



A Contracting Audit of the **Texas Workforce Commission**

**Audit Report #320-24-01
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Executive Summary

Purpose and Scope

The objectives of this contracting audit were to determine whether the Texas Workforce Commission (Commission):

- Solicited, awarded and managed contracts according to the applicable state laws and Comptroller requirements.
- Acquired goods and services in an effective and efficient manner.
- Processed contract payments according to applicable contract terms, state laws, Comptroller requirements and statewide automated system guidelines.
- Maintained appropriate documentation to support the procurement and contracting activities and related payments.

This audit was conducted by the Texas Comptroller of Public Accounts (Comptroller's office), and covers the period from March 1, 2022, through Feb. 28, 2023.

Background

The Texas Workforce Commission is the state agency charged with overseeing and providing workforce development services to Texas employers and job seekers. Its mission is to promote and support a workforce system that creates value and offers employers, families, individuals, and communities the opportunity to achieve and sustain economic prosperity.

Texas Workforce Commission website
<https://www.twc.texas.gov/>

Contract Transactions

Auditors reviewed a sample of three contracts totaling \$5,867,513.82. For the three contracts, auditors developed a representative sample of three contract payments totaling \$202,611.08 to ensure the Commission complied with the General Appropriations Act (GAA), [eXpendit \(FPP I.005\)](#), *State of Texas Procurement and Contract Management Guide* and pertinent statutes.

Audit Results

The Commission generally complied with the GAA, relevant statutes and Comptroller requirements. However, the Commission should consider making improvements to its:

- Contract award notification and reporting processes.
- Contract information website posting.
- Procurement/solicitation evaluation.
- Vendor performance reporting.



The Commission should also consider revising its contract templates. An overview of audit results is presented in the following table.

Table Summary

Contract	Amount	Type of Service	Procurement Cycle					Rating
			Planning	Procurement Method Determination	Vendor Selection	Contract Formation/Award	Contract Management	
Contract A	\$3,610,713.82	Construction and Building Renovations	Insufficient documentation for cost estimates	No exceptions	Procurement/solicitation evaluation process not fully compliant	<ul style="list-style-type: none"> Missing Texas required contract clauses Missing or untimely vendor compliance verifications 	No exceptions	Compliant, Findings Issued
Contract B	\$1,500,000	Training and Education to Vocational Rehabilitation (VR) Customers	Insufficient documentation for cost estimates	No exceptions	Procurement/solicitation evaluation process not fully compliant	<ul style="list-style-type: none"> Missing notice of award on ESBD Missing contract posting on agency website Missing Texas required contract clauses Missing or untimely vendor compliance verifications 	Failure to report to the Vendor Performance Tracking System	
Contract C	\$756,800	Vocational Rehabilitation Training Platform	Insufficient documentation for cost estimates	No exceptions	Procurement/solicitation evaluation process not fully compliant	<ul style="list-style-type: none"> Missing notice of award on ESBD Contract reporting to LBB not timely Missing or untimely vendor compliance verifications 	No exceptions	

Repeat Finding



Detailed Findings

Insufficient Documentation for Cost Estimates

Auditors noted that the Commission did not fully document the cost estimates as part of its procurement planning in any of the three contracts reviewed. Specifically, the Commission did not document the funding source that will be used to pay the vendor, or the availability and adequacy of budget in that funding source to cover the estimated cost of the contract.

For Contract A, the Commission noted that the project funding was approved as requested in the Commission's Legislative Appropriations Request for the 87th Texas Legislature. The Commission's finance area approved this contract as a fiscal 2022 capital budget project. For Contracts B and C, the Commission stated that the procurement checklists on both were reviewed and approved by the Vocational Rehabilitation Division director, who confirmed funds were available with signature. The Commission did not locate documentation in the procurement file supporting the cost estimate from the time of the checklist submissions.

According to the *State of Texas Procurement and Contract Management Guide: Procurement Planning – Cost Estimate*, a state agency must develop a cost estimate as well as make an initial determination of the funding source that will be used for the procurement during the procurement planning phase. The agency must ensure the procurement complies with any laws, special regulations, restrictions or limitations applicable to the source of funding. In addition, as part of a state agency's business process best practices, the availability of budget from the identified funding source to adequately cover the estimated cost of the procurement should be determined and documented in the procurement file as well.

Failure to identify the source of funding and to confirm the adequacy of budget could result in a procurement where the agency is unable to pay the vendor. In turn, this could potentially harm the agency and state's reputation as a whole and hinder the ability of procurement personnel to obtain best value for the state in future procurements.

Recommendation/Requirement

The Commission must modify its processes and procedures to ensure its cost estimates are documented during procurement planning. Specifically, the Commission must identify the appropriations, funds, and/or program cost accounts (PCA) that it intends to use to pay for the procurement, develop the estimated cost and confirm that the intended account/funding source has adequate budget available to cover the estimated cost. This process should be fully documented, either on the procurement checklist or on some other form of written communication and should be retained in the procurement file.



Commission Response

TWC agrees with this recommendation; however, TWC has adequate internal controls to ensure that no contract is entered into without the supporting budget. The TWC 1300 was revised and the procedure was updated in October 2022 to guide business units to provide a complete needs assessment and cost estimate, after the TWC 1300s were submitted for the subject contracts that were sampled by the CPA. The TWC 1300 contains required fields for the funding source, budget, designation of whether the procurement or contract is mandated by Texas Government Code, and affirmation of funding availability by the business unit head. Additionally, the form requires business units to check with TWC's Finance division to confirm the source and budget. The completed TWC 1300 is retained in the procurement file and is a component of the Contract Record Checklist (TWC 1400). TWC will make further improvements to the TWC 1300 and related procedures by October 2024.

TWC builds and develops its Legislative Appropriation Request (LAR) at a detail level including at the appropriation, fund and PCA (Strategy) level for almost all procurements over \$10,000. The cost estimates developed by program areas become the basis for the amounts in LAR which eventually gets adopted into the General Appropriation Act (GAA). Purchase Request (PR's) are submitted for all purchasing requests including those requiring solicitations in TWC's accounting system. For current year appropriations, PRs are budget checked in the accounting system to ensure funding is available prior to the procurement process starting. For procurements related to future year appropriations, by October 2024 staff will ensure the amounts in the PR are reviewed against the detail data in the GAA to ensure funding is available and is consistent with the funding identified in the TWC 1300. Staff will document in the PR it has conducted this check.

Missing or Untimely Vendor Compliance Verifications

Auditors noted that vendor compliance verifications (VCVs) were either not documented or were not performed timely in any of the three contracts reviewed. Specifically:

Contract A:

- The System for Award Management (SAM) check was done seven days after contract execution.
- The franchise tax check was done seven days after contract execution.
- Other checks (debarment, Iran, Sudan, foreign terrorist organization, boycott Israel) were done five days after contract execution.

Contract B:

- The list of financial companies that boycott energy companies retained in the contract file was a partial and incomplete printout.
- The SAM check was done about nine months before the contract was executed by the executive director. A second SAM check appears to have been done, but documentation retained was incomplete, missing two out of three pages, and it was unclear what search term was used.



- Other checks (debarment, Iran, Sudan, foreign terrorist organization, boycott Israel, franchise tax) were conducted about a month and half before contract award/execution.

Contract C:

- The SAM check was done about four months before the contract was executed by the executive director.
- Other checks (debarment, Iran, Sudan, foreign terrorist organization, boycott Israel, franchise tax) were also conducted about four months before the contract was executed by the executive director.

For Contracts B and C, the Commission noted that staff conducted the VCVs too early in the process. For Contract A, the Commission stated that the additional vendor checks were not completed or checked off on the procurement checklist due to the end/beginning of the fiscal year and a significant delay from award to purchase order.

According to the *State of Texas Procurement and Contract Management Guide*, Appendix: Post-Payment & Procurement Review Agency Document Checklist, at the time of award the contract file must contain proof of VCVs. For the SAM check and the warrant hold check, the guide requires proof of the checks be dated no more than seven days prior to contract award. While there are no specific timeframes noted for all the other checks, it is a best business practice that all VCVs be conducted within a reasonably short amount of time prior to contract award. VCVs that are performed after a contract is already awarded are not compliant with statutory requirements and would not protect the agency from contracting with inappropriate vendor(s). VCVs performed too early are likely to become “stale” and may not reflect the awarded vendor’s current status by the time the contract is awarded.

To demonstrate that a VCV was conducted, state agencies must retain dated proof, such as printouts, of the search results and the applicable [divestment lists](#) in the contract files. For more information on each of the VCVs, see the [State of Texas Procurement and Contract Management Guide](#): Contract Award & Amendment – Pre-Award Contract and Contract Amendment Compliance Checks – Vendor Compliance Verifications.

Recommendation/Requirement

The Commission must conduct all required VCVs timely and before any purchase, contract award, extension, or renewal, and must retain results from the specified website in the procurement file as evidence.

Commission Response

TWC agrees with this recommendation and has taken action to ensure all VCVs are completed timely and retained in the appropriate procurement or contract file. In December 2023, TWC updated the VCV procedure. In February 2024, TWC updated the Procurement and



Contract Checklist (TWC 1400) to ensure that all required vendor compliance verifications are completed no more than seven days prior to contract execution, renewal, or extension. PCS staff enter an automated workflow within the Enterprise Contract and Procurement System (ECPS) contract record with the results documented and saved in the procurement or contract record. The notification is automatically sent via email from the system to the assigned contract manager (CM).

In March 2023, PCS began performing weekly audits of a random sample of 10% of the Purchase Orders (POs) to check for compliance as the normal course of business. The results are disseminated monthly to ensure management is aware of any missing documentation and to require staff to rectify errors or gaps in the procurement or contract file. As needed, additional training is provided to ensure future compliance.

Missing Electronic State Business Daily Posting of Contract Award

Auditors noted that the Commission did not publicly post a notification of the contract award on the Electronic State Daily Posting (ESBD) website in two of the three contracts. According to the Commission:

- For Contract B, the award was made during the time when the original purchaser was transferring to another division. As a result, the original purchaser did not receive notification from Contract Administration Services that the contract was executed, and therefore did not post the notice of award to ESBD.
- For Contract C, the Commission stated that the purchaser completed the solicitation and routed the procurement checklist for signature to start the contract execution tasks, but the contract execution did not occur until more than a month later. Due to the lapse in time, the purchaser neglected to post the notice of award to ESBD.

See [Texas Government Code, Section 2155.083](#) for additional information regarding ESBD posting requirements and procurements exceeding \$25,000 in value. Specifically, Section 2155.083(k)(2) requires each state agency that awards a procurement contract estimated to exceed \$25,000 in value to post a notice on ESBD when the procurement contract is awarded or when the agency decides to not make the procurement.

Not posting either the solicitation or the notice of award on ESBD could cause the resulting contract to not provide the best value to the state. In addition, there may be an appearance of unfairness in vendor selection and the contract ultimately may be void.

Recommendation/Requirement

The Commission must ensure it posts on ESBD all procurements exceeding \$25,000, including a notification of award once the contract is awarded, or a notice of non-award in the event no contract is awarded. Evidence of the posting must be documented and retained in the contract file.



In addition, staff training programs and related documentation should include information on ESBD requirements.

Commission Response

TWC agrees with this recommendation and has taken action to ensure that all procurements that exceed \$25,000 which are required to be posted are posted to the Electronic State Business Daily (ESBD), including the notice of award or non-award. As a result of this audit, TWC is making a change to the process for the posting of notice of contract awards/non-awards.

Under the new process, additional PCS staff will be responsible for updating the ESBD with notification of award/non-award within two business days of the event. Access to the ESBD will be granted to PCS staff to facilitate this posting. Training materials and standard operating procedures for staff are currently being updated with this change. PCS staff will be notified and trained once materials are updated, and TWC anticipates that the process will be in full adoption by October 2024. Evidence of the posting will be documented and retained in the contract file. Evidence of non-award will be documented and retained in the procurement file. Additionally, ESBD posting will be added to the contract file checklist, TWC 1400, and the DAQA section will add this check to the audits conducted against awarded POs.

Contract Reporting to LBB Not Made Timely

Auditors noted that the Commission failed to timely report to the Legislative Budget Board (LBB) in one of the three contracts. Specifically, Contract C was executed on Sept. 16, 2022; reporting to LBB's contracts database was made on Oct. 20, 2022, after the 30-day LBB time limit. According to the Commission, at the time of Contract C's submission to LBB, the Commission's Procurement and Contract Services department (PCS) pulled the contract data to report monthly. PCS has since updated the reporting process to pull the contract data every two weeks to avoid missing the 30-day reporting requirement.

See the LBB's [Contract Reporting Guide](#) for additional information.

Recommendation/Requirement

The Commission must report contract awards to LBB in a timely manner and comply with GAA, Article IX, Section 7.04 and LBB's Contract Reporting Guide.

Commission Response

TWC agrees with this recommendation and has taken action to ensure contract awards are reported to LBB according to the LBB's Contract Reporting Guide. In September 2023, DAQA staff amended their process to review contracts every two weeks to determine which records meet the LBB reporting criteria and ensure the entry is completed by the due date. Contract records are reviewed weekly to ensure that PCS obtains an Attestation Letter signed by the TWC Executive Director. Records that require an Attestation Letter are reported to LBB weekly.



TWC will continue this practice with the increased frequency to ensure compliance with LBB reporting requirements.

Missing Contract Posting on Agency Website

The Commission was unable to locate documentation showing it posted the required contract information to its website in one of the three contracts (Contract B). The Commission noted its website administration vendor changed, and it did not consistently retain documentation of the quarterly reports of contracts to be posted on the website.

[Texas Government Code, Section 2054.126\(d\)\(4\)](#) states that state agencies that receive an aggregate of more than \$175 million of appropriations in the GAA for a state fiscal biennium must post the required contract information on their website for all contracts valued at more than \$100,000. This requirement applies to contracts even if they have already been reported to LBB's contracts database.

Recommendation/Requirement

The Commission must review its processes and procedures to ensure contract information is consistently posted to its website in a timely manner, in accordance with requirements established by the Texas Government Code.

Commission Response

TWC agrees with this recommendation and has taken action to ensure that all contract information is posted to the TWC website in a timely manner. DAQA staff update the website with new contract award information monthly. The web posting process, including documentation, was updated in June 2024 to ensure contracts that require posting to the website on award are posted within 30 days of contract award.

Missing Texas Required Contract Clauses

Auditors noted that the contract documents were missing certain Texas required contract clauses in two of the three contracts.

Contract A was missing the following clauses:

- **Prior Disaster Relief Contract Violation:** This clause was found in the terms and conditions attached to the request for proposal (RFP) document. However, the clause as it appeared in the RFP did not use wording that conformed to the standard text or alternate text from the *State of Texas Procurement and Contract Management Guide* (version 1.3), Appendix 22. It failed to mention or cite Texas Government Code, Section 2261.053, (only mentioned Section 2155.006). According to the Guide, Sections 2155.006 and 2261.053 mandate the use of statutorily specified text. The Commission agreed it cited Section 2155.006, but unintentionally left out Section 2261.053.



- **Texas Bidder Affirmation:** This clause, or wording similar to this clause, was not found on Contract A's cover sheet or in the RFP document. The Commission indicated that the terms and conditions utilized for this contract were those in effect at the time as approved by the Commission's Office of General Counsel (OGC) in April 2020. Up until September 2021, the Commission's process was for the OGC to not review construction contracts if the pre-approved template was used.

Contract B was missing the following clause: Signature Authority. The Commission agreed that this provision was not included in the contract document.

When required clauses are not included in a contract, there is an increased risk that the contract will be in violation of federal or state statutes and rules, which in turn increases the risk that the contract and the Commission will be subject to legal challenge or regulatory action.

The *State of Texas Procurement and Contract Management Guide* lists various contract clauses that protect the interests of the state. Contract language and wording must conform to the text of the required contract clauses and any additional language must not conflict with or weaken a required contract clause. Procurement staff should seek assistance from agency legal counsel prior to modifying the contract language since slight variations may result in non-compliance with applicable statutes and rules. See *State of Texas Procurement and Contract Management Guide: Contract Terms*.

Recommendation/Requirement

The Commission must ensure all required clauses listed in the *State of Texas Procurement and Contract Management Guide* are included in its contracts and solicitations. Required clauses that are omitted, or that use substantially altered language, must be reviewed, and approved by the Commission's legal counsel and the justification must be documented in the contract file.

Commission Response

TWC agrees with this recommendation and has taken action to ensure that all required clauses are included in agency contracts and solicitations. TWC Office of General Counsel (OGC) is responsible for reviewing all agency solicitations as well as contracts. As of February 2024, OGC has revised the terms and conditions to encompass all required clauses contained in the State of Texas Procurement and Contract Management Guide. TWC will continue to work with the OGC to ensure that all future legislative changes are included in each contract template.



Procurement/Solicitation Evaluation Process Not Compliant

Auditors noted that the solicitation evaluation process in the three contracts did not fully comply with the procedures established by the [State of Texas Procurement and Contract Management Guide](#). Under "Evaluation Committee Recommendation" the Guide states:

Once the evaluation process is completed, the committee chair will prepare, sign and date the master scoring matrix, and proceed with a recommendation to either award the contract to the highest ranked respondent without discussion, tentatively award the contract to the highest ranked respondent subject to successful completion of negotiations or not award the solicitation. It is recommended that each committee member review the master score sheet to verify the accuracy of the scoring.

None of the contracts reviewed contained an internal memorandum or other written communication prepared by the evaluation committee chair (i.e., the contract developer) to document his or her recommendation on how to proceed with the procurement. Neither the committee chair nor any of the committee members signed and dated the master score sheet to document the verification of the scoring accuracy.

According to the Commission, one of the three contracts (Contract A), missed these elements because its internal policies and procedures manual for construction and facilities management did not include or require these steps. However, the Commission noted that the bid tab is listed as a quality assurance (QA) item on the checklist ("Form 1400"), which the director of purchasing signed at that time. Also, the executive director approved and signed the contract, but there is no statutory requirement for the executive director to review other stages or details of the procurement process.

On the second contract (Contract B), the Commission mistakenly determined that the *State of Texas Procurement and Contract Management Guide* did not require an "internal memorandum" to document the evaluation committee chair's recommendation on how the procurement should proceed.

On the third contract (Contract C), the Commission noted that only a single response was received to the solicitation. Because there was only one response to this solicitation, the purchaser did not include a technical summary that would have outlined the recommendation to award the contract, why the vendor was chosen, or if negotiations were to occur.

Without an evaluation committee's final review of the scoring on the master score sheet, there would be an increased risk of using incorrect information as the procurement proceeds. Similarly, if the contract developer does not formally document a recommendation on how the procurement should proceed and if there is no documentation that the proper level of approval authority has reviewed and approved the recommendation, there would be an increased risk that the contract might be awarded to the wrong vendor or otherwise modified incorrectly.



Recommendation/Requirement

The Commission should review its internal policies and procedure to ensure it includes steps and requirements that fully correspond to, and are consistent with, those established by the Comptroller's office. Specifically, the Commission should ensure that its evaluation process for procurements that are competitively solicited follow the process detailed in the *State of Texas Procurement and Contract Management Guide*. See also Appendix: "Evaluation Committee Guidelines" of the guide.

Commission Response

TWC agrees with this recommendation and has taken action to ensure that the internal policies and procedures fully correspond to and are consistent with those established by the Comptroller's office, specifically those relating to the evaluation process for competitively solicited procurements.

TWC reviews its policies against the Procurement and Contract Management Guide annually or when a new version is issued by the Comptroller.

In March 2024, TWC revised its technical summary to require a summary of the scores, signatures and dates for verification and approval of all evaluators and the purchaser, and steps on how to proceed with the procurement. This document is retained in the procurement file. PCS will add to the technical summary signatures and dates for verification and approval by the business unit head and PCS department director.

Failure to Report to the Vendor Performance Tracking System

Auditors noted that the Commission did not submit a vendor performance report to the Vendor Performance Tracking System (VPTS) in one of the three contracts reviewed (Contract B). According to the Commission, staff did not complete the VPTS reporting as required. The Commission stated that it performs monthly quality assurance reporting on VPTS compliance to guard against these issues. Also, the contract review and closeout checklist that was implemented in January 2024 for quality assurance contains VPTS as an item.

The Statewide Procurement Division (SPD) administers VPTS for use by all ordering agencies per [Texas Administrative Code, Chapter 34, Section 20.115](#). VPTS relies on participation by ordering agencies to gather information on vendor performance. All agencies must "report vendor performance on purchases over \$25,000 from contracts administered by the SPD or any other purchase over \$25,000 made through delegated authority granted by SPD. Ordering entities are also encouraged to report vendor performance for purchases under \$25,000." Agencies must also maintain supporting documentation. See [Texas Government Code, Sections 2155.089](#) and [2262.055](#).



Recommendation/Requirement

The Commission should review its internal policies and procedures to ensure that purchases over \$25,000 are reported to VPTS upon completion of the purchase or after the contract ends. This report helps identify suppliers demonstrating exceptional performance, aids purchasers in making a best-value determination based on vendor past performance and protects the state from vendors with unethical business practices. Reporting also identifies vendors with repeated delivery and performance issues, provides performance scores in four measurable categories for Centralized Master Bidders List (CMBL) vendors, and tracks vendor performance for delegated and exempt purchases.

Commission Response

TWC agrees with this recommendation and has taken action to ensure that all purchases over \$25,000 are reported to VPTS on completion of the purchase or after the contract ends.

By October 2024, the contract manager will be able to access the ESBID to post the vendor performance report, shortening the time it takes to achieve compliance with this metric. Training materials and standard operating procedures for staff are currently being updated with this change. PCS staff will be notified and trained, and TWC anticipates that the process will be in full adoption by October 2024. TWC will monitor this measure to ensure compliance with VPTS reporting requirements and will coordinate with other business units in the event of compliance issues.



Appendices

Appendix 1 — Objectives, Scope, Methodology, Authority and Team

Audit Objective

The objective of this audit was to ensure contracting processes and payments comply with state laws and regulations.

Audit Scope

Auditors reviewed three contracts awarded by the Texas Workforce Commission (Commission) that processed through the Uniform Statewide Accounting System (USAS) and the Centralized Accounting and Payroll/Personnel System (CAPPS) from March 1, 2022, through Feb. 28, 2023, to determine compliance with applicable state laws.

The Commission received appendices with the full report, including 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 Commission should implement the recommendations listed in the Detailed Findings section of this report. It is the Commission'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 the Commission's documents comply in the future. The Commission must ensure 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.

Audit Methodology

The Expenditure Audit section uses limited sampling to conduct a post-payment audit, and relies on professional judgment to select areas the auditor considers high risk.

Fieldwork

Each auditor in the Expenditure Audit section approaches each audit with an appropriate level of professional skepticism based on the results of the initial planning procedures.

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



Audit Authority

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.

Audit Team

Jack Lee, Lead Auditor

David Saldivar, CTCD, CTCM, Staff Auditor

Kenneth L. Johnson, CPA, CIA, CISA, CTCD, CTCM, MBA, Staff Auditor



Appendix 2 — Definition of Ratings

Compliance Areas

Definition	Rating
Agency complied with applicable state requirements and no significant control issues existed.	Fully Compliant
Agency generally complied with applicable state requirements; however, control issues existed that impact the agency's compliance, or minor compliance issues existed.	Compliant, Findings Issued
Agency failed to comply with applicable state requirements.	Noncompliant
Restrictions impaired auditor's ability to obtain sufficient evidence to complete all aspects of the audit process. Causes of restriction include but are not limited to: <ul style="list-style-type: none">• Lack of appropriate and sufficient evidentiary matter.• Restrictions on information provided to auditor.• Destruction of records.	Scope Limitation

Internal Control Structure/Security Areas

Definition	Rating
Agency maintained effective controls over payments.	Fully Compliant
Agency generally maintained effective controls over payments; however, some controls were ineffective or not implemented. These issues are unlikely to interfere with preventing, detecting, or correcting errors or mitigating fraudulent transactions.	Control Weakness Issues Exist
Agency failed to effectively create or implement controls over payments.	Noncompliant

Repeat Finding Icon Definition



This issue was identified during the previous audit of the agency.