

# Technical Guidance Note

## TGN/HBS/20

Auditor Certification of 2019/20 Housing  
Benefit Subsidy Claims



 AUDIT SCOTLAND

Prepared for appointed auditors in the local government sector

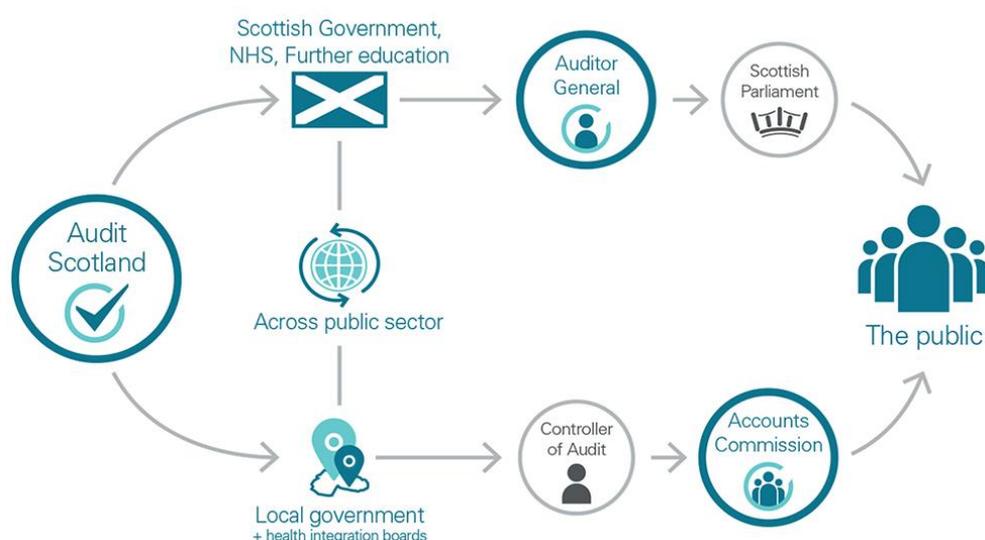
14 May 2020



## Who we are

The Auditor General, the Accounts Commission and Audit Scotland work together to deliver public audit in Scotland:

- The Auditor General is an independent crown appointment, made on the recommendation of the Scottish Parliament, to audit the Scottish Government, NHS and other bodies and report to Parliament on their financial health and performance.
- The Accounts Commission is an independent public body appointed by Scottish ministers to hold local government to account. The Controller of Audit is an independent post established by statute, with powers to report directly to the Commission on the audit of local government.
- Audit Scotland is governed by a board, consisting of the Auditor General, the chair of the Accounts Commission, a non-executive board chair, and two non-executive members appointed by the Scottish Commission for Public Audit, a commission of the Scottish Parliament.



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Our vision is to be a world-class audit organisation that improves the use of public money.

Through our work for the Auditor General and the Accounts Commission, we provide independent assurance to the people of Scotland that public money is spent properly and provides value. We aim to achieve this by:

- carrying out relevant and timely audits of the way the public sector manages and spends money
- reporting our findings and conclusions in public
- identifying risks, making clear and relevant recommendations.

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# Claim overview

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## Description of scheme

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A scheme by which local authorities claim funding from the Department for Work and Pensions towards the cost of paying housing benefit in their local areas.

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Claim reference	Deadline to auditors	Auditor submission deadline
MPF720B	30 April 2020	31 January 2021

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## Risk areas

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1. Benefit granted in the claim form does not agree to final subsidy reports.
  2. Benefit granted in the subsidy system does not reconcile to subsidy paid in the subsidy system.
  3. The benefits system is using incorrect benefit parameters to calculate benefit.
  4. The in-year reconciliation cells do not agree with the corresponding total expenditure cell.
  5. Uncashed cheques do not result in the necessary adjustments to subsidy.
  6. The criteria for the disproportionate rent increase exemption are not met.
  7. Expenditure on modified schemes is not properly treated.
  8. Administration subsidy is not properly stated.
  9. Interim benefit subsidy is not properly stated.
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## Address for certified claim

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Department for Work and Pensions, Operations Finance, Housing Delivery Division,  
Housing Benefit Unit-Room B120D, Warbreck House, Blackpool, FY2 0UZ

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Technical Guidance Note publication date and relevant year	Professional Support contact point and email address
14 May 2020 for 2019/20 claims	Anne Cairns <a href="mailto:TechnicalQueries@audit-scotland.gov.uk">TechnicalQueries@audit-scotland.gov.uk</a>

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# Introduction

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## Purpose

1. The purpose of this Technical Guidance Note from Audit Scotland's Professional Support is to provide external auditors appointed by the Accounts Commission with guidance on the certification of 2019/20 housing benefit (HB) subsidy claims. The approach set out in this technical guidance note has been agreed with the Department for Work and Pensions (DWP).
2. Appointed auditors are required by the [Code of Audit Practice](#) to review, as part of their audit appointment, approved grant claims and other financial returns submitted to grant-paying bodies by local government bodies and provide reasonable assurance as to whether they are fairly stated and in accordance with specified terms and conditions. One of the approved claims that auditors are required to certify is in respect of the HB subsidy scheme.
3. It is a condition of the DWP that external auditors should use the testing and reporting approach set out in their *Housing benefit assurance procedures* (HBAP). This technical guidance note therefore provides guidance on the application of the HBAP approach to the certification of subsidy claims of Scottish local authorities for 2019/20.
4. This Technical Guidance Note:
  - provides guidance for auditors on the examination of the HB subsidy claim, including highlighting the main risk areas
  - sets out and explains the preliminary procedures (at section 1), testing procedures (at section 2), procedures for evaluating results and agreed amendments (section 3) completion procedures (at section 4) and post-certification procedures (at section 5) that auditors should carry out (all summarised in the checklist at Appendix 1)
  - provides examples of reporting errors in covering letters at Appendix 3
  - provides examples of reporting the results of post-certification procedures at Appendix 4
  - clarifies for the DWP the nature of work undertaken by appointed auditors before giving their certificate.
5. Auditors are required to express their conclusion in a certificate attached to each claim. The assurance process performed by auditors is therefore described in the [Code of audit practice](#) as the certification of each claim.
6. Although this note provides a concise summary of the scheme, it may still be necessary for auditors to refer to the source material listed at Appendix 2 on which this note is based.
7. Auditors should also refer to the general guidance on the certification of claims provided by [Technical Guidance Note TGN/GEN/20](#).

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This Technical Guidance Note provides guidance on auditor certification of HB subsidy claims

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Auditors should use the HBAP approach

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Auditors should also refer to TGN/GEN/20

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## Changes in 2019/20

8. Changes in 2019/20 are explained in the overview section but in summary are amendments to or clarification of the administration of HB in respect of
  - claims from couples
  - disguised remuneration tax avoidance schemes

- a new basis of stay has been created for EEA (European Economic Area) and Swiss nationals
- Windrush compensation payments.

### Nature of scheme

9. The HB subsidy scheme is the means by which local authorities claim subsidy from the DWP towards the cost of paying HB in their local areas. Claimants obtain these benefits by application to the local authority.
10. Benefit schemes of rent rebates for tenants of a local authority and rent allowances for private tenants are provided for by the Social Security Contributions and Benefits Act 1992 and the Social Security Administration Act 1992 (as amended).

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The scheme subsidises the cost of paying HB

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### Funding arrangements

11. Provision for subsidies is made in sections 140A to 140G of the Administration Act and in *The Income-related Benefits (Subsidy to Authorities) Order 1998* (as amended). With the exception of certain areas of benefit spending where authorities have the most scope to monitor and control costs, subsidy is paid at the rate of 100%.
12. Monthly instalments of subsidy are made by the DWP on the basis of authorities' estimates in March and August on form MPF714B. Final subsidy claims are made on claim form MPF720B which requires to be certified by the external auditor.

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With some exceptions, subsidy is paid at the rate of 100%

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### Contact point

13. The contact point in Professional Support for this technical guidance note is Anne Cairns, Manager (Professional Support). Enquiries should be sent to [TechnicalQueries@audit-scotland.gov.uk](mailto:TechnicalQueries@audit-scotland.gov.uk).

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# Auditor certification overview

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## Purpose of section

**14.** This section provides an overview of the auditor certification arrangements, including an explanation of the HBAP approach.

## Changes in 2019/20

**15.** Key changes to HB administration include the following:

- From 15 May 2019, claimants in a couple are only be eligible to start receiving HB if either:
  - the claimant or their partner have both reached state pension age, or
  - one of the couple has reached state pension age and started to claim HB or pension credit before 15 May 2019.
- Where a mixed age couple tries to make a new claim to HB on or after 15 May 2019, they should be signposted to universal credit, except where:
  - backdating provisions enable a new HB claim to be made up to and including 13 August 2019
  - the mixed age couple have been continuously in receipt of pension credit from and including 14 May 2019
  - the claimant is in receipt of the severe disability premium.
- HM Revenue & Customs (HMRC) have identified disguised remuneration tax avoidance schemes and are recovering unpaid income tax and national insurance. HMRC introduced a one-off charge on 5 April 2019, which may be shown in earnings information from March to April 2019 as an amount 'paid'. This is not actual earnings and only regular earnings shown should be taken into account for the purposes of HB awards.
- A new basis of stay has been created for EEA (European Economic Area) and Swiss nationals under the EU Settlement Scheme (EUSS). The EUSS enables EEA and Swiss nationals and their family members, resident in the UK by a specified date, to apply for a UK immigration status which will protect their entitlements and right to remain in the UK.
- The Windrush Compensation Scheme (WCS) provides redress for those individuals who suffered financial loss, due to their inability to demonstrate their lawful right to live and work in the UK. Local authorities should either reinstate or award HB to eligible Windrush claimants. Compensation payments made by the Home Office under the WCS and the Windrush Exceptional Payments Scheme should be disregarded for the purposes of HB income or capital calculations.

## HBAP modules

**16.** The HBAP approach is set out in a number of modules, and those of relevance to auditors in Scotland are summarised in the following table:

Module	Content	Available
2: Uprating	A checklist to help auditors ensure that the local authority's system is using the correct benefit parameters to calculate benefit entitlement and to claim subsidy.	Now
3: Workbooks	Workbooks to be completed for detailed testing, including step-by-step guidance and a test result summary.	Now (follow the guidance provided on Audit Scotland's <a href="#">Technical Reference Library</a> )
5: Software diagnostic tool	A tool that ensures the subsidy claim has been completed using the recognised software for claim completion and reconciles benefit 'granted' to benefit 'paid' in accordance with the software supplier's instructions. Deviations from the software supplier's standard approach are identified and assessed so that appropriate action can be taken.	From June 2020 (for each software supplier)

17. Modules 1,6 and X do not apply in Scotland and are replaced by the guidance on the required approach to testing provided at sections 2 and 3 of this technical guidance note, and on reporting and further testing at sections 4 and 5.

18. Module 4, an analytical review tool used in previous years does not require to be completed for 2019/20.

### Testing methodology

19. A key element of the HBAP approach involves auditors selecting a sample of benefit cases and undertaking detailed testing using the HBAP Module 3 workbooks. The focus of the testing is to assess whether benefit has been awarded in accordance with regulations, and that subsidy has been properly claimed. It has the following stages:

- An initial random sample of cases should be selected.
- Where initial testing identifies errors, auditors should critically evaluate the reasons to determine what action and further testing is necessary.
- Where testing identifies issues that can be resolved, auditors should agree amendments to the claim form to be made by the authority.
- Where testing identifies issues that require a qualification to the auditor's conclusion on the claim form, they should be included in a covering letter.

20. Auditors should note that compliance with the testing arrangements set out in this technical guidance note is a condition of the DWP. Auditors should also have regard to the guidance in the HBAP help file.

21. The DWP has arrangements in place with local authorities to ensure that each local authority makes available information to external auditors that it has obtained from the DWP's Customer Information System (CIS). The DWP does not require any external auditor to use the CIS directly.

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Testing stages assess whether benefit has been awarded in accordance with regulations and subsidy has been properly claimed

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Auditors do not have to use the CIS directly

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## Data protection

22. The nature of benefits testing means that auditors are collecting, recording and transferring personal data relating to individuals' claims for benefit. This data falls under the scope of the *Data Protection Act 2018* reflecting the *General Data Protection Regulations* introduced to strengthen data protection arrangements. Key considerations include the collection, storing, transfer and discarding of benefits data, which should all be undertaken using secure means. Auditors should apply the following specific requirements to ensure secure handling and storage of personal data.
23. When obtaining data samples, the list provided by the authority should contain only sufficient information for the auditor to select their sample (not a full download of the data). The list should be sent to the auditor securely, stored securely, and destroyed securely (or returned) once the sample has been extracted.
24. When recording data in the workbooks, auditors should record data as set out in the guidance to the workbooks. This ensures that the amount of personal data retained is minimised, and the data is kept in one specific area in the workbooks. Auditors should not record personal data in free text fields in the workbooks in a form that is identifiable to the individual.
25. Workbooks should be stored securely and destroyed when no longer needed under the normal audit data retention processes. Auditors should ensure that any transfer of workbooks is secure.

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**Auditors should destroy workbooks when no longer needed**

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## Submission of claim to auditor

26. The subsidy claim forms are provided in a pdf format, and the completed pdf form is submitted by local authorities to the DWP by email. In addition, the DWP requires local authorities to scan and email them the first page of the claim form and the local authority certificate page.
27. Local authorities are required to submit a hard copy of the claim form, including a completed local authority certificate, to external auditors. The submission deadline for 2019/20 to both the DWP and auditors is 30 April 2020.
28. Due to the implications of COVID-19, the DWP is aware that the 30 April 2020 deadline for submission of the claim to DWP and auditors may not be achievable. In such cases the local authority should contact the DWP to ask for an extension to submission of the claim and/or the auditor certification deadline.
29. The DWP has agreed an electronic signature is acceptable for 2019/20 subsidy claim forms.

# Section 1

## Preliminary procedures

### Purpose of section

31. This section sets out the preliminary procedures that auditors should carry out when they receive the claim form.

### Preliminary procedure 1 - Completion of form

#### Auditors should confirm that:

- all relevant parts of the claim have been properly completed
- the authority certificate bears the original signature of the Chief Financial Officer
- all arithmetic on the claim is correct (confirmed by using the pdf form).

32. The subsidy claim form provides the analysis of qualifying expenditure on HB required by the DWP and for the calculation and summary of the related subsidy. The 1998 Order defines qualifying expenditure as the total of rent rebates and rent allowances granted by the local authority during the relevant year, subject to certain deductions. The mechanics of the form provide for the subsidy claimed in respect of expenditure on pages 2 to 9 to be calculated, transferred and summarised on page 1 of the form.

33. The claim form is divided into sections as set out in the following table:

Headline cell	Content	Covered by auditor's certificate
011	Total expenditure on rent rebates Analysed in cells 012 to 015 and 022 to 028, prior years overpayments in cells 029 to 033, and backdated expenditure in cell 038	Yes
094	Total expenditure on rent allowances Analysed in cells 095 to 117, prior years overpayments in cells 118 to 124, and backdated expenditure in cell 131	Yes
179S	Subsidy additions and deductions (uncashed payments)	Yes
180a to 190S	Disproportionate rent increase	Yes
201 to 210S	Local authority error subsidy cells (pre-populated)	No
212 to 216S, and 225	Modified schemes	214 Yes Other cells No

34. The pdf version of the claim form completes all necessary calculations and transfers of amounts between cells. Cells with a "S" suffix contain calculations or transferred amounts. Other cells are summarised in the following table:

Cells	Comments
001, 002, 005 and 008	Pre-populated by the DWP and are not covered by the auditor's certificate
003, 004, 006, 007 and 009	Automatically populated as the rest of the claim form is completed
016 to 020, 039 to 054, 080 to 093, 132 to 178, 191 to 200 and 211	Not used
055 to 079, 209, and 217 to 224	Do not apply to Scotland

### Preliminary procedure 2 - Correct form

**Auditors should confirm that they are reviewing the most up-to-date version of the form by confirming that the claim form presented for certification includes an entry in every cell including a zero entry in any cell that does not apply.**

35. The pdf form includes a validation check that all cells have been completed. However, it is possible for authorities to avoid carrying out this validation check, which would allow the form to be submitted with blank cells.
36. The DWP will perform checks upon receipt of the final claim to identify blank cells and may require re-submission, but it is possible that an authority may not provide an updated version to auditors. The claim form presented for certification should include an entry in every cell, including a zero entry in any cell that does not apply.

# Section 2

## Testing procedures

### Purpose of section

37. This section sets out the testing procedures that auditors should carry out on the claim form.

### Test 1 - Benefit granted

**Auditors should confirm for rent rebates and rent allowances that benefit granted in the claim form (total expenditure in the headline cells) agrees to final subsidy reports in accordance with HBAP module 5.**

38. Entries in the headline cells 011 and 094 represent the total expenditure for rent rebates and rent allowances in terms of benefit granted by the authority during 2019/20. Total expenditure includes:

- overpayments identified in the year relating to HB paid in the year (but not overpayments identified in the year relating to HB paid in an earlier year)
- backdated awards which apply where an application for HB is submitted for a period before the effective date of the claim and the authority has treated the claim as if it were made from the earlier date. They should be separately identified but otherwise should be treated in the same way as other expenditure attracting full rate subsidy
- extended payments which are those payments made for four weeks because certain benefits have ceased due to a claimant or partner starting work or increasing their wages
- the two weeks *transition to universal credit housing payment* for claimants migrating to universal credit.

39. Certain expenditure does not attract subsidy and is, as appropriate, either excluded entirely from the claim or identified in cells which do not generate subsidy. The following should be excluded from the headline cells:

- amounts in respect of the deductions specified in article 19 of the 1998 Order which are principally: benefit expenditure arising as a result of the cost of services or facilities which a tenant may choose whether or not to have (modular improvement/differential rent schemes); the value of most cash payments to tenants including rent free weeks and credits; and modified schemes
- amounts in respect of uncashed or returned instruments of payment that are not reissued or replaced (see test 6). Articles 19 and 20 of the 1998 Order require an adjustment to subsidy claims in respect of instruments of payment returned to the authority or passed their expiry date without being presented for payment. Where uncashed or returned instruments of payment are subsequently reissued or replaced authorities may only claim subsidy once
- disproportionate rent increases deduction (see test 7)
- overpayments and recovered departmental overpayments identified in the current year where the original payment was made in a previous year. To effect the necessary subsidy deduction, such overpayments and recoveries are recorded in the overpayment and recovery cells of the claim form for the year in which the overpayment is identified or the recovery made.

**Certain expenditure does not attract subsidy**

40. HB expenditure related to temporary accommodation management costs, included in the headline cells (011 and 094), should be shown in the relevant 'above the subsidy cap' cell (015 or 107) attracting a nil subsidy rate.
41. Subsidy should not be claimed in 2019/20 for HB which is due for a period falling wholly within the financial year 2020/21, but which is issued in 2019/20 to ensure timely receipt; subsidy for those payments should be claimed in 2020/21. Where a payment is made for a period which bridges two financial years, subsidy should be claimed in the year in which the payment is made.
42. Entries in the cells which analyse the totals in the headline cells (rent rebates in cells 012 to 033 and 038 and rent allowances in cells 095 to 124 and 131) should be completed on the same basis as the headline cells, i.e. based on benefits granted and excluding the categories of expenditure set out at paragraph 39.
43. Auditors should confirm for each benefit type that benefit granted in the claim form (total expenditure in the headline cells) agrees with the figure for benefit granted used in the software supplier's reconciliation of benefit granted to benefit paid per the benefit software. Auditors should refer to any differences in a covering letter. Rounding differences do not require to be reported.

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Subsidy should be claimed in the year in which HB is paid

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## Test 2 - Reconciliation to benefit paid

**Auditors should confirm for rent rebates and rent allowances that benefit granted in the sub system has been reconciled to benefit paid in the subsidy system in accordance with the software provider's instructions and as set out in HBAP module 5.**

44. Benefit granted will be more than the amount physically paid (in cash or by credit) in cases where deductions are made to recover overpayments or excess payments. Authorities should be able to reconcile benefit granted to benefit paid.
45. Auditors are not required to review any reconciliation between benefits paid per the benefits system and the general ledger or accounting systems.

## Test 3- Uprating of benefit systems

**Auditors should ensure that the local authority's system is using the correct benefit parameters to calculate benefit and to claim subsidy.**

46. The appendix contained within Module 2 of HBAP should be used to check that the local authority has updated the benefit parameters and allowances in accordance with the DWP's annual uprating of benefits. This will ensure that the correct parameters have been applied to benefit calculations and subsidy claimed. Failure to apply annual uprating correctly will result in incorrectly awarded benefit payments.

## Test 4 - Initial testing

**Auditors should select an initial sample of 20 cases from the headline cells for rent rebates rent allowances and test the headline cell entries and the analysis of expenditure in the det cell(s) that support the headline cell entry as set out in the HBAP module 3 workbooks.**

47. Auditors should select an initial random sample of 20 cases from the audit trails that support the headline cells for rent rebates (cell 011) and rent allowances (cell 094) on the claim form (i.e. a total sample of 40). If the test population for a benefit type is less than 100, auditors may reduce the initial sample pro rata, e.g. a population of 49 would require a sample of 10.
48. A sample case is defined by its case reference number. All benefit transactions in the year against the case reference number require to be tested.
49. If the local authority changes housing benefit software or supplier which results in a change in reference number for the sample case within the subsidy year the auditor will need to test all sample case transactions from the legacy system and new system so that all benefit transactions in the year made to the claimant are tested.
50. The work required on the initial samples involves testing the headline cell entries and the analysis of expenditure in the detailed cell(s) that support the headline cell entry. The detailed testing required is set out in the HBAP Module 3 workbooks, which record whether each case passes or fails each test. Guidance on evaluating the results of the initial tests is provided at section 3.
51. If testing is started early using an audit trail other than the final claim form, the details tested must be agreed to the final claim form audit trail before the claim is certified. Any differences must be examined and the impact assessed before the claim is certified.
52. The DWP introduced risk-based verification (RBV) on a voluntary basis from April 2012. Any local authorities opting to apply RBV are required by the DWP to have a RBV policy in place detailing their risk profiles, the verification standards which will apply, and the minimum number of claims to be checked. There is no national model for the RBV policy.
53. The RBV policy must be clear about the levels of verification to be applied by a local authority. Auditors are not required to approve the content or format of any RBV policy and should not do so. The content and scope of the policy is a matter for the local authority.
54. For certification purposes, the application of a local authority's RBV policy to individual benefit claims should be considered in the sample testing of cases under HBAP for 2019/20. Where RBV is not applied to a new claim or change of circumstance the prevailing standards of evidence to support claims for benefit and subsidy claimed apply.

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All transactions in 2019/20 against a selected reference number require to be tested

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Auditors should not approve any RBV policy

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## Test 5 - In-year reconciliation cells

**Auditors should confirm that the in-year reconciliation cells for rent rebates and rent agree the corresponding total expenditure cell.**

55. Each section of the claim form contains an in-year reconciliation cell which is calculated automatically by the pdf form in accordance with cell instructions. Cells 037 and 130 should agree with the entries in the headline cells 011 and 094 respectively. The in-year reconciliation cells seek to confirm that the figure in each total expenditure cell is supported by the analysis of expenditure that follows it.
56. However, there is no validation check forcing the two figures to be equal before the authority can certify the form. The DWP has confirmed it will pursue any differences at the initial claim stage and require an authority to undertake further work and provide the results of this work to its auditor. Auditors should refer to any differences remaining or identified at the final claim stage in their covering letter. The DWP may require authorities to resolve these differences but auditors are not required to do so. Differences due to roundings between the HB system outturn reports and the entries made on the claim form do not require to be included in the covering letter.

## Test 6 - Uncashed cheques

**Auditors should confirm that uncashed cheques and other expired instruments of payment result in the necessary adjustments to subsidy.**

- 57.** Local authority procedures for writing back uncashed cheques and expired instruments of payment must secure the necessary adjustments to subsidy, as subsidy is not payable on these items.
- 58.** Auditors should examine prime documents and assess whether the authority's system for dealing with uncashed cheques, etc results in them being excluded from the subsidy claimed. The adjustments to subsidy are as follows:
- Uncashed cheques, etc identified in the financial year of issue should have been deducted from the total qualifying expenditure for the year and from any other cell on the form in which the expenditure was included (e.g. from overpayments).
  - Uncashed cheques, etc from a previous financial year should have been accounted for by including the subsidy claimed in the previous year(s) in cell 179S.

## Test 7A - Disproportionate rent increase deduction - exemption

**Where the authority has claimed exemption from the disproportionate rent increase deduction auditors should assess whether the relevant exemption criteria has been met.**

- 59.** A disproportionate rent increase (DRI) deduction is required in calculating qualifying expenditure where the average rent of tenants receiving rebates has increased between 31 March 2019 and 31 March 2020 by a higher percentage than the percentage increase in the average rent of tenants who are not receiving rebates.
- 60.** Exemptions from the DRI deduction can be obtained if an authority can demonstrate that it has set rents to reflect the characteristics of individual dwellings and services provided rather than the HB status of tenants. There are two alternatives by which an authority can gain exemption from the DRI rule as summarised in the following table:

Category	Meaning	Conditions	Claimed by client yes in cell
A	Open and transparent rent-setting policies which apply to all tenants regardless of their HB status	<p>Policies and practices set rents for 2019/20 solely according to the type, condition, class or description of the dwelling and according to the services, facilities or rights provided to the tenant.</p> <p>Rent-setting policies and practices for 2019/20 have resulted in reasonable charges, having due regard to the type, condition, class or description of the dwelling and according to the services, facilities or rights provided to the tenant.</p> <p>Rent-setting policies and practices have no regard to a tenant's present or future HB status.</p> <p>Letting policies and practices in 2019/20 and the previous two years did not have regard to a tenant's present or future HB status.</p>	180b

Category	Meaning	Conditions	Claimed by clients in cell
B	Rent increased by a common percentage	An authority has to be able to demonstrate that: <ul style="list-style-type: none"> <li>it had no DRI deduction for 2018/19; and</li> <li>there is clear evidence that rent increases during 2019/20 were the same percentage and applied on the same day for all tenants.</li> </ul>	181b

61. It is the responsibility of the authority to demonstrate to auditors that it qualifies for exemption under either of these categories.

### Test 7B - Disproportionate rent increase deduction - no exemption

Where the authority does not have exemption from the DRI deduction, auditors should check that

- the entries in cells 184a to 185b are supported by control totals produced by the rehousing system
- the totals are accurate
- the amounts in respect of modular improvements and HB eligible service charges have been included in average rents
- the DRI percentage figure in cell 182 agrees to the authority's documentation supporting the entry in cell 188 of the 2018/19 subsidy claim form
- cells 182 to 190s have been properly completed.

62. If the authority does not gain exemption it will be required to carry out a simple calculation based on the DRI abatement applied in the preceding year, multiplied by any new abatement arising from a DRI in 2019/20.
63. The percentage figure for the disproportionate increase in rent rebates in 2018/19 should be entered in cell 182. The disproportionate increase factor for 2018/19 calculated by dividing the figure shown in cell 182 by 100 and shown to four decimal places, should be entered in cell 183.
64. The entries in cells 184 and 185 require the authority to separately identify the average weekly rent of dwellings as summarised in the following table:

Tenants in receipt of rebate as of 31 March 2020?	Average rent at 31 March 2019	Average rent at 31 March 2020
Yes	Cell 184(a)	Cell 184(b)
No	Cell 185(a)	Cell 185(b)

65. It is not relevant whether the benefit status of the tenant was the same on both dates, or whether the tenant had changed, as it is the HB status of the tenant on 31 March 2020 that is relevant when

determining the average rents. Entries in the above cells should be supported by control reports produced by the rent system, and auditors should be satisfied that these are accurate by testing individual cases from listings provided in support of the control totals. Amounts attributable to modular improvement schemes should be included in the average rent as should all those service charges which are eligible for HB.

- 66.** If an authority is unable to comply with the requirements of the determination or has performed its calculation on a different basis, auditors should report the facts to the DWP in a covering letter, and set out the rent-setting policy adopted, e.g. 'The local authority has increased its rents since March 2019 by applying the same percentage increase to all rents' or 'by applying cash increases based on the size of each dwelling'. Covering letters should explain how the increases were applied and not simply report that the increases were uniform and made with no regard to tenant status.

## Test 8- Modified schemes subsidy

**Auditors should confirm that expenditure on modified schemes has been:**

- **properly identified in cells 214 and 225**
- **excluded from other cells on the form.**

**Auditors should select a sample of 20 cases from cell 214 and test to ensure that the local scheme has been applied correctly as set out in the Module 3 workbooks.**

- 67.** Where an authority operates a discretionary local scheme (referred to in the form as a modified scheme) to disregard any war pension over and above the statutory disregards (i.e. £10 for war pensions, £96.31 for supplementary pre-1973 war widow's pensions, and £106.31 where both pensions are in payment), the increased benefit paid as a result of the discretionary scheme does not count as qualifying expenditure and is to be excluded from the claim (i.e. excluded from cells 011 and 094 and supporting cells).
- 68.** However, a local authority operating a discretionary scheme receives a 0.2% addition to subsidy, capped at 75% of the total benefit cost of the discretionary scheme to the authority. The total expenditure due to a discretionary scheme (referred to as voluntary on the form) should be entered in cell 214, and should be supported by control reports and totals which reconcile to the claim. Details of the individual cases making up these amounts should be produced by the HB system and should be tested to demonstrate that the scheme requirements have been applied correctly. The entry in cell 214 covers all rent rebate and rent allowance cases.
- 69.** The entry in cell 214 is analysed by benefit type in the table at cell 225. Auditors should agree this analysis to the control records provided to support cell 214. The entry in cell 214 and the total in cell 225 should be the same.
- 70.** Auditors may wish to use the workbook for the relevant benefit type to test the entry in cell 214. A sample of 20 cases should be tested unless the population is less than 100 when the auditor must apply a pro rata sample. The DWP requires the following tests to be carried out:
- Has the local discretionary scheme been agreed by full council? Auditors are not required to approve the content or format of any policy and should not do so.
  - Do the prime documents demonstrate that the claimant receives a war pension(s)?
  - Have statutory disregards been correctly applied?
  - Has the increased benefit paid as a result of the local scheme been separately identified and excluded from other cells on the claim form?
- 71.** In practice this probably means that one assessment line needs to be checked for income and disregard to see that the policy is being correctly applied.

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**The DWP  
requires these  
tests to be  
carried out**

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72. Errors identified in testing cases from cell 214 should be treated in the same manner as errors found from the initial sample from the headline cells.

### Test 9 - Administration subsidy

**Auditors should confirm that administration subsidy in cell 005 agrees to:**

- the DWP's 17 March 2020 letter
- the authority's financial statements.

73. The amount for administration subsidy in cell 005 is pre-filled by DWP and cannot be amended. However, auditors should agree the amount entered to the amount notified by the DWP in their letter dated 17 March 2020 letter. The amount should also agree to the authority's financial statements.

### Test 10 - Interim benefit subsidy

**Auditors should confirm that interim benefit subsidy in cell 008 agrees to:**

- the DWP's 17 March 2020 letter
- the authority's financial statements.

74. Interim benefit subsidy in cell 008, which includes amounts received in respect of HB expenditure and administration subsidy, is pre-filled by DWP and cannot be amended. Auditors should agree the entry in cell 008 to DWP's 17 March 2020 letter and to the authority's financial statements.
75. The entry in cell 008 should not include amounts received after the initial final claim is certified by the Chief Financial Officer, as the DWP's systems take automatic account of any later payments.

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# Section 3

## Evaluating results of initial testing and agreeing amendments

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### Purpose of section

76. This section provides guidance on evaluating the results of test 4.

**Auditors should evaluate the outcome of the initial testing and:**

- **consider whether results match their expectations**
- **carry out CAKE testing where appropriate**
- **critically evaluate the reasons for errors**
- **conduct additional testing where errors affect the amount of subsidy or relate to overpayments**
- **agree amendments to the claim form with the local authority.**

### Auditor expectations

77. Where initial testing produces results that do not match auditor expectations, additional work will be necessary to confirm the position. An additional sample of 40 cases from the cells previously containing the error should be tested. If the test population is less than 100, auditors may reduce the additional sample tested pro rata e.g. a population of 49 would require a sample of 20. The additional work required should take into account what the authority says it has done to address previous amendment, observation and qualification issues.

### CAKE testing

78. *Cumulative assurance knowledge and experience* (CAKE) testing may be required to follow up on prior year outcomes. CAKE testing may arise from an observation or qualification in the previous year's covering letter, or an amendment to the previous year's subsidy claim. The purpose of CAKE testing is to establish whether these issues remain unresolved.

79. For example, where misclassification of overpayments has been identified in previous work, but no cases are identified in this year's initial sample, an additional sample of cases from the overpayment cells should be examined to confirm that the misclassification of overpayments has been addressed by the authority and does not affect the claim for all or part of the current period. Reporting the results depends on whether errors have been identified as follows:

- Where the additional CAKE testing identifies errors, the results must be used to complete an extrapolation for inclusion in the covering letter to the DWP.
- Where the additional CAKE testing does not identify any errors and no errors were identified in the initial sample, the results must be reported in the letter to the DWP as an observation. In these circumstances, the issue need not be considered under the CAKE arrangements in the 2020/21 subsidy period.

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**CAKE testing follows up an issue in a previous covering letter**

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## Errors

**80.** Where initial testing identifies errors, auditors should critically evaluate the reasons. Errors should not be simply corrected in the current claim form without addressing the likelihood of similar errors in the population. It may be possible to conclude on the impact of the error as summarised in the following table:

Nature of error	Auditor response
Error is representative of the population (e.g. when system parameters are wrong)	<p>Auditors should:</p> <ul style="list-style-type: none"> <li>extrapolate the results of the initial testing</li> <li>agree an amendment to the claim form to be made by the local authority.</li> </ul>
Error is an isolated case	<p>Isolated errors are likely to be rare, and the presumption should be that an error is not isolated without a clear compelling case. An additional sample will therefore usually be required to confirm that an error in the initial sample is isolated. Where an additional sample shows no further errors, a conclusion that an error is isolated requires to be supported by, for example, the results of other testing, including by internal audit, or evidence from another source.</p> <p>Auditors should:</p> <ul style="list-style-type: none"> <li>clearly record how they reached the conclusion that an error is isolated in the covering letter to the DWP</li> <li>agree a simple amendment to the claim to be made by the authority.</li> </ul>
Error affects cells with relatively small populations (e.g. less than 100 cases)	<p>Where initial test findings show there are errors affecting cells with relatively small populations, and auditors are not in a position to agree an amendment, the remainder of the population should be examined to allow an agreed amendment to be made.</p> <p>Where auditors are satisfied with the results, they can then agree a simple amendment to the claim to be made by the local authority.</p>
Not possible to reach any of the above conclusions	Auditors should perform additional testing to help determine the significance of the errors found in the initial sample.

## Additional testing

**81.** Additional testing is required for:

- errors which affect the amount of subsidy claimed, and it is not possible to reach any of the above conclusions
- all errors identified in overpayments because of the complicating factors of local authority error and administrative delay subsidy and the subsidy entitlement conditions which apply to prior year overpayments.

**82.** Where possible, the authority should undertake any additional testing. The additional testing will focus on the particular characteristics of the error only. These characteristics may relate to an expenditure type e.g. earnings or to a specific detailed cell.

**83.** Where the nature of the error could appear in any benefit claim within the headline cell for that expenditure type e.g. incorrect earnings calculations,

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**The authority should undertake additional testing where possible which should be reviewed by auditors**

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the additional sample of cases should be selected from the headline cell. The extrapolation would be calculated on the value in the headline cell.

84. Where the error relates to a detail cell e.g. the misclassification of overpayments, then the additional sample should be selected from the detail cell and the extrapolation calculated on the value of the detail cell.
85. Auditors should specify the work to be done and review the work carried out, including an element of re-performance (see below). If the authority declines to carry out the additional testing required, auditors should perform it having discussed the impact on the audit fee with the authority.
86. Errors that would always result in an underpaid benefit, or errors which by their nature do not affect the amount of subsidy claimed (e.g. the misclassification of HB cases between cells of the same subsidy value) do not require additional testing. All overpayments are excluded from this exemption. Auditors should however refer to the initial sample results in the observations section of the covering letter to the DWP.
87. Where testing identifies errors unrelated to the original error being tested, auditors are not required to undertake any further additional testing in respect of this new error. This should be reported in the observation section of the covering letter to the DWP.

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If auditors carry out additional testing, they should consider the impact on the audit fee

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## Sub-populations

88. If auditors are unable to conclude that errors are isolated, the initial test findings should be examined to establish whether there is a pattern to the errors. This may allow the identification of a sub-population. An additional sample of at least 40 cases is required which drills down into that sub-population only. A biased sample from the total population will need to be taken. An example of a biased sample would be where errors have been made by an assessor or where a problem only occurs for a particular case type. The additional sample would be selected from the work of that individual or the case type i.e. the sub-population.
89. The additional sample should concentrate only on the error found, e.g. where an application form is unsigned, auditors should test whether forms in an additional sample were signed rather than carry out all the validity checks required by the workbook.
90. Auditors can then extrapolate the results of the initial and additional testing and agree an amendment to the claim form to be made by the authority. Where an amendment cannot be agreed, the additional information should be included in the covering letter, including any effect on other cells on the form.

## 40+ approach

91. Where auditors are not in a position to agree an amendment after the initial testing and drilling down into a sub-population is not possible, the approach agreed with the DWP is to select and test an additional random sample. A minimum sample of 40 cases should be selected from each cell where the initial testing identified errors. The sample will be a random selection of 40 cases. Where the nature of the error could appear in any benefit claim within the headline cell for that expenditure type e.g. incorrect earnings calculations, then the additional sample of cases should be selected from the headline cell. The extrapolation would be calculated on the value in the headline cell. Where the error relates to a detail cell e.g. the misclassification of overpayments, the additional sample should be selected from the detail cell and the extrapolation calculated on the value of the detail cell. The 40+ approach is useful where the nature and extent of errors found in the initial sample indicates that errors in the total population will be variable. The testing should focus on the errors identified in the initial sample.

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A minimum sample of 40 cases should be selected from each cell where the initial testing identified errors

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92. After the testing is complete:
  - where the results of initial and additional testing allow, auditors can extrapolate the results and agree an amendment to the claim form to be made by the authority

- where the results of testing do not allow agreed amendments to be made, the results of both the initial sample and the additional testing should be set out in a covering letter, including any effect on other cells on the form.

- 93.** 40+ testing is not required for errors which by their nature do not affect the amount of subsidy claimed (e.g. the misclassification of HB cases between cells of the same subsidy value, with the same method of entitlement calculation, which produce the same amount of qualifying expenditure), and errors that would always result in underpaid benefit and therefore an under claim in subsidy. The initial sample results only need to be reported under the observations heading in a covering letter (see Appendix 3). All overpayments are excluded from this 40+ exemption due to the complicating factors of local authority error and administrative delay subsidy and the subsidy entitlement conditions which apply to prior year overpayments.

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**40+ testing is not required for errors which do not affect the amount of subsidy claimed**

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### Re-performance of local authority testing

- 94.** Where a local authority carries out additional testing, auditors are required to re-perform some of this testing. The amount of re-performance varies depending on the type of testing:
- For small populations auditors should re-perform a random 10% of the population. Where the results of the re-performance testing do not identify any errors in the local authority's testing, an agreed amendment should be made and reported in the covering letter. If the re-performance testing identifies errors in the local authority's testing the auditor should point out the incorrect conclusion reached by the local authority and request that the local authority review all cases again in light of this issue. The auditor will then pick a further sample for re-performance testing including some with the characteristics of the incorrect conclusion. If this second attempt by the local authority is tested without error, then the auditor will rely on the results. If there are further errors the auditor may move to simply disclaim the local authority's testing and complete a test of 40 cases themselves and extrapolate from these results. An amendment must not be made and the issue and test findings with extrapolation must be included in the covering letter, including any effect on other cells on the form.
  - For sub populations and 40+ testing-auditors are required to re-perform all failed cases plus a random 10% sample of the passes. If the re-performance testing identifies errors in the local authority's testing the auditor should point out the incorrect conclusion reached by the local authority and request that the local authority reviews all cases again. The auditor is then required to pick a further sample for re-performance testing including some with the characteristics of the incorrect conclusion. If this second attempt of testing by the local authority is tested without error, then the auditor will rely on the results. If there are further errors the auditor will re-perform the full sample of 40 cases.

### Agreed amendments

- 95.** Auditors should agree with the local authority simple or, where required, extrapolated amendments to the claim form, which should then be made by the local authority.
- 96.** Where the local authority wishes to test a sample larger than 40 cases but without testing the entire population or sub-population, this will be subject to a separate agreement with the DWP. In these cases, the local authority should approach the DWP to agree the level of testing and re-performance testing required.

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**Agreed amendments should be made to the claim by the authority**

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### Error types

- 97.** To calculate a cell amendment (or an extrapolation for a covering letter), auditors should first determine the error type, as the DWP requires the different treatment of each type of error for subsidy purposes. This is summarised in the following table:

Error type	Impact on subsidy	Auditor response
1: Underpaid benefit	<p>Where benefit has been underpaid, there is no impact on the amount of subsidy to be claimed because subsidy cannot be claimed on benefit that has not been awarded.</p> <p>Underpaid benefit must, therefore, be excluded from the calculation of a cell amendment or extrapolation in a covering letter.</p>	<p>The underpaid amount should be excluded from the sample error (which is explained at paragraph 96) but the value of the case excluding the underpayment tested should be included in the sample value. The fact that there are cases where benefit has been underpaid should be included in the observation section of the covering letter. Where the nature of the error could equally result in an overpayment, additional testing is required to try to establish if overpayments have been made.</p>
2: Missing claim forms	<p>Subject to the application of a local RBV policy, where the claim form (paper, document image or electronic format) to support the claim is missing, and the authority is unable to produce other evidence that a claim form was received, the case should be excluded in its entirety from the subsidy claim form. The cell adjustment or extrapolation in a covering letter should remove all expenditure on the case from the subsidy claim form, i.e. from the headline cell and detail cell(s).</p>	<p>Where a local RBV policy does not require a claim form, auditors should confirm the authority has complied with its RBV policy for the year in which the claim was determined.</p> <p>If the authority has not complied with its RBV policy, error type 6 is relevant.</p>
3: Benefit overpaid or insufficient supporting information	<p>Subject to the application of a local RBV policy, where benefit has been overpaid, or supporting information for part of the claim is missing or insufficient, the headline cell should not be adjusted, but the cell adjustment or extrapolation in a covering letter should remove the expenditure from the detail cell(s) in which the expenditure is reported and increase the appropriate overpayment cell(s) by a corresponding amount (e.g. local authority error overpayments will need to be increased where these errors are caused by an act or an omission by the local authority).</p>	<p>Where a local RBV policy operates, auditors should confirm the authority has complied with it. Where the application of the RBV policy does not enable the auditor to establish the subsidy classification, the case should nevertheless be admitted for subsidy provided the policy has been applied. This is because certification covers the application of the RBV policy, rather than its contents or adequacy. If the authority has not complied with its RBV policy, error type 6 is relevant.</p>

Error type	Impact on subsidy	Auditor response
4: Expenditure misclassification	Where benefit expenditure has been misclassified (e.g. misclassifying local authority error overpayments as eligible overpayments), the headline cell should not be adjusted, but the cell adjustment or extrapolation in a covering letter should remove the expenditure from the detail cell(s) in which the expenditure has been incorrectly reported and increase the cell(s) in which it should have been reported by a corresponding amount.	Errors which by their nature do not affect the amount of subsidy claimed do not require additional 40+ testing (unless overpayments).
5: Impact cannot be determined		Where the consequential impact of the error on other cells cannot be determined, or the testing identifies a combination of one or more of the above error types and these cannot be separated to enable an amendment or extrapolation for the consequential effect on other cells to be reported in a covering letter, the error(s) should be reported in a covering letter against the cell(s) in which they were identified. The covering letter should state the reason why the corresponding entries could not be established.
6: Failure to apply the RBV policy	Where the authority has not applied its RBV policy (i.e. it has failed to apply the specified check), performed a check that does not meet the requirements of the RBV policy (e.g. the policy states eligible rent will be verified in all cases but the authority has simply agreed the rent to the direct debit on the claimant's bank statement, which does not verify eligible rent as the amount paid could include ineligible service charges), or cannot evidence that the check was performed (i.e. there is no record or prime documents to demonstrate the RBV policy check was performed), the headline cell is not adjusted but the cell adjustment or extrapolation in the covering letter should remove the expenditure from the detail cell(s) in which the expenditure is reported and increase the local authority error overpayment cell by a corresponding amount.	

98. Appendix 3 contains examples of the above error types and how these should be included in a covering letter.

## Calculating amendments

**99.** In order to calculate the amendment required to a cell total (or extrapolated figure to be included in a covering letter if an amendment cannot be made), auditors should multiply the cell (or sub-population) total by the proportion of the sample value that is found to be in error, i.e. Cell adjustment CA = (CT or SP) x SE/SV as explained in the following table:

Abbreviation	Expansion	Meaning (the value in £s of)
CT	Cell total	The cell from which the sample is drawn
SE	Sample error	The errors found in the sample, excluding cases where benefit has been underpaid (error type 1)
SP	Sub population	The sub population from which the additional sample is drawn
SV	Sample value	The sample tested

**100.** SE/SV is referred to in the standard covering letter as the percentage error rate.

**101.** Where testing identifies that expenditure has been incorrectly classified and some errors have the effect of increasing the amount that should be included in a cell and others the effect of decreasing the amount in that cell, the sample error should be the net figure.

## Corresponding amendments

**102.** In cases where testing results in an amendment to a cell (or an extrapolated figure included in a covering letter), the effect on other cells needs to be considered and corresponding amendments made or extrapolations provided. If corresponding amendments cannot be identified, the covering letter should explain why.

**103.** Amendments and extrapolations in covering letters require to satisfy the in-year reconciliation check in each section of the claim form. The failure to deal with the impact of amendments on other cells is likely to cause the in-year reconciliation to fail which would result in the DWP returning the claim to the authority for further work to be carried out.

**104.** It should be noted that all 2019/20 expenditure appears in the headline cell and in the detail cells which provide the supporting analysis. Only prior year overpayments do not appear in either the headline cell or the in-year reconciliation cells.

**105.** Where an error is discovered that if acted upon would create a prior year overpayment or amends an amount already reported as a prior year overpayment the extrapolation calculation should only include the error based on the current year HB expenditure not expenditure which was included in previous subsidy claims.

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**Auditors should consider the effect of cell amendments on other cells**

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## Making and confirming amendments

**106.** Amendments should be agreed with the authority and the claim returned to the authority for amendment and recertification. Where certification work results in agreed amendments to cell entries, authorities are required to:

- amend a pdf version of the form (not in manuscript) because this will ensure the amendments are automatically reflected in calculations and amounts transferred between cells
- perform the validation check
- print a copy of the amended form
- initial all input cells which have been amended (it is not necessary to initial changes to cells that contain calculations or cells that contain amounts transferred from other cells as these are updated automatically by the form)

- certify the amended form.
- 107.** Auditors should confirm that all agreed amendments to input cells have been made and initialled by the authority and confirm that no other input cells have been amended. Auditors must detail all amendments made to subsidy claims forms in the covering letter.
- 108.** However, where the number and nature of amendments is so complicated that auditors cannot come to a conclusion overall, it is appropriate to qualify rather than amend the claim.

# Section 4

## Completion procedures

### Purpose of section

**109.** This section sets out the completion procedures that auditors should carry out after they have performed, and evaluated the results of, the required testing.

### Completion procedure 1 - Covering letter

**Auditors should include any qualified conclusions, observations or amendments in a covering letter.**

**110.** Auditors should conclude whether or not the claim is fairly stated and in accordance with the relevant terms and conditions. Any qualified conclusion, observation or amendment should be set out in a covering letter referred to in the auditor's certificate. Auditors should complete the auditor certificate and covering letter in accordance with technical guidance note TGN/GEN/20.

**111.** Auditors should note that compliance with the reporting requirements of this technical guidance note is a condition of the DWP.

**112.** Where the results of testing do not allow agreed amendments to be made, the results of the testing should be set out as a qualified conclusion in a covering letter, including any effect on other cells on the form. The information required, and the structure for including it in a covering letter, is as follows:

- cell number and description, total, and population, and headline cell value
- a summary of the results from initial and additional testing set out in a tabular format
- the range of errors found in terms of value and benefit period, and note any differences in error rates between the initial and additional testing
- an explanation of how the errors occurred and the reason for them
- the error type
- the potential effect the error has on the subsidy claim
- any additional relevant information e.g. mentioning if similar errors have arisen in previous years or stating the action the authority is taking to resolve the issue
- an explanation as to why an amendment to the cell entry is not possible.

**113.** Appendix 3 provides examples of how the results of testing should be reported to the DWP in covering letters.

**114.** It is important that auditors ensure they explain why testing has not resulted in a cell amendment and the subsidy implications. The aim is to leave the DWP in no doubt about the conclusions auditors have reached, and therefore auditors should present their findings clearly and unequivocally. The DWP will use this information to decide what further action is required. For example, it may decide to settle the claim based on the test findings or may need the local authority to do more work, particularly if the problem has continued for

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Where cells cannot be corrected, auditors should qualify their conclusion on the claim

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Appendix 3 provides examples of reporting testing results in the covering letter

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some years. The key point is that the testing approach provides a basis for DWP to make such decisions and, hopefully, to achieve settlement of claims without further recourse to auditors.

115. Auditors should consider and set out the potential impact of qualifying a conclusion in respect of one cell on the form on the other cells, including the headline and in-year reconciliation cells. For example, where misclassification of overpayments results in a qualified conclusion, a corresponding qualified conclusion should be considered for the other overpayment cells affected. Similarly, where testing of overpayments identifies missing files, auditors should consider the potential impact on all cells, including the total expenditure cells that include expenditure on the case for which the file is missing.
116. The observations section of the covering letter template should be used to refer to errors found during initial testing that do not affect the subsidy claimed.
117. All amendments to claim forms require to be reported in the covering letter to leave the DWP in no doubt as to any adjustments required to subsidy payments to the local authority.

## Completion procedure 2 - Submission of certified claim by auditor

**Auditors should send a certified copy of the claim form and the covering letter to the DWP (submit to Professional Support) by 31 January 2021**

118. The certified copy of the claim form and covering letter should be submitted 31 January 2021 direct to:  
Department for Work and Pensions  
Operations Finance  
Housing Delivery Division  
Housing Benefit Unit-Room B120D  
Warbreck House, Blackpool, Lancashire  
FY2 0UZ
119. For 2019/20, the DWP has agreed to an extension to the normal deadline of 30 November until 31 January 2021 for submitting the 2019/20 claim and covering letter.
120. Auditors should advise authorities of any anticipated delays so that they can, if they wish, formally ask the DWP for an extension to the 31 January 2021 auditor certification deadline. The DWP will not accept extension requests from auditors.
121. Auditors should submit a copy of the certified claim form and their covering letter to Professional Support by:
  - emailing outputs (firms)
  - adding them to the relevant local authority's 'outputs' library in Sharepoint (ASG).

# Section 5

## Post-certification procedures

### Purpose of section

- 122.** This section sets out the procedures that auditors should carry out if they receive a request from the DWP to carry out additional work after the certified claim and covering letter has been submitted to the DWP.

### Post-certification procedure - Requests for further work

**Auditors should ensure requests for further work including the level of reperformance of work carried out by the local authority is completed appropriately**

- 123.** The DWP may request that further work is carried out on certified subsidy claims. This may be due to the DWP being unclear of the findings in the auditor's letter accompanying the certified claim or due to a local authority making representations to the DWP. Where the DWP agree to take the results of further work undertaken by the local authority into account when settling the final claim, further testing will be carried out by the local authority, and the auditor will be requested to carry out a level of re-performance testing and report on this to the DWP.
- 124.** Requests for further work will often fall into (but are not limited to) one of the following categories:
- further testing of an entire population or sub-population in order to reach an agreed amendment to the final subsidy claim
  - further testing of an extended sample to arrive at a more representative extrapolation calculation
  - evidence that an outlier is present in the extrapolation calculated from the testing carried out.
- 125.** The DWP will advise on the volume and nature of the testing to be carried out by the local authority, and the reperformance testing required by the auditor.
- 126.** The local authority must demonstrate to the auditor that the population being tested under further work can be reconciled to the equivalent population used for the initial and additional / 40+ or CAKE testing previously carried out on the subsidy claim. In applying the results of further work, where a sample population has been tested by the local authority, the cases previously tested will be excluded to avoid double counting. Where the full population of a cell has been tested under the further work, the cases previously tested will have been re-tested and should be included.
- 127.** Where further work requires a random sample to be taken from a larger population, the selection of the sample must be carried out by the auditor.
- 128.** The local authority will conduct the further work tests. The results of this work should be recorded in a format agreed between the auditor and local authority to enable the auditor to undertake the specified re-performance testing.
- 129.** The standard level of re-performance testing required by auditors is set out in the following table:

Auditors may have to carry out procedures after the certified claim has been considered by the DWP

Sample population	Auditor action	Example
500 cases or fewer	Auditor should re-perform a random sample of 10% of the testing carried out by the local authority	400 cases tested by the local authority under further work would result in 40 cases being re-performed.
Greater than 500 cases	<p>A sub-population of 500 cases will be taken and auditors should re-perform a random sample of 10% of that population. The 500 case sub-population should be the first 500 cases taken from a case list sorted in order of case reference number (low to high).</p> <p>For all cases that fall outside that 500 case sub-population, auditors should re-perform a random sample of 1% of that population.</p>	1500 cases tested by local authority would require the first 500 cases from the list to be identified and the re-performance of 50 cases. In addition, reperformance of a further 10 cases from the remaining 1000 is required.

- 130.** It should be noted that this is the standard approach that the DWP will take to the volume of re-performance testing which is required. However, this standard approach may be varied by the DWP. If the DWP intend to make a variation, this will be communicated by the DWP to the local authority.
- 131.** Appendix 4 includes an example of how the results of further work requests should be reported to the DWP by the auditor.

# Appendix 1

## Auditor action checklist

Preliminary procedures	Yes/No/N/A	Initials/date	W/P ref
1 Have you confirmed that:			
• the authority's arrangements for the completion of the claim appear adequate?			
• all relevant parts of the claim have been properly completed?			
• the authority certificate bears the original signature of the Chief Financial Officer?			
• arithmetic on the claim is correct (confirmed by using the pdf form)?			
2 Have you confirmed that you are reviewing the most up-to-date version of the form by checking that the claim form presented for certification includes an entry in every cell including a zero entry in any cell that does not apply?			

Testing procedures	Yes/No/N/A	Initials/date	W/P ref
1. Have you confirmed for rent rebates and rent allowances that benefit granted in the claim form (total expenditure in the headline cells) agrees to final subsidy reports in accordance with HBAP module 5?			
2. Have you confirmed for rent rebates and rent allowances that benefit granted in the subsidy system has been reconciled to benefit paid in the subsidy system in accordance with the software provider's instructions?			
3. Have you confirmed that the benefit parameters and allowances in the HB system are correctly up to date to reflect the annual uprating as set out in the tables contained in Module 2?			
4. Have you selected an initial sample of 20 cases from the headline cells for rent rebates and rent allowances and tested the headline cell entries and the analysis of expenditure in the detailed cell(s) that support the headline cell entry as set out in the HBAP module 3 workbooks?			

Testing procedures	Yes/No/N/A	Initials/date	W/P ref
5. Have you confirmed that the in-year reconciliation cells for rent rebates and rent allowances agree with the corresponding total expenditure cell?			
6. Have you confirmed that uncashed cheques and other expired instruments of payment result in the necessary adjustments to subsidy?			
<p>7. Have you assessed whether the relevant exemption criteria from the disproportionate rent increase deduction has been met (where the authority has claimed exemption)? <b>Or</b></p> <p>Where the authority does not have exemption from the DRI deduction, have you confirmed that:</p> <ul style="list-style-type: none"> <li>• the entries in cells 184a to 185b are supported by control totals produced by the rents system</li> <li>• the totals are accurate</li> <li>• the amounts in respect of modular improvements and HB eligible service charges have been included in average rents</li> <li>• the DRI percentage figure in cell 182 agrees to the authority's documentation supporting the entry in cell 188 of the 2018/19 subsidy claim form</li> <li>• cells 182 to 190s have been properly completed?</li> </ul>			
<p>8. Have you confirmed that expenditure on modified schemes has been:</p> <ul style="list-style-type: none"> <li>• properly identified in cells 214 and 225</li> <li>• excluded from other cells on the form?</li> <li>• have you selected an initial sample of 20 modified scheme cases from cell 214 as set out in the HBAP module 3 workbooks, specifically that: <ul style="list-style-type: none"> <li>i. the local discretionary scheme has been agreed by full council</li> <li>ii. the prime documents demonstrate that the claimant receives a war pension(s)</li> <li>iii. statutory disregards have been correctly applied</li> <li>iv. the increased benefit paid as a result of the local scheme has been separately identified and excluded from other cells on the claim form.</li> </ul> </li> </ul>			
<p>9. Have you confirmed that administration subsidy in cell 005 agrees to:</p> <ul style="list-style-type: none"> <li>• the DWP's 17 March 2020 letter</li> <li>• the authority's financial statements?</li> </ul>			

Testing procedures	Yes/No/N/A	Initials/date	W/P ref
10. Have you confirmed that interim benefit subsidy in cell 008 agrees to: <ul style="list-style-type: none"> <li>the DWP's 17 March 2020 letter</li> <li>the authority's financial statements?</li> </ul>			

Completion procedures	Yes/No/N/A	Initials/date	W/P ref
1. Have you included details of any qualifications to your conclusion, observations and amendments in a covering letter?			
2. Have you sent a certified copy of the claim form and the covering letter to the DWP (and submitted it to Professional Support) by 31 January 2021?			

Post-certification procedures	Yes/No/N/A	Initials/date	W/P ref
1. Have you included details of any qualifications to your conclusion, observations and amendments in a covering letter?			
2. Have you submitted a copy of the letter to the DWP detailing the results of further work to Professional Support?			

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# Appendix 2

## Rules for completing claim

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The following represent key sources of guidance in respect of the year end statement and can be accessed by following the hyperlinks or downloaded from Audit Scotland's [Technical Reference Library](#)

- [The Income-related Benefits \(Subsidy to Authorities\) Order 1998, SI 562](#), as amended
- [The Housing Benefit Regulations 2006, SI 213](#)
- [The Housing Benefit \(Persons who have attained the qualifying age for state pension credit\) Regulations 2006, SI 214](#)
- [The Housing Benefit and Council Tax Benefit \(Consequential Provisions\) Regulations 2006, SI 217](#)
- [Subsidy guidance manual](#)
- [Local housing allowance guidance](#)
- [Housing Benefit overpayments guide](#)
- [Housing Benefit subsidy claims: local authority best practice guide](#)
- Notes for guidance on completion of form MPF720B 2019/20
- DWP 17 March 2020 letter Housing benefit 2018/19 final subsidy claim (MPF720B) which enclosed the 2019/20 claim form and provides details of payments on account.

The following are listed for information only, and it should not be necessary to refer to these unless there is uncertainty or disagreement with the authority.

- **Subsidy circulars**
  - [S2/2019: 2019-20 Housing Benefit administration subsidy arrangements for English, Scottish and Welsh local authorities](#)
  - [S8/2019: Payment of New Burdens relating to the administration of Housing Benefit fraud referrals for 2019-20](#)
  - [S9/2019: Additional new burdens funding to meet the costs of implementing welfare reform changes in 2019 to 2020](#)
  - [S10/2019: Payment for the Verify Earnings and Pension alerts service 2019 to 2020](#)
- **Adjudication and operations circulars**
  - [A8/2018 \(Revised\) Housing Benefit: Uprating 2019-20](#)
  - [A2/2019 War Pensions: Uprating 2019/20 \(Rev\)](#)

- [A3/2019 Mixed age couples: changes to entitlement conditions from 15 May 2019](#)
- [A4/2019 Disguised remuneration schemes](#)
- [A7/2019 The Social Security \(Income-related Benefits\) \(Updating and Amendment\) \(EU Exit\) Regulations 2019](#)
- [A9/2019 Mixed age couples: further guidance \(revised\)](#)
- [A3/2020 Changes to the Severe Disability Premium process](#)
- **Urgent bulletins**
  - HB Bulletin U2/2019: Supreme Court [judgment](#): DA and Others and DS and Others
  - [HB Bulletin U3/2019: Court of Appeal judgment: The Secretary of State for Work and Pensions v Hockley \(1\) and Nuneaton and Bedworth Borough Council \(2\)](#)
  - [HB Bulletin U1/2020: RR –v– The Secretary of State for Work and Pensions](#)

# Appendix 3

## Examples of the format to be used when reporting errors in covering letters

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### Summary of Initial Testing

#### **Cross cutting qualification issues [Examples]**

##### **Local authority's certificate**

The claim form certificate has been signed by the authority confirming that the administrative systems, procedures and key controls for awarding benefits operate effectively and the authority has taken reasonable steps to prevent and detect fraud. No evidence of work done to support this assertion has been provided by the authority. The errors identified this year are consistent with test findings in previous years, suggesting the authority has not changed its working practices or introduced internal controls to address previously identified issues.

The results of testing where this issue has been identified are recorded in this letter in qualifications against specific cells.

##### **Data conversion and missing audit trails**

During 2019/20 the Authority changed housing benefit systems from the XXXXX system to the YYYYY system. This process involved the transfer and conversion of subsidy data from the old system to the new. Although change control was implemented by the authority there has been no testing by Internal Audit or officers of the local authority to provide assurance that data conversion was successfully achieved and that exception reports generated have been cleared correctly. The housing benefits section has not undertaken any sample checks on the claim data prior to the completion of the claim. My testing has identified some data conversion errors and missing audit trails.

The authority is unable to identify the extent of any data conversion errors and establish if subsidy has been under or over claimed as a result. I am therefore unable to conclude that all entries on the claim are fairly stated and in accordance with the relevant terms and conditions.

The results of testing where this issue has been identified are recorded in this letter in qualifications against specific cells.

### In year reconciliation cells

Cells 037 and 130 should agree to the entries in cells 011 and 094 respectively. The following differences are noted:

Claim cell:	£ amount:	Claim – reconciliation cell:	£ amount:	Difference:
011 – Rent Rebates	£240,999	037	£240,867	£132
094 – Rent Allowance	£21,971,540	130	£21,971,736	(£196)

### Sample testing of headline cells

In accordance with HBAP Module 3 an initial sample of cases was completed for all general expenditure cells. We have re-performed a sample of the local authority's 40+ testing and confirm the tests we have carried out concur with the local authority's results:

Cell 011 Rent Rebate- no claims were found to be in error.

or,

Cell 011 Rent Rebate- incorrect application of non-dependant deduction

Initial Testing of Cell 011 identified 1 claim had a non-dependant deduction incorrectly applied. As it was not possible to correctly establish the error for amendment, additional testing of 40 cases was completed for the error. This is detailed in Appendix A.

Cell 011 Rent Rebate -self-employed income

Initial Testing of Cell 011 identified that the authority has incorrectly calculated self-employed earned income resulting in an overpayment of benefit. The authority identified all self-employed claims in Cell 011 and has tested each claim. This is detailed in Appendix C as the authority has amended the claim in respect of these incorrect claims.

Cell 094-Rent allowances- failure to apply the Risk Based Verification (RBV) policy

Initial testing of cell 094 identified 2 cases where the local authority failed to apply its RBV policy and 2 cases where the local authority did not verify eligible rent in accordance with the RBV policy. As it was not possible to correctly establish the error for amendment additional testing of 40 cases was completed for the error. This is detailed in Appendix A.

## Completion of Modules

The specific test requirements set out in Modules 2 and 5 have been completed.

### Module 2- benefit system parameters

Testing of module 2 identified benefit had been underpaid as a result of the authority entering a lower amount when updating a system parameter. This is detailed in Appendix B.

### Module 5- Benefit software: reconciliation of benefit granted to paid

We have completed the questionnaire for the appropriate software supplier and no issues were identified,

or

The authority uses the XXXX benefit software. The software supplier provides a method for the authority to reconcile benefit granted per the benefit software to benefit paid per the benefit software.

The benefit granted figures in the claim form and the benefit granted figures used in the reconciliation differ by the amounts in column C below. The authority has performed the software supplier's reconciliation but to fully reconcile benefit granted and paid the authority has also made the balancing adjustments set out in columns D and E below.

Cell:	A. Benefit granted per the claim form:	B. Benefit granted per the software supplier's reconciliation of benefit granted to paid:	C. Difference A minus B:	D. Benefit granted per the software supplier's reconciliation increased by	E. Benefit granted per the software supplier's reconciliation decreased by	F. Adjusted benefit granted figure per authority reconciliation B + D - E
011 – Rent Rebates	£240,999	£240,987	£12	£0	£1,342	£239,645
094 – Rent	£21,971,540	£21,971,540	£0	£0	£0	£0

Cell:	A. Benefit granted per the claim form:	B. Benefit granted per the software supplier's reconciliation of benefit granted to paid:	C. Difference A minus B:	D. Benefit granted per the software supplier's reconciliation increased by	E. Benefit granted per the software supplier's reconciliation decreased by	F. Adjusted benefit granted figure per authority reconciliation B + D - E
Allowance						

The sum of £1,342 in column E represents the unreconciled difference between benefit granted and benefit paid per the software supplier's reconciliation.

ALTERNATIVELY: The authority has not applied/has varied the software supplier's reconciliation process as follows (add text explaining what the authority has done).

### Summary of testing arising from Cumulative Assurance Knowledge and Experience (CAKE)

CAKE testing has been carried out based upon the preceding covering letter on sub populations for:

Rent Rebates - misclassification of expenditure as backdating expenditure within Cell 011

Rent Allowances - misclassification of expenditure as backdating expenditure within Cell 131

Rent Allowances - incorrect calculation of earned income selected from Cell 094

Rent Allowances- incorrect classification of overpayments within Cell 114

We have re-performed a sample of the council's testing and confirm the tests we have carried out concur with the authority's results. These results are outlined in Appendix A.

The following CAKE tests have returned no errors and are considered as closed:

Rent Rebates - misclassification of expenditure as backdating expenditure within Cell 011

Rent Allowances - misclassification of expenditure as backdating expenditure within Cell 131

## Appendix A- Errors identified

### Cell 011 Overpaid benefit – non-dependant deduction error

Cell 011 Rent rebates

Cell Total: £2,774,426

Cell Total £800,526– sub population

Cell Population: 841 cases

Cell Population: 150 cases – sub population

Initial Testing showed 1 claim (value: £5,032) had a non-dependant deduction incorrectly applied that resulted in an underpayment of £36.60. As there is no eligibility to subsidy for benefit which has not been paid, the underpayment (or nil impact) identified does not affect and has not, therefore, been classified as errors for subsidy purposes and so is not included in the extrapolation below.

As it was not possible to correctly establish the error for amendment additional testing of 40 cases was completed.

Only one further claim was identified as an error. 1 claim (total value £3,856) was discovered to have had a non-dependant deduction applied incorrectly resulting in an overpayment of £183.

The result of my testing is set out in the table below:

Sample	Movement / brief note of error:	Original cell total: sub population (Non Dep deductions)	Sample error:	Sample value:	Percentage error rate (to two decimal places):	Cell adjustment:
		[CT]	[SE]	[SV]	[SE/SV]	[SE/SV times CT]
Initial sample of 20– 1 error	Incorrect Non Dep deduction Calculation – Cell 011	£2,774,426	£0	£5,032		

Sample	Movement / brief note of error:	Original cell total: sub population (Non Dep deductions)	Sample error:	Sample value:	Percentage error rate (to two decimal places):	Cell adjustment:
Additional testing sample – 40 cases 1 error	Incorrect Non Dep deduction Calculation – Cell 011	£800,526	£183	£201,260		
Combined sample - 60 cases	Incorrect Non Dep deduction Calculation – Cell 011	£800,526	£183	£206,292	0.09%	£720
Adjustment:	Combined sample - Cell 014 is overstated	£800,526	£183	£206,292	0.09%	(£720)
Corresponding adjustment	Combined sample - Cell 026 is understated					£720

Given the nature of the population and the variation in the errors found, it is unlikely that even significant additional work will result in amendments to the claim form that will allow me to conclude that it is fairly stated.

**Cell 094- Overpaid benefit-failure to apply the RBV policy**

Cell total £899,540

Cell population 1,001

Testing of the initial sample identified;

- 2 cases (total value £1,524) where the local authority failed to apply its RBV policy. The effect of these errors is to overstate cells 103 and 114 with a corresponding understatement of cell 113; there is no effect on cell 094; and
- 2 cases (total value £980) where the local authority did not verify eligible rent in accordance with the RBV policy because the checks performed do not meet the requirements of the policy. Should the Department decide that the failure to verify rent in accordance with the RBV policy means that subsidy has been overpaid, the effect of these errors is to overstate cells 103 and 114 with a corresponding understatement of cell 113; there is no effect on cell 094.

Testing of an additional sample of 40 cases identified a further 3 cases (total value £1,254) where the local authority could not provide evidence that eligible rent was verified in accordance with the RBV policy (supporting documentation was not retained). Should the Department decide that the failure to retain evidence of verification means that subsidy has been overpaid, the effect of these errors is to overstate cells 103 and 114 with a corresponding understatement of cell 113; there is no effect on cell 094.

Errors ranged in value from £54.00 to £1200.00

The result of my testing is set out in the table below:

Sample:	Movement/ brief note of error	Original cell total - sub population :	Sample error:	Sample value:	Percentage error rate	Cell adjustment :	Revised cell total if cell adjustment applied:
		[CT]	[SE]	[SV]	[SE/SV]	[SE/SV times CT]	[RA]
Initial sample of 20- 4 errors	Failure to apply the RBV policy and failure to verify eligible rent to the required standard	£899,540	£2,504	£11,182			
Additional sample - 40 cases 3 errors	Failure to provide evidence that eligible rent was verified in accordance with the RBV policy	£899,540	£1,254	£27,204			
Combined sample 60 cases	Failure to apply the RBV policy	£899,540	£3,758	£38,386	9.8%	£88,155	
Adjustment:	Combined sample. Cell 103 overstated.	£899,540	(£3,601)	£38,386	(9.4%)	(£84,557)	
Adjustment:	Combined sample. Cell 114 overstated.	£899,540	(£157)	£38,386	(0.4%)	(£3,598)	
Total corresponding adjustment	Total understatement of cell 113.					£88,155	

Given the nature of the population and the variation in the errors found, it is unlikely that even significant additional work will result in amendments to the claim form that will allow me to conclude that it is fairly stated.

#### **Cell 094 Overpaid benefit – earned income calculation error**

Cell 094: Rent allowances total expenditure

Cell Total: £97,642,719

Cell Total £28,190,982 – sub population

Cell Population: 17,720 cases

Cell Population: 5,318 cases – sub population

Headline Cell: £97,642,719

In 2016/17 and 2017/18 it was identified that the local authority has incorrectly calculated earned income resulting in an overpayment of benefit. During our initial testing, 6 cases (value £21,433) where the assessment was based on earned income were tested and no errors were identified.

However, given the nature of the population and the errors found in the previous claim, an additional sample of 40 cases where an assessment in the subsidy period was based upon earned income was tested. This additional testing identified:

4 cases which resulted in an overpayment of housing benefit to a total of £1,477 due to miscalculating the claimants earned income. The errors ranged from £2 to £823.71.

As a result of the additional testing it was discovered that an overpayment was incorrectly classified. This is detailed in appendix B.

5 cases which had resulted in an underpayment of housing benefit to a total of £2,053 due to miscalculating the claimants earned income. As there is no eligibility to subsidy for benefit which has not been paid, the underpayment (or nil impact) identified does not affect and has not, therefore, been classified as errors for subsidy extrapolation purposes.

The result of my testing is set out in the table below:

Sample	Movement / brief note of error:	Original cell total: sub population (claims with earning)	Sample error:	Sample value:	Percentage error rate (to two decimal places)	Cell adjustment:
		[CT]	[SE]	[SV]	[SE/SV]	[SE/SV X CT]
Initial sample – 6 cases	Incorrect Income Calculation	£97,642,719	£0	£21,433		

Sample	Movement / brief note of error:	Original cell total: sub population (claims with earning)	Sample error:	Sample value:	Percentage error rate (to two decimal places)	Cell adjustment:
CAKE sample – 40 cases- 4 errors	Incorrect Income Calculation	£28,190,982	£1,477	£269,191		
Combined sample - 46 cases	Incorrect Income Calculation	£28,190,982	£1,477	£290,624	0.51%	£143,774
Corresponding adjustment:	Cell 102 is overstated	£28,190,982	£721	£290,624	0.25%	-£70,477
Corresponding adjustment:	Cell 103 is overstated	£28,190,982	£756	£290,624	0.26%	-£73,297
Total corresponding adjustment	Total understatement of Cell 113					£143,774

Given the nature of the population and the variation in the errors found, it is unlikely that even significant additional work will result in amendments to the claim form that will allow me to conclude that it is fairly stated.

### **Cell 114 Expenditure misclassification – Incorrect classification of eligible overpayments**

Cell Total: £1,459,422

Cell population 6,324

Headline Cell: £97,642,719

It was identified in the 2018/19 claim and reported in the qualification letter for that year that Cell 114 included overpayments that should properly have been classified as Cell 113 LA error and administrative delay overpayments. Testing within the initial testing for 2019/20 included 4 cases within Cell 114 eligible overpayments and in all cases the overpayments were classified appropriately. Additional 40+ testing was undertaken of Cell 114 overpayments.

#### **Additional Testing**

Testing of an additional random sample of 40 cases identified 3 cases (total value £534) where the dates have been incorrectly applied and part of the overpayment should have been classified in cell 113 (LA error and administrative delay overpayments) not cell 114.

Consequently, cell 114 is overstated and cell 113 is correspondingly understated there is no effect on cell 094.

Errors ranged in value from £54.00 to £380.00

The result of my testing is set out in the table below:

Sample:	Movement/ brief note of error	Original cell total:	Sample error:	Sample value:	Percentage error rate	Cell adjustment:	Revised cell total if cell adjustment applied:
		[CT]	[SE]	[SV]	[SE/SV]	[SE/SV times CT]	[RA]
Initial sample - 4 cases	Combined results for initial sample.	£1,459,422	£0	£5,621			
Additional sample - 40 cases 3 errors	Cell 114 overstated. Cell 113 understated	£1,459,422	£534	£68,676			
Combined sample 46 cases	Combined sample. Cell 114	£1,459,422	£534	£74,297	0.72%	£10,508	£1,448,933
Adjustmen t	Cell 114- eligible overpaymen ts error is overstated.					-£10,508	
Total correspon ding adjustmen t	Total understatem ent of Cell 113					£10,508	

Given the nature of the population and the variation in the errors found, it is unlikely that even significant additional work will result in amendments to the claim form that will allow me to conclude that it is fairly stated.

## Appendix B

### Observations

Example 1: Error Type 1

#### **Error Type 1 – underpaid benefit which would always result in an underpayment.**

Cell 011: Rent Rebates – Total expenditure (Benefit Granted)

Cell Total £1,034,012

Cell Population 34,003

Headline Cell £1,034,012

Underpaid benefit

Testing of the module 2 identified where benefit had been underpaid as a result of the local authority entering a lower amount when uprating the x system parameter.

As there is no eligibility to subsidy for benefit which has not been paid, the underpayments that could be identified do not affect subsidy and have not, therefore, been classified as errors for subsidy purposes. Because this error will always result in an underpayment of benefit, additional testing has not been undertaken.

#### **Error Type 1 – underpaid benefit which could also result in an overpayment.**

**Cell 011: Rent Rebates – Total expenditure (Benefit Granted)**

**Cell Total £71,143**

**Cell Population 1,283**

**Headline Cell £234,890**

Testing of the initial sample identified 2 cases where benefit had been underpaid as a result of the authority miscalculating the claimant's weekly rent liability.

As there is no eligibility to subsidy for benefit which has not been paid, the 2 underpayments identified do not affect subsidy and have not, therefore, been classified as errors for subsidy purposes. However, because errors miscalculating the weekly rent liability could result in overpayments an additional random sample of 40 cases was tested. No further underpayments and no overpayments were identified.

#### **Error type 3 overpaid benefit or insufficient information found during additional testing and therefore part of CAKE for following year**

Cell 094 Overpaid benefit – Earned Income calculation error additional issue

As a result of the additional testing of 40 claims on Cell 94- earned income, it was discovered that an overpayment had been classified as an eligible error (Cell 114) when it should have

been classified as a local authority error and administrative delay overpayment (Cell 113). Cell 114 is over stated by £33.00 and Cell 113 is understated by the same amount.

#### **Error Type 4- Misclassification between cells**

##### **Cells 011 and 023 & Cells 094 and 102: Rent Rebates & Rent Allowances**

**Cell Total £2,029,034**

**Cell Population 43,659**

**Headline Cell £2,029,034**

Testing of the initial sample identified 1 case where the benefit type for a particular housing association provider had been miscoded by the authority; as a result, expenditure that should have been shown in the rent allowance cells 094 and 102 appears in the rent rebate cells 011 and 023. As the eligible rents and benefit entitlement have been correctly calculated as rent allowance cases, and the detail cells involved attract the same subsidy values, no additional 40+ testing has been undertaken.

The authority has confirmed the nil subsidy impact and has therefore not amended their claim form.

#### **Appendix C Amendments to the claim form MPF720B**

##### **Error Type 4 – expenditure misclassification. Where benefit expenditure has been misclassified**

Cell 95 Regulated Tenancies

Initial testing found claims in Cell 95 classified as Regulated claims that, on the analysis of the tenancy agreements, are RSL tenancies. The authority tested all claims in Cell 95 and confirmed that the Cell 95 is overstated by £41,000 and Cell 102 is understated by the same amount.

The number of cases in Cell 95 - 1487. We re-performed the test on 60 cases. No errors were found.

This is reflected in the amendment made to Form MPF720B dated XX.

##### **Error Type 3- benefit overpaid or insufficient supporting information.**

Cell 011 Rent rebate Self-employed earnings incorrectly calculated

Cell Total: £2,774,426

Cell Total £193,560– sub population

Cell Population: 841 cases

Cell Population: 105 cases – sub population

Initial Testing of Cell 011 identified that the local authority has incorrectly calculated self-employed earned income resulting in an overpayment of benefit. The authority identified all self-employed claims in Cell 011 and has tested each claim.

A total of 7 claims were found to be incorrect- Cell 014 was found to be overstated by £1,209.73 and Cell 028 was understated.

We have re-performed the test on 11 cases plus all cases found to contain errors and the authority's findings on those claims were correct.

Cells 14 and 28 have been amended on form MPF720B dated XX . Cell 011 remains unchanged

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# Appendix 4

## Examples of the format to be used when reporting the results of post-certification procedures

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### **[Name of Local Authority] Housing Benefit Subsidy claim [financial year] Further work.**

I am writing to you in connection with the above.

On [date of agreement] an agreement was made between the DWP and the local authority that the local authority would undertake further work on the above-named housing benefit subsidy claim.

On the basis of your letter to the [x] Council dated [x] we were asked to perform the [xxxx] procedures as detailed in the [DWP letter]

We confirm we carried out those procedures [with the following exceptions]

The results of our procedures are set out in the following section.

### **Findings**

[x] Council information submitted to the auditor:

Original Population or sub population

Value of population

Number of cases

Sample selected and tested by the local authority

Value of sample

Number of cases

Cases found by the local authority to be in error values and numbers

Records made by the local authority of changes to cell values

Including impact and compensating cell values

Results of re-performance testing including:

Nature of error

Value of error

Value of re-performance sample

[Note- If a population is defined then confirmation is required that the sample contains the appropriate claims.

If a sample was taken from the population confirmation that the auditor chose the sample.

Confirmation is required that the local authority provided the results in the prescribed manner.

Confirmation is required that the auditor completed the re-performance work and provide details of the testing results.

If the work was not completed in the correct manner or errors were found when the re-performance testing was completed, then a statement is required confirming that the local authority did not complete the work in the prescribed manner.]

# Technical Guidance Note TGN/HBS/20

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