

Assurance and Evaluation

Office of the Director-General

Primary Growth Partnership: Assurance on Farm IQ Management of Funding

April 2013

Note - All recommendations have been addressed. (July 2013)



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INTRODUCTION

PURPOSE

- This report sets out the overall conclusions and findings from our assurance work looking at the systems that Farm IQ Systems Limited (FarmIQ) has in place for managing Primary Growth Partnership funding received from the Ministry for Primary Industry (MPI).
- Farm IQ is a company formed by two partners (Silver Fern Farms and Landcorp) in August 2010, to deliver the Integrated Value Chain for Red Meat PGP programme. Silver Fern Farms hold the majority shareholding in the company.
- 3. The Integrated Value Chain for Red Meat PGP Programme aims to achieve its goal through six distinct projects. These include the:
 - development of market analysis (including work to identify market and consumer needs and develop consumer sensory evaluation);
 - IT and database (including the development of software to collect and analyse animal specific performance data); and
 - farm productive capacity (the development of farm management systems including the equipment and infrastructure to collect data from farms).

CONTEXT FOR WORK

4. The Primary Growth Partnership (PGP) is a government-industry partnership that invests in significant programmes of research and

innovation to boost the economic growth and sustainability of New Zealand's primary and food sectors. The Ministry provides funding to the partners for the programmes. The partners are required to provide co-funding at least equivalent to the Ministry's funding. Cofunding can be either in the form of cash contributions or in kind contributions.

- 5. There are currently eleven PGP programmes in operation. A further six programmes have been initially approved and are either at the stage of developing business plans or negotiating contracts. Further PGP funding of \$4.85m per year is also provided by MPI to the New Zealand Agricultural Greenhouse Gas Research Centre.
- Last year, the MPI Assurance and Evaluation team were asked to develop proposals for a programme of assurance work to help provide additional comfort to the Ministry and the Minister around PGP partner's management of funding and claims for funding.
- 7. Each contract between MPI and the partners provides rights of access to records to carry out an audit of the partner's use of the funds. Each funding contract sets out that partners, "must keep appropriate accounting and other records of the use of the funding (including payslips, invoices and receipts) and the co-funding and manage the combined funding in accordance with recognised research and accounting best practice standards, so as to enable MPI to carry out an audit and determine whether the Funding and Co-funding is being used in accordance with this agreement. "

OBJECTIVES

- 8. The main objectives of this assurance work are to ensure that the funding being provided by MPI and co-funding being provided by the partners was being used solely and specifically to meet the costs of the programme and in accordance with the PGP agreement between MPI and the PGP partner(s).
- 9. The work also aims to confirm that PGP partners have:
 - Sufficient, relevant and reliable records of use of the funding and co-funding to adequately support the funding/ co-funding claims.
 - Financial management systems in place to manage PGP funding and co-funding including:
 - Financial management reporting processes (including financial data to support funding claims).
 - Cost allocation processes.
 - Payments processes.
 - Budgeting, cash flow and forecasting processes.
- 10. It is not an objective of this work to assess or comment on the progress in delivering the outcomes and outputs of the programme. Nor is it intended to comment on the value for money that the programme and its constituents projects represent.

WHAT WE DID AND HOW WE DID IT

12. To achieve our objectives for this work, we talked to people in the Ministry, Farm IQ, and partner organisations to understand the

systems and processes being used to manage the funding/cofunding, and make claims for funding. Our work included:

- Discussing with Farm IQ finance the systems and processes used by Farm IQ for recording financial management data and information, and for developing financial management reports and request for MPI funding invoices.
- Discussing with the responsible Landcorp Assistant
 Accountant the systems and processes operated by Landcorp
 Farming Limited (Landcorp) on behalf of Farm IQ for
 processing payments to their suppliers and employees and
 making funding claims to MPI.
- Reviewing financial management papers including 2012-13
 Business plan, 2012-13 budget spreadsheets, monthly reports to the Programme Steering Group and Board, and variance analysis reports.
- Checking documentation which supports and substantiates the claims for MPI funding being made by Farm IQ (we identified a sample of 20 programme expenditure transactions from November 2012 programme expenditure claims to review in detail).

MAIN FINDINGS AND CONCLUSIONS

CONCLUSIONS

- 13. Our overall conclusions are that Farm IQ financial management systems are working effectively. Farm IQ financial management processes are commensurate with the size and complexity of its current operations. There are defined processes for:
 - o Developing annual budgets for the life of the programme.

- Monitoring and forecasting spend.
- o Financial reporting to governance groups and MPI.
- Allocating costs.
- Making and recording payments to employees and suppliers.
- 14. The funding being provided by MPI and co-investors is being used to meet the costs of the Farm IQ programme (this conclusion is based on our review of the documentation and information supplied by Farm IQ and PGP partners to support the 20 transactions selected as part of our audit testing). We found that:
 - Amounts claimed from the Ministry are supported by documentary evidence.
 - Amounts being claimed are relevant and appropriate costs to be borne by the partnership programme.
 - An adequate process exists to value in kind contributions and amounts being claimed for in kind contributions are supported by sufficient evidence to support them.
 - Note that a proportion of the costs being funded by both MPI and co-investors are for personnel and sub contractor costs. While we are able to confirm the value of these costs (by checking against agreed hourly rates etc), we are unable to comment on the accuracy of the actual hours worked by each person (we can only confirm that systems exist and are operating to collect this information).

Findings and observations Verification of the programme expenditure incurred by Farm IQ partners

- 15. Some of the programme expenditure is directly incurred by the partners Silver Fern Farms, Landcorp and TruTest). These companies report back to Farm IQ monthly on the expenditure incurred using a management reporting tool designed by Farm IQ. The underlying evidence of the expenditure is retained by the partners.
- 16. Farm IQ do not currently have a process for verifying the underlying accuracy of the programme expenditure being reported by the partners. This poses some risks that amounts reported may be misstated and these misstatements may not be picked up.
- 17. Farm IQ's Policy re PGP (December 2012) sets out that Farm IQ will complete audits of partner PGP records "as and when required to be assured that the policy is being followed". An audit would be one way of gaining assurance about the accuracy of the amounts involved. We were told while there have been no audits carried out to date, there is an intention to conduct audits in the future.
- 18. In addition, some regular checking (say every three months) of the underlying data being provided by partners would provide periodic assurance over the accuracy of amounts being claimed and an opportunity to address any discrepancies or deficiencies in a timely manner.

Calculation of personnel related contribution in kind costs

- 19. Some of the costs being incurred and reported either as contributions in kind (Silver Fern Farms and Tru Test) or as cash costs (Landcorp and Tru-test) relate to time spent by the partner's employees in delivering elements of the programme.
- 20. We were unable to confirm some of the rates being charged by the partners for their employees against the rates that were agreed by MPI and the partners when the programme was established. In three instances, in our sample, the partners appeared to be understating the costs they incurred and in one case overstating the costs. We were told by one of the partner organisations that they recognised that they were understating their contribution but it was easier administratively for them to do what they were doing.
- 21. As the amounts involved are not material in the context of the value of the costs of the whole programme, this is not a significant concern. Our findings were raised and discussed with Farm IQ finance.
- 22. More detailed commentary on the work done and our understanding of the systems and processes we reviewed are provided (for Farm IQ and MPI) in Appendix One.
- 23. We would like to thank the staff of Farm IQ, Silver Fern Farms, Landcorp, and Tru-test for their assistance during this audit.

Actions to be considered

- 24. There are three minor actions for Farm IQ to consider:
- Put in place a process to carry out some regular focussed verification checks of the accuracy of the data being reported by partners.
- Put in place a process to carry out audits of partner PGP records "as and when required".
- Ensure that data recorded in the two financial information systems is regularly reconciled.

Farm IQ Management response to actions April 2013 Action (1)

 Put in place a process to carry out some regular focussed verification checks of the accuracy of the data being reported by partners.

Farm IQ response: on a quarterly timetable, beginning in June 2013 Farm IQ finance will request source documents from each partner on a sample of transactions selected from the previous three months. These source documents will be used to verify the project claim and especially ensure correct process is followed regarding contribution in kind claims

Action (2)

Put in place a process to carry out audits of partner PGP records "as and when required".

Farm IQ response: depending on the result of the quarterly verification checks Farm IQ will determine the requirement for an audit of partner PGP records.

Action (3)

 Ensure that data recorded in the two financial information systems is regularly reconciled.

Farm IQ response: A reconciliation between Quickbooks and the Access database will now be carried out on a monthly basis. This will become part of the monthly process. It is acknowledged that there may be timing difference between the two systems, however with the recent shortening of the delay in project reporting, we have eliminated most of this variation. Any timing differences will be listed as part of the reconciliation.

APPENDIX ONE: FARM IQ FINANCIAL MANAGEMENT DETAILED COMMENTARY

BACKGROUND – OUR UNDERSTANDING OF THE PARTNERSHIP

- Farm IQ Systems Limited is a company formed by the PGP partners Silver Fern Farms (SFF) and Landcorp in August 2010. Its vision is to create a demand driven integrated value chain for red meat that delivers sustainable benefits to all participants: farmers, processors and marketers. The company has a board made up of two independents and three SFF/Landcorp directors/senior managers. The board is headed by Alison Paterson.
- 2. Farm IQ has around fourteen employees –including its Chief Executive Officer, an Operations Manager, Chief Information Officer, General Manager Farm Systems as well as several business managers. It calls significantly on the staff time and resources of the two main partners in the company Silver Fern Farms and Landcorp to help deliver its outcomes. Landcorp provide help with Farm IQ accounting by providing the services of one of their Assistant Accountants to help with processing transactions and managing Farm IQ finances.
- Additional services are provided by other partners including TruTest who provide in kind and cash contributions to the

- programme to help with the design and development of equipment and infrastructure.
- 4. Key suppliers include AgResearch who are involved in genetics research for the programme, Texas Tech University (market analysis, consumer sensory evaluation) and Fronde (development of IT and database).
- 5. The total budget for the seven year life of this PGP programme is \$150.7m of which \$59.3m has been committed by MPI. Silver Fern Farms provide most of the other funding for the programme either by funding the cost of SFF employees doing the work (particularly for Outcomes 2 and 5), contributing to Farm IQ costs (particularly for outcome 3) or paying for other suppliers to do work for the programme.
- 6. In 2012-13, some \$27.6m is expected to be spent on taking forward the programme, of which \$17.5m will be met by MPI. The total costs incurred are split between the following categories of spend:
 - Outcome 1 Programme Governance
 - Outcome 2 Market Analysis
 - Outcome 3 IT and database
 - Outcome 4 Genetics
 - o Outcome 5 Processing
 - Outcome 6 Farm Productive Capacity

BUDGETING PROCESS

Overall conclusion – budgeting processes robust and systematic and commensurate with current size and complexity of organisation

Work done

- Discussed budget setting process with Farm IQ Finance
- Reviewed 2012-13 budget spreadsheets for intermediate outcomes 1, 2.4, 3 and 6.3 to understand the basis for setting budgets and the drivers of cost

Commentary

- 5. The overall indicative seven year budget and business plan were developed when the PGP programme was first established in 2010. We understand that this initial budget was developed by a consultant from Deloittes Deloittes were involved in setting up a number of the elements of the Farm IQ financial systems including the budgets. Already, after two years, there have been some significant changes to the budget and funding assumptions this is perhaps inevitable given the inherent uncertainty in developing new and innovative outputs and products.
- 6. The programme has been under spent in both 2010-11 and 2011-12 (planned spend for two year period \$40.4m, actual spend \$30.2m). Some of this spending has been delayed other spending in future years has now been brought forward from the later years to earlier years of the programme. Changes have been

- made to the 2012-13 budget which have implications for MPI levels of funding these have been discussed with MPI and a specific contract variation has been agreed and signed off by the DG to reflect this.
- 7. Annual budgets for each outcome are developed as part of the annual business planning process. The content of the Farm IQ business plan is put together by the CEO with input from the five outcome project managers. The financial elements of the plan including the budgets for each outcome are brought together by the Farm IQ finance person with input from the outcome project managers and where necessary other personnel (as an example the budget for objective 6.3 requires some input from TruTest Limited who are responsible for delivering most of the work associated with this outcome objective).
- 3. The annual budgets are split into budgets for each intermediate outcome and then each lower level intermediate outcome objective. Essentially the budgets for each of the six intermediate outcomes are drawn up using costing information and estimates provided by the six project managers for each of the outcomes.
- 9. Farm IQ finance has developed a series of spreadsheets which are used to collect and collate the data used in the setting of the budgets. Farm IQ finance was able to clearly and concisely articulate the basis used for setting the budgets for outcomes that Farm IQ control.

- 10. At the objective level, the spending is split into categories of cost (these categories match the categories of costs as they are set out in the Farm IQ Chart of Accounts). The costs are split between those costs incurred and funded by Farm IQ's partners (Silver Fern Farms, Landcorp, Tru Test) or costs funded by MPI. There are a number of different formulae for splitting and allocating costs between partners, some of which are quite complex.
- 11. The Board and Programme Steering Group assess these budgets as part of their involvement in the organisation's governance. This is evidenced by the minutes of their meetings.
- 12. Our specific notes on elements of the budget reviewed are set out below:

Programme Management 2012-13 Intermediate Outcome (IO) 1

- MPI contributes \$1.059m to this budget.
- There is a relatively simple split of costs between the partners.
 MPI pays all programme management costs except the costs of the four business managers (Silver Fern Farms meets this cost) and the partner's governance costs.
- o These governance costs budgeted at \$306k are met by three partners (these are contributions in kind from each of the partners). Both Farm IQ Finance and Landcorp/Trutest personnel are uncertain about the basis of the budgets for these costs (budgets set by Deloitte contractor). These amounts may no longer represent accurate budgets

 While amounts are not material it might be timely as part of 2013-14 budget to reconsider the budget for governance costs.

IT and Database Value Chain Systems Implementation Intermediate Outcome (IO3.2)

- MPI contributes \$4.452m to this budget. Main elements of cost are the system costs (including Fronde's costs:- development costs of \$4.4m, hosting and support costs \$0.3m and help desk costs of \$0.6m) salary costs of Farm IQ staff of \$0.7m
- Farm IQ finance explained that they seek to initially cover costs from SFF and Landcorp agreed contribution up to their maximum agreed contribution and then MPI picks up the rest of the cost up to the set annual limit. Sighted evidence of this process

Farm Productive Capacity – Equipment Infrastructure Design and Development Intermediate Outcome (IO6.3)

- MPI contributes \$2.32m to this budget.
- Most of this cost relates specifically to the purchasing of ear tags to enable the collection of on farm data. Remaining costs relate to labour (50% of labour costs) and material costs incurred by Tru-Test Limited. Budget for this developed by TruTest.

MONITORING AND FORECASTING PROCESSES

Overall conclusion – monitoring and forecasting processes robust and commensurate with size and complexity of organisation

Work done

- Discussed monitoring and forecasting processes with Farm IQ
 Finance
- Reviewed 2012-13 monthly reports to Programme Steering group for evidence of monitoring
- Reviewed February 2013 forecasting documents to understand how process operates

Commentary

- 13. As part of monitoring spending against the budget, each month Farm IQ Finance puts together a monthly financial report – these reports are generated from figures recorded in an Access Database which has been developed for financial management of the programme. The monthly report sets out actual and budgeted spend for the month and year to date and identifies which partner (MPI, Silver Fern Farms, other) is responsible for meeting these costs. The report also sets out the annual budget and projected budget and identifies any variance between the two.
- 14. Note: the financial figures recorded in the Access database only recognise actual payments and actual contributions in kind made to suppliers and employees. The database figures are not

- adjusted each month to recognise any accruals for any liabilities incurred which have not been paid so this means there is no recognition of any work done but not invoiced or work prepaid where the benefit lies in the future.
- 15. The Monthly report is circulated to the project managers and the finance person seeks commentary and explanations from them for any significant variances. These written explanations form the basis of the monthly reporting back to the board and Programme Steering Group on financial performance.
- 16. The quality and level of detail of the commentary and explanations is commensurate with the scale and complexity of the spending (while the budgets for some of the outcomes are quite significant the actual breakdown of these budgets is relatively easy to monitor). It provides sufficient detail to provide clarity around any variances.
- 17. Each month an Operational Report to the Board/Programme Steering Group (PSG) is developed for each of the intermediate outcomes these reports include some financial information. The degree of detail provided on the finances and budgets within each of the six operational reports to the board varies. The information is not presented consistently. While this is not specifically relevant to this audit more consistent presentation of the information may assist members of the steering group in their understanding of the progress of each set of outcomes and outputs. This variation in

- style reflects the fact that each of the six reports are completed by a different project manager in their own style.
- 18. The Monthly Report is reviewed as part of the Board meetings and PSG meetings. These are the key governance forums for the PGP programme.
- 19. Farm IQ undertake as a minimum two forecasting exercises in the year itself – these are the October and February reviews and are aligned with MPI/government's in year forecasting review timetables. Process requires each of the project managers to assess their spend to date and future spending commitments to determine financial requirements for the remainder of the financial year.

PROCESSES FOR PAYMENT OF SUPPLIERS AND EMPLOYEES

Overall conclusion – sufficient, relevant and reliable records of use of funding to support request for funding payments to MPI.

Payment processes suitably robust and commensurate with the size and complexity of the organisation

Work done

- Discussed processes for paying suppliers and employees with relevant personnel
- Selected sample of 20 transactions from November 2012 programme expenditure
- Reviewed supporting documentation such as invoices, time records, direct credit records, contracts to ensure records support the payment made and thus support the request for funding payment to MPI

Commentary

20. Farm IQ have contracted Landcorp to provide financial processing services to FarmIQ. One Landcorp staff member (Assistant Accountant) completes all aspects of payroll, accounts payable and receivable processing, monitors the Farm IQ Westpac bank account, and maintains the Farm IQ general ledger accounting (Quickbooks) and an access database which records financial information for management reporting purposes. Farm IQ finance

are responsible for exercising oversight of the work done on Farm IQ's behalf by the Assistant Accountant.

Payment of suppliers

- 21. Accounts payable data is processed and entered in Quickbooks (QB) by the Assistant Accountant. They also manage the set up of new suppliers in QB as and when they are required.
- 22. When suppliers submit invoices they are reviewed, approved and coded to the relevant project by Farm IQ finance or the relevant project or business manager and then passed to the Assistant Accountant for processing. The approval may be accompanied by instructions from the relevant manager on any split of the expense between partners and / or sub-projects, and the applicable details and amounts of any split. Any split is calculated based on the agreed budget split set for each particular sub-project.

Note: all invoices in our sample were approved by appropriate project managers. This addresses one of the findings of the Deloitte audit of the June 2012 accounts.

23. The Assistant Accountant manually enters the invoice details into both QB and the Access Database. Each invoice is initialled and dated stamp to denote that it has been entered into both of these systems – this acts as a control to mitigate the risk of duplicate payments

- 24. Invoice details are entered in the Access Database at sub-project level detail including any split required between charges to partners and / or sub-projects. Sub-project level detail cannot be entered in QB, only the project class. QB doesn't have a posting date function so only the invoice date is entered.
- 25. Invoices from suppliers are not generally paid until the money to fund them is received from the relevant partners this is generally received from MPI around the end of each month. Once funding for these programme expenses is received the Assistant Accountant releases the invoices for payment in QB. The payment process itself is done using Westpac internet banking to make direct credit payments. Payments release requires the authorisation of the CEO of Farm IQ.

Note: all payments released in our sample were checked and signed off by the Farm IQ CEO.

Payment of employees

- 26. Payroll data is entered in Farm IQ payroll and HR system, IMS, by the Assistant Accountant. Reimbursement of these salaries are claimed retrospectively from partners. At the year end, Farm IQ finance calculates any salary accruals for year end accounts.
- 27. The Farm IQ Operations Manager emails fortnightly timesheets for all Farm IQ employees to the Assistant Accountant. These details are manually entered into IMS. IMS has been pre-set with employee details and conditions, including the sub project that

salary costs should be charged against. Any applicable changes for each pay run, are made by the Assistant Accountant based on the information recorded on the timesheets.

Note: all salary payments in our sample were agreed to supporting documents

28. Once all the data is entered into the system, IMS produces a General Ledger report which Farm IQ Finance checks against timesheets, and then approves.

Note: all employee payments in our sample were checked and approved by Farm IQ finance

29. The bulk totals from IMS are exported by expenditure code and project code to QB. Payment to employees is made using Westpac internet banking direct credit system. The payment release is authorised in the same way as for supplier payments.

FINANCIAL MANAGEMENT REPORTING AND LEDGER ACCOUNTING

Overall conclusion – financial management reporting systems and processes are commensurate with size and complexity of the organisation

Need for regular reconciliation or similar process to compare information recorded across two financial information systems

Need to verify semi regularly the underlying evidence to support partner's claims for costs incurred

Work done

- Discussion of systems and processes with Farm IQ Finance and Landcorp staff
- Checking of systems entries to monthly reports to ensure consistency of data entry and figures reported

Commentary

- 30. Farm IQ use two systems to record financial information about payments to employees and suppliers, and cost incurred by the two partners Silver Fern Farms and Landcorp.
 - Quickbooks accounting: this is an off the shelf software accounting package marketed in New Zealand by a company called Reckon. Records payments to employees and other payments to suppliers and any other general ledger

- accounting entries. Note; payments to suppliers and employees (mostly direct credit payments) are generated and paid using Westpac on line banking.
- Access database: Farm IQ also records financial management information in a database which was developed for them by a Landcorp systems accountant the database was developed because Quickbooks only has limited reporting functionality. The financial information in the database and the Quickbooks general ledger system should be identical. The information in the database is used as the source of the information for producing financial reports including the monthly reports and the requests for payment which are provided to the Programme Steering Group, MPI and partners.
- 31. Quickbooks is a reasonably simple and easy to use software package like other products such as MYOB it is designed for smaller organisations although it does have the capacity to be used by larger and more complex organisations. While Farm IQ remains relatively self contained with a relatively small number of employees and suppliers the package is commensurate with its needs. With the further development of the company and with greater complexity, the company will need to look at its accounting technology requirements more closely.
- 32. The financial data recorded in the Access Database and Quickbooks is drawn both from records of Farm IQ's own financial activities, and partners activities. Both Silver Fern Farms and Landcorp incur costs related to the programme which they initially

- meet and either claim back or recognise as contributions in kind (Silver Fern Farms costs are primarily related to programme outcomes 2 and 5 which they manage and deliver).
- 33. Additionally, while not a shareholder in the Farm IQ company, Tru-Test is a partner and incurs regular costs which are recognised both as actual costs they incur or contribution in kind (primarily related to programme outcome 6).
- 34. SFF, Landcorp and Trutest are required to provide Farm IQ with monthly financial reports, which provide Farm IQ with the financial information that they need to produce monthly accounts for the programme.
- 35. These monthly reports were designed for Farm IQ by Deloittes. They are based on a spreadsheet template. The reports include details of item by item programme expenditure, whether the expenditure was cash or an in kind contribution, or whether recovery is sought from MPI.
- 36. The information is provided to Farm IQ and the Assistant Accountant keys the information into both Quickbooks and the database. The underlying documentation which supports the reported figures such as employee time records, payment invoices, contracts etc is retained by each of the partners.
- 37. From this monthly report relevant invoices to partners (including MPI) are generated in QB. The monthly reports are run by the

Assistant Accountant and checked by Farm IQ finance. Any accounting adjustments are made by the Assistant Accountant, after these checks.

Note: Farm IQ do not require the two partners and Tru-test to provide them with the underlying detail to support their spending – this could include supplier invoices, contracts, employee time records salary details etc. Currently Farm IQ do not do any verification checks to consider the veracity of the information being provided by the partners. Farm IQ Policy states that Farm IQ will complete audits of partner PGP records "as and when required". We were told they have not audited any of the partner records. There is an intention to conduct audits in the future.

In addition, some regular checking of the underlying data being provided by partners would provide periodic assurance over the accuracy of amounts being claimed and an opportunity to address any discrepancies or deficiencies in a timely manner.

38. While Farm IQ continues to use two systems to record its financial information it is important that there are controls to ensure the accuracy and consistency of the information across these systems. Reconciling the data in both systems becomes an important control. Farm IQ Finance indicated that ideally the QB and Access Database should be reconciled monthly, but due to pressure of work, this reconciliation is currently being performed approximately every six months. Currently the data is reconciled

up to December 2012. Efforts to carry out more frequent reconciliation will continue.

39. As a mitigation, to reduce possibilities of keying or other data errors for accounts payable between QB and the Access database, the Farm IQ Finance person and Assistant Accountant have agreed to introduce a new process. The Assistant Accountant will run the 'Unpaid Invoices' report from QB which downloads to Excel format. He will then add sub-project information, and recovery information. The intention is for the Assistant Accountant not to alter any dollar figures except where invoices need to be split between projects and/or recovery sources. This Excel spreadsheet can then be uploaded to the Access database rather than rekeying data. This arrangement is likely to reduce the possibility of error through duplicate keying.