

November 6, 2015

Mr. Chris Kloeris
Executive Director
Texas Optometry Board
333 Guadalupe St., Suite 2-420
Austin, Texas 78701-3938

Dear Mr. Kloeris:

We have completed a post-payment audit of all payroll, purchase and travel transactions of the Texas Optometry Board (Board). We would like to thank you and your staff for your responsiveness and cooperation in assisting us with this audit. A draft of this audit report was sent to you on Sept. 24, 2015. The Board's response to the draft is included in this report.

Our purpose was to determine whether the Board's expenditures complied with certain state laws and rules concerning expenditures and with the processing requirements of the Uniform Statewide Accounting System (USAS) and the Uniform Statewide Payroll/Personnel System (USPS). The Board is responsible for ensuring that its staff is knowledgeable in these areas.

The Board must submit to the Texas Comptroller of Public Accounts (Comptroller's office) a corrective action plan that addresses the instances of errors detailed within this report. The plan must provide for appropriate improvements in the control structure related to the Board's payment process and show expected dates of implementation. The corrective action plan must be completed and signed by management and internal audit. An electronic copy of the corrective action plan is attached. Our office must receive the completed plan on or before Dec. 7, 2015.

We intend for this report to be used by the Board's management and certain state officials and agencies as listed in Texas Government Code, Section 403.071. However, this report is a public record and its distribution is not limited.

We noted other matters involving the processing of expenditures by the Board that we have communicated to you in an email dated Sept. 24, 2015.



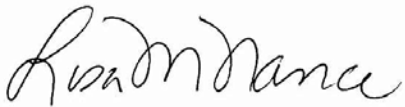
Mr. Chris Kloeris
November 6, 2015
Page Two

The Board may inquire about and register for training related to expenditures through the Fiscal Management [Training Center](#).

We would like to request input from you or your designee on the quality of the audit process and the service provided by the audit staff while conducting this audit. Please take our [Post-Payment Audit Survey](#) to rate and comment on the post-payment audit process. Your feedback is greatly appreciated.

Thank you for your cooperation. If we can be of any further assistance, please contact derik.montique@cpa.texas.gov or 512-4305-9761.

Sincerely,



Lisa M. Nance
Manager, Statewide Fiscal Services
Fiscal Management Division

Attachments

cc: Dr. John Coble, Chair, Texas Optometry Board
Derik Montique, Auditor, Texas Comptroller of Public Accounts



Fiscal Management Division
Expenditure Audit Section
Auditor: Derik Montique

Audit Report # 514-15-01
November 6, 2015

Post-Payment Audit of the Texas Optometry Board



Glenn Hegar
Texas Comptroller of Public Accounts

Table of Contents

Executive Summary

Audit scope.....	i
Payroll transactions and payroll deductions	i
Purchase transactions	i
Travel transactions.....	ii
Fixed assets.....	ii
Security.....	ii
Internal control structure.....	ii
Prior post-payment audit and current audit recurring findings	iii

Detailed Findings — Travel

Receipt Not in Employee's Name	1
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Detailed Findings — Expenditure Approvals

Control Weakness Over Expenditure Processing.....	2
Employee Retained Security To Expend Funds After Termination	4

Appendices

Appendix 1 — Summary of Sample Errors Detected	A.1
Appendix 2 — Schedule of Errors — Travel	A.2
Appendix 3 — Schedule of Errors — Employee Retained Security to Expend Funds After Termination	A.3
Appendix 4 — Audit Process Overview.....	A.4

EXECUTIVE SUMMARY

Audit scope

We audited all of the Texas Optometry Board (Board) payroll, purchase and travel transactions that processed through the Uniform Statewide Accounting System (USAS) and the Uniform Statewide Payroll/Personnel System (USPS) during the period beginning Sept. 1, 2013, through Aug. 31, 2014, to determine compliance with applicable state laws.

The Board received appendices with its full report that included a list of the identified errors. Copies of the appendices may be requested through a [Public Information Act](#) inquiry.

The audit provides a reasonable basis for the findings set forth in this report. The Board should implement the recommendations listed in the Detailed Findings of this report. It is the Board's responsibility to seek refunds for all overpayments unless it determines it is not cost effective to do so. If necessary, the Comptroller's office may take the actions set forth in Texas Government Code, Section 403.071(h), to ensure that the Board's documents comply in the future. The Board must ensure that the findings discussed in this report are resolved.

Texas law requires the Texas Comptroller of Public Accounts (Comptroller's office) to audit claims submitted for payment through the Comptroller's office. All payment transactions are subject to audit regardless of amount or materiality.

Payroll transactions and payroll deductions

Payroll transactions were audited for compliance with the General Appropriations Act (GAA), the [Texas Payroll/Personnel Resource](#) and other pertinent statutes.

- No issues were identified.

A limited sample of voluntary contributions was also audited.

- No issues were identified.

Purchase transactions

Purchase transactions were audited for compliance with the GAA, [eXpendit](#), the [State of Texas Procurement Manual](#) and other pertinent statutes.

- No issues were identified.

Travel transactions

Travel transactions were audited for compliance with the GAA, [Textravel](#) and other pertinent statutes.

The audit identified:

- Receipt not in employee's name.

Fixed assets

The audit included a limited review of fixed assets acquired by the Board during the audit period to test for accurate reporting and to verify existence of the assets.

- All assets tested were in their intended location.

Security

The audit included a security review to identify any of the Board's employees with security in USAS, USPS or on the voucher signature cards who were no longer employed or whose security had been revoked. Upon termination or revocation, certain deadlines must be observed so that security can be revoked in a timely manner.

The review identified:

- One employee who retained the security to expend funds after termination.

Internal control structure

The Board's internal control structure was reviewed. The review was limited to obtaining an understanding of the Board's controls sufficient to plan the audit and did not include tests of control policies and procedures.

The review identified:

- Two employees who had the ability to process expenditures without oversight. Each employee could:
 - Process and release payments through USAS.
 - Adjust payment instructions in the Texas Identification Number System (TINS) and approve vouchers.
 - Process and release payrolls.
 - Pick up warrants from the Comptroller's office and approve paper vouchers.

Prior post-payment audit and current audit recurring findings

A prior post-payment audit of the Board's payroll, purchase and travel transactions was concluded on July 22, 2011.

During the current audit, the following recurring finding was identified:

- Control weakness over expenditure processing.

Contact:

Derik Montique, MBA, CFE
512-305-9761

Contributing Auditors:

Bill Hornstein, CTP
Aleks Nećak, CTP

DETAILED FINDINGS — TRAVEL

Receipt Not in Employee's Name

Finding

We identified one transaction in which an employee claimed reimbursement on behalf of a board member. The board member's airline ticket was purchased by the employee at the time of the reservation. After the travel was completed, the employee requested that the reimbursement for the airfare be made payable to the employee who purchased the tickets.

For a description of receipt requirements, see [Textravel – Commercial air transportation](#).

Recommendation/Requirement

The Board must ensure that reimbursements are only for the employee incurring the expense. We recommend that the Board ensure that all employees are knowledgeable about the travel rules set forth in [Textravel](#).

Board Response

The agency will insure that this type of transaction will not occur in the future.

DETAILED FINDINGS — EXPENDITURE APPROVALS

Control Weakness Over Expenditure Processing

Finding

As part of our planning process for the post-payment audit, we reviewed certain limitations that the Board placed on its accounting staff members' abilities to process expenditures. We reviewed the Board's security in USAS, USPS, TINS and voucher signature cards that was in effect on Nov. 14, 2014. We did not review or test any internal or compensating controls that the Board may have relating to USAS, USPS or TINS security or internal transaction approvals.

We identified two employees with multiple security capabilities. Both employees had the security to:

- Process and release payments through USAS,
- Adjust payment instructions in TINS and approve vouchers,
- Process and release payrolls without electronic oversight and
- Pick up warrants from the Comptroller's office and approve paper vouchers.

The Board received a schedule of this finding during fieldwork.

To reduce risks to state funds, agencies should have controls over expenditure processing that segregates each accounting task to the greatest extent practical. Ideally, no individual should be able to enter or alter and then release payments or other accounting transactions within the statewide financial systems without another person's involvement.

We ran a report to determine whether any of the Board's payment documents processed through USAS or USPS during the audit period because of the action of only one person. Four USAS transactions were either entered and approved, or altered and approved, by the same person without another person's electronic oversight. These documents resulted in payments totaling \$69,124.78. We provided the Board with a copy of this report during fieldwork. We verified that all transactions were valid expenditures.

As a result of our previous audit, the Board stated that it would request receipt of the Risky Document Report (DAFR9840) to identify documents that the same user entered or altered and then released for processing. However, a query of our database indicates that the request for DAFR8940 has been inactive since December 2014.

Recommendation/Requirement

As recommended in our prior audit, the Board should continue to review the controls over expenditure processing and segregate each task to the greatest extent possible to ensure that no individual is able to process payments without oversight.

We strongly recommend that the Board request the implementation of the preventive control discussed in [USAS Accounting and Payment Control \(FPP B.005\)](#) for all transactions in USAS. With this modification on its profile, an edit automatically prevents the release of a document that the same user entered or altered. This implementation would allow the Board to establish independent control over this recurrent risk.

Board Response

Approval signatures are required prior to release of payments in USAS/USPS. Because of the small number of employees in the agency, several employees have the authority to process and release payments in USAS/USPS. However, the completion of these tasks are separated as much as possible and the security of the agency's funds are taken very seriously by management and staff. Staff closely reviews payment reports following release of payments in USAS to ensure that no inappropriate activity has occurred. Staff will insure that the Risky Document Report (DAFR8940) will be requested to identify the documents that the same user entered or altered and then released for processing.

Employee Retained Security To Expend Funds After Termination

Finding

The Board failed to submit a request to remove an employee's security from USAS and USPS on or before the effective date of the employee's termination date. The removal of the employee's security occurred four days after the employee's termination. Any payment submitted in USAS or USPS that was approved by the employee's expired authority would have constituted an unapproved expenditure. We did not identify any unapproved expenditures. The Board stated that the delay in removing the employee's security occurred because of oversight.

For an employee whose authority to approve an agency's expenditures is revoked for any reason, the employee's USAS and USPS security profile must be changed not later than the effective date of the revocation or termination to prevent the employee from executing electronic approvals for the agency. See 34 Texas Administrative Code, Section 5.61(k)(5)(A)-(B).

Recommendation/Requirement

The Board must ensure compliance with the preceding requirements. The Board must also ensure that the person responsible for sending notifications to the Comptroller's office is aware of the designated employee's termination on or before the date the termination becomes effective and follow through with the Comptroller's office to ensure the receipt of the notification and that the revocation occurred.

Board Response

The agency will terminate access immediately upon the employee's termination date.

Appendices



APPENDICES

Appendix 1 — Summary of Sample Errors Detected

Audit Period: September 1, 2013 through August 31, 2014

GROUP 1 (USPS) — PAYROLL TRANSACTIONS — Detailed Audit

Low Range	High Range	Audited Transactions	Errors Detected (A)	Sample Base (B)	Error Rate (C)	Population Base
\$0.00	\$999,999,999.99	167	\$0.00	\$295,361.85	0.000000	\$295,361.85

GROUP 2 (USPS) — PER DIEM ALLOWANCE TRANSACTIONS — Detailed Audit

Low Range	High Range	Audited Transactions	Errors Detected (A)	Sample Base (B)	Error Rate (C)	Population Base
\$0.00	\$999,999,999.99	26	\$0.00	\$1,710.00	0.000000	\$1,710.00

GROUP 1 (USAS) — PURCHASE TRANSACTIONS — Detailed Audit

Low Range	High Range	Audited Transactions	Errors Detected (A)	Sample Base (B)	Error Rate (C)	Population Base
\$0.00	\$999,999,999.99	194	\$0.00	\$225,635.38	0.000000	\$225,635.38

GROUP 2 (USAS) — TRAVEL TRANSACTIONS — Detailed Audit

Low Range	High Range	Audited Transactions	Errors Detected (A)	Sample Base (B)	Error Rate (C)	Population Base
\$0.00	\$999,999,999.99	151	\$412.99	\$18,739.53	0.022038	\$18,739.53

Legend

Sample Error Rate (C) = (A) ÷ (B)

Note: All dollar amounts rounded to the second decimal place. All error rates rounded to the sixth decimal place.

APPENDICES

Appendix 2 — Schedule of Errors — Travel

Doc #	Sfx	Type of Error	Vendor Name	Amount of Error
15144161	001	Receipt Not in Employee's Name	Melvin G	\$412.99

APPENDICES

Appendix 3 — Schedule of Errors — Employee Retained Security to Expend Funds After Termination

Employees who terminated employment, or whose authority was revoked, that kept release security in USAS or USPS after authority expired.

Employee Name	Terminated Employment	Date Agency Sent Request to Remove/Release Security	Days Request was Delinquent*
Holder, Lisa	3/31/2014	USAS - 4/4/2014 USPS - 4/4/2014	4 4

*Agency must send a request not later than the date of termination.

Appendix 4 — Audit Process Overview

Post-payment audits are conducted by the Expenditure Audit section of the Comptroller's Statewide Fiscal Services department.

Audit objectives

The primary objectives of a post-payment audit are to:

- Ensure payments are documented so a proper audit can be conducted.
- Ensure payment vouchers are processed according to the requirements of the Uniform Statewide Accounting System (USAS) and either:
 - ◊ The Uniform Statewide Payroll/Personnel System (USPS),
 - ◊ The Standardized Payroll/Personnel Report System (SPRS) or
 - ◊ The Human Resource Information System (HRIS).
- Verify payments are made in accordance with certain applicable state laws.
- Verify assets are in their intended locations.
- Verify assets are properly recorded for agencies and institutions of higher education that use the State Property Accounting (SPA) System.
- Verify voucher signature cards and systems security during the audit period are consistent with applicable laws, rules and other requirements.

Comptroller's office responsibilities / Supporting statute

A state agency may request the Texas Comptroller of Public Accounts (Comptroller's office) to pay a claim against the agency only by submitting the appropriate payment voucher to the Comptroller's office.

- [Texas Government Code, Sections 404.046, 404.069, 2103.003, 2103.0035, 2103.004.](#)

State law prohibits the Comptroller's office from paying a claim against a state agency unless the Comptroller's office audits the corresponding voucher.

- [Texas Government Code, Sections 403.071\(a\), 403.078, 2103.004\(a\)\(3\).](#)

State law allows the Comptroller's office to audit a payment voucher before or after the Comptroller's office makes a payment in response to that voucher.

- [Texas Government Code, Section 403.071\(g\)-\(h\).](#)

In addition, state law authorizes the Comptroller's office to conduct pre-payment or post-payment audits on a sample basis.

- [Texas Government Code, Sections 403.011\(a\)\(13\), 403.079, 2155.324.](#)

Methodology

The Expenditure Audit section uses one or more of the following generally recognized auditing techniques to conduct a post-payment audit:

- Detailed audit (100 percent of a given population)
- Stratified random sampling
- Randomly generated sampling
- Non-probability sampling
- Limited sampling

Fieldwork

Each auditor in the Expenditure Audit section is required to approach the fieldwork phase of each audit with an appropriate level of professional skepticism based upon the results of the initial planning procedures.

If an auditor suspects during an audit that fraud, defalcations or intentional misstatement of the facts has occurred, the auditor will meet with his or her supervisor or the Statewide Fiscal Services manager, or both, to decide what course of action or additional procedures would be appropriate.

Reporting

Each auditor audits payment vouchers according to established policies and procedures. The audit findings are reported to the audited agency in the form of a report.

The audit report:

- Discloses the total dollar amount of any unsubstantiated payments or overpayments noted in the audit.
- Includes recommendations and requirements for the audited agency.

Each auditor:

- Discusses the management issues noted during the audit at the exit, and
- Includes details of these issues to the chief fiscal officer after the exit.