

FINANCE COMMISSION

Austin, Texas

INTERNAL AUDIT PLAN

For Fiscal Year 2014



FINANCE COMMISSION

Austin, Texas

Internal Audit Plan
For Fiscal Year 2014

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Garza/Gonzalez & Associates

CERTIFIED PUBLIC ACCOUNTANTS

Finance Commission Members and
Finance/Audit Committee Members
Austin, Texas

Enclosed is the proposed fiscal year 2014 Internal Audit Plan (Plan) for the Finance Commission. This Plan determines the scope of internal audit activities and is the source for assignment and prioritization of internal audit responsibilities for fiscal year 2014 for the Texas Department of Banking (DOB), Department of Savings and Mortgage Lending (SML) and the Office of Consumer Credit Commissioner (OCCC). Specific planning for audit procedures is a naturally ongoing process; thus, the Plan is reviewed annually and may be revised as necessary by the Board or Audit Committee.

This Plan has been prepared following Generally Accepted Auditing Standards and International Standards for the Professional Practice of Internal Auditing, as determined by the Institute of Internal Auditors.

*Garza/Gonzalez
& Associates*

January 30, 2014

FINANCE COMMISSION

Austin, Texas

Internal Audit Plan
For Fiscal Year 2014

I. Methodology

The fiscal year 2014 Internal Audit Plan (Plan) for the Finance Commission was prepared using a risk assessment process, where we reviewed various documents and conducted interviews with various employees, as documented below. These 3 agencies, which are considered financial regulatory agencies, were granted self-directed, semi-independent (SDSI) status in the 81st Legislature Session, effective September 1, 2009. With the SDSI status, these agencies are not required to have their budget approved by the Legislature; however, the Finance Commission is responsible for setting their spending authority or limits. Each agency's entire operating funds are generated from fees assessed to the businesses they supervise and are used to fund both direct and indirect costs. General revenue funds are not used to support their operations.

The following documents were reviewed to update our understanding of the 3 agencies:

- Operating Budgets
- Organizational Charts
- Policies and Procedures
- Applicable Laws and Rules
- Audit and/or Monitoring Reports from Third Party Agencies
- Prior Internal Audit Reports

Additionally, interviews with Commissioners, Deputy Commissioners, and/or Division Directors were conducted to update our understanding of each Division, and its role within the overall scheme of the respective agency. Topics discussed in the interviews included business process activities, controls, systems, past performance, and interaction with other agencies. Utilizing information obtained through the inquiries and background information reviewed, audit areas for each of the 3 agencies were identified as potential audit topics. A risk analysis was completed for each individual audit topic and then compiled to develop an overall risk assessment for each of the 3 agencies.

FINANCE COMMISSION

Internal Audit Plan

The following 8 risk factors were considered for each potential audit topic:

- | | |
|---|--|
| 1. Financial Materiality | Measure of the auditable unit's materiality based on the dollar amount per year of assets, receipts, or disbursements for which it is responsible. |
| 2. Time Since Last Audit or Review | Measure of the number of years between the date of the previous audit or review and the date of the risk assessment. |
| 3. Results of Last Audit or Review | Measure of the results of the previous audit or review. |
| 4. Adequacy of Staffing Levels | Measure of the adequacy of the staffing level of the auditable unit as it relates to the achievement of its objectives. |
| 5. Policies and Procedures | Measure of the existence of policies and procedures documenting the auditable unit's activities. |
| 6. Compliance with Contracts, Laws, and Regulations | Measure of the existence of contracts, laws, and/or regulations for which the auditable unit is responsible for complying. |
| 7. Susceptibility of Material Theft or Fraud | Measure of the auditable unit's risk and controls in place as it relates to material theft or fraud. |
| 8. Issues or Concerns | Measure of issues or concerns by management, the Finance Commission, or Audit Committee. |

FINANCE COMMISSION

Internal Audit Plan

II. Scope

In accordance with the **International Standards for the Professional Practice of Internal Auditing**, the audit scope will encompass the examination and evaluation of the adequacy and effectiveness of the respective agency's system of internal control and the quality of performance in carrying out assigned responsibilities. The audit scope includes the following objectives:

- **Reliability and Integrity of Financial and Operational Information** – Review the reliability and integrity of financial and operating information and the means used to identify, measure, classify, and report such information.
- **Compliance with Policies, Procedures, Laws, Regulations, and Contracts** – Review the systems established to ensure compliance with those policies, procedures, laws, regulations, and contracts which could have a significant impact on operations and reports, and determine whether the organization is in compliance.
- **Safeguarding of Assets** – Review the means of safeguarding assets and, as appropriate, verify the existence of such assets.
- **Effectiveness and Efficiency of Operations and Programs** – Appraise the effectiveness and efficiency with which resources are employed.
- **Achievement of the Organization's Strategic Objectives** – Review operations or programs to ascertain whether results are consistent with established objectives and goals and whether the operations or programs are being carried out as planned.

FINANCE COMMISSION

Internal Audit Plan

III. Texas Department of Banking

Internal Audit Plan

The Internal Audit Plan (Plan) includes 2 audits to be performed during the 2014 fiscal year. The Plan also includes a follow-up of the prior year audit recommendations, other tasks that may be assigned by the Finance Commission during the year, and preparation of the Annual Internal Audit Report for fiscal year 2014.

Risk Assessment

Utilizing information obtained through the inquiries and background information reviewed, 18 audit areas were identified as potential audit topics. A risk analysis utilizing the 8 risk factors, mentioned in section I of this report, was completed for each individual audit topic and then compiled to develop an overall risk assessment.

Following are the results of the risk assessment performed for the 18 potential audit topics identified:

HIGH RISK	MODERATE RISK	LOW RISK
Payroll & Human Resources	Money Service Businesses	Performance Measures
Purchasing	Prepaid Funeral Guaranty Funds	Fixed Asset Management
Revenue Accounting Process		Perpetual Care Cemeteries
Management Information Systems		Imaging & Records Management
		Travel
		Corporate Activities
		IT Examinations
		Financial Reporting
		Bank Examinations
		Trust Examinations
		Risk Management
		Prepaid Funeral Contracts

The 2014 Risk Assessment Summary is included on page 12 of this report.

FINANCE COMMISSION

Internal Audit Plan

In the prior 3 years, internal audits were performed in the following areas:

Fiscal Year 2013:

- Corporate Activities
- Prepaid Funeral Contracts

Fiscal Year 2012:

- Bank Examinations
- Prepaid Funeral Guaranty Funds

Fiscal Year 2011:

- Revenue Accounting Process
- Trust Examinations
- Financial Reporting

The areas recommended for internal audits and other functions to be performed for fiscal year 2014 are as follows:

1. Money Service Businesses (MSB)

The planned audit procedures include the following:

- a. Review and obtain an understanding of the laws and regulations provided in the Texas Finance Code (TFC) and Texas Administrative Code (TAC); and, the Bank Secrecy Act requirements, as applicable to MSB.
- b. Obtain and review the MSB area's written policies and procedures, collect available documentation, and conduct interviews to document formal/informal processes and controls.
- c. Determine if significant TFC, TAC, and Bank Secrecy Act compliance requirements are included in the examination procedures used to examine records of MSB licensees.
- d. Obtain a listing of MSB examinations performed during the current fiscal year and select a sample to test for various attributes to assess the adequacy of internal controls over the MSB area and to determine that the applicable laws, regulations, policies, and procedures are consistently applied.
- e. Obtain a listing of new and renewed applications and cancelled licenses that were processed during the current fiscal year and select a sample to test for compliance with policies, procedures, rules and regulations, and current practices in place.
- f. Obtain a list of annual assessment fees assessed and collected during the current fiscal year and test a sample to ensure the fee was properly calculated, collected, and recorded.
- g. Other procedures deemed necessary during audit fieldwork.

FINANCE COMMISSION

Internal Audit Plan

2. Management Information Systems (MIS)

An assessment of the MIS division, to include departmentally-administered systems, will be performed in accordance with selected components of Texas Administrative Code 202 (TAC 202).

As part of the assessment, we plan to—

- a. Review the controls and processes in place to ensure sensitive or confidential information is protected from unauthorized access, modification, or destruction.
 - b. Review the controls and processes in place to manage access to information resources to ensure authorized use, such as—
 1. Conditions in place to protect information resources assigned from DOB to another state agency, a contractor, or other third party.
 2. Modification or removal of a user's access authorization.
 3. Password usage.
 4. Encryption requirements in place for information storage devices, data transmissions, portable devices, etc.
 5. Periodic monitoring of unauthorized software installation.
 - c. Review the process in place that provides individual accountability for changes made to information resources systems.
 - d. Observe the adequacy of the physical access to information resources.
 - e. Review the preventative controls and processes in place and recovery techniques and technologies in place in the event of a loss of business functionality resulting from various events or incidents.
- #### 3. Follow-up of Internal Audits
- Perform follow-up procedures to determine the status of prior year comments that were not fully implemented as of the fiscal year ended August 31, 2013. The audit procedures will result in a determination that the recommendation is (1) Fully Implemented; (2) Substantially Implemented; (3) Incomplete/Ongoing; or, (4) Not Implemented.
- #### 4. Other Tasks
- Other tasks as may be assigned by the Finance Commission during the fiscal year.

FINANCE COMMISSION

Internal Audit Plan

IV. Department of Savings and Mortgage Lending

Internal Audit Plan

The Internal Audit Plan (Plan) includes 1 audit to be performed during the 2014 fiscal year. The Plan also includes a follow-up of the prior year audit recommendations, other tasks that may be assigned by the Finance Commission during the year, and preparation of the Annual Internal Audit Report for fiscal year 2014.

Risk Assessment

Utilizing information obtained through the inquiries and background information reviewed, 15 audit areas were identified as potential audit topics. A risk analysis utilizing the 8 risk factors, mentioned in section I of this report, was completed for each individual audit topic and then compiled to develop an overall risk assessment.

Following are the results of the risk assessment performed for the 15 potential audit topics identified:

HIGH RISK	MODERATE RISK	LOW RISK
Consumer Protection	Thrift Supervision and Compliance	Records Management
Mortgage Examinations (includes training)	Mortgage Licensing	Legal and Enforcement
Thrift Examinations (includes training)	Fixed Assets	Management Information Systems
Purchasing and Travel		Performance Measures
Payroll and Human Resources		Financial Reporting
Revenue Accounting Process		Risk Management

The 2014 Risk Assessment Summary is included on page 13 of this report.

In the prior 3 years, internal audits were performed in the following areas:

Fiscal Year 2013:

- Thrift Supervision and Compliance

Fiscal Year 2012:

- Mortgage Licensing

Fiscal Year 2011:

- Legal and Enforcement
- Revenue Accounting Process

FINANCE COMMISSION

Internal Audit Plan

The area recommended for internal audit and other functions to be performed for fiscal year 2014 are as follows:

1. Consumer Protection

The planned audit procedures include the following:

- a. Review and obtain an understanding of the applicable laws and regulations, as applicable to the Consumer Protection area.
- b. Obtain and review written policies and procedures, collect available documentation, and conduct interviews to document formal/informal processes and controls in place over the Consumer Protection area.
- c. Obtain a list of complaints received during the current fiscal year and select a sample to test for various attributes to assess the adequacy of internal controls over the Consumer Protection area and to determine that the applicable laws, regulations, policies, and procedures are consistently applied.
- d. Review and assess the adequacy of the process in place to ensure that complaints are addressed in a timely manner.
- e. Review the system in place to track complaints filed to determine if it is utilized as intended and provides pertinent information on the status of open claims.
- f. Review the reasonableness and completeness of any penalties assessed by SML.
- g. Other procedures deemed necessary during audit fieldwork.

2. Follow-up of Prior Year Internal Audits

Perform follow-up procedures to determine the status of prior year comments that were not fully implemented as of the fiscal year ended August 31, 2013. The audit procedures will result in a determination that the recommendation is (1) Fully Implemented; (2) Substantially Implemented; (3) Incomplete/Ongoing; or, (4) Not Implemented.

3. Other Tasks

Other tasks as may be assigned by the Finance Commission during the fiscal year.

FINANCE COMMISSION

Internal Audit Plan

V. Office of Consumer Credit Commissioner

Internal Audit Plan

The Internal Audit Plan (Plan) includes 1 audit to be performed during the 2014 fiscal year. The Plan also includes a follow-up of the prior year audit recommendations, other tasks as may be assigned by the Finance Commission, and preparation of the Annual Internal Audit Report for fiscal year 2014.

Risk Assessment

Utilizing information obtained through the inquiries and background information reviewed, 18 audit areas were identified as the potential audit topics. A risk analysis utilizing the 8 risk factors, mentioned in section II of this report, was completed for each individual audit topic and then compiled to develop an overall risk assessment.

Following are the results of the risk assessment performed for the 18 potential audit topics identified:

HIGH RISK	MODERATE RISK	LOW RISK
Texas Financial Education Endowment Fund	Fiscal Division	Records Management
Professional Licensing (Pawnshop Employees & MLO)	Regulated Examinations	Complaint Investigations
Property Tax Lender Examinations	Pawn Examinations	Human Resources
Billing and Collection of Fees	Credit Access Business Examinations	Performance Measures
Motor Vehicle Sales Finance Examinations	Fixed Assets	Business Licensing
	Management Information Systems	Registration
		Risk Management

The 2014 Risk Assessment Summary is included on page 14 of this report.

In the prior 3 years, internal audits were performed in the following areas:

Fiscal Year 2013:

- Credit Access Business Examinations

Fiscal Year 2012:

- Complaint Investigations

Fiscal Year 2011:

- Management Information Systems
- Business Licensing

FINANCE COMMISSION

Internal Audit Plan

The area recommended for internal audit and other functions to be performed for fiscal year 2014 are as follows:

1. Professional Licensing

The planned audit procedures include the following:

- a. Review and obtain an understanding of the laws and regulations provided in the Texas Finance Code (TFC) and Texas Administrative Code (TAC), as applicable to the Professional Licensing area.
- b. Obtain and review the Professional Licensing area's written policies and procedures, collect available documentation, and conduct interviews to document formal/informal processes and controls.
- c. Obtain a listing of new and renewed applications that were processed during the current fiscal year and select a sample to test for compliance with policies, procedures, rules and regulations, and current practices in place.
- d. Obtain a list of application and annual fees collected for the Professional Licensing area during the current fiscal year and test a sample to ensure the fee was properly calculated, collected, and recorded.
- e. Other procedures deemed necessary during audit fieldwork.

2. Follow-up of Internal Audits

Perform follow-up procedures to determine the status of prior year comments that were not fully implemented as of the fiscal year ended August 31, 2013. The audit procedures will result in a determination that the recommendation is (1) Fully Implemented; (2) Substantially Implemented; (3) Incomplete/Ongoing; or, (4) Not Implemented.

3. Other Tasks

Other tasks as may be assigned by the Finance Commission during the fiscal year.

ATTACHMENTS

TEXAS DEPARTMENT OF BANKING
Risk Assessment Summary
For Fiscal Year 2014

		RISK FACTOR WEIGHT																
		10.00%	16.50%	16.00%	15.00%	12.50%	12.00%	8.00%	10.00%									
		RISK FACTORS																
		1	2	3	4	5	6	7	8									
										Compliance with Contracts, Laws & Regulations		Susceptibility of Material Theft or Fraud		Existence of Issues or Concerns		Total		
POTENTIAL AUDIT TOPIC		Financial Materiality	Time Since Last Audit or Review	Results of Last Audit or Review	Adequacy of Staffing Levels	Policies and Procedures												
High Risk: > 144																		
1	Payroll & Human Resources	3	30.00	1	16.50	1	16.00	2	30.00	1	12.50	2	24.00	2	16.00	1	10.00	155.00
2	Purchasing	3	30.00	1	16.50	1	16.00	2	30.00	1	12.50	2	24.00	2	16.00	1	10.00	155.00
3	Revenue Accounting Process	3	30.00	1	16.50	1	16.00	2	30.00	1	12.50	2	24.00	2	16.00	1	10.00	155.00
4	Management Information Systems	1	10.00	1	16.50	2	32.00	1	15.00	1	12.50	2	24.00	2	16.00	2	20.00	146.00
Moderate Risk: 133 - 144																		
5	Money Service Businesses	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	140.50
6	Prepaid Funeral Guaranty Funds	3	30.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	140.00
Low Risk: < 133																		
7	Performance Measures	1	10.00	2	33.00	1	16.00	2	30.00	1	12.50	1	12.00	1	8.00	1	10.00	131.50
8	Fixed Assets Management	2	20.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	130.00
9	Perpetual Care Cemeteries	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	2	24.00	1	8.00	1	10.00	128.50
10	Imaging & Records Management	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	2	24.00	1	8.00	1	10.00	128.50
11	Travel	3	30.00	1	16.50	1	16.00	1	15.00	1	12.50	1	12.00	2	16.00	1	10.00	128.00
12	Corporate Activities	1	10.00	1	16.50	2	32.00	1	15.00	1	12.50	2	24.00	1	8.00	1	10.00	128.00
13	IT Examinations	1	10.00	1	16.50	1	16.00	2	30.00	1	12.50	2	24.00	1	8.00	1	10.00	127.00
14	Financial Reporting	1	10.00	1	16.50	1	16.00	2	30.00	1	12.50	2	24.00	1	8.00	1	10.00	127.00
15	Bank Examinations	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	124.00
16	Trust Examinations	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	124.00
17	Risk Management	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	1	12.00	1	8.00	1	10.00	116.50
18	Prepaid Funeral Contracts	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	1	8.00	1	10.00	112.00

Risk Factor Rating:

- 1 - Low Risk
- 2 - Moderate Risk
- 3 - High Risk

TEXAS DEPARTMENT OF SAVINGS AND MORTGAGE LENDING
Risk Assessment Summary
For Fiscal Year 2014

POTENTIAL AUDIT TOPIC	RISK FACTOR WEIGHT								Total									
	10.00%	16.50%	16.00%	15.00%	12.50%	12.00%	8.00%	10.00%										
	RISK FACTORS																	
	1	2	3	4	5	6	7	8										
	Financial Materiality	Time Since Last Audit or Review	Results of Last Audit or Review	Adequacy of Staffing Levels	Policies and Procedures	Compliance with Contracts, Laws & Regulations	Susceptibility of Material Theft or Fraud	Existence of Issues or Concerns										
High Risk: > 137																		
1	Consumer Protection	1	10.00	3	49.50	1	16.00	1	15.00	1	12.50	2	24.00	1	8.00	1	10.00	145.00
2	Mortgage Examinations (Includes Training)	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	140.50
3	Thrift Examinations (Includes Training)	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	140.50
4	Purchasing & Travel	3	30.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	140.00
5	Payroll and Human Resources	3	30.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	140.00
6	Revenue Accounting Process	3	30.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	140.00
Moderate Risk: 129 - 137																		
7	Thrift Supervision and Compliance	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	3	36.00	2	16.00	1	10.00	132.00
8	Mortgage Licensing	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	3	36.00	2	16.00	1	10.00	132.00
9	Fixed Assets	2	20.00	1	16.00	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	130.00
Low Risk: < 129																		
10	Records Management	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	2	24.00	1	8.00	1	10.00	128.50
11	Legal and Enforcement	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	124.00
12	Management Information Systems	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	120.00
13	Performance Measures	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	1	12.00	1	8.00	1	10.00	116.50
14	Financial Reporting	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	1	8.00	1	10.00	112.00
15	Risk Management	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	1	12.00	1	8.00	1	10.00	100.00

Risk Factor Rating:

- 1 - Low Risk
- 2 - Moderate Risk
- 3 - High Risk

OFFICE OF CONSUMER CREDIT COMMISSIONER
Risk Assessment Summary
For Fiscal Year 2014

		RISK FACTOR WEIGHT																
		10.00%	16.50%	16.00%	15.00%	12.50%	12.00%	8.00%	10.00%									
		RISK FACTORS																
		1	2	3	4	5	6	7	8									
										Compliance with Contracts, Laws & Regulations		Susceptibility of Material Theft or Fraud		Existence of Issues or Concerns		Total		
POTENTIAL AUDIT TOPIC		Financial Materiality	Time Since Last Audit or Review	Results of Last Audit or Review	Adequacy of Staffing Levels	Policies and Procedures												
High Risk: > 155																		
1	Texas Financial Education Endowment Fund	3	30.00	3	49.50	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	173.00
2	Professional Licensing (Pawnshop Employees & MLO)	1	10.00	3	49.50	1	16.00	2	30.00	1	12.50	2	24.00	1	8.00	1	10.00	160.00
3	Property Tax Lender Examinations	1	10.00	3	49.50	1	16.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	157.00
4	Billing and Collection of Fees	3	30.00	2	33.00	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	156.50
5	Motor Vehicle Sales Finance Examinations	1	10.00	2	33.00	1	16.00	2	30.00	1	12.50	3	36.00	1	8.00	1	10.00	155.50
Moderate Risk: 137 - 155																		
6	Fiscal Division (includes Purchasing & Travel & Payroll Division)	3	30.00	1	16.50	1	16.00	2	30.00	1	12.50	2	24.00	2	16.00	1	10.00	155.00
7	Regulated Examinations (includes Training)	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	140.50
8	Pawn Examinations	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	140.50
9	Credit Access Business Examinations	1	10.00	1	16.50	2	32.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	140.00
10	Fixed Assets	3	30.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	140.00
11	Management Information Systems	3	30.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	140.00
Low Risk: < 137																		
12	Records Management	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	2	24.00	1	8.00	1	10.00	128.50
13	Complaint Investigations	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	3	36.00	1	8.00	1	10.00	124.00
14	Human Resources	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	2	16.00	1	10.00	120.00
15	Performance Measures	1	10.00	2	33.00	1	16.00	1	15.00	1	12.50	1	12.00	1	8.00	1	10.00	116.50
16	Business Licensing	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	1	8.00	1	10.00	112.00
17	Registration	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	2	24.00	1	8.00	1	10.00	112.00
18	Risk Management	1	10.00	1	16.50	1	16.00	1	15.00	1	12.50	1	12.00	1	8.00	1	10.00	100.00

Risk Factor Rating:

- 1 - Low Risk
- 2 - Moderate Risk
- 3 - High Risk