

An Audit of Report on

# Management Controls at the Texas Commission on Law Enforcement Officer Standards and Education



**Office of the State Auditor**  
**Lawrence F. Alwin, CPA**

September 1994

Report No. 95-002



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### Members of the Legislative Audit Committee:

The lack of effective management controls at the Texas Commission on Law Enforcement Officer Standards and Education is impeding the agency from accomplishing key functions effectively. As a result, the agency is not able to effectively carry out mandated responsibilities.

- The data contained within the automated system is unreliable. As a result, the agency is not able to ensure compliance with statutory and agency rule requirements.
- Controls over financial resources bypass reasonable safeguards. The accounting department is both approving and processing expenditures. The internal accounting system is also not reconciled to USAS in a timely manner. As a result, controls are not adequate to ensure that transactions are properly authorized and expended. This creates the potential for inaccuracies in accounting records to exist, and the agency may experience difficulties in preparing the annual financial report.
- The administration of the human resource function is an additional responsibility for the accounting department. Performance evaluations are not administered on an annual basis, training critical to performing job tasks is not provided, and employee job descriptions have not been updated. As a result, merit raises have been given without support, and the agency is not complying with legislation which requires annual performance evaluations. Additionally, lack of training may reduce employee productivity and professional development.

This review was requested by the agency's governing board to facilitate a transition in the agency's management by identifying opportunities for improvement in agency operations. We commend the agency for the interest and concern shown by its request for this review. We also thank the management and employees for their cooperation throughout the engagement.

Sincerely,

A handwritten signature in black ink, appearing to read "Lawrence F. Alwin".

Lawrence F. Alwin, CPA  
State Auditor

LFA/rmn

# Key Points Of Report

## An Audit Report on Management Controls at the Texas Commission on Law Enforcement Officer Standards and Education

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September 1994

### Key Findings

- The data contained within the automated system is unreliable. As a result, the agency is not able to ensure compliance with statutory and agency rule requirements.
- Controls over financial resources bypass reasonable safeguards. The accounting department is both approving and processing expenditures. The internal accounting system is also not reconciled to USAS in a timely manner. As a result, controls are not adequate to ensure that transactions are properly authorized and expended. This creates the potential for inaccuracies in accounting records to exist, and the agency may experience difficulties in preparing the annual financial report.
- The administration of the human resource function is an additional responsibility for the accounting department. Performance evaluations are not administered on an annual basis, training critical to performing job tasks is not provided, and employee job descriptions have not been updated. As a result, merit raises have been given without support, and the agency is not complying with legislation which requires annual performance evaluations. Additionally, lack of training may reduce employee productivity and professional development.

### Contact:

Paul Garner, Audit Manager (479-4765)

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*This management control audit was conducted in accordance with Government Code, Chapter 321.0133, VTCS. The Texas Commission on Law Enforcement Officer Standards and Education requested this audit.*

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## Executive Summary

The lack of effective management controls at the Texas Commission on Law Enforcement Officer Standards and Education has impeded the agency from effectively carrying out its mission. We found that the agency's management information system is not reliable, financial and human resource controls need improvement, performance and efficiency goals are not currently being met, and problems brought to the attention of management were not acted upon in a timely manner. The agency needs to address the following areas:

- The automated system does not meet user needs.
- Controls over financial resources bypass reasonable safeguards.
- Key human resource functions are not performed.
- Fund-raising for the Peace Officers' Memorial Fund is not progressing as planned.
- Lease space occupied by the agency exceeds General Services Commission guidelines.

### **The Agency's Automated System Does Not Meet The Needs Of The Users**

The data contained within the automated system is unreliable. As a result, errors have been made in awarding proficiency certificates to law enforcement officers, and the ability of the agency to monitor its rules and regulations has been impaired. The certificates are often required for career ladder progression and obtaining employment and are, therefore, critical to the professional development of law enforcement officers in Texas.

The agency uses the automated system to maintain data on approximately 75,000 law enforcement officers in Texas for the

purposes of 1) answering inquiries from law enforcement agencies and the general public, 2) monitoring compliance with the agency's rules and regulations, and 3) determining eligibility for proficiency certifications.

The existing automated system is inadequate, and efforts to develop a new system have progressed slowly. Plans to develop a new automated system began in 1992, and it is projected that the new system will not be completed until fiscal year 1997. Further compounding this problem is the fact that the automated system operates on a minicomputer which is approaching the end of its useful life and which is no longer supported by its vendor.

The agency must use an automated system because of the amount of information maintained to answer inquiries, monitor compliance, and determine eligibility for proficiency certifications. However, the manual files are the only ones which can be relied upon. The agency will be required to re-develop files for approximately 75,000 law enforcement officers. In the interim period, a process will need to be developed to monitor compliance and issue certificates using the manual files.

### **Controls Over Financial Resources Bypass Reasonable Safeguards**

Expenditure approval and processing is performed by the accounting department, and the processing and reconciliation of accounting transactions is not occurring in a timely manner. As a result, controls are not adequate to ensure that expenditures are properly authorized and used as intended. Additionally, errors in data entered into USAS have not been corrected in a timely manner.

## Executive Summary

### **Key Human Resource Functions Are Not Performed**

Performance evaluations are not administered on an annual basis, merit raises have been given without the required support, training critical to the performance of job tasks is not provided, and employee job descriptions have not been updated. As a result, the agency is not complying with statutory requirements which require that performance evaluations be performed on an annual basis and that merit increases be supported with performance evaluations. Additionally, without current job descriptions and necessary training, employee productivity and professional development may not be maximized.

### **Fund-Raising For The Peace Officers' Memorial Is Not Progressing According To Performance Guidelines**

Fund-raising efforts for the Peace Officers' Memorial are not progressing as planned. Total costs for the Memorial are estimated at \$1,680,000. According to the General Appropriations Act, the agency is scheduled to complete fund-raising by the end of fiscal year 1994. As of May 1994, contributions totaled \$140,456, and, after expenses, the fund balance was \$72,504.

### **Lease Space Occupied By The Agency Exceeds General Services Commission Guidelines**

The agency's current space allocation ratio is 286.21 square feet per full-time equivalent employee. The General Services Commission's maximum allowance is 153 square feet per full-time equivalent employee.

Consideration should be given to making excess space available for use by other agencies or to defray the cost of off-site storage. Eliminating off-site storage could generate \$1,680.00 in cost savings per year.

### **Summary Of Management's Responses**

*Management concurs with the findings and recommendations contained in this report. They have included corrective action plans and time tables for implementation of the recommendations.*

### **Summary Of Audit Objective And Audit Scope**

The objective of this audit was to evaluate the effectiveness of control systems essential to the functioning of the Texas Commission on Law Enforcement Officer Standards and Education.

The scope of the audit included management information systems, financial controls, controls over human resources, management reports, management approval processes, and space allocation. This audit was performed at the request of the agency's governing board.

Section 1:

## The Agency's Automated System Does Not Meet The Needs Of The Users

Management controls over the Management Information Systems (MIS) function are inadequate and, as a result, the agency's automated system does not meet the needs of the users. Inadequacies in the MIS function have impaired the agency's ability to efficiently and effectively perform its duties. Specifically,

- The data contained within the automated system is unreliable. As a result, the agency has made errors in awarding proficiency certificates, and the ability of the agency to monitor its own rules has been impaired.
- The existing automated system is inadequate, and progress in developing a new system has been slow. Compounding this problem is the fact that the automated system operates on a minicomputer which is approaching the conclusion of its useful life and is no longer supported by its vendor.
- Several policies and controls related to the MIS function should be developed. These policies and controls are necessary in order to safeguard the integrity of the automated system and allow the MIS function to effectively support the goals of the agency.

The agency is at an impasse. The agency cannot stop using the current automated system because the information needed to answer inquiries, monitor compliance, and determine eligibility for proficiency certification is maintained on the current system. In order to establish data integrity, the agency may be required to devise manual procedures to monitor the approximately 75,000 law enforcement officers.

Section 1-A:

### The Data Contained Within The Automated System Is Unreliable

A variety of data errors were identified in the automated system. We randomly selected ten hard copy files containing information for individual law enforcement officers and compared the documentation in these files with the data for these law enforcement officers available from the automated system. During this comparison, in 9 of 10 sample cases, we found at least one error or discrepancy in the data contained in the automated system. Some of the more significant types of errors or discrepancies we found in the automated system data included the following:

- The automated system contained incomplete law enforcement employment history for two law enforcement officers in our sample. In one case, evidence in the hard copy file indicated that the individual had been employed in law



enforcement on 15 separate occasions, while the automated system only contained evidence of employment on 5 separate occasions.

- The automated system contained inaccurate data for years of service in the field of law enforcement for 6 of the 10 law enforcement officers in our sample.
- In 5 of the 10 sample cases, we found evidence in the hard copy files of training hours received by the law enforcement officers which we could not trace back to the training data maintained in the automated system. We could not trace these training hours back to the data contained within the automated system because the data contained within the automated system is not maintained at the level of detail necessary to be able to perform this analysis.

In addition to the errors noted above, agency staff also provided us with additional, similar examples of inaccurate data in the system.

The unreliable data is primarily due to the poor design of the automated system. Several design flaws in the automated system have diminished the reliability of the data in the system and have caused errors in this data. For example, in cases in which a law enforcement officer was employed more than once at the same law enforcement agency in the same capacity, the automated system replaced any records of previous employment in the system with the most current record of employment.

Additionally, the automated system is not designed to accurately calculate a law enforcement officer's years of service in the field of law enforcement. Although the agency's MIS staff have implemented a mechanism which allows the agency staff to correct years of service data and re-enter employment history erroneously deleted from the system, this mechanism is used by the agency staff only on a case-by-case basis when they identify errors in a law enforcement officer's year of service or employment history.

In addition to design flaws, on-line screen data edit checks have been removed from the automated system, thus allowing users to enter invalid codes into the system. Moreover, according to agency staff, in 1988 or 1989 approximately 30,000 records were physically deleted from the automated system and never recovered.

Finally, training data in the automated system is not current. Agency staff estimate that the data entry staff are approximately two months behind in entering law enforcement officer training information into the automated system. The fact that agency staff are limited to inquiry-only access during certain hours of the day has contributed to the accumulation of training information which has not been entered into the system. In addition to the fact that the training data is not current, training data is stored in the automated system at such a high level that it makes it difficult to determine whether individuals are claiming training hours for courses which they have already taken.

Due to the erroneous data, the agency has issued proficiency certificates to individuals who did not qualify for these certificates. The agency issues several types

of proficiency certificates which certify that law enforcement officers have received certain types of training, have earned a specific number of college credits, and have a certain number of years of service. The agency awards one type of proficiency certificate (the Master Peace Officer Certificate) based upon applications submitted by law enforcement officers. However, all other types of certificates are automatically generated based upon information contained within the automated system. Specifically, a batch program reads the data in the automated system and identifies the officers who qualify for these certificates. After the individuals qualifying for these certificates have been identified, the certificates are printed and mailed.

However, since the data in the automated system contains errors, the current approach to generating the proficiency certificates has caused the agency to issue proficiency certificates to individuals who do not meet the qualifications for these certificates. In some law enforcement agencies, salaries of the law enforcement officers are impacted by acquiring a proficiency certificate. In one case, a law enforcement officer was hired to be chief of police at a law enforcement agency based, in part, upon the fact that he had acquired a proficiency certificate. However, after the certificate had been awarded to this individual, the agency learned that the certificate had been awarded in error because the individual's education and training records in the agency's automated system were inaccurate. The agency subsequently informed the individual that his certificate had been issued in error, and the individual had to arrange to take necessary training which would qualify him for the certificate.

The problem of issuing erroneous proficiency certificates is so common that the agency has developed a form letter to inform the law enforcement agency employing an officer that the proficiency certificate has been issued in error. This letter also requests that the certificate be returned.

Additionally, the data in the automated system does not allow the agency to effectively monitor its rules or answer inquiries. Since the data in the automated system is not completely accurate, any reports which are produced using data from this system are not reliable. In addition, if accurate and complete information is not maintained, the agency will be unable to effectively monitor its own rules. Finally, users cannot rely fully on using the automated system to effectively and efficiently answer inquiries. Instead, they must take the time to retrieve hard copy files when answering telephone inquiries.

Significant manual efforts will be required to correct the data in the automated system before the data is converted to a new automated system. Since data contained within the automated system contains errors, and since other data is physically missing from the system, a significant manual effort will need to be expended to correct and complete this data before it is converted to a new automated system.

Recommendation:

Accurate information must be made available in a manner which supports the agency's goals and objectives. In addition, this information must be timely. To help

ensure that accurate and timely data is made available to agency users, we recommend the following:

- The agency should formulate and implement a plan to identify and correct all erroneous data in its automated system. In addition, the agency should formulate and implement a plan to re-create data which is physically missing from the system. One approach to these plans could be to obtain employment and training information maintained by local law enforcement agencies and compare this information to the data in the automated system.

Management's Response:

*We are developing formal procedures to identify and correct corrupt data. We have contracted with the Department of Information Resources (DIR) to conduct a comprehensive Management Information System (MIS) analysis and establish a revised MIS plan for the agency.*

- The agency should ensure that the data currently maintained in the automated system is accurate, complete, and up-to-date before this data is converted into a new automated system.

Management's Response:

*We will implement the recommendations of DIR in accomplishing conversion process.*

- Until the data is corrected, the agency should develop new procedures for generating proficiency certificates. One alternative to the current procedure could be to require individuals to submit applications for these certificates. The agency is already using this approach for one type of proficiency certificate, the Master Peace Officer Certificate.

Management's Response:

*The Commission has appointed a subcommittee to explore the extension of that process to all non-mandatory certificates. We will continue to explore this option and anticipate a subcommittee report by mid-September 1994. We will continue to improve data quality prior to the transfer to a new system. The primary errors are service time calculations done by a programming error some years back. This is being addressed by the Master Peace Officer system and a new policy to check this on files every time that we pull a file.*

- As a proactive measure, the agency should implement a procedure requiring law enforcement agencies to obtain prior written approval from the agency before commissioning law enforcement officers. As part of this approval procedure, the agency should, using information contained in its manual files,

verify that each of the individuals to be commissioned possesses the required license to serve as a law enforcement officer.

Management's Response:

*We will immediately begin an education program for constituent agencies concerning the requirement that all documentation must be on file with the Commission before a license can be issued. The hard copy is already used to establish eligibility for licensing. The practice of giving oral approval to an agency before the license has been issued is being reconsidered.*

Section 1-B:

**The Existing Automated System Is Inadequate, And Efforts To Develop A New System Have Progressed Slowly**

The automated system is a tool of critical importance for the agency's Licensing Section, yet the condition of the system is unsatisfactory. The automated system contains both on-line and batch features and was originally designed to provide users with access to the following information:

- detailed information on each licensed law enforcement officer in the State
- information on the training received by each licensed law enforcement officer in the State
- information describing law enforcement training academies and training courses
- information describing law enforcement agencies

Significant examples of the manner in which agency staff use the automated system information include the following:

- to monitor law enforcement officer compliance with agency rules and regulations
- to answer inquiries from law enforcement agencies and the public
- to determine eligibility for most of the proficiency certificates awarded by the agency

Although the importance of the automated system as a tool in effectively performing essential duties is clear, the condition of this system is unsatisfactory. For example, inherent flaws in the design of the data files in the system do not ensure the integrity of the data contained within the system, as was discussed in detail at Section 1-A.

In addition, the automated system is not generating reports needed by users to perform essential functions. For example, reports displaying counts of the total number of licenses and certificates issued are not automatically produced by the system and must be tabulated manually by agency staff.

The training courses completed by law enforcement officers are not recorded individually in the automated system, but rather are stored in general categories of

training. Therefore, information regarding the individual training courses completed by a law enforcement officer is not available from the automated system.

The automated system operates on a minicomputer which is inadequate. The automated system currently operates on a minicomputer which is nearing the end of its useful life. The space available on the minicomputer is insufficient in meeting the needs of the automated system users. These space limits reduce the time during which the automated system is fully available to users. For example, the space limitations require agency MIS staff to make the necessary daily backups of data using tapes instead of disk space. However, when these backups are taken, users have inquiry-only access and cannot make any updates to the data. Specifically, users are limited to inquiry-only access (but not update access) until 9:30 a.m. Monday through Thursday and until 11:00 a.m. on Friday. In addition to its space limitations, the minicomputer is no longer supported by its vendor.

The agency is currently in the process of purchasing a new computer. According to MIS staff, the purchase of the new computer will eliminate the problems caused by the space limitations of the current computer.

The present condition of the automated system can be attributed to poor design and inadequate modifications which have been made to the system over the years. The agency's strategic plan developed in June 1992 stated that the Licensing and Certification Systems ". . . have been patched and rematched; are severely aged and near the end of their functional cycle; are poorly designed and cumbersome written; and normal maintenance requires one full-time dedicated programmer/analyst."

We were informed of several elements of the design of the automated system which make the system inadequate in fulfilling the needs of its users. For example, the original design of the data structure within the automated system did not allow the system to store complete records of a law enforcement officer's employment if that officer had been employed by the same law enforcement agency in the same capacity on more than one occasion. In another example, to make a simple change to a law enforcement officer's social security number, the structure of the data requires that users delete and re-enter all of a law enforcement officer's employment and training records line by line.

In addition to its original design flaws, system modifications made over the years which were intended to correct problems with the automated system have actually aggravated the deterioration of the system. For example, to address technical problems that users were experiencing with the automated system software, a programmer no longer employed by the agency added numerous recovery routines to automated system software, but never addressed the root causes for these technical problems. We were also informed that numerous on-line edit checks originally incorporated into the automated system were removed by the former programmer. These edit checks were originally designed to prevent users from entering invalid codes into the automated system.

Without an adequate automated system, the agency will remain unable to effectively monitor its own rules, and users will remain unable to perform their duties in an

efficient manner. Due to its present condition, the automated system prevents the agency from effectively monitoring its own rules. In addition, the productivity of users of the automated system is diminished when these individuals cannot retrieve information from the system in a convenient manner.

The agency cannot efficiently monitor its own rules, in part, because the automated system does not automatically generate the reports necessary to perform this function. In addition, the data in the automated system is not structured to allow these reports to be generated. For example, Agency Rule 211.100 specifies that peace officers must receive 40 hours of training every two years. However, the automated system does not automatically produce reports identifying individuals who are not in compliance with this rule, and the training data maintained in the system is not stored in the appropriate manner to allow this type of report to be generated. When agency staff actually visited 34 law enforcement agencies to determine the compliance rate for this rule, they found that 58 percent of the law enforcement officers at these agencies were not in compliance with this rule. The agency is incurring unnecessary costs because the automated system will not produce information needed to monitor compliance with rules and regulations. The agency estimates that the cost of a visit to each individual law enforcement agency was \$2,136.50, for a total cost for all visits of \$72,641.00.

Another important function performed by the agency is responding to inquiries from law enforcement agencies and the public regarding information which should be maintained in the automated system. However, when users cannot fully use the automated system during key time periods during the day, they are limited in their ability to effectively and efficiently answer these inquiries. At a recent workshop held by the agency to discuss the public's thoughts and concerns about law enforcement and the role of the agency, several law enforcement agencies throughout the State commented on inadequate record keeping at the agency, insufficient agency technology, and poor agency telephone response to inquiries.

Recommendation:

Information resources technologies should support the strategic directions and needs of the agency. In addition, useful, accurate, and timely information must be made available in a manner which supports the strategies, goals, and objectives of the agency. Finally, user satisfaction with automated systems is based, in part, upon the availability, reliability, and responsiveness of those systems. To help ensure that automated systems at the agency meet the needs of users, we recommend the following:

- The agency should place a high priority upon replacement of its minicomputer and the automated system. In addition, both agency MIS staff and functional users should clearly identify significant design flaws in the current automated system and ensure that these flaws are not incorporated into a new system.

Management's Response:

*The comprehensive MIS analysis and plan includes staff and user input into both identification of flaws as well as functional needs.*

- The agency should explore other sources of information in the State (such as systems maintained by local law enforcement agencies) in order to obtain the information necessary to monitor agency rules which the current automated system does not provide.

Management's Response:

*By December 1, 1994, we will begin to work with larger agencies who have accurate employee training records to compare and correct our data files electronically. A large percentage of all officers in the State are employed by about ten percent of the larger agencies.*

Consideration should be given to whether the existing automated system should continue to be used during the time period in which a new system is developed. If the agency decides to continue using the existing system, it should arrange for the following:

- Until the new computer is purchased, the agency should make arrangements to provide users with full access to the automated system during normal working hours. This may require MIS staff to work staggered schedules so that tape backups can be completed before 8:00 a.m.

Management's Response:

*MIS staff will begin to do backups immediately outside of normal business hours. This will continue until the new hardware is in place which will provide full backup in an efficient manner.*

- Until a new automated system is implemented, the agency should ensure that all possible on-line edit checks for data fields are re-established.

Management's Response:

*The on-line edit checks have already been placed back into the system. In addition, some of the programs developed by MIS staff combine file rebuilds with edit checks for fields which results in a list of errors which is being provided to Licensing staff for resolution. This contributes to our ongoing clean up efforts.*

Progress toward development of a new automated system has been slow, and users believe they have not had sufficient input into the design of the new system. Plans to develop a new automated system began in 1992. However, progress in developing a new system has been slow, and the only major components of the development completed, to date, include the restructuring of some of the data files and the completion of research necessary to purchase a new computer. In addition, according to the documented plans for the new system, the re-engineering of the automated system software is not scheduled to be completed until fiscal year 1997.

In addition to the slow rate of progress in developing a new automated system, agency users believe that they have not had sufficient input into the plans for the new system.

Progress toward the development of a new automated system has been interrupted by the time spent maintaining the existing automated system. According to MIS staff, progress in developing a new automated system has been interrupted because they have been compelled to devote time to supporting the existing automated system. During 1993, MIS staff spent approximately nine months keeping the current automated system and minicomputer operating. Specifically, MIS staff were working on technical problems such as improving serious security weakness in the system, fixing core dumps, and identifying and fixing several other types of hardware and software problems which were occurring. MIS staff also devoted time toward developing new software required by the introduction of the agency's Master Peace Officer Certificate.

Improper oversight and lack of accountability have also delayed progress in developing the new automated system. Although MIS staff have been planning a new automated system since 1992, regular status reports regarding the advancement or progress toward the new system have not been prepared. The first documented plan detailing the components of the system development was prepared by MIS staff at the request of the agency's Assistant Director in May 1994.

In addition to the lack of adequate reporting and monitoring of the status of the development of the new automated system, MIS staff do not maintain a formal project tracking system to monitor the hours devoted to various MIS projects. Although MIS staff complete time sheets each week, these time sheets do not provide adequate information to determine how many hours were devoted to supporting the current system, how many hours were devoted to developing the new system, and how many hours were devoted to other MIS projects.

Additionally, the current organizational structure of the agency is somewhat unorthodox. Specifically, the Systems Analyst reports directly to the Executive Director, while the Information Resources Manager (and Department of Information Resource contact person) reports to the Assistant Director. It is difficult for either the Executive Director or the Assistant Director to obtain a full understanding of the status of MIS operations at the agency when the Information Services staff is not organized into a single unit reporting to a single manager.



Finally, emphasis upon the MIS function in the agency-wide strategic plan has diminished. Specific goals and strategies were identified for the MIS function in the strategic plan prepared in June 1992. However, no specific goals or strategies directly relating to the MIS function at the agency were identified in the strategic plan prepared in May 1994. Additionally, MIS staff had no input into that agency-wide strategic plan.

Slow progress in implementing a new automated system with little user input will impair the ability of the agency to operate efficiently and achieve its goals. If a new automated system is not implemented in a timely manner, existing problems with the automated system previously discussed will continue, and, as a result, the ability of the agency to achieve its mission could be impaired. If the proper level of user input into the design of a new system is not obtained, the new system may not function in accordance with management's intentions. In addition, system redesign to meet the needs of users can be expensive and difficult to accomplish.

Recommendation:

During development of new systems, information must be made available which shows actual performance in relation to goals and objectives. In addition, information resources management should be reviewed periodically to ensure that appropriate controls have been established which promote the attainment of the goals and objectives. Moreover, obtaining user input into the design of new systems helps to ensure that the new systems will meet user needs. Finally, the organization of the MIS function should be sufficiently important in the organizational hierarchy to enable the function to meet established objectives. To help ensure that a new automated system is implemented in a timely manner, we recommend the following:

- The agency should consider reevaluating its approach to the development of the new automated system. Specifically, the agency should determine whether alternatives exist to allow in-house development of the new system and whether these alternatives would allow a satisfactory system to be implemented in a more timely manner.

Management's Response:

*Systems development, project management, implementation and training will be accomplished through an interagency assistance agreement with DIR pending approval of emergency deficiency funding.*

- The agency should ensure that a representative sample of the users of the new automated system have input into the design or acquisition of that system.

Management's Response:

*The comprehensive MIS analysis and plan includes staff and user input into both the identification of flaws as well as functional needs.*

- Agency MIS staff should establish a formal tracking system to monitor the progress of and hours consumed by MIS projects.
- Agency MIS staff should prepare regular, formal status reports regarding significant MIS projects and present these reports to the Executive Director and Assistant Director.

*Management's Response:*

*We are in the process of developing a tracking system to document the time consumed on various projects. Reports to management have begun and will be provided on a monthly basis.*

- The agency should consider simplifying the organizational structure of its MIS staff so that a single, cohesive team of MIS staff reports its progress to one manager.

*Management's Response:*

*This recommendation is implemented by a new agency wide organizational structure. The position of Systems Analyst/Administrative Aide has been eliminated. The employee in that position is no longer with the agency. All MIS personnel report to a Director whose primary responsibilities are technology, research and development.*

Section 1-C:

**Internal Controls And Policies Regarding The Effective Use Of Management Information Systems Should Be Developed**

The agency lacks several important policies relating to its MIS function. Currently, the agency has no formal policy for users of automated systems to follow when they wish to request special programming projects. In addition, the agency has no formal policy regarding the necessary review of proposed system changes and the analysis of the impact of those changes upon the entire automated system. Further, the agency lacks formal policy regarding the use of computer equipment and printers.

The agency also lacks formal policies for assigning responsibility for access to program documentation or investigating access violations. Additionally, there are no formal policies for security over the data processing facility.

The agency lacks several important internal controls relating to its MIS function. The agency's disaster recovery plan for its computing environment has not been updated since 1990, and it is missing several key elements. For example, the agency has no alternative site agreement for the use of a compatible computing environment in the event of an emergency or disaster. In addition, no risk assessment has been performed to identify risks to which the agency may be subject.

MIS staff maintain no log to monitor use of program documentation, systems software, production data, on-line applications, or passwords. In addition, invalid access attempts are not logged, and there are no written procedures for investigation of access violations. Further, access to production data is not monitored. Finally, the agency has not assigned personnel the responsibility of performing quality assurance with regard to systems development, and there are no established procedures for the testing of program changes and review of these changes by another individual.

Proper policies and controls have not been implemented due to insufficient oversight and direction and due to the size of the agency's MIS staff. We examined evidence indicating that MIS staff had requested that agency management establish specific policies. However, agency management never addressed these requests. In addition, the relatively small MIS staff, as well as the space limitations on the current computer, have made implementation of certain controls in the area of MIS difficult.

Without the proper policies and controls in place over the MIS function, the integrity of automated systems is diminished, and the MIS function performs less efficiently. Without necessary policies related to the MIS function, the function's ability to support the goals of the agency is diminished. In addition, without proper controls over the MIS function, the integrity of automated systems may be compromised.

Recommendation:

Adequate policies are necessary in order to effectively control and direct the work environment. In addition, internal controls must be in place to operate effectively and prevent or identify errors. In order to ensure that adequate policies and internal controls are established, we recommend the following:

- The agency should establish formal policies for users of automated systems to follow when they wish to request special programming projects.
- The agency should establish formal policies for review of proposed system changes and the analysis of the impact of those changes upon the entire automated system.
- The agency should establish a formal policy regarding the use of computer equipment and printers.

Management's Response:

*Some procedures are in place to request system/program changes. The DIR Assistance Project will identify sufficient procedures to satisfy each of these three recommendations.*

- The agency should establish formal policies for assigning responsibility for access to program documentation, investigating access violations, and for security over the data processing facility.

Management's Response:

*We have established a program to limit access and to identify users who log on to the PRIME System. Further policies and procedures will be implemented immediately as identified through the DIR assistance project.*

- The agency should prepare a complete disaster recovery plan for its computing environment.

Management's Response:

*We have been unsuccessful in establishing a recovery plan for the PRIME System because there are no PRIME Systems known to be available since the discontinuation of PRIME Systems. A disaster recovery plan is included in the DIR assistance project.*

- The agency should maintain a log to monitor use of program documentation, systems software, production data, on-line applications, and passwords. Invalid access attempts should be logged and investigated. Additionally, access to production data should be monitored.

Management's Response:

*A user log has been established and is printed and reviewed daily. Invalid access attempts are identified and investigated. User IDs and passwords are limited depending upon the user need to perform certain tasks as approved by an agency administrator. Procedures to monitor production data are being developed.*

- The agency should assign personnel the responsibility of performing quality assurance with regard to significant systems development.

Management's Response:

*Under the new agency wide organization, responsibility for quality assurance is assigned to the program managers.*

Section 2:

## **Controls Over Financial Resources Bypass Reasonable Safeguards**

Financial controls are not adequate to ensure that expenditures are properly authorized and used as intended and that errors are identified in a timely manner. Specifically,

- Expenditure approval and processing is performed by the accounting department. As a result, controls are not adequate to ensure that expenditures are properly authorized and resources are used as intended.
- Transactions have not been entered into the internal accounting system in a timely manner. As a result, the internal accounting system has not been reconciled to USAS since November 1993. Additionally, errors in data entered into USAS have not been corrected in a timely manner.

Section 2-A:

### **The Accounting Department Is Both Approving And Processing Expenditures**

A review of the accounting records revealed that the accounting department was both approving and processing travel vouchers. Additionally, purchase vouchers for professional services were not approved by the appropriate individuals. Responsibility for expenditure approval and processing should be separated, and expenditures should be approved by the appropriate individuals to ensure that resources are expended and used as intended.

Section 2-B:

### **The Internal Accounting System Has Not Been Reconciled To USAS In A Timely Manner**

Transactions have not been entered into the internal accounting system in a timely manner. As a result, the internal accounting system which is used to generate the agency's annual financial report has not been reconciled to USAS since November 1993. Additionally, errors in data entered into USAS have not been corrected in a timely manner. Unless the internal accounting system is updated, the agency may experience difficulties in preparing the annual financial report. Timely processing and reconciliation of accounting transactions is necessary to ensure that errors are identified and corrected in a timely manner.

#### **Recommendation:**

We recommend the following:

- The agency should review approval processes and ensure that procedures are in-place to provide assurance that expenditures are properly approved and used as intended. Additionally, expenditures should not be approved solely by the accounting department.

#### **Management's Response:**

*Expenditures are no longer approved by the accounting department. Under the new organizational structure, administrative officers are responsible for*

*the approval process. Additional policies and procedures affecting the accounting and finance operations are included in the drafting of revised policies and procedures agency wide. The accounting and finance personnel now report to the Chief of Professional Standards and Administrations Operations.*

- Information in the internal accounting system should be updated to include all transactions to date to ensure that the agency's annual financial report can be prepared in a timely manner. The internal accounting system should be reconciled to USAS on a monthly basis to ensure that information in both systems is accurate.

*Management's Response:*

*Information in the internal accounting system has now been brought up-to-date. The internal accounting system is now being reconciled to USAS on a monthly basis. A formal policy and process procedures will be developed and implemented by October 1, 1994, to ensure that the reconciliation is accomplished monthly. Written reports will be required which record how the MIPS is reconciled.*

Section 3:

## **Key Human Resource Functions Are Not Performed**

Inadequacies in the human resource function create the risk that employees may not operate in the most efficient and effective manner. Recently, responsibility for human resource functions were transferred to the accounting department. Consequently, the accounting department has experienced a backlog in workload, and many key human resource functions have not been performed. Specifically,

- Performance evaluations are not administered on an annual basis. Performance appraisals encourage good performance, discourage substandard performance, provide a basis for human resource decisions, and provide a basis for employee training and development. Additionally, Chapter 415.013 of the Government Code requires the agency to develop a system of annual performance evaluation based on measurable job tasks.
- Training critical to performing job tasks is not provided. Proper training optimizes employee productivity, enhances professional and personal development, and assists the agency in accomplishing its goals and objectives.
- Employee job descriptions have not been updated. Job descriptions provide assurance that job expectations are clearly communicated and that employees are classified at the proper levels.

Section 3-A:

### **Performance Evaluations Are Not Administered On An Annual Basis**

As a result, merit raises have been given without the required support. Additionally, since performance evaluations are not administered, the agency has not been able to award \$46,459 in salary increases which was appropriated during fiscal year 1994. The agency may lose \$23,230, one half of the appropriated amount for salary increases, if the funds are not awarded by the end of the fiscal year.

We randomly selected personnel files for 5 of the 37 staff at the agency and determined the last time periods for which these employees received performance evaluations. None of these employees had been evaluated within the last two years. The same personnel files did not contain adequate support for merit raises awarded to these employees.

Performance appraisals encourage good performance and provide a basis for correcting and discouraging substandard performance, provide a foundation for human resource decisions, and provide a basis for employee training and development. Additionally, Chapter 415.013 of the Government Code requires the agency to develop a system of annual performance evaluation based on measurable job tasks. Merit pay for agency employees must be based on this system.

Section 3-B:

### **Training Critical To The Performance Of Job Tasks Is Not Provided**

Many employees at the agency stated that they did not receive training that would assist in performing job duties. Employees indicated needed training in the areas of development of computer skills, management skills, interpersonal skills, and human resources related knowledge and skills.

Training is necessary to optimize employee productivity, enhance professional and personal development, and to assist the agency in accomplishing its goals and objectives. Additionally, Article V, Section 82 of the General Appropriations Act requires all state agencies that have three or more complaints of employment discrimination during each year of the biennium to expend appropriated funds to receive Comprehensive Equal Employment Opportunity training. Two complaints which are employer related have been filed with the Equal Employment Opportunity Commission.

Section 3-C:

### **Employee Job Descriptions Have Not Been Updated**

In August 1993, the agency reduced its staff by 12.5 full-time employees due to the transfer of the Law Enforcement Management Institute from the agency to Sam Houston State University, the elimination of two strategies, and the reduction in funding for remaining strategies. After the loss of these employees, many of the

responsibilities previously performed by these employees were reassigned to the remaining staff at the agency. However, the agency has not yet updated the job descriptions for the remaining employees. Job descriptions provide assurance that job expectations are clearly communicated and employees are classified at the proper levels.

Recommendation:

- Consideration should be given to transferring responsibility for human resource functions out of the accounting department.

Management's Response:

*Human resources were placed under the Accounting Department in September 1993 as a temporary measure caused by a reduction-in-force. The majority of the functions will be transferred as a part-time endeavor to a member of the training staff who has background in training need assessment, performance evaluations, and human resource development activities who will act as Human Resource Coordinator. Those activities involving financial transactions (insurance, retirement, investments, and payroll) will remain with the Accounting Department. Personnel Records will be maintained by an Administrative Assistant in the executive level of the agency. Work related activities such as leave requests and time schedules will be the responsibility of the respective operations managers. These practices will be implemented by written policy and procedures by September 1, 1994.*

- Performance evaluations should be administered on an annual basis.

Management's Response:

*A performance system will be developed by the Human Resource Coordinator in conjunction with the Management Team. Implementation will begin by October 1994. Each manager will be responsible for the successful implementation of the program for their own staff. The quality of their effort will be an item on which they will be evaluated on their own performance evaluation.*

- Merit raises should be supported with adequate documentation.

Management's Response:

*Merit raises will be supported by adequate documentation. The previously mentioned performance evaluation system will be used for the necessary documentation.*



- Training needs should be identified. Training critical to the performance of job duties should be provided in a cost-effective manner.

Management's Response:

*Training needs will be identified under the coordination of the Human Resource Coordinator with considerable employee input. The initial program will focus on identifying those areas where improved performance is needed to implement the Commission's Strategic Plan. A policy and procedures will be developed that requires the discussion of training needs at every Management Team meeting in which implementation planning is discussed. The Human Resource Coordinator will have primary responsibility to see that this issue is raised, although all managers will be responsible for identifying training needs. Employees will be encouraged to identify their own training needs. Training available through other State agencies will be utilized. These procedures will begin by October 1, 1994.*

- Employee job descriptions should be updated to properly reflect tasks performed by employees.

Management's Response:

*Employee job descriptions will be updated by December 1. The Human Resource Coordinator will have the primary responsibility for this. Every supervisor will have included in their job description their responsibility for performance evaluation, identifying training needs, and implementing any training plan developed.*

*The Human Resource Coordinator will coordinate the updating of existing policies and procedures to make sure that they are current and relevant. A staff Human Resource Management and Development Committee will be formed which will be responsible for the development and implementation of training and education plans. Those plans will include a minimum training or education standard for employees and managers on an annual basis. These policy revisions will include a revised and re-implemented Career Ladder Program. Specific funds for training and education will be identified within each strategy. However, training funds may be limited by appropriations.*

*The Human Resource Coordinator, along with the Human Resource Management and Development Committee will be responsible for getting the existing policies and procedures brought up-to-date. This will be accomplished by December 1, 1994. Personnel policies and procedures of other State agencies of similar size will be reviewed and incorporated when appropriate.*

Section 4:

## Fund-Raising For The Peace Officers' Memorial Fund Is Not Progressing According To Performance Guidelines

Fund-raising efforts for the Peace Officers' Memorial Fund are not progressing to meet the costs necessary for the Memorial, which are estimated at \$1,680,000. According to the current General Appropriations Act, the agency should have been finished with fund-raising by the end of fiscal year 1994. As of May 1994, contributions totaled \$140,456, and, after expenses, the fund balance was \$72,504. Legislation enabled the Peace Officers' Memorial Advisory Committee to conduct fund-raising efforts, and in 1991, resources were appropriated to the agency to also raise funds for the Memorial. During our limited review, no significant errors, irregularities, or instances of illegal acts were noted.

### Recommendation:

The agency and the Peace Officers' Memorial Advisory Committee should evaluate current efforts to determine how goals and statutory requirements for the Peace Officers' Memorial Advisory Committee will be achieved.

### Management's Response:

*Chapter 415, Subchapter F, Government Code establishes the Texas Peace Officers' Memorial Advisory Committee (TPOMAC) and charges it to fund, design, construct, update, maintain, and manage the memorial on the grounds of the Capitol Complex in honor of those Texas peace officers who have died in the line of duty. TCLEOSE provides administrative and staff support to fund raising activities, research, and other necessary functions of the Committee. TCLEOSE has limited oversight and reporting responsibilities under the provisions of the Government Code, however, the oversight responsibilities or authority are not stipulated by the statute.*

*The Texas Peace Officers' Memorial Advisory Committee clearly has the authority and responsibility under Section 415.112 to "fund, design, construct, update, maintain, and manage" the Texas Peace Officers' Memorial. Its duties in "advising" the Commission include the actual performance of all tasks relevant to the establishment, funding, construction and maintenance of the Memorial (415.117). Funds raised by the Committee may only be used by the Committee (415.120(b)). The Committee submits reports to the Commission but the Commission may not adopt a rule relating to the Committee (415.118). The Commission is responsible for the submission of an oversight report to the legislature before the commencement of each regularly scheduled session of the legislature (514.118). Due to the ambiguity of the statute concerning the Commission's specific oversight authority and responsibility over the Committee, we have drafted a request for an Attorney General's Opinion to clarify the provisions of the statute.*

*The staff, working with the Peace Officers' Memorial Advisory Committee, has recently taken the following steps to expedite fund raising:*

1. *Several cities are working on a Utility Bill Rate-Up and Add-On Program. Wichita Falls implemented this program in May. If this program is successful and is implemented by the top 20 cities in Texas, sufficient funds can be raised by this method. The Utility Rate-Up Program is a program where the local entity adds a surcharge to utility bills that is dedicated to the memorial fund.*
2. *State Senators and State Representatives are actively involved in assisting in the fund raising efforts.*
3. *Several business organizations are sponsoring fund raising events.*
4. *Charitable foundations will continue to be contacted.*
5. *Major corporations will continue to be contacted.*
6. *Staff and Committee members are preparing a proposal to contract with a fund raising professional to assist with fund raising efforts. Since this cannot involve appropriated funds, it must be approved by the Committee.*

Section 5:

## **Lease Space Occupied By The Agency Exceeds General Services Commission Guidelines**

The lease space occupied by the agency exceeds General Services Commission guidelines. The agency's current space allocation ratio is 286.21 square feet per full-time equivalent employee. The General Services Commission encourages agencies to make every effort to achieve a ratio of not more than 153 square feet per full-time equivalent employee. Additionally, the agency pays \$140.00 per month for off-site storage costs. Excess space within the agency could be used to eliminate off-site storage costs.

### **Recommendation:**

Consideration should be given to making excess space available for use by other agencies, or to defray the cost of off-site storage. Eliminating off-site storage costs could generate \$1,680.00 in cost savings per year.

### **Management's Response:**

*We are in the process of preparing a response to the General Services Commission request for a space allocation plan. The Space Allocation Plan will include a redesign of our space to make it more clearly meet our current and future needs. The redesign of current space will allow us to hold Commission Meetings, training sessions, committee meetings for job content experts, licensing training sessions, and storage. The space as currently configured does not allow us to effectively and efficiently conduct these essential activities of the agency. The redesign of the current space will begin by September 1, 1994.*

*We have removed all property from off-site storage and have terminated the contract for the storage space. In addition, we will continue efforts with the General Services Commission to dispose of the surplus property.*

## Objective, Scope, And Methodology

### Objective

The objective of this audit was to evaluate the existing management controls at the Texas Commission on Law Enforcement Officer Standards and Education and to identify opportunities for improvement. The audit evaluated the control systems in place as of May 1994.

### Scope

The scope of the audit included consideration of management information systems, financial controls, controls over the administration of human resources, management reports, the management approval process, and space allocation.

The consideration of the agency's management information systems included a review of:

- the reliability of the data maintained within the agency's automated system
- the quality of the existing automated system and the progress in implementing a new system
- the impact of the condition of the automated system and data upon the ability of the agency to monitor its rules and issue proficiency certificates to law enforcement officers
- the policies, procedures, and internal controls related to the management information systems in place at the agency

The consideration of the agency's financial controls included a review of:

- the controls in place over the donations received for the Peace Officers' Memorial Fund, as well as the progress in raising funds for this Memorial
- the transfer of funds for the Law Enforcement Management Institute from the agency to Sam Houston State University
- the controls in place over the processing and approval of agency expenditures and receipts
- the status of prior financial control findings identified by the State Auditor's Office

The consideration of the administration of the agency's human resource function included a review of:

- the placement of human resource administration within the agency's organizational structure
- the ability of the agency to comply with human resource laws and regulations
- the adequacy of the agency's performance evaluation system, staff training, and job descriptions

The consideration of the agency's management reports included a review of:

- the timeliness and accuracy of both budgetary and program reports
- the sufficiency of reports in fulfilling the needs of management

The consideration of the agency's management approval process included a review of:

- the process by which program decisions were made (in specific instances)

The consideration of the agency's space allocation included a review of:

- the average gross square footage per full-time equivalent employee at the agency compared to relevant General Services Commission guidelines for this ratio

## **Methodology**

Information collected to accomplish our objectives included the following:

- Interviews with agency commissioners and staff and officials from the State Comptroller's Office, Sam Houston State University, and the Department of Information Resources
- Documentary evidence such as:
  - General Appropriations Act and relevant state statutes and regulations
  - Agency financial and program reports
  - Detailed agency financial records (such as vouchers)
  - Agency policies and procedures
  - Agency strategic plans and legislative appropriations requests
  - Technical documentation describing the agency's automated management information systems
  - Agency memoranda and miscellaneous documentation

Procedures and tests conducted:

- Comparison of a randomly selected sample of hard copy source documents with comparable information in the agency's automated systems
- Review of a randomly selected sample of expenditures and revenues for proper approval and processing
- Review of a randomly selected sample of personnel files for evidence of performance evaluations
- Calculation of the average gross square footage of office space per agency full-time employee

Analysis techniques used:

- Control reviews
- Trend Analysis
- Fluctuation Analysis

- Review of various measures used by the agency
- Data Comparison
- Ratio Analysis

Criteria used:

- Relevant state statutes and the General Appropriations Act
- Management Information Systems standards issued by the Department of Information Resources
- State Auditor's Office Accountability Project Methodology general and specific criteria

### **Other Information**

Fieldwork was conducted from May 23, 1994, through June 16, 1994. The audit was conducted in accordance with applicable professional standards, including:

- Generally Accepted Government Auditing Standards
- Generally Accepted Auditing Standards

The audit work was performed by the following members of the State Auditor's staff:

- Michael Doerr (Project Manager)
- Randy Davis, CPA
- Marianne Rutledge, CPA
- Nancy McBride
- Paul T. Garner (Audit Manager)
- Deborah L. Kerr, Ph.D. (Audit Director)

## Agency Profile

The Commission on Law Enforcement Officer Standards and Education was established in 1965. The agency's mission is to ensure a Texas where people are served by highly trained and ethical law enforcement and corrections personnel through screening, developing and monitoring human resources, and setting standards.

The agency is responsible for administering professional programs for the improvement of the 75,772 law enforcement and corrections personnel employed by Texas state and local government agencies. Specifically, the agency establishes training and certification standards, administers facilities for the purpose of administering licensing examinations, processes and approves law enforcement officer license applications, and licenses and approves training academies and training contractors. Finally, the agency is also responsible for providing assistance to the Texas Peace Officers' Memorial Advisory Committee in developing a peace officers' memorial to honor Texas peace officers who have died in the line of duty.

Until September 1, 1993, the agency was also responsible for administering the Law Enforcement Management Institute. However, on September 1, 1993, HB 977 transferred the Law Enforcement Management Institute from the agency to Sam Houston State University.

## Reference List

- State of Texas, Texas Commission on Law Enforcement Officer Standards and Education. *1994-1995 Request for Legislative Appropriations*.
- \_\_\_\_\_. *Agency Strategic Plan for the 1995-1999 Period*.
- \_\_\_\_\_. *Annual Financial Report for the Year Ended August 31, 1993*.
- \_\_\_\_\_. General Appropriations Act, 73rd Legislature, Regular Session (1993).
- Vernon's Texas Codes Annotated, Government Code, Chapter 415.



Copies of this report have been distributed to the following:

## **Legislative Audit Committee**

Honorable James E. "Pete" Laney, Speaker of the House, Chair  
Honorable Bob Bullock, Lieutenant Governor, Vice Chair  
Senator John Montford, Chair, Senate Finance Committee  
Senator Kenneth Armbrister, Chair, Senate State Affairs Committee  
Representative Robert Junell, Chair, House Appropriations Committee  
Representative Tom Craddick, Chair, House Ways and Means Committee

## **Governor of Texas**

Honorable Ann W. Richards

## **Legislative Budget Board**

Mr. John Keel, Director

## **Sunset Advisory Commission**

Mr. John Moore, Director

## **Texas Commission on Law Enforcement Officer Standards and Education, Commissioners**

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Mr. J. J. Berry, Jr.  
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Mr. H. L. O'Neal  
Ms. Sally Werst  
Chief William P. Whitworth

## **Ex-Officio Members**

Dr. Kenneth H. Ashworth, Commissioner, Texas Higher Education Coordinating Board  
Dr. Lionel R. Meno, Commissioner of Education, Texas Education Agency  
Honorable Dan Morales, Attorney General of Texas  
Mr. Adan Munoz, Jr., Executive Director, Governor's Office Criminal Justice Division  
Colonel James R. Wilson, Director, Texas Department of Public Safety

## **Texas Commission on Law Enforcement Officer Standards and Education**

Mr. D. C. (Jim) Dozier, Executive Director