional custodians throughout Western Australia and their continuing connection to the land, waters and community. We pay our respects to all members of the Aboriginal communities and their cultures, and to Elders both past and present.

WESTERN AUSTRALIAN AUDITOR GENERAL'S REPORT

Verifying Employee Identity and Credentials



**THE PRESIDENT
LEGISLATIVE COUNCIL**

**THE SPEAKER
LEGISLATIVE ASSEMBLY**

VERIFYING EMPLOYEE IDENTITY AND CREDENTIALS

This report has been prepared for submission to Parliament under the provisions of section 25 of the *Auditor General Act 2006*.

This focus area audit assessed whether 8 local government entities had suitable policies and procedures in place for screening new employees, and for monitoring existing employees for changes in their circumstances which may impact their employment.

I wish to acknowledge the cooperation of the staff at the entities included in this audit.

A handwritten signature in black ink, appearing to read 'C Spencer'.

CAROLINE SPENCER
AUDITOR GENERAL
19 June 2019

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Auditor General's overview

This focus audit examined controls for verifying the identity and credentials of new employees and monitoring the status of existing employees.

We previously performed this audit in 2015 for state government entities. This report covers a sample of local government entities.

Our audit found that all entities need to improve their practices for screening employees. We identified many instances where local government entities were not checking the identity, right to work in Australia, employment history, qualifications and criminal backgrounds of new and existing employees.

While this audit was not designed to identify individual cases of inappropriate staff appointment, it did reveal significant shortcomings in policy and practices. If not addressed, these control weaknesses could impact the quality of employees in, and the integrity of, the public sector.

These focus audits can be considered as 'hygiene' audits as they give an indication of the health of various management controls. We conduct these audits as an extension of our annual financial audits, using more detailed testing than is required for forming our financial audit opinions.

The findings of these audits are likely representative of issues in other government entities that were not part of our sample. I encourage all entities, and not just those audited, to periodically assess themselves against these risks and controls on an ongoing basis. Our better practice checklist at Appendix 1 has been designed to assist entities to run their own hygiene checks.



Executive summary

Background

The activities and functions carried out by local government entities (entities) are diverse and involve a great deal of interaction with local communities. It is therefore essential that they recruit the right people.

Entities need sound, consistently applied employee screening processes to confirm the identity, integrity and academic credentials of potential employees. The screening process usually involves undertaking referee checks, checking criminal backgrounds and verifying employment history and educational qualifications. It is also important that entities continue to monitor employees, to identify changes in their circumstances which may impact their duties. The rigour of the processes may vary depending on the duties of the role and the related risks of employing the wrong person.

We previously performed this audit in 2015 for state government entities and found many instances where identity, qualifications, criminal backgrounds and right to work in Australia were not checked prior to employment.

Conclusion

All of the 8 entities we audited need to improve their policies and practices for screening employees.

We found many instances where entities did not check the identity, right to work in Australia, employment history, qualifications and criminal backgrounds of employees prior to their commencement. We also found instances where entities did not obtain a working with children check for positions which required it. These findings create a risk that an entity may employ inappropriate or unqualified staff.

Only the Shire of Boyup Brook and the City of Melville were monitoring their employees for all significant changes to their status which could impact their employment.

What we did

The focus of this audit was to assess if the sampled entities were adequately screening their employees to verify their employment history and performance, to check professional qualifications, to verify an employee's identity and right to work in Australia and, where appropriate, identify and assess criminal records.

We assessed the policies and practices at 8 entities, of varying size and location. We used the following lines of inquiry:

1. Do entities have suitable policies and procedures for screening employees?
2. Did entities adequately screen new employees to verify their identify, check employment history and educational/professional qualifications, and perform risk based criminal record checking?
3. Are entities monitoring existing employees for changes in their status (new criminal convictions or discontinuance of essential qualifications)?

The audit examined whether controls were in place to support good recruitment practices. It was not designed to identify individual cases of inappropriate appointment.

We tested a sample of 306 employees across 8 entities to assess screening practices. Our sample included a mix of new and existing employees.

We conducted this audit under section 18 of the *Auditor General Act 2006* and in accordance with Australian Auditing and Assurance Standards. The approximate cost of undertaking the audit and reporting is \$125,000.

The following 8 entities were included in this audit:

Entities
City of Melville (Melville)
City of Subiaco (Subiaco)
Shire of Boyup Brook (Boyup Brook)
Shire of Coolgardie (Coolgardie)
Shire of Dundas (Dundas)
Shire of Williams (Williams)
Town of Claremont (Claremont)
Town of Victoria Park (Victoria Park)

What did we find?

All 8 entities need to improve their practices in some way, with none of the entities displaying good policies or practices for verifying employee identity and credentials.

Only 3 entities had policies for verifying employee identity and credentials

Robust employee screening processes and procedures help entities to recruit appropriate staff and ensure that current staff remain suitable for their roles.

Policies and procedures for verifying employee identity and credentials should require checking of claims made by potential employees including their identity, relevant professional qualifications, memberships or licenses, prior work history, right to work in Australia and, where appropriate, criminal background. If there are any specific requirements for a position, such as qualifications or a working with children check, entities should clearly document these requirements in position description forms and these checks should also be part of the recruitment and monitoring processes.

Only Melville, Subiaco and Dundas had policies for verifying employee identity and credentials. Although the policies for these entities covered most requirements, there is scope for them to be improved by mandating a 100-point identity check and requiring periodic checking of staff for changes in their circumstances which may impact their employment.

It is important that recruitment policies and related documentation provide clear guidance to staff on instances where criminal background or working with children checks are required for the position. As noted in our 2015 report, criminal background checks are important for many positions, but not necessarily every position. Each entity needs to consider the need for criminal background or working with children checks based on the duties and risks of the position and the requirements of legislation.¹

While the majority of entities did not have specific policies and procedures for verifying employee identity and credentials, several had included the requirement for criminal background checks in position description forms. However, at Boyup Brook, Coolgardie and Williams, there was no requirement to perform criminal background checks for important positions. For certain positions, such as senior officers who approve key transactions and positions involving procurement, finance, human resource management and information system management, there should be some level of criminal background checks for potential employees.

Circumstances of individual employees can change over time, and it is therefore important that policies and procedures include requirements to monitor existing employees. This can include, where appropriate, periodic criminal background checks and requesting evidence that staff have maintained their essential qualifications. It is also good practice to require annual declarations from employees advising of any changes in their circumstances.

For the 3 entities with policies for verifying employee identity, only Melville's policy required periodic criminal background checks for positions requiring a criminal background check. In addition, none of the policies required employees to make annual declarations about changes to their status.

¹ Working with Children (Criminal Record Checking) Act 2004

There were many instances where staff identity or eligibility to work in Australia was not checked

It is essential to confirm the identity of all new employees. Australian Standard 4811-2006 'Employment Screening' regards this as an essential step in a recruitment process. This should be done prior to their commencement, preferably using a 100-point identity check. It is also important to verify that the potential employee has a right to work in Australia prior to engaging them in paid work.

From our sample of 306 employees, we found 81 instances (26%)² where there was no evidence that the entity checked the identity of the staff prior to employment. For a further 198 employees, across all 8 entities, the verification was inadequate because it fell short of the documentation needed for a 100-point check.

Of particular concern was the high percentage (89%) where there was no evidence of checking an applicant's eligibility to work in Australia. This shortcoming applied to every entity in our sample.

We found that most entities had identified the essential qualifications for positions, such as university degrees, first aid certificates or licenses, and clearly articulated these requirements in position description forms. For the regional entities in our sample, our testing confirmed that the entities were verifying that applicants held these essential qualifications prior to their employment. However, at Melville, Victoria Park and Subiaco, we found 54 instances (45%) where there was no evidence of this checking.

Reference checks were not done for more than half the new employees we tested

Reference or referee reports are an important tool to verify claims made by potential employees about their employment history and experience, and to clarify any uncertainties. In some instances, the checks may reveal information about a potential employee that was not readily apparent from other checks and documentation. They provide useful information about the integrity of applicants and should be a mandatory step in all recruitment procedures.

Entities can perform reference checks in a number of ways, including phone calls, emails or pro-forma forms. While a minimum two reference checks from appropriate referees is advisable, this may not be necessary for all positions. For more senior positions and roles that have significant financial responsibility, two reference checks are highly recommended.

We sampled 153 employees recruited by the entities in the period between 1 July 2015 and 20 September 2018. For more than half our sample (79 employees across all entities), we found there was no evidence that a reference check was performed as part of the recruitment process.

Most of the entities we reviewed had assessed whether a criminal background check was required for the position. However, entities were not consistently performing criminal background checks in line with their policies or position description forms. In total, we found 63 instances at 5 entities³ where a criminal background check was required, but there was no evidence that it was performed.

² City of Melville, City of Subiaco, Shire of Dundas, Town of Claremont, Town of Victoria Park

³ City of Melville, City of Subiaco, Shire of Dundas, Town of Claremont and Town of Victoria Park

Criminal background checks, before commencement of employment and periodically thereafter, are an important way of identifying employees whose background may represent a risk to the entity, other employees or customers.

Some entities were not consistently obtaining working with children checks

Because of the diverse nature of activities and functions performed by entities, there are a number of positions which involve working with vulnerable people in the community, such as children. The *Working with Children (Criminal Record Checking) Act 2004* and *Working with Children (Criminal Record Checking) Regulations 2005* require people engaged in 'child-related work' to have a working with children check card. While the requirements of the act may not apply to every position involving work with children, we believe it is good practice to perform these checks for these positions.

Melville, Claremont, Boyup Brook, Dundas and Williams had assessed the need for working with children checks and, based on our sample testing, were obtaining these checks as required. Subiaco, Coolgardie and Victoria Park had a small number of instances where management considered a working with children check was required, but there was no evidence that it was obtained.

Entities need to improve how they monitor existing employees for changes in their status

If a position requires an employee to hold a licence, working with children check card, or a professional qualification, entities should regularly monitor whether employees continue to hold the required qualification/clearance. Similarly, if the position requires the employee to have a criminal background check, there should be periodic checks to ensure that there has not been a change in circumstances which could cause a risk to the entity, other employees and customers.

Only Boyup Brook and Melville had procedures in place to regularly monitor employees for all significant changes in their status. Consequently, there is a risk that the other entities may be unaware if there is a change in circumstance, such as a loss of licence, which would affect the employee's capacity to perform their duties.

Recommendations

Public sector entities should:

1. have approved policies and procedures for verifying employee identity and credentials which cover:
 - using a 100-point identity check
 - criminal background checks, based on the risks associated with the position
 - periodic monitoring of existing employees
2. assess the positions which may require a criminal background or working with children check and ensure that these requirements are clearly documented in position description forms
3. for high risk positions, or positions where there is an ongoing requirement to hold a licence or professional qualification, obtain regular declarations from employees that there is no significant change in their circumstances
4. ensure that sufficient documentary evidence is obtained prior to appointment which supports an employee's
 - identification and right to work in Australia
 - professional qualifications and memberships
 - criminal background or capacity to work with children (where necessary)
5. perform appropriate referee checks for all potential employees and ensure that all employees' reference checks are retained in their employee or recruitment file
6. develop a procedure for monitoring the expiry dates of licences, certificates or working with children checks so that they can be followed up with the employee close to expiry date
7. perform periodic criminal background checks for positions which require it.

Under section 7.12A of the *Local Government Act 1995*, all sampled entities are required to prepare an action plan addressing significant matters relevant to their entity for submission to the Minister for Local Government within 3 months of this report being tabled in Parliament and for publication on the entity's website. This action plan should address the points above, to the extent that they are relevant to their entity, as indicated in this report.

Response from entities

The local government entities audited accepted the recommendations and confirmed that where relevant, they either have amended policies and practices or will improve human resource processes.

Appendix 1: Better practice principles

The following table shows control principles on which our audit focused. They cover a number of practices and controls related to verifying employee identity and credentials which are also recommended in Australian Standard 4811-2006 'Employment Screening'. They are not intended to be an exhaustive list.

Verifying employee identity and credentials	Focus Area	What we expected to see
Policy	Policies and procedures	<ul style="list-style-type: none"> Policy is in place which covers the verification process for all potential employees and the monitoring process for existing employees.
	Risk Assessment	<ul style="list-style-type: none"> Entities have assessed the risk associated with each position and determined whether a criminal background or working with children check is required. Position description forms clearly document the requirements of each position including any essential qualifications, licences and memberships and whether any criminal background or working with children checks are required.
Recruitment and Appointment	Qualifications	<ul style="list-style-type: none"> Entities verify essential qualifications, licences and memberships during the recruitment process.
	Past Work History	<ul style="list-style-type: none"> Referee/reference reports are obtained and reviewed as part of the selection process.
	Identity and Right to Work	<ul style="list-style-type: none"> Entities check the identity of successful applicants using a 100-point identification check. Entities confirm successful applicants' right to work in Australia by reviewing passports, visas and/or birth certificates.
	Criminal Background checking	<ul style="list-style-type: none"> Criminal background or working with children checks are obtained (where required) and reviewed by the entity.
	Recordkeeping	<ul style="list-style-type: none"> Entities retain documentation to demonstrate that they verified the potential employee's qualifications, past work history, identity, right to work in Australia and criminal background prior to the start date.
Monitoring of Existing Employees	Declarations	<ul style="list-style-type: none"> Employees provide an annual declaration to advise whether there has been a significant change in their circumstance which could impact their employment.
	Review	<ul style="list-style-type: none"> Entities monitor the expiry date of essential qualifications/licences and follow up with employees close to the expiry date. Where criminal background checks are required for the position, they are re-performed on a periodic basis.

Source: OAG based on Australian Standard AS 4811-2016 'Employment Screening'

Auditor General's Reports

Report number	Reports	Date tabled
23	Improving Aboriginal Children's Ear Health	12 June 2019
22	Opinions on Ministerial Notifications	5 June 2019
21	Engaging Consultants to Provide Strategic Advice	5 June 2019
20	Information Systems Audit Report 2019	15 May 2019
19	Audit Results Report – Annual 2018 Financial Audits	15 May 2019
18	Firearm Controls	15 May 2019
17	Records Management in Local Government	9 April 2019
16	Management of Supplier Master Files	7 March 2019
15	Audit Results Report Annual 2017-18 Financial Audits of Local Government Entities	7 March 2019
14	Opinions on Ministerial Notifications	13 February 2019
13	Opinion on Ministerial Notification	23 January 2019
12	Managing Disruptive Behaviour in Public Housing	20 December 2018
11	Opinions on Ministerial Notifications	20 December 2018
10	Opinions on Ministerial Notifications	18 December 2018
9	Treatment Services for People with Methamphetamine Dependence	18 December 2018
8	Opinions on Ministerial Notifications	10 December 2018
7	Audit Results Report – Annual 2017-18 Financial Audits of State Government Entities	8 November 2018
6	Opinion on Ministerial Notification	31 October 2018
5	Local Government Procurement	11 October 2018
4	Opinions on Ministerial Notifications	30 August 2018
3	Implementation of the GovNext-ICT Program	30 August 2018
2	Young People Leaving Care	22 August 2018
1	Information Systems Audit Report 2018	21 August 2018

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RECOMMENDATION Public sector entities should:	Officer Comment / Outcome
<p>4. Ensure that sufficient documentary evidence is obtained prior to appointment which supports an employee's</p> <ul style="list-style-type: none"> • identification and right to work in Australia • professional qualifications and memberships • criminal background or capacity to work with children (where necessary) 	<p><i>The interview process sufficiently covers a potential employee's Right to Work in Australia and what requirements need to be met to be employed with the Shire.</i></p> <p><i>As part of the recruitment selection process, HR staff complete Form 165 – Recruitment Selection Report. This form captures a preferred applicant check list which again covers the Right to Work in Australia. A check is completed in VEVO (Department of Home Affairs) for visa details and conditions.</i></p> <p><i>Professional Qualifications and memberships – new staff are required to provide a copy of these documents to HR, again this forms part of the recruitment check via Form 165. Existing staff are required to advise HR of any new qualifications and/or memberships as they occur. Discussion occurred whether we set a level of employment that we would undertake an actual check on 'said' qualifications. Teresa has investigated options for this service and through Fit 2 Work this can be done at a cost of \$25.00 per qualification check.</i></p> <p><i>Potential to undertake a Risk Matrix assessment on what positions require a minimum qualification to undertake – for example, Finance Manager holding an Accounting degree.</i></p> <p><i>Criminal background and WWC - as stated previously these are captured at recruitment level. WWC are monitored for expiration via HR monthly report.</i></p>
<p>5. Perform appropriate referee checks for all potential employees and ensure that all employees' reference checks are retained in their employee or recruitment file.</p>	<p><i>Preferred candidates from an interview process are appropriately screened via two referee checks. This process involves a HR officer contacting both referee's by phone and taking notes of the questions asked. These notes are typed up, any obvious issues are highlighted. These notes are then presented to the CEO for consideration.</i></p> <p><i>To note: at least one referee must be current supervisor or manager, if not the candidate must provide a reason why.</i></p> <p><i>The referee checks are retained in the recruitment file applicable for the position.</i></p>
<p>6. Develop a procedure for monitoring the expiry dates of licences, certificates or working with children checks so that they can be followed up with the employee close to expiry date.</p>	<p><i>HR are managing this process effectively. A report is produced monthly of all certificates, licences and WWC that are due to expire. HR staff will then contact the staff member to ensure these documents are renewed/validated.</i></p>
<p>7. Perform periodic criminal background checks for positions which require it.</p>	<p><i>Again, this can be captured as part of the 'Annual Employee Declaration' process and would cover a considerable number of staff.</i></p> <p><i>Teresa will incorporate this into the declaration process.</i></p>



In attendance: Phillip Anastasakis – Deputy CEO
Teresa Partridge – Human Resource Officer
Cindy Barbetti – Compliance Officer

Objective: To discuss the findings from the WA Auditor General’s Report 24: June 2018-19 Verifying Employee Identity and Credentials.

Report: [OAG Report - Verifying Employee Identity and Credentials](#)

RECOMMENDATION Public sector entities should:	Officer Comment / Outcome
<p>1. Have approved policies and procedures for verifying employee identity and credentials which cover:</p> <ul style="list-style-type: none"> • using a 100-point identity check • criminal background checks, based on the risks associated with the position • periodic monitoring of existing employees 	<p><i>The Shire has a draft policy and procedure that will manage and direct recruitment and employee selection. The policy covers ‘Selection and Appointment’ (refer 4.7) and directs that candidate selection methods include ‘Due diligence candidate screening’ and ‘Referee reports’.</i></p> <p><i>We are satisfying the 100 point ID check, which is also a requirement of undertaking employee checks through Fit 2 Work. The required ID through Fit 2 Work is actually above the 100 points required. It was agreed to update the administration policy AP019 Pre-Employment Police Clearances to make mention of the 100 point ID Check.</i></p> <p><i>PR023 Pre-Employment Police Clearances provides the appropriate levels of risk management in the recruitment process to minimise the risk of employing people with prior criminal convictions in areas relevant to their employment.</i></p> <p><i>Periodic monitoring of existing employees will be captured as part of the ‘Annual Employee Declaration’ process.</i></p>
<p>2. Assess the positions which may require a criminal background or working with children check and ensure that these requirements are clearly documented in position description forms</p>	<p><i>Currently the recruitment process involves <u>all</u> potential employees undergoing a criminal background check through Fit 2 Work</i></p> <p><i>Positions that require Working with Children check (WWC) are noted on Position Descriptions (PD’s) and conditions of employment.</i></p> <p><i>WWC are required for Rec Centre, Creche, Community Development and Library positions.</i></p>
<p>3. For high risk positions, or positions where there is an ongoing requirement to hold a licence or professional qualification, obtain regular declarations from employees that there is no significant change in their circumstances</p>	<p><i>Drivers Licences, WWC, White Card, Traffic Management and First Aid are maintained and monitored through Human Resources (HR). These are captured in SynergySoft and are reported on monthly for checking the expiry date.</i></p> <p><i>A concern that has been identified is if a staff member losses their Drivers Licence how is the Shire informed? Teresa advised that this is covered through the policy (AP020) and procedure (PR029) that states “Loss of licence; for the purpose of this policy shall include lapsed, cancelled, failure to renew, renewal not issued, suspension and cancellation”. All staff are made aware of the policy as part of their induction process and they are “required to notify their supervisor/Director at the earliest opportunity when they lose their licence”.</i></p> <p><i>Phil enquired if it is a requirement for Building staff to hold some form of accreditation to undertake their role as inspectors and if this requirement is ongoing? Yes, Building Staff are required to be registered with the ‘Australian Institute of Building Surveyors (AIBS)’ and also be a registered builder through the ‘Building Commission’.</i></p> <p><i>Again, the ‘Annual Declaration’ process can be amended to include an employee declaration that there has been no significant change in their circumstances.</i></p>

Recommendations Summary

Introduction

This document is a summary of the recommendations made in Amicus Advisory's full report to Council in June 2019. The points made are Amicus' recommendations only and ultimately it is the responsibility of Shire of Dardanup to choose which points are relevant and should be adopted by Council. For more details on any of the summary points listed below please refer to the full report.

Suggested Changes and Additions to Existing Investment Policy

- Expand the definition of credit ratings to also include ratings by Moody's and Fitch
- Use only long-term ratings as opposed to a combination of short and long-term ratings to avoid confusions which, in Amicus' experience with other councils, can arise in practice
- Expand the "AA" rated policy band to "AA and Major Banks" to guard against a situation where the Major Banks are downgraded (most likely as a group because of a downgrade to either Australia's sovereign rating, the sovereign's support for the banking system or a change in S&P's view of the risks in the whole Australian banking environment)
- Expand the policy to include fixed and floating rate notes in addition to term deposits
- Consider adding a statement on Council's policy regarding ESG investments
- Consider adding provisions within the policy for rectification of breaches to policy and "grandfathering" of investments
- Consider adding a statement of target portfolio returns relative to a relevant benchmark

Suggested Investment Strategy Options

Returns can be enhanced by taking a moderate and conservative level of risk in the areas of credit, interest rate and maturity or a combination of these depending on the prevailing market conditions and the relative value of different investment opportunities available.

In June 2019, Amicus recommended (based on the then prevailing market conditions and investment opportunities):

- Reducing the amount of cash in the "At Call" accounts if liquidity considerations allow
- Matching known liabilities over the next 12 months
- Increasing portfolio diversity through \$1 million term deposit investments in high quality ADIs outside the Major Banks depending on rates offered
- Reducing exposure to AMP because of likely upcoming downgrades of the entity
- Considering adding longer dated fixed and floating rate notes to the portfolio both as an investment opportunity and to create a "liquidity buffer" through time
- Considering purchasing Westpac "Green" Term Deposits if ESG considerations were a relevant factor
- Considering investing in fixed rate term deposits to hedge against future interest rate reductions

Amicus notes the recommendations above were (in Amicus' opinion) relevant to the market conditions at the time; however investment strategy is not "set and forget" and needs to be reviewed regularly (at least every 3 months) because market conditions and investment opportunities can change rapidly. To this point, Amicus considers parts of this strategy recommended in June 2019 to now be out-dated in September 2019 due primarily to further domestic interest rate reductions and significant changes in global market conditions.