# **Procurement Plan**

# TEXAS COMMISSION ON FIRE PROTECTION FINANCIAL ACCOUNTABILITY SYSTEM

Texas Commission on Fire Protection

Revised: November 30 2023

# **Texas Commission on Fire Protection FY24 Agency Procurement Plan**

#### **General Information**

Agency Name: Texas Commission on Fire Protection

Agency Number: 411

#### **Procurement Director Contact Information**

Name: Amanda Khan Phone Number: 512 936 3846

E-mail Address: Accounts.payable@tcfp.texas.gov

#### **Purchasing Capacity Assessment**

Dollar value of agency delegated purchases for FY23: \$50,300.28

Number of purchasing FTEs: 2
Automated purchasing tools used by the agency (if applicable): 0

#### **Certified Procurement Professionals**

Number of certified purchasing FTEs: 2
Number of certified contract management FTEs: 2

- Name, title and certification number for each purchasing FTE and CTCM
  - o Amanda Khan Division Chief, CTCM #1900045438
  - o Annalise Beasley Accountant II Purchaser CTCD #1900044085, CTCM#190004086

#### **Training Projections for the Fiscal Year**

Number of seats needed for CTCD certification courses for FY24: 1 Number of seats needed for CTCM certification courses for FY24: 0

#### **Delegated Purchasing Assessment**

Please list the names of personnel with delegated signature authority for proprietary justifications:

Mike Wisko Agency Chief

Cliff Grant Deputy Chief of Professional Standards

Delegated Purchase	Anticipated Value for FY24	Previous FY Value for same/similar purchase:	Name of current vendor:	Has the agency looked for the item on CPA or DIR contract? (Y/N)
Fleet Vehicles (9)	\$456,392.97		Silsbee Toyota	Y
Relocation Services	\$360,000.00		TFC	Y
Fleet Vehicle (3)	\$162,000.00		Silsbee Toyota	Y



# **Accounting Procedures**

#### Travel voucher reimbursements and audits:

- Travelers submit travel vouchers through the agency's FARM system.
  - The Travel accountant will monitor TripId travel vouchers on FARM Trips Open Trips.
     Once the status is ComplianceApproved, the trip is ready for completion and payment.
  - 2. The travel accountant should review the attached travel vouchers within trips for compliance to travel regulations, accuracy and completeness.
  - 3. Any discrepancies, variances, or mistakes should be addressed with the traveler and their supervisor if needed. Travel vouchers should remain in Open Trip status until corrected by the traveler.
  - 4. Completed audited travel vouchers should be printed and readied for payment.
  - 5. Performance measures log should be updated with travel voucher information.
  - 6. A document number should be assigned to the travel voucher.
  - 7. The travel tab on the document log should be updated and checked for duplicate trip submissions.
  - 8. TripId Travel Vouchers should be Closed in FARM and moved to Closed Trips.
  - 9. Travel vouchers should be entered in CAPPS, reviewed by the senior accountant and approved by the financial manager.
  - 10. Travel vouchers are filed accordingly in the travel accountant's file system.
- Performance Measures Updates
  - Prior to travel vouchers being enter in CAPPS for payment, the financial metrics and mileage from travel vouchers should be entered in the performance measures log.
  - The performance measure log is located at G:\Travel\Performance Measures of the shared accounting drive.

### Purchase Orders for Goods and Services

- 1. Once a request has been received by the purchaser from a department supervisor, the purchaser should research the best vendor(s) to complete the request considering:
  - The type of services/ goods needed,
  - The estimated cost, and
  - The quantity of the item needed
  - HUB vendors available
  - Texas Smartbuy ability to complete request



- The Purchaser should use state approved purchasing methods to research vendors for the goods/services, and identifies a vendor offering the best cost or value for such goods/services.
- 3. The purchaser should complete a Purchase Order (PO) in CAPPS and submit it for approval.
- 4. The PO should be approved by the senior accountant, the financial manager and executive director for final approval.
- 5. After the PO is approved, the purchaser should print out the PO and complete the order with the vendor(s) of choice.
- 6. If the agency has a line of credit with the vendor, the purchaser should utilize that line of credit to complete the purchase.
- 7. If the vendor requires immediate payment, the purchaser should utilize the agency's procurement credit card to complete the purchase.
  - A copy of the purchase order is required to request the procurement card. In addition to the purchase order, the purchaser should provide the following on the PROCUREMENT CARD ACTIVITY LOG:
    - ➤ The signature of the requestor
    - The date that the card is signed out
    - > The vendor name
    - > The cost as specified on the purchase order document
  - If the Purchaser needs follow-up contact with the designated vendor to provide additional specifications, he or she should take a copy of the purchase order and a signed copy of the "Sales Tax Exemption Certificate" to complete the transaction.
  - After the purchase, the Purchaser should obtain an itemized invoice clearly stating charges and payments.
  - The Purchaser should return the procurement card sign it in, on the PROCUREMENT CARD ACTIVITY LOG, listing the following information:
    - ➤ The actual cost of the purchase
    - ➤ The signature of the requestor
    - The date the card was returned
  - If there is a difference in cost or quantity from the original PO, the Purchaser will provide justification.
- 8. For Electronic Delivery of purchases:
  - For software, purchases consisting of a download of software, the "skip receiving" box checked on the purchase order.
  - The IT department member issues an e-mail confirmation to the purchaser for filing with corresponding purchase documentation and invoice.



- 9. After the completion of the purchase order, all supporting documentation is filed with the purchase order in their purchasing staging area inside the Purchaser's files until the goods have been received or services have been completed.
- 10. Receipt of Goods.
  - Goods are delivered to our agency to the Customer Service Rep who should sign for and release the goods to the senior accountant.
  - Purchases should be received by the senior accountant or other staff member of the agency.
  - The senior accountant should match the sending vendor name to a Purchase
     Order from the outstanding PO's awaiting the arrival of goods.
  - Purchases should be checked against invoice/packing slip to ensure completeness and accuracy.
    - If shipment is partial shipment, the senior accountant should note the partial shipment in CAPPS and notify the purchaser.
    - The purchaser should contact the vendor to get an estimated delivery date of the remaining items.
  - Received packing slip/invoice should be placed in senior accountant's folder for payment processing.
- 11. Senior accountant should review PO folder daily for completed orders.
- 12. Once an invoice is received, senior accountant should complete payment of the PO in CAPPS.
- 13. Payments for received orders in CAPPS are submitted by the senior accountant and approved by the Financial manager.
- 14. Payment vouchers are filed accordingly in the Purchaser's file system.

#### Receipt of Services

- 1. When the agency pays for services as part of its ongoing daily operations, the "skip receiving" box on the PO is checked.
- 2. Payment for services provided to the agency is processed by the senior accountant and is detailed in the Monthly payment of POs below.

### <u>Citibank Travel Card Payments</u>

- 1. Citibank travel cards are used by travelers for state travel.
- 2. Citibank travel card statements are received by the agency monthly.
- 3. When the Citibank Travel card statement is received by the agency, it should be stamped with the received date and routed to the travel accountant for audit and processing of payment.



- 4. The agency has 30 days to settle payment for the charges from the date of receipt\*.
- 5. The travel accountant should review and audit all charges on the statement for accuracy and completeness.
- 6. Charges on the statement should be cross- reference against travel vouchers submitted by travelers and reference document numbers should be noted on the statement.
- 7. Any discrepancies and variances should be investigated and resolved.
- 8. Notable large discrepancies should be addressed with the financial manager.
- 9. After the audit is completed, a document number should be assigned and noted on the document number log.
- 10. The statement should be entered in CAPPS for processing and payment.
- 11. The senior accountant should review the entries for errors to accounting strings.
- 12. The payment should be sent for approval to the Financial manager.
- 13. The travel accountant should update the performance log with statement date, payment and document numbers.
- 14. After payment is sent, the senior accountant should update the document log with payment number from USAS.
- 15. Payment vouchers are filed accordingly in the travel accountant's file system.

#### Hotel Engine Direct Billed - Travel

- 1. Hotel engine direct bills hotels for hotel charges by travelers for state travel.
- 2. Hotel engine direct billed statements are received by the agency monthly via email to accounts.payable mailbox.
- 3. When the Hotel engine statement is received by the agency, it should be routed to the travel accountant for audit and processing of payment.
- 4. The travel accountant should stamp the statement with date of receipt. The agency has 30 days to settle payment for the charges from the date of receipt\*.
- 5. The travel accountant should review and audit all charges on the statement for accuracy and completeness.
- 6. Charges on the statement should be cross- reference against travel vouchers submitted by travelers and reference document numbers should be noted on the statement.
- 7. Any discrepancies and variances should be investigated and resolved.
- 8. Notable large discrepancies should be addressed with the financial manager.
- 9. After the audit is completed, a document number should be assigned and noted on the document number log.
- 10. The statement should be entered in CAPPS for processing and payment.
- 11. The senior accountant should review the entries for errors to accounting strings.
- 12. The payment should be sent for approval to the Financial manager.
- 13. The travel accountant should update the performance log with statement date, payment and document numbers.



- 14. After payment is sent, the senior accountant should update the document log with payment number from USAS.
- 15. Payment vouchers are filed accordingly in the Travel accountant's file system.

#### Enterprise Direct Billed Rentals - Travel

- 1. Enterprise rental cars direct bills the agency for rentals used by travelers for state travel.
- 2. Enterprise statements are received by the agency weekly.
- 3. Enterprise statement are received by the agency at the accounts payable email box.
- 4. The agency has 30 days to settle payment for the charges from the date of the email.
- 5. The travel accountant should review and audit all charges on the statement for accuracy and completeness.
- 6. Charges on the statement should be cross- reference against travel vouchers submitted by travelers and reference document numbers should be noted on the statement.
- 7. Any discrepancies and variances should be investigated and resolved.
- 8. Notable large discrepancies should be addressed with the financial manager.
- 9. After the audit is completed, a document number should be assigned and noted on the document number log.
- 10. The statement should be entered in CAPPS for processing and payment.
- 11. The senior accountant should review the entries for errors to accounting strings.
- 12. The payment should be sent for approval to the Financial manager.
- 13. The travel accountant should update the performance log with statement date, payment and document numbers.
- 14. After payment is sent, the senior accountant should update the document log with payment number from USAS.
- 15. Payment vouchers are filed accordingly in the Travel accountant's file system.

### **Disputes with Vendors**

- 1. The Purchaser should compile all relevant information including the following before contacting vendor to report issue.
  - i. the invoice number and amount
  - ii. date the goods/services were received by the agency
  - iii. the document number that was entered in USAS for payment
  - iv. the dates of payment(s) if made
- 2. The Purchaser should follow-up with email communication until the issue is resolved with the vendor.



3. The Purchaser should document all communications and communicate outcome of dispute with senior accountant and financial manager.

#### <u>Citibank Procurement Card Purchases</u>

- 1. The Citibank procurement card is used by the agency for purchases requiring immediate payment.
- 2. The Citibank procurement card statement is received by the agency monthly.
- 3. When the Citibank procurement card statement is received by the agency, it should be routed to the senior accountant for audit and processing of payment.
- 4. The senior accountant should stamp the statement with date of receipt. The agency has 30 days to settle payment for the charges from the date of receipt\*.
- 5. The senior accountant should review and audit all charges on the statement for accuracy and completeness.
- 6. Charges on the statement should be cross- reference against POs submitted and invoices received.
- 7. Any discrepancies and variances should be investigated and resolved.
- 8. Notable large discrepancies should be addressed with the financial manager.
- 9. After the audit is completed, a document number should be assigned and noted on the document number log.
- 10. The statement should be entered in CAPPS for processing and payment.
- 11. The senior accountant should review the entries for errors to accounting strings.
- 12. The payment should be sent for approval to the Financial manager.
- 13. After payment is sent, the senior accountant should update the document log with payment number from USAS.
- 14. Payment vouchers are filed accordingly in the senior accountant's file system.

### Monthly payments PO's and Interagency Transfer Voucher "ITV" Payments

- Recurring billing purchases require open purchase orders and are created at the
  beginning of the fiscal year by the senior accountant. The total dollar amount assigned
  to each purchase order is determined by the financial services manager according to the
  agency budget.
- 2. The senior accountant is responsible for maintaining the agency's ongoing service accounts with vendors which (and include but not limited to):
  - i. Wireless provider, Verizon.
  - ii. Texas Department of Information Resources, DIR
  - iii. Mail services



- 1. USPS through the Comptroller's office CPA
- 2. FedEx -
- iv. Texas State Library and Archives TSLA
- v. Texas Department of Public Safety DPS
- vi. State Office of Risk Management SORM
- vii. Pitney Bowes Reserve Account
- viii. Xerox Copy machines
- ix. Work Quest document destruction services
- x. Workers Assistance Program WAP
- 3. Invoices for monthly and quarterly service accounts should be routed to the senior accountant for audit and payment.
  - For ITV payments: the invoice received should be date-stamped by the senior accountant, the invoice and payment information should then be entered in the ITV tab of the excel document log.
- 4. The senior accountant should audit invoices received for accuracy and completeness. Any discrepancies should be addressed and resolve prior to payment.
- 5. Payments for services verified should be entered in CAPPS for approval by the Financial manager and submission to USAS.
- 6. The financial manager should pre-release payments in CAPPS/USAS.
- 7. The document log should be updated with payment information processed that day.
- 8. The senior accountant should review the DAFR report the business day following payment to verify payments processed correctly.
- 9. The document log should be updated to reflect payment numbers from the DAFR report.
- 10. Payment vouchers are filed accordingly in the senior accountant's file system.

# Interagency Transfer Voucher "ITV" Payments

Once the invoice has been received and date-stamped by the senior accountant, the invoice should be entered into the ITV tab of the excel document log.

# **Revenue Money Mail and Deposits**

- 1. Money mail arrives by USPS and should be routed to the travel accountant.
- 2. The travel accountant opens mail and endorses all check and money orders; applications with corresponding payments should be arranged and routed to the senior accountant.
- 3. Mail not pertaining to the financial department is routed to the appropriate staff.



- 4. Applications for exams and certifications with corresponding payments should be reviewed and processed by the senior accountant.
- 5. Funds should be applied to the proper account holder in FARM for the corresponding application.
- 6. Any discrepancies in the applications should be routed to the corresponding department to address any issues. Funds should be applied to the account holder even if the application has discrepancies.
- 7. The senior accountant should compile all checks and money orders processed during the day into the day's deposit.
- 8. The daily report should be printed through FARM's Documents section.
- 9. Travel accountant verifies deposit for accuracy and completeness.
- 10. The senior accountant will verify totals of checks and money orders received against the daily report. Any discrepancies should be researched and resolved.
- 11. The senior accountant will enter the daily revenue totals in the Cash Receipts module of CAPPS.
- 12. The accounting entries in CAPPS should be reviewed for accuracy and completeness. Any variances should be investigated and resolved.
- 13. The deposit slip is printed in CAPPS and the deposit approved to be sent to USAS.
- 14. The deposit slip and accompanying checks and money orders should be routed to the travel accountant to verify totals are correct. Discrepancies should be addressed if they exist.
- 15. The travel accountant is responsible to transport the deposit to the Treasury.
- 16. Deposits should be deposited in the Treasury within 72 hours of receipt.
- 17. The Financial manager should pre-release the deposit in USAS/CAPPS.
- 18. The senior accountant should review the DAFR report the following business day to verify funds were properly applied to the agency's accounts.
- 19. Deposit documentation are filed accordingly in the senior accountant's file system.

#### Online Revenue

- 1. Online revenue is processed by Texas.gov. Review of the agency's account is accessible at <a href="https://tpe2admin-tx.cdc.nicusa.com/texas/Login.aspx">https://tpe2admin-tx.cdc.nicusa.com/texas/Login.aspx</a>
- 2. The senior accountant should review the USAS PPLEXT file and Texas.gov payments excel files to reconcile online deposited funds for accuracy and completeness.
- 3. Any discrepancies and variances should be investigated and resolved.
- 4. Unresolved discrepancies should be forwarded to the Financial manager.
- 5. The senior accountant updates the FYXX USAS FARM NIC.xlsx file on the Shared drive under G:\0x-Books

#### General Ledger Entries



- 1. The senior accountant is responsible for general ledger entries.
- 2. General Ledgers entries are originated by the financial manager and submitted to the senior accountant for entry in CAPPS and USAS.
- 3. General ledger entries are sent for approval and release by the financial manager.
- 4. Any general ledger entries needing the agency's appropriation control officer (ACO) review and release should be entered with a following notification to the ACO for review and release.

### Transfer of funds (Fund 0802)

- 1. The senior accountant should review the balance in Appropriation 13014, Fund 0802 (License Plate's Fire Fighters Trust fund) by the first business day of each month.
- 2. The balance of the fund should be noted for transfer out.
- 3. The senior accountant should complete the payment voucher in CAPPS in the amount of fund 0802 balance.
- 4. The payment voucher should be submitted to the financial manager for approval and release in CAPPS/USAS.
- 5. The senior accountant should verify and reconcile the payment voucher the following next business day.
- 6. When the warrant arrives at the agency, the senior accountant should verify the amount and payee is correct. The warrant should be mailed to the Fire Fighters Relief and Scholarship Fund within one business day.

### **Reconciliations - Daily**

- 1. The senior accountant is responsible for reconciling the agency's accounts.
- 2. Daily reconciliations of payments and revenue are performed by the senior accountant.
- 3. The senior accountant should refer to the DAFR and PPLEXT files on USAS to reconcile processed payments and agency revenue received by the state Treasurer both through the online portal and money mail.
- 4. Any discrepancies on reconciliations should be noted and resolved. The senior accountant should discuss discrepancies and resolutions with the financial manager.
- 5. If discrepancies need to involve the agency's ACO or Texas.gov, all discussions and resolutions should be documented.



- \* The agency has a policy to pay invoices and statements of charges within 30 days of receipt of an accurate invoice/statement. If corrections are needed on an invoice or statement, the agency has a policy to pay invoices/statements within 30 days of receipt of corrected invoice/statement.
- \*\* Financial manager is the backup for the Travel accountant/Purchaser.

  Senior accountant is the backup for the Financial manager.

  Travel accountant/Purchaser is the backup for the Senior accountant.



# A Follow-Up Audit of the Texas Commission on Fire Protection

Audit Report #411F-23-01
August 9, 2023

Glenn Hegar
Texas Comptroller of Public Accounts

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# **Executive Summary**

# **Purpose and Scope**

In May 2023, the Texas Comptroller of Public Accounts (Comptroller's office) completed a follow-up audit of the Texas Commission on Fire Protection (Commission) to check the status of the open recommendations the Comptroller's office made in the most recent post-payment audit.

This audit was selected for follow-up using a risk-based approach and the significance of issues found during the recent full-scope audit. The follow-up audit scope is limited to verifying that the Commission has designed and implemented controls to address issues noted in the previous audit, unless auditors become aware of significant potential issues during planning or fieldwork.

The objectives of this follow-up audit were to determine whether the payroll, purchase/payment cards, grants, system access and payment processing made in the post-payment audit (audit report number 411-20-01) issued Sept. 13, 2021, were implemented and to determine whether the expenditures since December 2021 have complied with applicable state laws and rules concerning expenditures and with processing requirements of the Uniform Statewide Accounting System (USAS) and the Uniform Statewide Payroll/Personnel System (USPS).

# **Background**

The auditors consider recommendations:

- **Implemented** when the agency staff has provided sufficient and appropriate evidence to support all elements of the recommendation.
- In Progress when agencies have specific plans to begin or have begun to implement the recommendation and intend to fully implement it.
- Not Implemented when evidence does not show meaningful movement toward implementation, when no evidence of implementation has been provided, when implementation has started but is expected to take more time, so there has been no measurable progress yet, or when a new recommendation was issued within the last three months.
- Not Tested when an agency did not process any transactions of the type that is tested during the audit period.

The audit methodology included reviewing the Commission's corrective action plan and implementation timeline created in response to the post-payment audit. Auditors also selected samples of transactions, reviewed supporting documentation submitted by the Commission, and met with agency staff.



# **Audit Results**

The Commission stated that it continues to work on the outstanding recommendations.

Of the 13 recommendations selected for review:

- Two recommendations were implemented.
- Four recommendations were not implemented.
- Six recommendations are in progress.
- One recommendation was not tested.



# **Detailed Information**

# **Payroll**

Auditors developed a sample of five payroll transactions totaling \$18,310 to ensure the Commission complied with the General Appropriations Act (GAA), **Texas Payroll/Personnel Resource (FPP F.027)** and relevant statutes. Below is a list of the previous payroll findings and the follow-up audit results.

September 2021	September 2021	Reported	May 2023	Implementation
Audit Findings	Audit Recommendations	Implementation/Actions Taken	Testing	Status
Incorrect state effective service date/Incorrect ongevity payment	The Commission must review its controls and personnel records to ensure accuracy and completeness. 34 Texas Administrative Code Section 5.40(c)(2) states each state agency must ensure its internal operating procedures include quality control measures that will detect and prevent any incorrect compensation to an employee. The Commission must ensure it follows its internal policies, verifies previous state employment when it is listed on an application or other applicable form, and enters the prior employment in USPS. Additionally, the Commission should consider enhancing its procedures to include the State of Texas Employment History Application during the new hire process to ensure employees receive state service credit for eligible periods of state employment.	The agency has completed the resolution on this issue. Procedures were reviewed to ensure compliance.	Auditors found that the Commission failed to obtain a prior state service verification for one employee, which resulted in an incorrect effective service date. The employee is not entitled to longevity yet.	In Progress



# **Purchase/Payment Cards**

Auditors developed a sample of 12 purchase transactions totaling \$19,524.26 and five payment card transactions totaling \$4,457.30 to ensure the Commission complied with the GAA, **expendit (FPP I.005)** and relevant statutes. Below is a list of previous purchase and payment card findings and the follow-up audit results.

September 2021 Audit Findings	September 2021 Audit Recommendations	Reported Implementation/Actions Taken	May 2023 Testing	Implementation Status
Annual procurement plans not submitted	The Commission must ensure staff updates the procurement plan and submits it to the Comptroller's office annually by November 30 using the template provided on the Comptroller's office website.	The agency will submit the annual procurement plan prior to the deadline for this current calendar year. Procedures have been updated to reflect this requirement for future years.	Auditors found that the Commission did not submit the annual procurement plans for fiscal 2021 and fiscal 2022. The Commission did not update its policies and procedures to add the annual procurement plan submission requirement.	Not Implemented
Incorrect procurement method used	The Commission must ensure staff uses the correct purchasing method as outlined in the State of Texas Procurement and Contract Management Guide. If TCI or WorkQuest offers a product or service, but the Commission has justification to source from a different vendor, staff must obtain appropriate waivers or document the exceptions before purchase and must document that in the procurement file.  In addition, the Commission must ensure its policies and training materials include instructions for using the correct purchasing method and maintaining necessary supporting documentation.	The agency reviewed procedures to ensure correct procurement methods will continue to be utilized as outlined in the contract guide.	Auditors found that one purchase transaction did not contain documentation on why TCI or WorkQuest was not selected.	In Progress



September 2021 Audit Findings	September 2021 Audit Recommendations	Reported Implementation/Actions Taken	May 2023 Testing	Implementation Status
Missing receiving documentation	The Commission must ensure staff does not make payments for goods or services without adequate supporting documentation to justify and validate each purchase. An employee independent from the purchasing process should confirm that goods and services were received as expected and should retain the confirmation in agency records.  The Commission must also ensure its policies and training materials include instructions on performing and documenting the confirmation of goods and services received, maintaining necessary supporting documentation, and meeting the minimum requirements and expectations for the purchasing and payment review/approval process.	The agency reviewed procedures to comply with this requirement.	Auditors found that one purchase transaction did not contain verification of services received.	In Progress
Missing documentation of warrant hold check	The Commission must check the vendor's warrant hold status before making any payment card purchase over \$500 and must retain the results of the check in the payment card file as evidence.	Procedures on warrant hold checks were expanded to include documentation.	Auditors found that four payment card documents did not contain documentation that the warrant hold check was conducted prior to the purchase.	Not Implemented
Missing proprietary purchase justification	The Commission must ensure staff completes and retains a proprietary purchase justification when a purchase of goods or services specifies only one manufacturer, product or provider. In addition, the Commission must ensure its policies and training materials include instructions for completing the proprietary purchase justification.	The agency has reviewed procedures to ensure compliance with this recommendation.	The Commission did not have any proprietary purchases to test during the audit period.	Not Tested



				- 0
September 2021 Audit Findings	September 2021 Audit Recommendations	Reported Implementation/Actions Taken	May 2023 Testing	Implementation Status
Untimely purchase order (PO) and missing detailed scope of work, terms and conditions	The Commission must ensure that staff finalizes a PO and provides it to the vendor before ordering goods or allowing the vendor to perform services. The PO must include a detailed scope of work and the terms and conditions of the purchase for the vendor to fulfill its obligations, as well as any exceptions that have been accepted.  When payments to a vendor are for direct and indirect costs actually incurred (the cost reimbursement methodology), additional specifications such as per diem rates, expense limits, and requirements for using the most cost-effective options and maintaining supporting documentation should be included in the PO to provide guidance and expectations for acceptable expenses. Staff should include accurate estimates of all travel expenses related to the services purchased in the PO.	The agency has reviewed procedures to ensure compliance with this recommendation.	Auditors found that all POs were processed in a timely manner. However, four purchase transactions did not contain the detailed scope of work, terms and conditions.	In Progress
Commission Branco				

#### **Commission Response**

The agency agrees. Due to an oversight by the previous finance manager, the agency failed to submit annual procurement plans for 2021 and 2022. The agency has current policies and procedures in place to prevent future oversights. The agency will add more details for each PO. The agency will also conduct warrant hold checks prior to completing the purchase and will also include proper documentation for methods of procurement and receiving documentation.



#### **Grants**

Auditors developed a sample of five grant transactions totaling \$13,412.48 to ensure the Commission complied with the GAA, state laws and regulations pertaining to grants. Below is a list of previous grant findings and the follow-up audit results.

September 2021	September 2021	Reported	May 2023	Implementation
Audit Findings	Audit Recommendations	Implementation/Actions Taken	Testing	Status
Missing grant agreement and published purpose	To ensure funds are used to provide emergency relief and college scholarships to professional firefighters and their dependents, the Commission must maintain sufficient controls over the grant funds by:  • Creating a formal grant agreement with the receiving organization to document the assignment, expectations, and any terms and conditions related to the grant funds.  • Considering implementation of procedures to monitor the receiving organization's compliance with the grant agreement.  The Commission must also publish the purpose of the grant on its public website and provide the website link to the Comptroller's office.	The agency is in discussion with the firefighters scholarship fund and a memorandum of understanding (MOU) between the organizations will be completed prior to the end of the calendar year. The MOU will address the issues noted.	The Commission did not provide or publish on its website a grant agreement or an MOU between the Commission and the firefighters scholarship fund. The MOU was not developed until after audit fieldwork began. The Commission published the grant information on its website during fieldwork.	Not Implemented

#### **Commission Response**

Agency agrees. The agency is working with the association that receives the funds from the professional firefighter license plates that is funneled to our agency from another state agency. Those funds are managed by the receiving association for the purpose of emergency relief and scholarships for professional firefighters and their dependents.



# **Targeted Analysis**

Auditors reviewed the Commission's procedure to comply with the federal mandate to properly identify and handle payments involving the international movement of funds. Below is the previous Direct Deposit Authorization form finding and the follow-up audit result.

Incomplete Direct Deposit Authorization forms  The Commission must ensure all payees requesting direct deposit payments submit a completed, signed Direct Deposit Authorization form with the international payment verification question answered. The Commission should process a Direct Deposit Authorization form only if it is the proper, signed form with a completed international payment verification section.  The agency has reviewed procedures to ensure compliance with this recommendation.  Auditors found that the international verification question answered for the five Direct Deposit Authorization forms reviewed.	September 2021 Audit Findings	September 2021 Audit Recommendations	Reported Implementation/Actions Taken	May 2023 Testing	Implementatior Status
	Direct Deposit Authorization	all payees requesting direct deposit payments submit a completed, signed Direct Deposit Authorization form with the international payment verification question answered. The Commission should process a Direct Deposit Authorization form only if it is the proper, signed form with a completed international payment	procedures to ensure compliance with this	found that the international verification question was answered for the five Direct Deposit Authorization	Implemented
Commission Response	Commission Respo	nse			



# **System Access and Payment Processing**

Auditors reviewed certain limitations the Commission placed on its accounting staff's ability to process expenditures. Auditors reviewed the Commission's security in USAS, USPS, Texas Identification Number System (TINS) and voucher signature cards that were in effect on April 6, 2023. Below are the previous findings for internal control structure, system security, missing Confidential Treatment of Information Acknowledgement (CTIA) forms and the follow-up audit results.

September 2021 Audit Findings	September 2021 Audit Recommendations	Reported Implementation/Actions Taken	May 2023 Testing	Implementation Status
Failure to notify Comptroller to remove employee from signature card	The Commission must ensure compliance with security revocation requirements for terminated employees. It must also ensure the person responsible for sending the revocation notifications to the Comptroller's office is aware of terminations on or before the termination date and follows up with the Comptroller's office to ensure receipt of the notification and confirm the revocation occurred.	The agency has reviewed established procedures to ensure compliance with this recommendation.	Auditors found that the Commission failed to notify the Comptroller's office to remove one out of two terminated employees from the signature card.	In Progress
Failure to request security access removal	The Commission must ensure compliance with the security revocation requirements for terminated employees. It must also ensure the person responsible for sending the termination notifications to the Comptroller's office is aware of the employee's termination date and follows up with the Comptroller's office to ensure receipt of the notification and confirm the revocation occurred.	The agency has reviewed established procedures to ensure compliance with this recommendation.	Auditors noted that the Commission submitted the required documentation to remove the terminated employee's security access as required.	Implemented
Missing Confidential Treatment of Information Acknowledgment (CTIA) form	The Commission should enhance its procedures to ensure no user gains access to any of the statewide financial systems before completing a CTIA form.	The agency has reviewed established procedures to ensure compliance with this recommendation.	Auditors found that the Commission provided the CTIA forms for two employees. However, one of the forms was signed after the employee connected to Comptroller's office system.	In Progress



September 2021	September 2021	Reported	May 2023	Implementation
Audit Findings	Audit Recommendations	Implementation/Actions Taken	Testing	Status
Control weaknesses over expenditure processing	The Commission should review the controls over expenditure processing and segregate each task to the maximum extent possible to ensure no individual is able to process payments without oversight. Auditors strongly recommend the Commission:  • Elect to have the document tracking control edit on the USAS Agency Profile (D02) set to either prevent a user who enters or alters a batch from releasing that same batch, or to warn a user who attempts to release his or her own entries or charges. Additionally, the Commission should review the preventive and detective controls over expenditure processing discussed in USAS Accounting and Payment Control (FPP B.005), such as the Risky Document Report (DAFR9840), which identifies documents the same user entered or altered, then released for processing.  • Work with the Comptroller's office Statewide Fiscal Systems security staff to set up user profiles that separate the entry and approval of payroll transactions in USAS/USPS.  • Limit the access of users who can set up a user profile, process/release payroll and change employee direct deposit information in USPS. An individual must not be able to hire or change employee payment instructions and process/release (approve) payroll for the same employee.	The agency is aware of these risks. The agency is limited by the size of staff and mitigates the risk through direct oversight by management and existing staff. For guaranteed continuation of services to the stakeholders, the agency has multiple users who are able to complete authorizations and approvals if staff were to be diminish in any form. The agency acknowledges these inherent risks of small organizations and has incorporated established reconciliation and review procedures which mitigate the risk to acceptable levels.	Auditors found that one employee had multiple security weaknesses related to USAS, USPS, TINS, and signature cards at the time of the follow-up review.	Not Implemented



September 2021	September 2021	Reported	May 2023	Implementation
Audit Findings	Audit Recommendations	Implementation/Actions Taken	Testing	Status
Control weaknesses over expenditure processing (CONTINUED)	<ul> <li>Limit the access of users who can enter/change or release/approve a voucher in USAS to view only access in TINS (PTINS02). An individual should not be able to create or approve a payment and create or change a vendor profile/direct deposit information.</li> <li>Limit user access by removing the user from the signature card or by removing the user from the Authorization for Warrant Pickup list.</li> <li>Limit the access of users who can approve paper vouchers (by being on the signature card) to view-only access in TINS (PTINS02). An individual must not be able to change vendor/employee profile/direct deposit information and approve a payment.</li> <li>Ensure that employees who can process a payment voucher in USAS/create a paper voucher (by being on the signature card) do not have the ability to change the warrant hold status of a vendor in TINS.</li> </ul>			Not Implemented

The agency agrees. There was an oversight where the previous finance manager failed to revoke authorization on the signature card. This was corrected as soon as current management was made aware of the situation. The agency has current policies and procedures in place to prevent future oversights for the signature cards and CTIA forms. Due to the size of the agency, there is going to be an inherent risk over controls over expenditure processing. The agency is working to maximize both separation of duties and business continuity with limited staff and review control structures as suggested in the findings.



# **Appendix**

# Objectives, Scope, Methodology, Authority and Team

## **Audit Objectives**

The objectives of this follow-up audit were to determine whether the recommendations made in the post-payment audit (audit report number 411-20-01) issued Sept. 13, 2021, were implemented.

### **Audit Scope**

Auditors selected transaction samples of the Texas Commission on Fire Protection (Commission) covering the open recommendations the Comptroller's office made in the most recent post-payment audit. 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 follow-up audit and verify that the Commission has designed and implemented controls to address issues noted in the previous audit.

#### **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**

Eunice Miranda, CTCD, CTCM, Lead Auditor