

**OFFICE OF CONSUMER CREDIT  
COMMISSIONER**  
Austin, Texas

INTERNAL AUDIT ANNUAL REPORT

Fiscal Year 2024



OFFICE OF CONSUMER CREDIT COMMISSIONER  
Austin, Texas

Annual Internal Audit Report  
Fiscal Year 2024

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# Garza/Gonzalez & Associates, LLC

CERTIFIED PUBLIC ACCOUNTANTS

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Finance Commission Members and  
Audit Committee Members  
Office of Consumer Credit Commissioner  
Austin, Texas

We performed procedures to assess the effectiveness and efficiency of the Office of Consumer Credit Commissioner's (OCCC) internal control structure over Examinations: Data Collection Area (Area); and, its compliance with the Area's established policies and procedures, for the 8 months ended April 30, 2024.

The results of our procedures disclosed that OCCC's internal control structure over the Area was generally adequate and no material instances of noncompliance were noted. However, we did identify certain matters, included in this report, that are opportunities for strengthening internal controls and ensuring compliance with OCCC's established policies and procedures. Based on the degree of risk or effect of these matters in relation to the audit objective, they were rated as Priority, High, Medium, or Low, as further described in the "Summary and Related Rating of Observations/Findings and Recommendations" section of this report.

We also conducted a follow-up on the findings and recommendations presented in the prior year's internal audit reports that were not fully implemented. This report reflects the results and implementation status of our follow-up procedures, and includes all information required for compliance with the State of Texas Internal Audit Annual Report requirements. It has been prepared by Garza/Gonzalez & Associates, an independent Certified Public Accounting firm, following Generally Accepted Government Auditing Standards, International Standards for the Professional Practice of Internal Auditing, and the Institute of Internal Auditors' Code of Ethics contained in the Professional Practices Framework.

We have discussed the comments and recommendations from the audit of the Area, as well as the implementation status from the follow-up procedures performed, with various OCCC personnel. We would be pleased to discuss these matters with you in further detail.



June 14, 2024

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INTRODUCTION

The Office of Consumer Credit Commissioner (OCCC) operates pursuant to Chapter 14 of the Texas Finance Code, and under the oversight of the Finance Commission of Texas, who appoints the Consumer Credit Commissioner. OCCC's mission is to regulate nonbank financial services and to educate consumers and industry providers. OCCC has authority to regulate consumer credit transactions and interest rates in Texas, offers protection to consumers, coordinates educational efforts aimed at consumers and industry alike, and advises lenders on compliance issues.

OCCC examines licensed financial service providers, such as motor vehicle sales finance companies, regulated lenders, payday/title loan lenders, and pawnshops/pawn employees, to ensure compliance with applicable statutes and regulations. OCCC also engages in investigations of registered creditors and debt management and settlement providers.

OCCC was granted Self-Directed, Semi Independent (SDSI) status in the 81st Legislative Session. As an SDSI agency, OCCC is not required to have their budget approved by the Legislature; instead, the Finance Commission is responsible for setting OCCC's spending authority or limits. OCCC's entire operating funds are generated from fees assessed to the businesses it supervises and are used to fund both, direct and indirect costs. General revenue funds are not used to support OCCC's operations.

**2024 Internal Audit Plan**

Following are the internal audit functions performed, as identified in OCCC's 2024 Internal Audit Plan, dated January 23, 2024, and approved by the Audit Committee and Finance Commission on February 16, 2024:

- Risk Assessment & Preparation of the 2024 Internal Audit Plan
- Examinations: Data Collection Area Audit
- Follow-up of Prior Year Internal Audits
- Preparation of the 2024 Internal Audit Annual Report
- Other Tasks

This report contains the results of the Examinations: Data Collection Area Audit, reflects the results of the follow-up procedures performed this year on the findings from the prior year's internal audit reports, and meets the State of Texas Internal Audit Annual Report requirements.

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### I. Compliance with Texas Government Code, Section 2102.015: Required Posting of Internal Audit Information

To comply with the provisions of Texas Government Code, Section 2102.015 and the State Auditor's Office guidelines, within 30 days after approval by the Finance Commission, OCCC will post the following information on its website:

- An approved fiscal year 2025 audit plan, as provided by Texas Government Code, Section 2102.008.
- A fiscal year 2024 internal audit annual report, as required by Texas Government Code, Section 2102.009.

The internal audit annual report includes any weaknesses, deficiencies, wrongdoings, or other concerns raised by internal audits and other functions performed by the internal auditor, as well as a summary of the actions taken by OCCC to address such concerns.

### II. Consulting and Nonaudit Services Completed

The internal auditor did not perform any consulting services, as defined in the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing* or any non-audit services, as defined in the *Government Auditing Standards*, 2018 Revision, Technical Update April 2021, Sections 3.64-3.106.

### III. External Quality Assurance Review

The internal audit department's most recent *Peer Review Report*, dated December 15, 2021, indicates that its system of quality control has been suitably designed and conforms to applicable professional standards in all material respects.

### IV. Internal Audit Plan for Fiscal Year 2024

The approved Internal Audit Plan (Plan) included one audit to be performed during fiscal year 2024. The Plan also included a follow-up on prior year internal audit recommendations that were not fully implemented as of fiscal year 2023, other tasks as may have been assigned by the Finance Commission or Audit Committee, and, preparation of the 2024 Internal Audit Annual Report.

#### Risk Assessment

Utilizing information obtained through the completed questionnaires received and background information reviewed, 12 areas<sup>1</sup> were identified as potential audit topics. A risk analysis utilizing 8 risk factors was completed for each individual audit topic and then compiled to develop an overall risk assessment.

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<sup>1</sup> Excludes the TFEE Fund Investment Portfolio Administration area, as it requires a biennial audit.

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Following are the results of the risk assessment performed for the 12 potential audit topics identified:

HIGH RISK	MODERATE RISK	LOW RISK
Payroll and Human Resources Examinations Legal and Enforcement	Management Information Systems [(MIS) Includes Disaster Recovery Plan] Business Licensing Procurement/Contract Management/HUB	Fiscal Division (Includes Asset Management & Travel) Revenue Accounting Process Complaint Intake and Investigation Business Registration & Professional Licensing Records Management TFEE Fund Grant Administration

In the prior 3 years, the following audits and functions were performed by the internal auditor:

Fiscal Year 2023:

- Risk Assessment & Preparation of the Internal Audit Plan
- TFEE Fund Investment Portfolio Administration Audit (*Required Periodic Audit*)
- Human Resources and Payroll Audit
- Follow-up of the Prior Year Internal Audits
- Preparation of the Internal Audit Annual Report

Fiscal Year 2022:

- Risk Assessment & Preparation of the Internal Audit Plan
- Regulated Lenders Examinations Audit
- Follow-up of the Prior Year Internal Audits
- Preparation of the Internal Audit Annual Report

Fiscal Year 2021:

- Risk Assessment & Preparation of the Internal Audit Plan
- TFEE Fund Investment Portfolio Administration Audit (*Required Periodic Audit*)
- Fiscal Division (Includes Fixed Assets & Travel) Audit
- Follow-up of the Prior Year Internal Audits
- Preparation of the Internal Audit Annual Report

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The internal audits and other tasks performed for fiscal year 2024 were as follows:

<b>Report No.</b>	<b>Audits/Report Titles</b>	<b>Report Date</b>
1.	Examinations: Data Collection <i>Objective:</i> To assess the access levels to examination applications to ensure authorized handling of examination data, and to evaluate the design and operation of internal controls over examination data collection. This was to ensure the validity, accuracy, and completeness of the data entered into or extracted from the database, supporting monitoring and reporting activities.	6/14/2024
1.	Internal Audit Annual Report – Follow-up of findings and recommendations that were presented in the Prior Year Internal Audit Report.  <i>Includes all reported audit results for Fiscal Year 2024.</i>	6/14/2024
-	Other Tasks Assigned by the Finance Commission or the Audit Committee	None

## V. Executive Summary

### Examinations: Data Collection (Area)

#### BACKGROUND

OCCC's Consumer Protection department is responsible for examining licensed financial service providers to ensure compliance with laws and regulations designed to protect consumers. The department is also responsible for ensuring that information obtained during examinations is kept confidential. These examinations are conducted by financial examiners based in 3 regional offices: Dallas-Fort Worth, Houston, and San Antonio. Additionally, the Senior Staff and Admin Support operate from the Austin office. Effective January 1, 2022, OCCC also conducts annual examinations of at least 10 registered crafted precious metals dealers.

Examinations are typically scheduled by the supervising examiner at each regional office using a risk-based approach, considering factors such as examiner availability and travel budget. A risk score, calculated in ALECS (described below), is assigned to each licensee based on factors such as complaints, the previous examination date and results, and the entity's size. Examinations for secondary mortgage lenders regulated by the Finance Code Chapter 342, Subchapter G and the Texas Constitution, Article XVI, Sec. 50(a), and property tax lenders regulated by the Finance Code Chapter 351, collectively referred to as "mortgage examinations", are conducted at least every 5 years to meet the Conference of State Bank Supervisors (CSBS) accreditation standards.

#### ALECS

In March 2017, OCCC's examination module was fully integrated into the agencywide regulatory information management system, ALECS (Application, Licensing, Examination, and Compliance System). Changes to ALECS require a formal change management process, prioritizing critical changes such as cybersecurity and regulatory requirements.

Access to examination data and work papers in ALECS is controlled by the following 2 matrices:

- **User Roles:** Users are assigned the minimum roles (Examiner, Review Examiner, Exam Tech, etc.) necessary to perform their duties.
- **Examiner Permissions:** ALECS only allows examination assignments to qualified examiners who have successfully completed training for that license type.

The Austin Senior Staff reviews ALECS access for the Consumer Protection staff during the agencywide annual user account review. The most recent review occurred in October 2023.

Key ALECS controls relevant to examination data include:

- Standardized input data via pull-down selection menus.
- Automatic entry of dates triggered by user actions.
- Identification and enforcement of required field to ensure data completeness.
- Restriction of examination work paper modifications to the assigned financial examiner during the examination process, with no modifications allowed after finalization.

Supervising examiners and Austin Senior Staff use various reports extracted from ALECS to schedule, track, and monitor examinations. Examination data in ALECS is also the source for performance measures reported to the Finance Commission.



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### **State Examination System (SES)**

SES is a supervisory platform suite developed for state financial regulatory agencies and administered by CSBS. OCCC financial examiners participating in multistate mortgage examinations are granted access to SES, as those examinations are conducted within the SES. While examination work papers are maintained in SES, all other examination data, such as examiner assignments and dates, is maintained in ALECS. OCCC's designated SES Account Administrators receive monthly notification in SES to either confirm existing user accounts or submit change requests. During the audit period, 4 examinations were initiated in SES.

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### **Audit Objective, Scope, and Methodology**

#### **Objective**

The objective of our audit was to assess the access levels to examination applications to ensure authorized handling of examination data and to evaluate the design and operation of internal controls over examination data collection. This was to ensure the validity, accuracy, and completeness of the data entered into or extracted from the database, supporting monitoring and reporting activities.

#### **Scope**

The scope of our audit included reviewing the Area's policies, procedures, and processes, as well as testing selected user rights and reports prepared by the Area during the period from September 1, 2023 to April 30, 2024 (audit period).

#### **Methodology**

The audit methodology included reviewing applicable laws and regulations, OCCC's established policies and procedures, and other internal and external documentation. Additionally, onsite interviews and walkthroughs were conducted with OCCC personnel.

We obtained and/or reviewed the following information:

- A. Organizational charts applicable to the Area.
- B. OCCC's written policies and procedures related to the Area.
- C. ALECS and SES user account lists.
- D. Sample scheduling, monitoring, and managerial reports.

We performed various procedures to achieve the objective of our audit, including:

1. Reviewed and obtained an understanding of the laws and regulations in the Texas Finance Code, Texas Occupations Code, and Texas Administrative Code, as applicable to the Area.
2. Reviewed the Area's written policies and procedures, and conducted interviews and walkthroughs to understand the controls, processes, and current practices in place.
3. Reviewed the current ALECS user account list against the organizational chart to determine whether the following roles assigned to users are appropriate:
  - Scheduling Manager
  - Examiner
  - Review Examiner
  - Exam Tech
4. Selected all 4 employees who separated from the Consumer Protection department subsequent to the annual ALECS account review in October 2023 through April 30, 2024, to verify timely account deactivation based on the dates documented in HR's Exit Interview Checklist and IT's Employee Network Termination Request form.

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5. Reviewed a sample of the following reports to verify completeness and consistency, and to identify unusual data values:
  - ALECS ExamSchedule (InDashboard) report
  - ALECS ScheduleAnExam (CanBeScheduled) report
  - Exam Review Program Report
  - Weekly Managers Meeting Report
6. Traced the fiscal year 2024, quarter 2 performance measures reported to the Finance Commission to the monthly summary prepared by the Admin Support. Then, traced the February 2024 calculation in the monthly summary to the corresponding ALECS report.

**VI. Observations/Findings and Recommendations**

SUMMARY and RELATED RATING of OBSERVATIONS/FINDINGS and RECOMMENDATIONS

As OCCC’s internal auditors, we used our professional judgment in rating the audit findings identified in this report. The rating system was developed by the Texas State Auditor’s Office and is based on the degree of risk or effect of the findings in relation to the audit objective(s). The table below presents a summary of the observations/findings and recommendations included in this report and the related rating.

<b>Summary of Observations/Findings &amp; Recommendations and Related Ratings</b>		
<b>Finding No.</b>	<b>Title</b>	<b>Rating</b>
1	Exam Review Status	Medium
2	ALECS Account Deletion	Low
3	Risk Score Calculation	Low
<p><u>Description of Rating</u></p> <p>A finding is rated <i>Priority</i> if the issues identified present risks or effects that if not addressed could critically affect the audited entity’s ability to effectively administer the programs(s)/function(s) audited. Immediate action is required to address the noted concern(s) and reduce risks to the audited entity.</p> <p>A finding is rated <i>High</i> if the issues identified present risks or effects that if not addressed could substantially affect the audited entity’s ability to effectively administer the programs(s)/function(s) audited. Prompt action is essential to address the noted concern(s) and reduce risks to the audited entity.</p> <p>A finding is rated <i>Medium</i> if the issues identified present risks or effects that if not addressed could moderately affect the audited entity’s ability to effectively administer programs(s)/function(s) audited. Action is needed to address the noted concern(s) and reduce risks to a more desirable level.</p> <p>A finding is rated <i>Low</i> if the audit identified strengths that support the audited entity’s ability to administer the programs(s)/function(s) audited or the issues identified do not present significant risks or effects that would negatively affect the audited entity’s ability to effectively administer the programs(s)/function(s) audited.</p>		

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**OBSERVATIONS/FINDINGS and RECOMMENDATIONS**

Report No.	Report Date	Name of Report	Observations/Findings and Recommendations
1	6/14/24	Examinations: Data Collection	<p><b>1. Exam Review Status</b></p> <p>The Exam Review Program Report dated May 27, 2024 contained 4 finalized examinations that were marked as “In-Review” status in ALECS but not assigned to a review examiner. The discrepancy resulted in the following delays as of May 27, 2024 for high-risk examinations:</p> <ul style="list-style-type: none"> <li>• Two 4-rated examinations were 167 days and 217 days past the Follow-Up Date.</li> <li>• Two 3-rated examinations were 28 days and 132 days past the Follow-Up Date.</li> </ul> <p>OCCC identified this issue for separate examinations in fiscal year 2022 and previously addressed it by submitting IT tickets to assign review examiners to those examinations.</p> <p><b>Recommendation:</b> We recommend that OCCC strengthen its current monitoring process to ensure instances described above are detected and addressed in a timely manner until a system-level solution for ALECS is implemented.</p> <p><b>Management’s Response:</b> Management agrees with the recommendation. The review of the four exams identified in the report has been completed. The exam review procedures have been updated to require a monthly evaluation of potential “in-review” discrepancies. If an exam is identified as having an “in-review” status, without an assigned review examiner, exam staff will initiate a correction. As of July 2024, there are no “in-review” exam discrepancies.</p> <p><b>2. ALECS Account Deletion</b></p> <p>Our review of ALECS account deletions for 4 terminated Consumer Protection staff disclosed 3 instances where their ALECS accounts were deleted 7 to 11 days after their last day of employment. In the absence of documentation, we were unable to determine whether other preventive measures, such as changing passwords, were taken by IT sooner. Since ALECS is a web-based application, returning agency-issued equipment alone will not prevent employees who are separating from the agency from accessing ALECS after their last day of employment.</p> <p><b>Recommendation:</b> We recommend that OCCC clarify ALECS account deletion procedure to ensure separating employees’ access to ALECS is disabled on their last day of employment.</p> <p><b>Management’s Response:</b> Management agrees with the recommendation. In the instances identified, the terminated staff members had completed the exit process through HR but were still on the payroll expending accrued leave. The OCCC has updated the network termination request form to clarify that the last day of network access is an employee’s last day of physical employment even if the employee remains on the payroll expending accrued leave. The OCCC also added a checklist item to notate the date ALECS permissions are disabled.</p>

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Report No.	Report Date	Name of Report	Observations/Findings and Recommendations
1	6/14/24	Examinations: Data Collection	<p><b>3. Risk Score Calculation</b></p> <p>The ALECS report used to schedule examinations contained 4 licensees for which the risk score was not calculated. Subsequent to our inquiry, OCCC identified 2 separate conditions that led to the risk scores not being calculated. However, the root causes of those conditions have not yet been determined.</p> <p><b>Recommendation:</b> We recommend that OCCC strengthen current monitoring to identify unusual risk score values until the root causes are identified and remedied.</p> <p><b>Management’s Response:</b> Management agrees with the recommendation. The OCCC has studied the conditions which caused the unusual risk scores. The exam scheduling procedures have been updated to address unusual risk scores. Exam staff will review the ALECVS scheduling report monthly to identify any unusual risk scores. If an unusual risk score is identified exam staff will initiate a correction. As of July 2024, there are no unusual risk scores on ALEC’s scheduling reports.</p>

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Report No.	Report Date	Name of Report	Observations/Findings and Recommendations	Status (Fully Implemented, Substantially Implemented, Incomplete/Ongoing, or Not Implemented) with explanation if not yet fully implemented
1	6/14/24	2024 Follow-Up	<p align="center"><b><u>Follow-Up of Prior Year Internal Audits</u></b></p> <p>Following is the status of the recommendations made in prior years that had not been fully implemented.</p> <p><u>Human Resources and Payroll (Report date 7/6/2023)</u></p> <p><b>1. Applications</b> OCCC should ensure applications are not only completed in their entirety, but also signed by the applicant to denote that the information provided is complete and accurate.</p> <p><b>2. HR Forms</b> OCCC should determine whether rehires are required to complete new hire forms or if previous completed forms may be relied upon. However, if new forms are not required, the previous completed forms should be located and retained in the employee’s personnel file, in accordance with OCCC’s records retention policy.</p> <p><b>3. Personnel Action Form (PAF) – Employee Classification (Observation)</b>  The HR department should conduct a review of each employee’s most recent PAF and ensure all documented information is in alignment with the correct SAO job description; and, verify agreement with what is reflected in CAPPS, which will validate the accuracy of employees’ salaries.</p> <p><b>4. Approval of Time (Observation)</b> The Payroll department should ensure that time reflected in CAPPs is approved by the employee’s supervisor prior to the employee being paid. In addition, OCCC should investigate whether supervisor approval may be bypassed to allow for payment, and, contract the Comptroller’s Office to determine why the supervisor’s approval was not evident.</p> <p><u>Fiscal Division (Report date 5/20/2021)</u></p> <p><b>1. Travel Policies &amp; Procedures (P&amp;P)</b> OCCC should update its travel policies and procedures to be consistent with current requirements and practices.</p>	<p align="center"><b>Fully Implemented</b></p> <p align="center"><b>Fully Implemented</b></p> <p align="center"><b>Fully Implemented</b></p> <p align="center"><b>Fully Implemented</b></p> <p align="center"><b>Fully Implemented</b></p>

### **VII. External Audit Services Procured in Fiscal Year 2024**

OCCC procured the internal audit services documented in the approved Internal Audit Plan for fiscal year 2024. No other external audit services were performed.

### **VIII. Reporting Suspected Fraud and Abuse**

OCCC has provided information on their website home page on how to report suspected fraud, waste, and abuse to the State Auditor's Office (SAO) by posting a link to the SAO's fraud hotline. OCCC has also developed a Fraud Prevention Policy that provides information on how to report suspected fraud, waste, and abuse to the SAO.

### **IX. Proposed Internal Audit Plan for Fiscal Year 2025**

The risk assessment performed during fiscal year 2024 was used to identify the following *proposed* areas that are recommended for internal audit and other tasks to be performed for fiscal year 2025. The Internal Audit Plan for Fiscal Year 2025 will be developed and presented to the Audit Committee and Finance Commission, for acceptance and approval, at a meeting to be determined at a later date.

- Legal and Enforcement
- TFEE Fund Investment Portfolio Administration Audit (Required Periodic Audit)
- Follow-up of Prior Year Internal Audits
- Other Tasks Assigned by the Finance Commission



ATTACHMENT

**OFFICE OF CONSUMER CREDIT COMMISSIONER**  
**History of Areas Audited**  
**For Fiscal Year 2024**

	POTENTIAL AUDIT TOPIC	Fiscal Year Audited/Reviewed											
		2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	
1	Business Licensing												
2	Business Registration & Professional Licensing	A*			B*	D							
3	Complaint Intake and Investigation				A*/B*	D							
4	Examinations			A*		D							
5	Fiscal Division (Includes Asset Management & Travel)				B	A*/D							A
6	Legal and Enforcement				B	C*/D*							
7	Management Information Systems [(MIS) Includes Disaster Recovery Plan]	E			B*	D							
8	Payroll and Human Resources				B*/E	D*							
9	Procurement/Contract Management/HUB				B	C*							
10	Records Management					C*/D*							
11	Revenue Accounting Process				B	D							
12	TFEE Fund Grant Administration		A		A*	D							

*Required Periodic Audit*

13	TFEE Fund Investment Portfolio Administration				A	D							
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Periodic vulnerability scans are performed by the DIR or a third-party procured through the DIR, which are considered standardized reviews and therefore not reflected in this schedule by year.

**Note:** 1. Performance Measures are included in the scope of the applicable audit area(s).

2. Effective FY23 —

- All examinations-related areas were combined into the "Examinations" auditable area.
- Business Registration and Professional Licensing were combined into the "Business Registration & Professional Licensing" auditable area.

**Legend (audits/reviews with an asterisk are considered limited scope for the audit area)**

- A** Internal audit performed by Garza/Gonzalez & Associates, CPAs.
- A1** Internal audit performed by McConnell & Jones LLP.
- B** Audit performed by the State Auditor's Office (SAO).
- C** Post-Payment audit performed by the Comptroller of Public Accounts (CPA).
- C1** Overpayment Recovery audit performed by the CPA.
- D** Sunset Review performed by the Sunset Advisory Commission.
- E** IT assessment performed by the Department of Information Resources (DIR) or a third-party vendor procured through the DIR.
- F** Policy review performed by the Texas Workforce Commission.