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REGULATORY BOARD REVIEW

BOARD OF EXAMINERS FOR SPEECH-LANGUAGE PATHOLOGY AND AUDIOLOGY

AUDIT OVERVIEW

The Board of Examiners for Speech-Language Pathology and Audiology Should be Continued and Adhere to Its Complaint Procedure

The Board of Examiners for Speech-Language Pathology and Audiology Should Use the State Treasurer's Lockbox Banking System to Improve Its Internal Controls

The Board of Examiners for Speech-Language Pathology and Audiology Needs to Improve Its Website



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EXECUTIVE SUMMARY

The Legislative Auditor conducted a regulatory board review of the Board of Examiners for Speech-Language Pathology and Audiology authorized pursuant to West Virginia Code §4-10-10. The report contains the following issues:

Report Highlights

Issue 1: The Board of Examiners for Speech-Language Pathology and Audiology Should be Continued and Adhere to Its Complaint Procedure.

- The Board has complied with most Chapter 30 requirements but its register, roster and annual reports are incomplete.
- The Board is financially sufficient.
- The Board's actions with regard to complaints are timely but are not always documented or in adherence to its complaint procedures.

Issue 2: The Board of Examiners for Speech-Language Pathology and Audiology Should Use the State Treasurer's Lockbox Banking System to Improve Its Internal Controls.

- The Board cannot segregate duties for processing cash receipts because it only has one employee.
- The Board's financial record-keeping is non-compliant with state law and is inadequate to determine if the Board has collected all license renewal fees.
- The Board does not deposit funds within 24-hours as required by WVC §12-2-2.
- The Board does not sufficiently secure purchase card records or the personal data of applicants and licensees.

Issue 3: The Board of Examiners for Speech-Language Pathology and Audiology Needs to Improve Its Website.

- The Board's website needs increased transparency and user-friendliness to improve accountability and public accessibility.

Recommendations

1. *The Legislative Auditor recommends that the Legislature continue the Board of Speech-Language Pathology and Audiology.*
2. *The Legislative Auditor recommends that the Board of Speech-Language Pathology and Audiology should add to its roster and register: applicant's age, names of applicants denied licensure; licensees' educational qualifications; whether or not an examination was required; suspensions or revocations imposed; and licensees' office address as required in WVC §30-1-12(a).*
3. *The Legislative Auditor recommends that the Board of Speech-Language Pathology and Audiology submit an annual report to the Governor each year as required in WVC §30-1-12(b).*
4. *The Legislative Auditor recommends that the Board of Speech-Language Pathology and Audiology consider requiring licensure applicants, and periodically licensees, provide the Board with a sealed, FBI criminal history background check as a pre-requisite to licensure and licensure renewals.*
5. *The Legislative Auditor recommends that the Board of Speech Language-Pathology and Audiology begin utilizing the State Treasurer's lockbox banking system to establish better financial internal controls.*
6. *The Legislative Auditor recommends that the Legislature consider amending state law to require a state agency to use the State Treasurer's lockbox banking system if that agency does not have a sufficient number of employees to provide for segregation of duties with regard to revenue collections.*
7. *The Legislative Auditor recommends that the Board of Speech-Language Pathology and Audiology secure purchase card records and personal data of applicants and licensees.*
8. *The Legislative Auditor recommends that if the Board of Speech-Language Pathology and Audiology continues to receive fees at its office it should process the cash equivalents out of sight of the public.*
9. *The Legislative Auditor recommends that the Board of Speech-Language Pathology and Audiology make improvements to its website to increase user-friendliness and transparency.*
10. *The Legislative Auditor recommends that the Board of Speech-Language Pathology and Audiology update its website to include detailed information about each licensee.*

ISSUE 1

The Board of Examiners for Speech-Language Pathology and Audiology Should be Continued and Adhere to Its Complaint Procedure.

Issue Summary

The Board of Speech-Language Pathology and Audiology should be continued. The Legislative Auditor found the following in the overall functioning of the Board:

- The Board has complied with most Chapter 30 requirements but its register, roster and annual reports are incomplete.
- The Board is financially sufficient.
- The Board's handling of some complaints shows deficiencies.
- The Board appears to have made a decision about a complaint outside of an open meeting.
- The Board does not require a Federal Bureau of Investigations (FBI) criminal history background check.

The Legislative Auditor finds that the State has a continuing interest in regulating the two professions of Speech-Language Pathologists and Audiologists.

The Board Should Be Continued

In 2001 the Legislative Auditor conducted a regulatory board review of the Board of Examiners for Speech-Language Pathology and Audiology. The report concluded that the unregulated practice of speech-language pathology and audiology could put the public at risk for harm. As the occupational tasks of speech-language pathologists and audiologists have not changed since the 2001 report, the Legislative Auditor finds that the State has a continuing interest in regulating the two professions of Speech-Language Pathologists and Audiologists.

The Board Has Complied With Most Chapter 30 Requirements

The Board of Examiners for Speech-Language Pathology and Audiology (Board) is compliant with most of the general provisions of Chapter 30 of the West Virginia Code. The Board complies with the following provisions:

- The Board has attended the State Auditor’s orientation session (§30-1-2a (b));
- The Board has adopted an official seal (§30-1-4);
- The Board meets at least once annually (§30-1-5(a));
- The Board has promulgated rules specifying the investigation and resolution procedure of all complaints (§30-1-8(k));
- The Board is financially self-sufficient in carrying out its responsibilities (§30-1-6(c));
- The Board has established continuing education (§30-1-7a); and
- The Board has published its address and telephone number as required by (§30-1-12(c)).

The Board’s annual report does not contain an itemized statement of its receipts and disbursements and statistical reports by county of practice (§30-1-12(b)).

In addition, the Board has partially complied with the following general provisions of Chapter 30:

- The Board’s register and roster of applicants does not contain the following information specified in Code: age, names of applicants denied licensure; licensees’ educational qualifications; whether or not an examination was required; suspensions or revocations imposed; and licensees’ office address (§30-1-12(a) and 13).
- The Governor's Office does not have record of the Board submitting its annual report in 2010 but the Board did submit the annual report to the Legislature in FY 2009 through FY 2012 (§30-1-12(b))
- The Board’s annual report does not contain an itemized statement of its receipts and disbursements and statistical reports by county of practice (§30-1-12(b)).

The Board is currently financially self-sufficient.

The Board Is Financially Self-sufficient

The Board is maintaining an end-of-year cash balance that is in excess of one year of expenditures. Financial self-sufficiency of regulatory boards is required by West Virginia Code §30-1-6(c). The Board’s end-of-year cash balances confirm that the Board is currently financially self-sufficient (see Table 1).

Table 1
Revenues and Expenditures FY 2008 to FY 2012

FY	Beginning of Year Cash Balance	Revenues	Expenditures	End of Year Cash Balance
2008	\$154,927	\$25,752	\$84,728	\$95,951
2009	\$95,251	\$168,133	\$94,653	\$169,431
2010	\$169,431	\$37,860	\$94,722	\$112,569
2011	\$112,569	\$185,541	\$89,686	\$208,423
2012	\$208,423	\$39,034	\$80,295	\$167,162

Sources:

State Auditor's Office

Legislative Auditor's Digest of Revenue Sources in West Virginia FY 2008 to FY 2012.

Rounding may affect totals.

The Board's Initial License, and Renewal Fees Are Comparable To Neighboring States' Boards

The Legislative Auditor compared the Board's fees to those of West Virginia's neighboring states. While West Virginia's initial licensure fee is the same as Kentucky and Ohio, three states, Maryland, Pennsylvania and Virginia have a lower initial licensing fee. West Virginia's renewal fee is higher than four of her neighbors, with only Maryland having a higher renewal fee. See Table 2 for the initial licensure and renewal fees of West Virginia and her neighbors.

Table 2
Current Licensure Fees of West Virginia and Neighboring States

State	Initial Licensure Fee	Renewal Fee	Renewal Period
Kentucky	\$200	\$150	biennial
Maryland	\$150	\$250	biennial
Ohio	\$200	\$120	biennial
Pennsylvania	\$20	\$46	biennial
Virginia	\$135	\$75	annual
West Virginia	\$200	\$175	biennial

Sources: Websites of each individual state board responsible for licensing speech-language pathologists and audiologists.

The Board Resolves Complaints Within Mandated Time Frames

The Legislative Auditor reviewed all 10 complaints received in fiscal years 2010 through 2012. Complaints made by the public were about a billing for services not rendered, falsified medical records, an appointment time not kept, and employment discrimination. The Board initiated complaints of an ethics violation, an individual falsifying a license, persons practicing without a license, and licensees aiding and abetting unlicensed practice. The Board considers all of these complaints closed. See Appendix C to view a table that lists the official complaints received by the Board for the past three fiscal years. All complaints were resolved within the 18-month period as mandated by statute. The complaint resolution time for the Board from 2010 through 2012 ranged from 11 days to 13 months, with an overall average of 6 months. Table 3 shows the number of complaints received yearly for the past three fiscal years and the average time to resolution.

All complaints were resolved within the 18-month period as mandated by statute.

Table 3
Complaint Decision Statistics

Fiscal Year	Number of Complaints Received	Number of Complaints Closed Within 18 Months	Average Months to Decision
2010	4	4	3.5
2011	2	2	13
2012	4	4	2.75

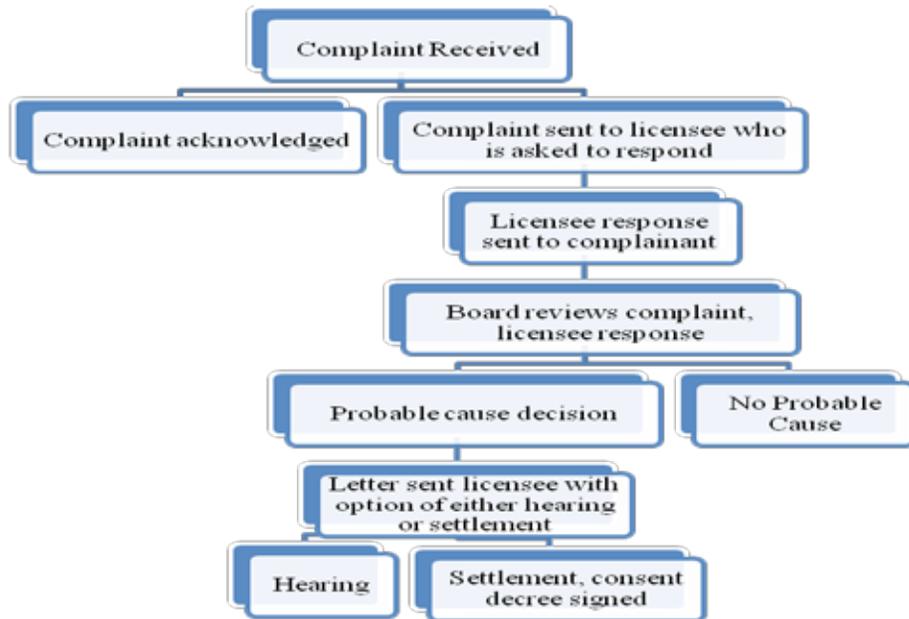
Source: Legislative Auditor's review of the Board's complaint file.

The Board Has Deviated From Complaint Procedures

The Board does not always follow statutory requirements or its established rules for addressing complaints. The Board's official complaint process, as found in its procedural rules, is outlined below.

The Board does not always follow statutory requirements or its established rules for addressing complaints.

Figure 1: Board's Complaint Process



The Legislative Auditor identified three areas in which the Board did not follow statutory requirements for handling complaints or its own established procedures:

1. Acknowledgement of Complaints

One complaint file does not have documentation to indicate the Board acknowledged a complaint made by the public. The public made only four complaints. Pursuant to its procedural rules the Board is required to acknowledge complaints with a letter to the complainant. The letter is to tell the complainant one or more of the following:

1. The complaint will be reviewed by the Board.
2. The complaint is outside the Board's jurisdiction with suggestions as to how the complainant may find resolution.
3. More information is needed for the Board to review the complaint.

The Board should strive to comply with its procedural rule and always acknowledge complaints received.

One complaint file does not have documentation to indicate the Board acknowledged a complaint made by the public.

2. Licensee Was Not Informed That a Complaint Was Made

In one instance, there is no evidence in the complaint file that the Board informed a licensee of a complaint filed against him. In order to comply with governing rules the Board is required to inform licensees when someone files a complaint against them. The information is to be provided to licensees in a timely manner and licensees are to be provided due process.

In one instance, there is no evidence in the complaint file that the Board informed a licensee of a complaint filed against him.

3. Complainant Was Not Informed of the Board's Decision

In this third instance, there is no evidence in the complaint file that the Board informed a complainant of a decision it made to place a licensee on one-year probation. The Board's complaint process does not specify notifying the complainant or the licensee of the Board's complaint resolution. However, Code §30-1-5(c) states,

Every board referred to in this chapter has a duty to investigate and resolve complaints which it receives and shall, within six months of the complaint being filed, send a status report to the party filing the complaint by certified mail with a signed return receipt . . .

Chapter 30 clearly requires licensing boards to send information to complainants within six months of a complaint being filed. The Board should conduct all complaint proceedings in compliance with the requirements of Chapter 30 and its procedural rules.

There is no evidence in the complaint file that the Board informed a complainant of a decision it made to place a licensee on one-year probation.

The Board Has Established Continuing Education Requirements

The Board has established continuing education requirements for its licensees. Each speech-language pathologist and audiologist is required to complete a minimum of 20 hours of continuing education during the 2-year licensure period. Continuing education courses offered by the American Speech-Language-Hearing Association, the West Virginia Speech-Language-Hearing Association, and the American Academy of Audiology are approved without Board review. All licensees are required to provide the Board with the continuing education presenter or monitor's signature as proof the licensee completed the continuing education course.

Speech-language pathologists and audiologists must complete the same number of continuing education hours biennially as neighbors Ohio and Pennsylvania. Virginia requires three times as many continuing education hours as West Virginia in the same number of years. Kentucky and Maryland each require 10 more hours per biennial renewal cycle. Table 4 displays the continuing education requirements for West Virginia and neighboring states.

All licensees are required to provide the Board with proof the licensee completed the continuing education course.

State	CE Hours	Renewal Period
Kentucky	30	Biennial
Maryland	30	Biennial
Ohio	20	Biennial
Pennsylvania	20	Biennial
Virginia	30	Annual
West Virginia	20	Biennial

Source: Websites of each individual state board responsible for licensing speech-language pathologists and audiologists.

The Board Should Consider Requiring Licensure Applicants to Submit a Sealed, FBI Criminal History Background Check

The Board should consider requiring applicants for licensure to submit FBI criminal background checks at the time of application for a license and periodically thereafter. The Board does not have legal authority to conduct federal criminal background checks itself on licensees. However, it could require applicants to obtain a personal criminal background check and provide the sealed results to the Board.

Conclusion

The Board of Examiners for Speech-Language Pathology and Audiology is compliant with most of the general provisions of Chapter 30 of the West Virginia Code. The Board is financially self-sufficient. The Board's actions with regard to complaints are timely but are not always documented or in adherence to its complaint procedures. The Board

is complying with continuing education requirements for its licensees, and the Board is publically accessible. Nevertheless, the Board keeps an incomplete register, roster and annual report. In addition, the Board should submit an annual report to the Governor as required in Code.

Recommendations

1. *The Legislative Auditor recommends that the Legislature continue the Board of Examiners for Speech-Language Pathology and Audiology.*
2. *The Legislative Auditor recommends that the Board of Examiners for Speech-Language Pathology and Audiology should add to its roster and register: applicant's age, names of applicants denied licensure; licensees' educational qualifications; whether or not an examination was required; suspensions or revocations imposed; and licensees' office address as required in WVC §30-1-12(a).*
3. *The Legislative Auditor recommends that the Board of Examiners for Speech-Language Pathology and Audiology submit an annual report to the Governor each year as required in WVC §30-1-12(b).*
4. *The Legislative Auditor recommends that the Board of Examiners for Speech-Language Pathology and Audiology consider requiring licensure applicants, and periodically licensees, provide the Board with a sealed, FBI criminal history background check as a pre-requisite to licensure and licensure renewals.*

Issue 2

The Board of Examiners for Speech-Language Pathology and Audiology Should Use the State Treasurer's Lockbox Banking System to Improve Its Internal Controls.

Issue Summary

The Board lacks internal controls for financial management. The Legislative Auditor finds that:

- One employee handles all financial transaction components for a substantial amount of the Board's revenues.
- The Board's financial record-keeping is non-compliant with state law and is inadequate to determine if the Board has collected all license renewal fees.
- Funds are not deposited within 24-hours as required by WVC §12-2-2.
- Purchase card records as well as the personal data of applicants and licensees are not sufficiently secured.

The Board cannot segregate duties for processing cash receipts because it only has one employee.

Financial Internal Controls Need to Be Improved

The Board's procedure for financial management lacks controls with respect to segregation of duties. Segregation of duties is an important internal control that guards against inappropriate use of funds received by the Board. The Board's single employee handles all components of financial transactions for a significant percentage of the Board's revenues. The Board's only employee receives, images, and deposits 90 percent of the Board's revenues in years when licenses are not renewed and 39 percent of revenues in renewal years. **The Board cannot segregate duties for processing cash receipts because it only has one employee.**

Licensees renew licenses every two years. Licensees may pay the renewal fee electronically through an online portal on the Board's webpage or telephone the Board and provide their credit card number to the Board employee who electronically submits the payment. In the last renewal cycle, 61 percent of all license renewal monies were paid using the online method. The Board's employee also processes paper payments such as checks. Table 5 shows the percentage of revenues processed by the Board's one staff person and the revenues paid online by the licensee.

Table 5
Percentage of All Revenues
FY 2010 through FY 2012

FY	Revenues Processed By Board Employee			Revenues Paid Online by Licensee		
	Locally Deposited Fees	Percentage	Online Paid Fees	Percentage	License Renewal	Percentage
2010	\$30,595	82%	\$3,915	10%	\$3,025	8%
2011	\$59,061	32%	\$13,060	7%	\$113,975	61%
2012	\$27,613	71%	\$6,190	16%	\$4,950	13%

Source: WV State Treasurer's Office.

The Board has not maintained an itemized list of receipts as required by Code §30-1-12(b). Revenues received by the Board prior to February 2011 exist only as copies of checks, which may or may not indicate the purpose of the payment. The associated paperwork that accompanied the check is maintained separately. The Board's record-keeping is insufficient to determine if the Board has collected the amount of expected license renewal fees.

The Board's record-keeping is insufficient to determine if the Board has collected the amount of expected license renewal fees.

The Board receives most of its revenue from fees paid by licensees for initial licensure and for license renewals. As of FY 2011, the Board reported 689 licensed speech-language pathologists and 135 audiologists. Based on an average number of licensees reported in its FY 2011 annual report, the Board's license renewal revenue should be about \$144,200. However, the Legislative Auditor's examination of renewal revenue deposits shows about \$35,000 less than the revenue amount expected. Table 6 compares the revenue the Board has attributed as license renewal to the revenue expected based on the number of licensees.

Table 6
Board's FY 2011 License Renewal Revenue

FY	Audiologists (\$175)	S-L Pathologists (\$175)	Projected Revenue	Recorded as Renewal Revenue	Difference
2011	135	689	\$144,200	\$109,125	(\$35,075)

Source: Board FY 2011 annual report and WV State Treasurer's Office deposit history.

The Board's records do not assign nearly \$40,191 to any particular fee. The Legislative Auditor determined that the difference between the projected license renewal revenues and the revenues recorded as renewal revenues could be a result of the non-assigned revenue.

The amount of \$40,191 is large enough to include the \$35,075 difference between projected revenues and recorded revenues. The Board should document its revenue sources and continually assess that collections are consistent with projected revenues. One way the Board could document its revenue sources would be to utilize services of the State Treasurer such as the lockbox banking system. The State Treasurer offers lockbox banking to state agencies for a nominal cost. This change would require that the Board's licensees mail check payments for fees directly to a post office box accessible only by the State Treasurer. The Treasurer's Office makes several daily trips to the post office ensuring that no payment remains in the post office overnight. The Treasurer's Office deposits payments upon receipt, ensuring that funds are immediately available in a Board's bank account. The Treasurer's Office processes the checks and captures data from coupons or stubs so that a Board can credit the payment correctly in its payment system. Boards are able to query the status of accounts and can receive images of checks, coupons or stubs. If a Board chooses to have licensees mail payments and associated paperwork to the Treasurer's lockbox, the Treasurer's Office forwards all paperwork to the Board after payments are processed. The Treasurer can also image the documents for a Board. (See Appendix D to see the Treasurer's brochure for the lockbox service.)

One way the Board could document its revenue sources would be to utilize services of the State Treasurer such as the lockbox banking system.

The Board does not deposit all revenue within 24 hours.

Revenues Not Being Deposited Within 24 Hours

Code requires that agencies deposit revenue within 24 hours. The Board does not deposit all revenue within 24 hours. **According to the Board's own data, 35 percent of deposits did not occur within a day of receipt in FY 2012.** Compliance with the 24-hour deposit requirement is impossible for a board with one employee who will take time off for the usual reasons such as sickness or vacation. There have been occasions where a check received by the Board was not deposited for approximately two weeks. In order to address the lack of segregation of financial duties, and to allow all deposits to be made within the statutory time frame, the Legislative Auditor recommends that the Board begin utilizing the State Treasurer's lockbox.

Physical Control Over Records Needs to Be Implemented

According to the Standards for Internal Control in the Federal Government, access to resources and records should be limited to authorized individuals, and accountability for their custody and use should be assigned and maintained. For instance, the State Auditor's Purchasing Card Policies and Procedures Manual requires that the spending unit provide and maintain internal controls to ensure physical security of purchase card records. Records must be stored in a secure location where only authorized individuals have access. The Legislative Auditor observed that the Board's purchase card records are kept in unlocked filing cabinets in its office. This area can be accessed from two doors left propped open during business hours. These entries allow access to the files by unauthorized individuals. The Board should provide greater security over these records, and the personal identifying information of applicants and licensees (DOB, social security numbers, and college transcripts) kept in the same cabinets. Unauthorized individuals should not be able to walk into the office and access this information as they now could.

The Legislative Auditor observed that the Board's purchase card records are kept in unlocked filing cabinets in its office. This area can be accessed from two doors left propped open during business hours.

Conclusions

Internal controls regulate and guide an agency's operations. This Board's internal controls cannot provide reasonable assurance of effectiveness and efficiency of operations, reliability of financial reporting, and compliance with applicable laws and regulations. The Board's staff size is not large enough to provide segregation of duties but improved control over security can be implemented.

Recommendations

5. *The Legislative Auditor recommends that the Board of Examiners for Speech Language-Pathology and Audiology begin utilizing the State Treasurer's lockbox banking system to establish better financial internal controls.*
6. *The Legislative Auditor recommends that the Legislature consider amending state law to require a state agency to use the State Treasurer's lockbox banking system if that agency does not have a sufficient number of employees to provide for segregation of duties with regard to revenue collections.*

7. *The Legislative Auditor recommends that the Board of Examiners for Speech-Language Pathology and Audiology secure purchase card records and personal data of applicants and licensees.*
8. *The Legislative Auditor recommends that if the Board of Examiners for Speech-Language Pathology and Audiology continues to receive fees at its office it should process the cash equivalents out of sight of the public.*

Issue 3

The Board of Examiners for Speech-Language Pathology and Audiology Needs to Improve Its Website.

Issue Summary

The Legislative Auditor’s Office conducted a literature review on assessments of governmental websites and developed an assessment tool to evaluate West Virginia’s state agency websites (see Appendix E). The assessment tool lists several website elements. Some elements should be included in every website, while other elements such as social media links, graphics and audio/video features may not be necessary or practical for state agencies. Table 7 indicates that the Board integrates 34 percent of the checklist items in its website. This measure shows that the Board needs to make more improvement in the user-friendliness and transparency of its website.

The Board needs to make more improvement in the user-friendliness and transparency of its website.

Table 7 Board Website Evaluation Score			
Substantial Improvement Needed	More Improvement Needed	Modest Improvement Needed	Little or No Improvement Needed
0-25%	26-50%	51-75%	76-100%
	34%		
<i>Source: The Legislative Auditor’s review of the Board’s website.</i>			

The Board’s Website Scores Relatively Low in User-Friendliness and Transparency

In order for citizens to engage with a board online, they should be able to gain access to the website and to comprehend the information posted there. A user-friendly website employs up-to-date software applications, is readable, well-organized and intuitive, provides a thorough description of the organization’s role, displays contact information prominently and allows citizens to understand the organization of the board. Governmental websites should also include budget information and income sources to maintain transparency and the trust of citizens. The Legislative Auditor reviewed the Board’s website for both user-friendliness and transparency. As illustrated below in Table 8, the website is not user-friendly or transparent. **The Board should consider making website improvements to provide a better online experience for the public and for its licensees.**

Table 8
Website Evaluation Score

Category	Possible Points	Agency Points	Percentage
User-Friendly	18	7	39%
Transparent	32	10	31%
Total	50	17	34%

Source: Legislative Auditor's review.

The Board's Website Is Navigable But Needs Additional User-Friendly Features

While navigating the Board's website is easy, useful features including a search box to increase its user friendliness are not present. However, the Board's homepage links to every page making it navigable. The Board has a link on its homepage labeled *consumer guide*. This *consumer guide* has a few important consumer questions, including how to file a complaint, with the associated answers. The link's label obscures this helpful feature's purpose. The Board should consider adding FAQ (frequently asked questions) instead of its current label of *consumer guide* to describe the information this link contains.

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The reading level of the text on the website makes it difficult for the average citizen to understand. The Board's website readability is at the 11th and 12th grade reading level. A report done by the Brookings Institute determined that government websites should be written at an 8th grade reading level to facilitate readability. Readable, plain language helps the public find information quickly, understand the information easily and use the information effectively.

User-Friendly Considerations

The following are three attributes that could lead to a more user-friendly Board website:

- **Search Tool** - A search box to allow users to search for the specific information they seek.
- **Site Functionality** – The website should include buttons to adjust the font size, and resizing of text should not distort site graphics or text.

- **Feedback Options** - A page where users can voluntarily submit feedback about the Board's website or particular section of the website.

The Board does not have elements such as really simple syndication, graphics and audio/video features. The absence of these elements lower the Board's overall user friendliness score but are not essential for the Board to convey the Board's role or impede public from finding information.

The Website Needs to Be More Transparent

A website that is transparent will have elements such as email contact information, the location of the agency, the agency's phone number, as well as public records, the budget and performance measures. A transparent website will also allow for citizen engagement so that their government can make policies based on the information shared. The Website Criteria Checklist and Points System (see Appendix E) demonstrates that the Board's website has 10 of 32 core elements that are necessary for a general understanding of the Board. The Board's home page has the Board office's email and physical address as well as its telephone number. Additionally all Board member names and most of their telephone numbers are on the homepage. This allows citizens to locate the information necessary to communicate with the Board. The Board also has pertinent public information on its website including its enabling statute, governing rules and disciplinary actions it has taken against licensees.

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Transparency Considerations

Several other elements are also necessary to provide a transparent website. The following are a few attributes that could be beneficial to the Board in increasing its transparency:

- **Mapped Location of Board Office**- The Board's contact page should include an embedded map that shows the Board's location.
- **Budget**- A link to the annual Board budget, preferably to the checkbook level.
- **Public Records**- The agency's website should contain applicable public records such as meeting minutes and annual reports.

- **Calendar of Events**- The Board’s website should contain information on events, meetings, etc. ideally imbedded using a calendar program.
- **Organizational Chart**- The agency’s website should contain a narrative describing the agency organization, preferably in a pictorial representation such as a hierarchy/ organizational chart.
- **Complaint Form**- A specific page that contains an online complaint form.
- **FOIA Information**- Information on how to submit at FOIA request, ideally with an online submission form.

The Board can also improve public transparency by providing detailed information for each licensed speech-language pathologist and audiologist.

The Board can also improve public transparency by providing detailed information for each licensed speech-language pathologist and audiologist. The Board could include (at a minimum) such information as the speech-language pathologist or audiologist’s name, work address, education, disciplinary actions taken by the Board against the licensee, and licensure dates. Search features by licensee’s name, license number and work location would make obtaining information about licensees easy for the public. Based on the results of this website evaluation, **the Legislative Auditor recommends that the Board make improvements to its website to increase user-friendliness and transparency.**

Conclusion

The Board’s website lacks several of the features that promote user-friendliness and transparency. Users of the Board’s website will not find the Board’s budget, meeting minutes, annual reports, or any indication of the number of licensees in the state, counties where licensees work or any detail on licensees. Providing website users this information would greatly improve transparency. In order to improve the experience website users have the Board should provide the following on its website: a link labeled how file a complaint on the homepage, find a licensee search feature and a general website search box.

Recommendations

9. *The Legislative Auditor recommends that the Board of Examiners for Speech-Language Pathology and Audiology make improvements to its website to increase user-friendliness and transparency.*

10. *The Legislative Auditor recommends that the Board of Examiners for Speech-Language Pathology and Audiology update its website to include detailed information about each licensee.*

Appendix A: Transmittal Letter

WEST VIRGINIA LEGISLATURE *Performance Evaluation and Research Division*

Building 1, Room W-314
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0610
(304) 347-4890
(304) 347-4939 FAX



John Sylvia
Director

November 20, 2012

Patricia J Nesbitt, Administrative Services Manager
Board of Examiners Speech-Language Pathology & Audiology
99 Edmiston Way
Box 11, Suite 214
Buckhannon, WV 26201

Dear Ms. Nesbitt,

This is to transmit a draft copy of the regulatory board review of the Board of Examiners of Speech-Language Pathology and Audiology. This report is scheduled to be presented during the December 10-12 interim meeting of the Joint Committee on Government Operations, and the Joint Committee on Government Organization. We will inform you of the exact time and location once the information becomes available. It is expected that a representative from your agency be present at the meeting to orally respond to the report and answer any questions the committees may have.

If you would like to schedule an exit conference to discuss any concerns you may have with the report, please notify us between November 21 and November 28, 2012. We need your written response by noon on November 29, 2012, in order for it to be included in the final report. If your agency intends to distribute additional material to committee members at the meeting, please contact the House Government Organization staff at 340-3192 by Thursday, December 6 to make arrangements.

We request that your personnel not disclose the report to anyone not affiliated with your agency. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Midkiff".

Michael Midkiff
Research Manager

Joint Committee on Government and Finance

Appendix B: Objective, Scope and Methodology

The Performance Evaluation and Research Division (PERD) within the Office of the Legislative Auditor evaluated the Board of Examiners for Speech-Language Pathology and Audiology (Board). This regulatory board review is required and authorized by the West Virginia Performance Review Act, pursuant to West Virginia Code §4-10-10(b), as amended. The purpose of the Board, as established in West Virginia Code §30-32 is to protect the public interest through its license process and to be the regulatory and disciplinary body for audiologists and speech-language pathologists throughout the state.

Objective

The purpose of this review is to determine whether the Board should be continued. In addition, this review is intended to assess the Board's compliance with the general provisions of Chapter 30, Article 1 of the *West Virginia Code*, the Board's enabling statute, and other applicable rules and laws such as the Open Governmental Proceedings (WVC §6-9A). The Legislative Auditor also examined the Board's revenues to determine whether the Board is financially self-sufficient. Finally, the Legislative Auditor assessed the Board's website for user-friendliness and transparency.

Scope

The evaluation included reviewing the Board's policies and procedures, meeting minutes, complaint files from 2010-2012, complaint-resolution process, disciplinary procedures and actions, continuing education requirements and verification, the Board's compliance with the general statutory provisions for regulatory boards and other applicable laws, and key features of the Board's website. The evaluation also included examining the Board's financial internal controls, and revenues and expenditures for the period of FY 2007 through 2012. Auditors did not review license renewal receipts at the individual detail level because the Board only began maintaining a log of receipts in February 2011.

Methodology

PERD staff visited the Board's office in Buckhannon and met with its staff. Some information gathered for this review included interviews with the Board's staff, and staff of other agencies, which included the State Treasurer's Office, and the Legislative Auditor's Budget Office Division. Interviews and verbal comments made by these agencies were confirmed by written statements and in many cases were confirmed by corroborating evidence as well. PERD collected and analyzed the Board's complaint files, meeting minutes, annual reports, budget information, licensee roster, procedures for investigating and resolving complaints, and continuing education. This information was assessed against statutory requirements in §30-1 and §6-9A of the West Virginia Code as well as the Board's enabling statute §30-32 to determine the Board's compliance with such laws.

The Legislative Auditor noticed that the Board's revenues attributed to license renewal revenues were \$35,075 less than would have been expected to be generated based on the number of licensees. The Board did not begin keeping a log of individual receipt collections until February 2011. Revenues received by the Board prior to February 2011 exist only as copies of the original checks. The Legislative Auditor determined that the Board's data were not sufficiently reliable for the purposes of this financial review because the Board had not maintained an itemized list of receipts until February 2011. In order to obtain reasonable assurance that revenue figures were sufficient and appropriate, PERD obtained the Board's deposits into the State's Financial Information and Management System (FIMS) and the online license renewal payments for fiscal years 2010 through 2012 from the State Treasurer. The Legislative Auditor concluded from an examination of the online activity and the deposits that non-assigned revenues deposited were \$40,191 and would be sufficient to include the discrepant amount.

The Legislative Auditor tested the Board's expenditures for fiscal years 2010 through 2012 to reduce audit risk. The test involved determining what percent of total expenditures verifiable expenditures comprised. Verifiable expenditures include: salaries and benefits, travel reimbursement, board-member compensation, insurance, office rent and utilities, printing and binding costs, rental fees, telecommunication costs, computer services, bank fees, and contractual agreements. The Legislative Auditor determined that during the scope of the review, verifiable expenses were between 85 and 92 percent of total expenditures. These percentages gave reasonable assurance that the audit risk was reduced to a satisfactory level with regards to expenditures.

This performance audit was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS). Those standards require that the audit be planned and performed to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. The Legislative Auditor believes that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix C: Complaints FY 2010-2012

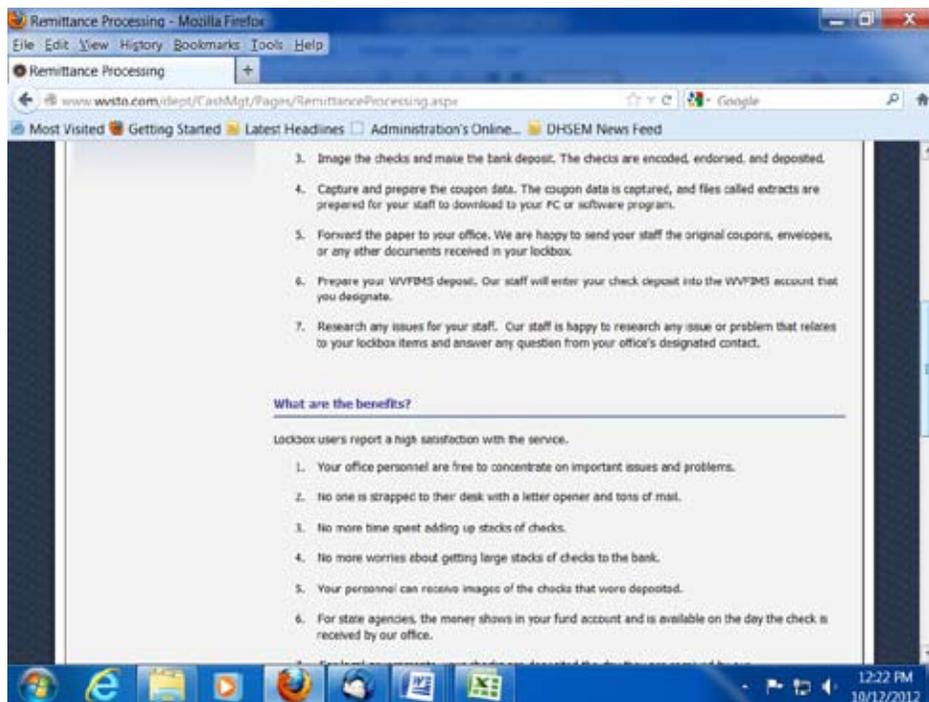
Board of Speech-Language Pathology and Audiology Complaint

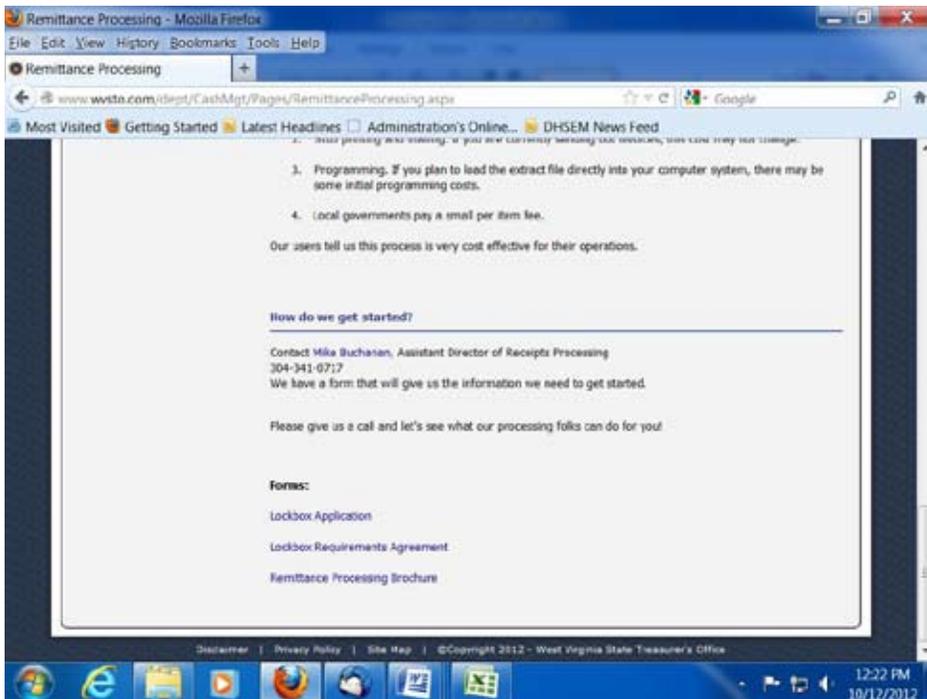
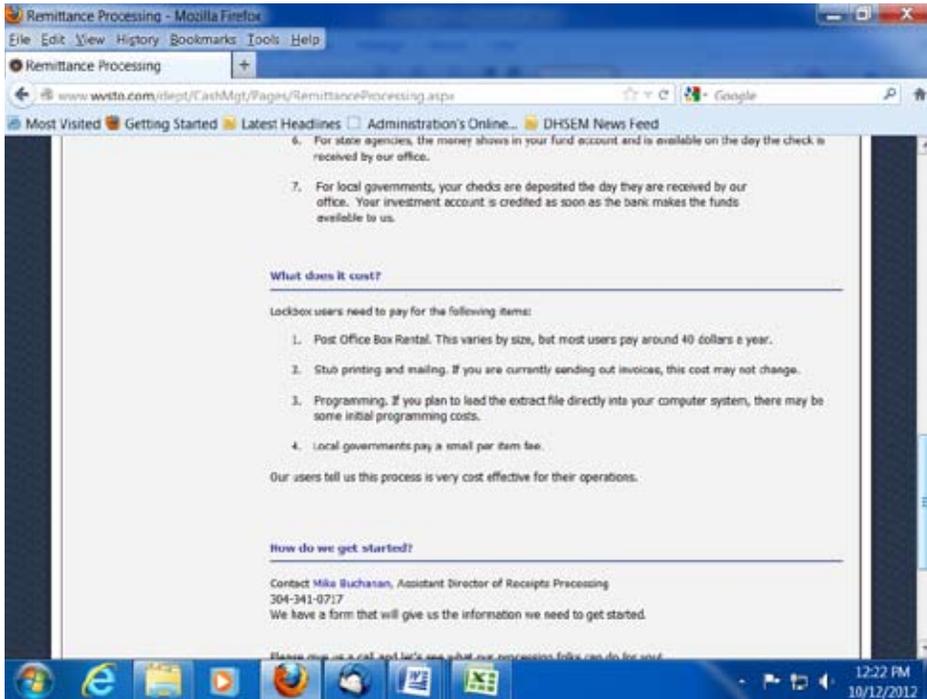
Official Complaints FY 2010 through 2012			
FY	Nature of complaints received	Decision	Time to close
2010	Ethics violation supervision of provisional license	SLP: letter of reprimand	6 months
	Billing dispute	SLP license suspension stayed, 1 year probation	6 months
	Falsified Medical records	Audiologist: No probable cause	2 months
	Practicing with falsified license	SLP: Cease and Desist letter	11 days*
2011	Practicing without a license	SLP: Letter of reprimand, Ethics course, Write article explaining consequences of ignoring licensing laws, and fine of \$250	13 months*
	Aided and abetted unlicensed practice	SLP: 2 year probation, Supervision training course, quarterly attestations of non-supervision, \$500 fine	13 months*
2012	Appointment time not kept	Audiologist: No probable cause	4 months
	Practicing without a license	SLP: Letter of reprimand, workplace ethics course, write article explaining consequences of ignoring licensing laws, and fine of \$500	1 month*
	Aided and abetted unlicensed practice	SLP: 2 year probation, Supervision training course, quarterly attestations of non-supervision, \$500 fine	3 months*
	Employment discrimination	SLP: No jurisdiction	3 months

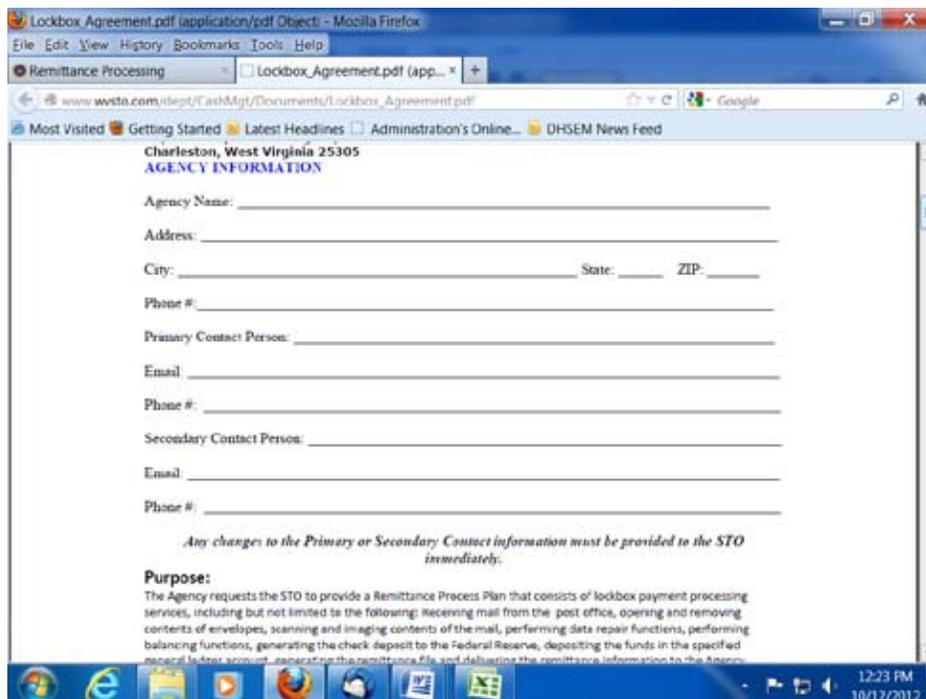
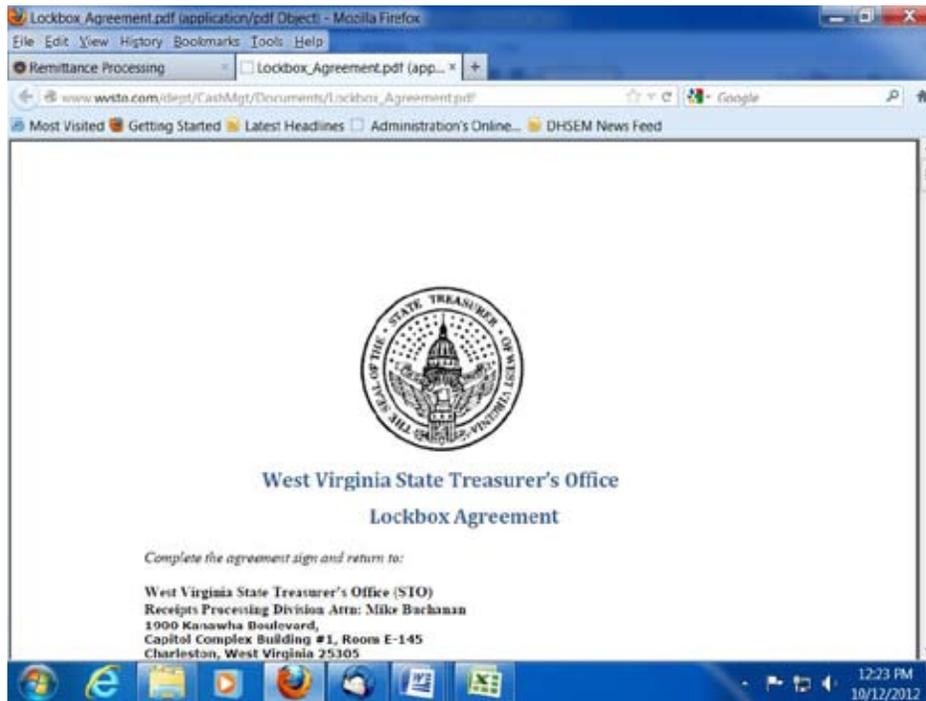
Source: Legislative Auditor's analysis of Board's complaint files.

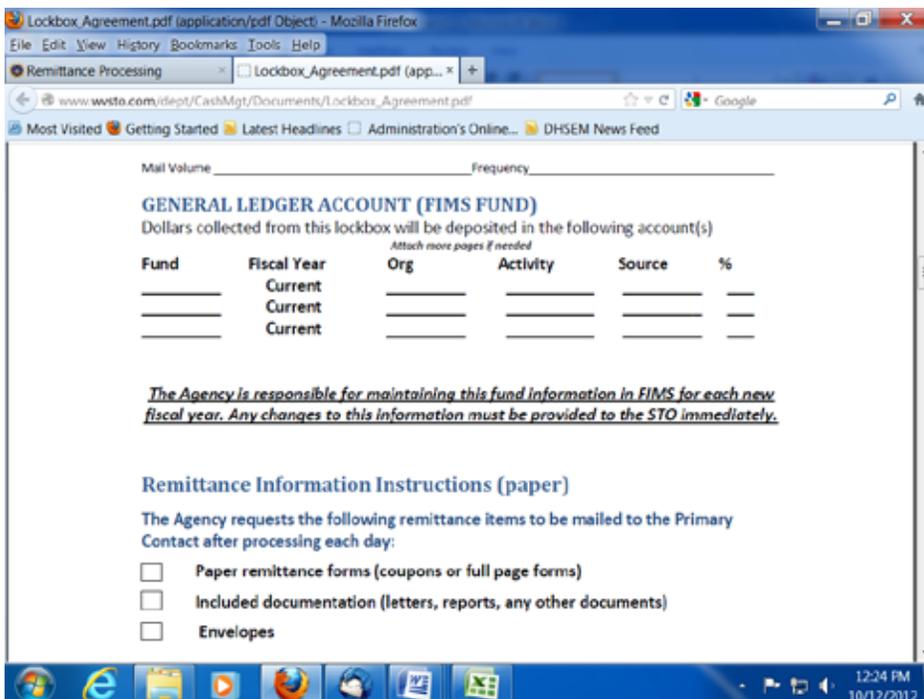
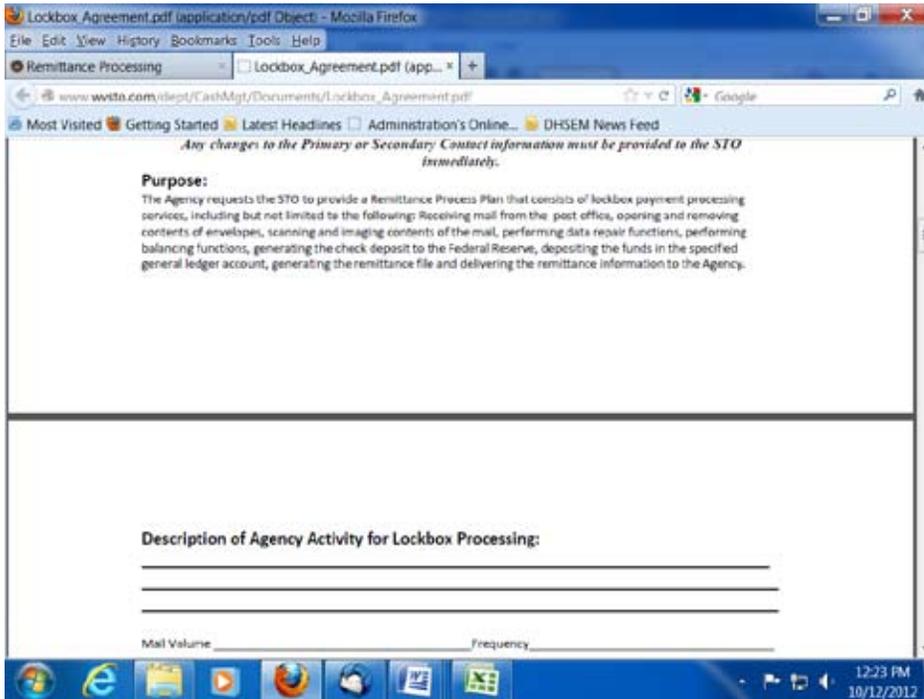
*Board was complainant.

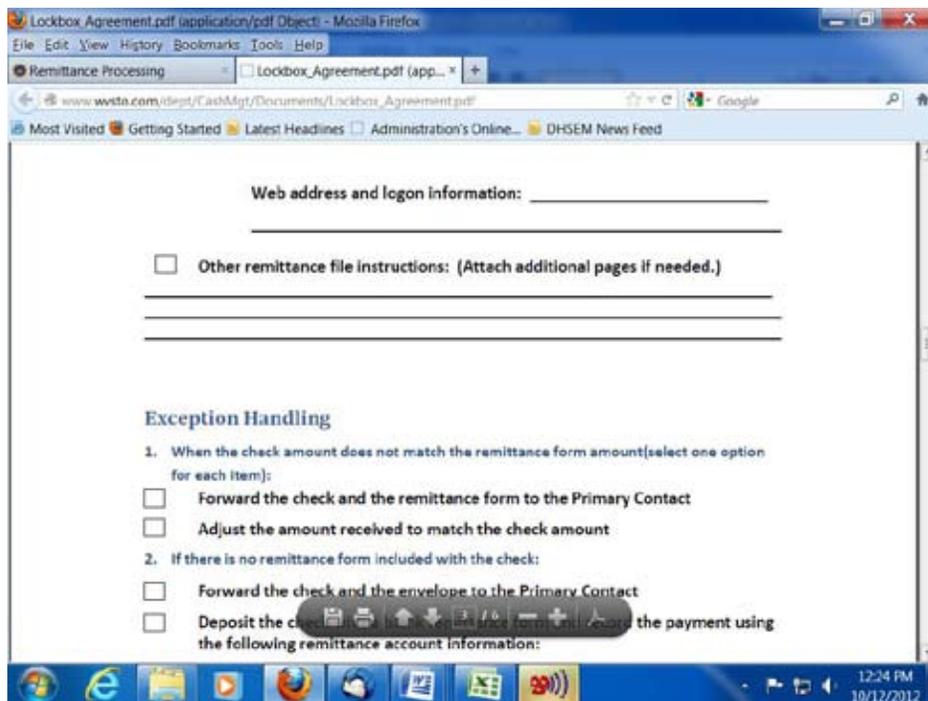
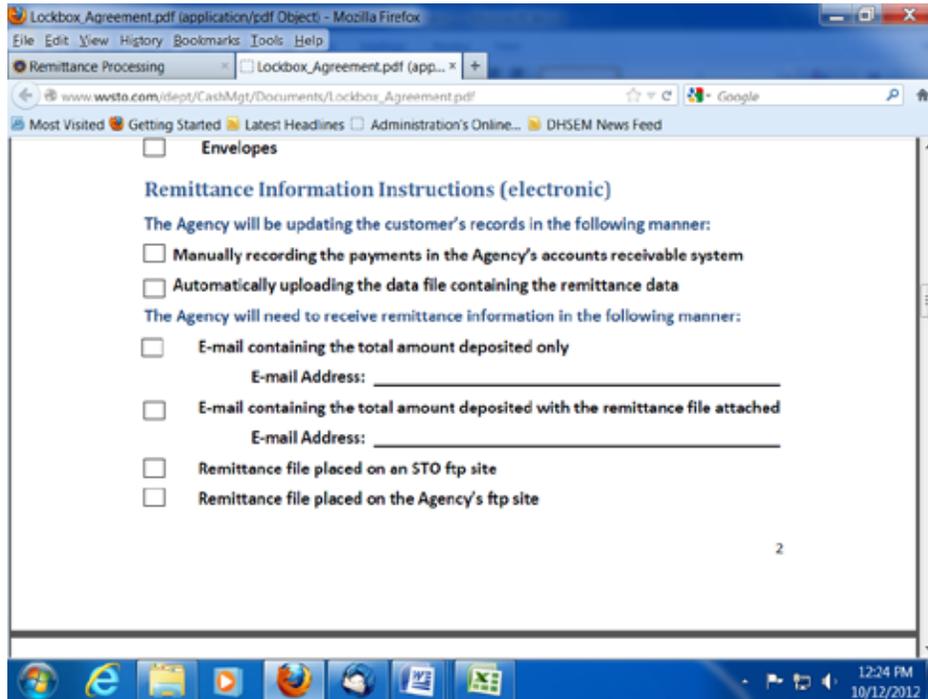
Appendix D: West Virginia Treasurer's Lockbox Banking

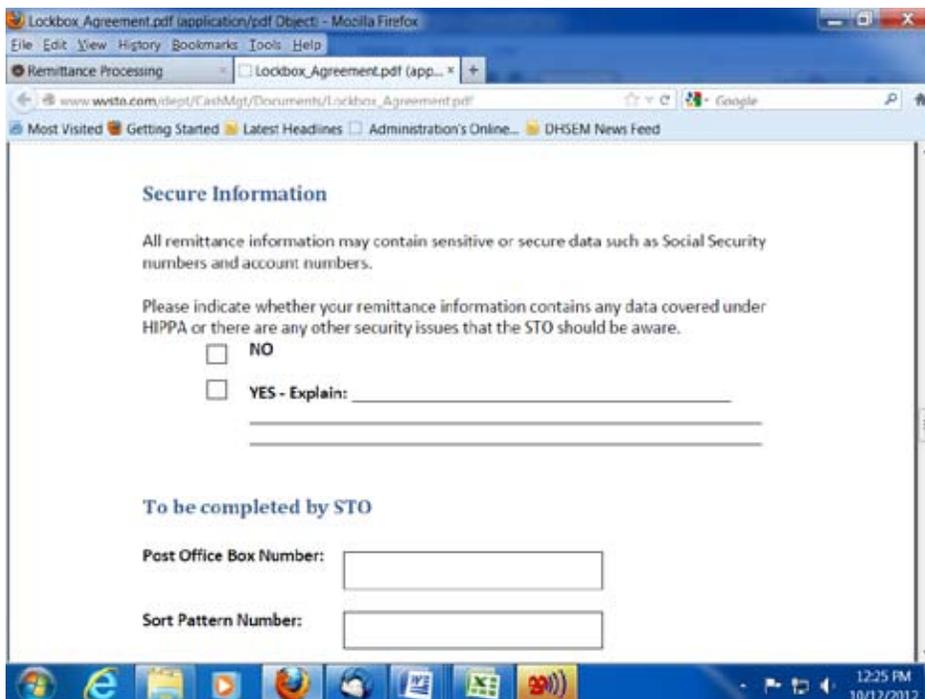
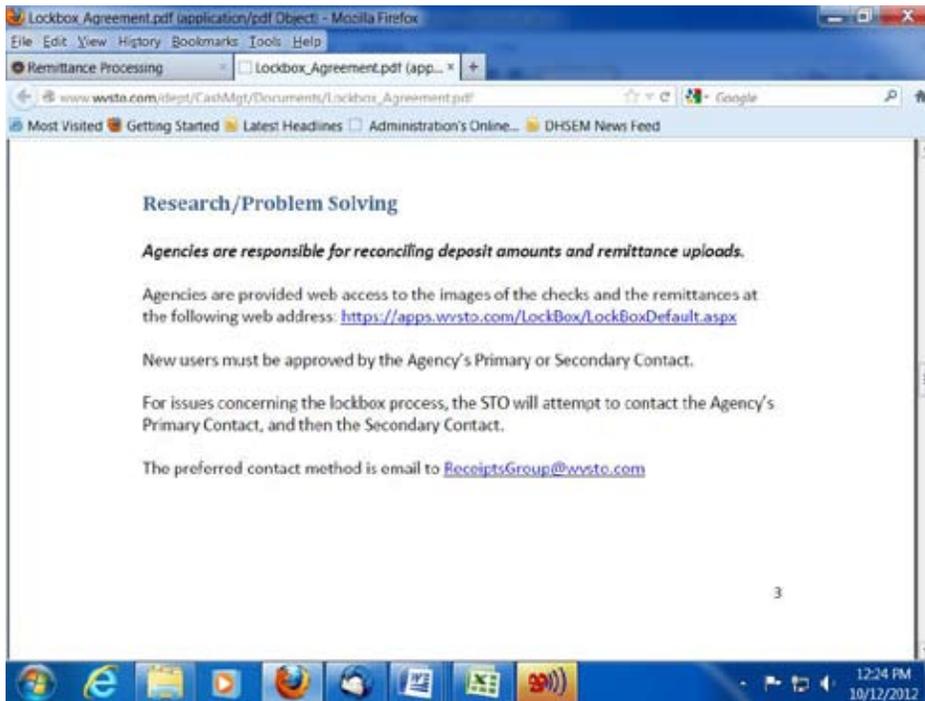


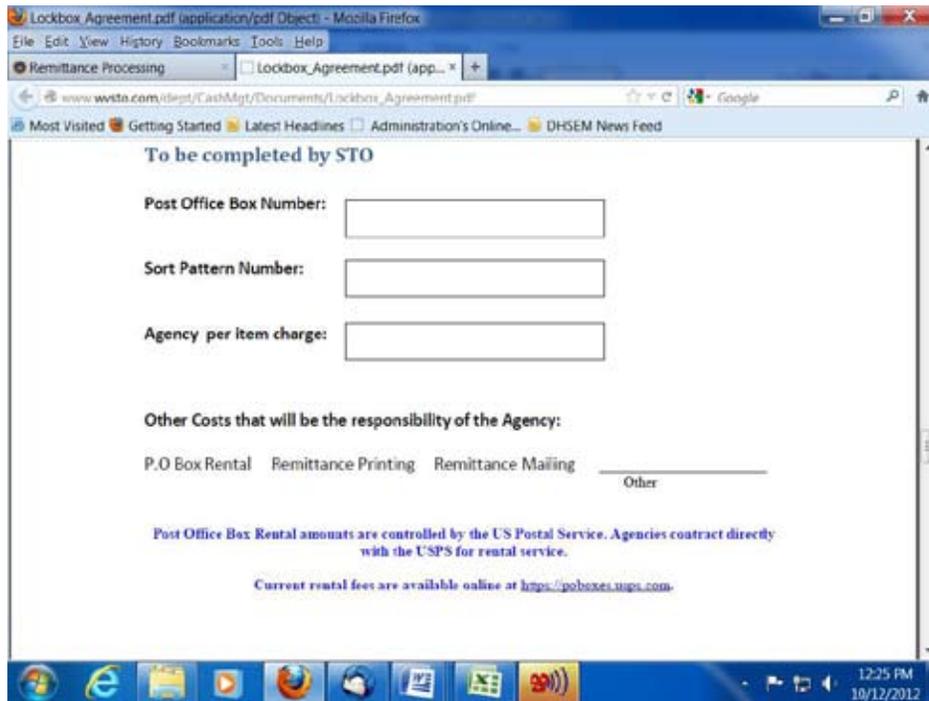












Appendix E: West Virginia Treasurer's Lockbox Banking

Website Criteria Checklist and Points System Board of Examiners for Speech-Language Pathology and Audiology			
User-Friendly	Description	Total Points Possible	Total Agency Points
Criteria	The ease of navigation from page to page along with the usefulness of the website.	18	7
		Individual Points Possible	Individual Agency Points
Search Tool	The website should contain a search box (1), preferably on every page (1).	2 points	0 points
Help Link	There should be a link that allows users to access a FAQ section (1) and agency contact information (1) on a single page. The link's text does not have to contain the word help, but it should contain language that clearly indicates that the user can find assistance by clicking the link (i.e. "How do I...", "Questions?" or "Need assistance?")	2 points	2 points
Foreign language accessibility	A link to translate all webpages into languages other than English.	1 point	0 points
Content Readability	The website should be written on a 6 th -7 th grade reading level. The Flesch-Kincaid Test is widely used by Federal and State agencies to measure readability.	No points, see narrative	
Site Functionality	The website should use sans serif fonts (1), the website should include buttons to adjust the font size (1), and resizing of text should not distort site graphics or text (1).	3 points	1 point
Site Map	A list of pages contained in a website that can be accessed by web crawlers and users. The Site Map acts as an index of the entire website and a link to the department's entire site should be located on the bottom of every page.	1 point	1 point

Website Criteria Checklist and Points System Board of Examiners for Speech-Language Pathology and Audiology			
Mobile Functionality	The agency's website is available in a mobile version (1) and/or the agency has created mobile applications (apps) (1).	2 points	0 points
Navigation	Every page should be linked to the agency's homepage (1) and should have a navigation bar at the top of every page (1).	2 points	2 points
FAQ Section	A page that lists the agency's most frequent asked questions and responses.	1 point	1 point
Feedback Options	A page where users can voluntarily submit feedback about the website or particular section of the website.	1 point	0 points
Online survey/poll	A short survey that pops up and requests users to evaluate the website.	1 point	0 points
Social Media Links	The website should contain buttons that allow users to post an agency's content to social media pages such as Facebook and Twitter.	1 point	0 points
RSS Feeds	RSS stands for "Really Simple Syndication" and allows subscribers to receive regularly updated work (i.e. blog posts, news stories, audio/video, etc.) in a standardized format.	1 point	0 points
Transparency	Description	Total Points Possible	Total Agency Points
Criteria	A website which promotes accountability and provides information for citizens about what the agency is doing. It encourages public participation while also utilizing tools and methods to collaborate across all levels of government.	32	10

Website Criteria Checklist and Points System
Board of Examiners for Speech-Language Pathology and Audiology

		Individual Points Possible	Individual Agency Points
Email	General website contact.	1 point	1 point
Physical Address	General address of stage agency.	1 point	1 point
Phone Number	Correct phone number of state agency.	1 point	1 point
Location of Agency Headquarters	The agency's contact page should include an embedded map that shows the agency's location.	1 point	0 points
Administrative officials	Names (1) and contact information (1) of administrative officials.	2 points	2 points
Administrator(s) biography	A biography explaining the administrator(s) professional qualifications and experience.	1 point	0 points
Privacy policy	A clear explanation of the agency/state's online privacy policy.	1 point	1 point
Public Records	The website should contain all applicable public records relating to the agency's function. If the website contains more than one of the following criteria the agency will receive two points: <ul style="list-style-type: none"> • Statutes • Rules and/or regulations • Contracts • Permits/licenses • Audits • Violations/disciplinary actions • Meeting Minutes • Grants 	2 points	2 points
Complaint form	A specific page that contains a form to file a complaint (1), preferably an online form (1).	2 points	1 point
Budget	Budget data is available (1) at the checkbook level (1), ideally in a searchable database (1).	3 points	0 points
Mission statement	The agency's mission statement should be located on the homepage.	1 point	1 point

<p align="center">Website Criteria Checklist and Points System Board of Examiners for Speech-Language Pathology and Audiology</p>			
Calendar of events	Information on events, meetings, etc. (1) ideally imbedded using a calendar program (1).	2 points	0 points
e-Publications	Agency publications should be online (1) and downloadable (1).	2 points	0 points
Agency Organizational Chart	A narrative describing the agency organization (1), preferably in a pictorial representation such as a hierarchy/organizational chart (1).	2 points	0 points
Graphic capabilities	Allows users to access relevant graphics such as maps, diagrams, etc.	1 point	0 points
Audio/video features	Allows users to access and download relevant audio and video content.	1 point	0 points
FOIA information	Information on how to submit a FOIA request (1), ideally with an online submission form (1).	2 points	0 points
Performance measures/outcomes	A page linked to the homepage explaining the agencies performance measures and outcomes.	1 point	0 points
Agency history	The agency's website should include a page explaining how the agency was created, what it has done, and how, if applicable, has its mission changed over time.	1 point	0 points
Website updates	The website should have a website update status on screen (1) and ideally for every page (1).	2 points	0 points
Job Postings/links to Personnel Division website	The agency should have a section on homepage for open job postings (1) and a link to the application page Personnel Division (1).	2 points	0 points

Appendix F: Agency Response

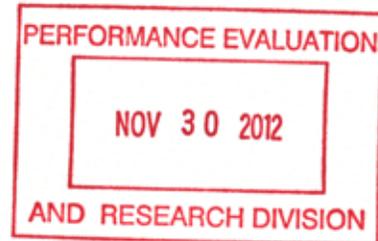
West Virginia Board of Examiners for Speech-Language Pathology and Audiology

Board Members

Michael J. Zagarella, AuD., President
Gary Vandevander, M.S., CCC-A
Vickie Pullins, M.A., CCC-SLP, Secretary
Cinda Shaver, M.S., CCC-SLP, Member
Joe E. Richards, M.A., Citizen Member

November 30, 2012

Mr. Michael Midkiff
West Virginia Legislature
Performance Evaluation and Research Division
Building 1, Room W-314
1900 Kanawha Blvd., East
Charleston, WV 25305-0610



RE: REGULATED BOARD REVIEW REPORT

Dear Mr. Midkiff:

The Board would like to take this opportunity to address and respond to items in the draft copy of our Legislative Review, received the afternoon of November 20, 2012, and our discussions of the same, as follows:

Page 2 – The Board's register and roster of applicants

- I agree the register/roster/database does not contain the names of applicants denied licensure, licensees' educational qualifications and whether or not an examination was required. Areas for these entry of these requirements will be added by the Treasurer's Office and the database updated by the Board Office to include these requirements.
- The register does, however, contain the licensees' age (date of birth), suspensions or revocations imposed and the licensees' office address or addresses. (See Attachment #1)

Page 2 – Annual Reports

- I cannot answer for the annual reports for years 2007 – 2009 but I do know my predecessor was very diligent and took the submission of the reports very seriously. With the exception of the Secretary of State, all the reports are transmitted electronically making it difficult for the sender to track.
- I did prepare and submit annual reports for 2010 – 2012. It is my understanding the 2009-2010 report was not received by the Governor's office.

99 Edmiston Way, Box 11 - Suite 214, Buchhannon, West Virginia 26201

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Phone: 304-473-4289

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In-state toll free number: 877-462-5460

~Patricia Nesbitt – Administrative Services Manager~

I have the emails sent to the Governor's office with the 2010-2011 (sent September 1, 2011) and 2011-2012 (sent August 30, 2012) annual reports attached.

If the requirement for sending annual reports to the Governor, the Senate President, the Speaker of the House, the Resources Manager/Legislative Librarian and the Legislative Manager/Legislative Auditor & Joint Commission on Government & Finance continues, it would be advantageous for all if a simple acknowledgement system for the receipt of the report could be implemented.

- An itemized statement of receipts and disbursements and statistical reports by county of practice will be included in the 2012-2013 annual report.
- From my perspective, the Annual Report should also include the actual number of license renewals for the applicable year(s) so an official recorded record is available. This number is critical for Projected Revenue calculations during a Legislative Audit. This is further explained under "Financial Internal Controls"

Pages 4-6 – DEVIATION FROM COMPLAINT PROCEDURES

- Item 1) Acknowledgement of Complaints & Item 2) Licensee was not Informed that a Complaint was Made, both refer to the Board's Case #35.

- Both of the above are true "with extenuating circumstances."

A call was received at the Board Office on 09/13/2011 from a gentleman wanting to talk to a Board Member to have an Audiologist's license revoked because he was not seen "right away" as promised. It took a ½ hour for his name to be called but he then demanded a new appointment later in the afternoon. The Audiologist could not oblige the patient. I gave him the Board Chair's phone number and explained all complaints had to be in writing and specific procedures, per legislative rules, had to be followed. He did not care about our procedures and rules and wanted to have a meeting that evening in Teays Valley to revoke the license of the Audiologist. He did want to file a written complaint, so I emailed or faxed the complaint forms to him. He faxed the complaint forms to the Board Office the following day.

He called the Board Chair and the Board Office numerous times for a couple days until I decided I really needed to try to diffuse the situation because he was totally irrational. It made no difference how polite I was or what I tried to explain, every conversation ended with him screaming and, a few times, hanging up. I made phone calls to Audiologists in the Charleston area to see if there was any way they might be able to perform a hearing test on this gentleman that day. After finding someone who had an opening that afternoon and was willing to see him, I called the gentleman and gave him the phone number of the available Audiologist's office.

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~Patricia Nesbitt – Administrative Services Manager~

After “fixing” the situation, I contacted our attorney at the AG’s office, explained the situation, sent a copy of the complaint and ask if this complaint required the standard procedures for our complaint process. The response from the AG’s office was,

“I believe the Board has the inherent authority to dismiss for lack of probable cause any complaint making allegations that, even if true, would not violate any provision of Article 32 of the Code or your rules. This is such a complaint. My advice is for the Board, at its next meeting, to dismiss the complaint for lack of probable cause. I see no reason to even solicit a response from Simmons. But the Board, not staff, has to be the one to dismiss it.”

The Board dismissed the case during a Board Meeting in Executive Session on January 22, 2012 and sent a certified letter on January 25, 2012 to the complainant stating the same. The complainant signed for the letter on February 12, 2012.

The Attorney was more concerned with the fact that I took it upon myself to “find” an Audiologist for this gentleman. I do understand the concern but at the time, it seemed like a viable solution to the problem.

With a simple Google search, I found a public record court ordered Forensic Psychiatric Evaluation of the gentleman for a lawsuit filed by him in 2007.

“It should be noted that Mr. _____’s psychological profile and behavior would suggest that he has propensity for aggressive behavior. No history of overt violence is found, however, given his degree of agitation and volatility noted during our examination, any threats made by Mr. _____ should be taken seriously and dealt with appropriately.”

This evaluation confirmed my uneasy feelings when dealing with this gentleman. I was very glad my office is in Buckhannon and he is in the Charleston and Putnam County area.

Because of the extenuating circumstances and advice from the AG’s office, I believe Case #35 (Item 1 and Item 2) should not be included as a deviation from complaint procedures.

- **Item 3) – Complainant was not Informed of the Board’s Decision**
- This item is valid and true. Case #30 was initiated in December, 2009 and settled July 19, 2010. I filled the Administrative Services Manager position on May 1, 2010. This was an oversight on my part.

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~Patricia Nesbitt – Administrative Services Manager~

- **Item 4) – Complaint Not Addressed in Open Meeting**
- This was a Board initiated complaint after a verification request from Genesis Rehab on 06/22/2010 revealed a SLP was, and had been for several years, providing services on a falsified license and falsified ASHA Certification at a Charleston area rehab center. The health facility was notified so they could take appropriate action but since she was not licensed, I contacted our attorney at the AG's office for advice on how to proceed. On the advice of our attorney, a cease and desist letter was sent via certified mail on June 25, 2010, but she did not think there was jurisdiction over the unlicensed SLP from the Board's perspective.

All the facts and information were submitted to the proper authorities, via the WV AG's office, eventually finding its way to the US Attorney's office for prosecution. A plea agreement was reached and sentencing was April 27, 2012.

Because of advice received from the AG's office and the Board's lack of jurisdiction over unlicensed practice, I believe Case #32 should not be included as a deviation from complaint procedures.

Page 8 – RECOMMENDATIONS #5

- The Board acknowledges the recommendation for criminal history background checks. The Board will certainly study the feasibility and take this under consideration for future initial license applicants and current licensees.

Page 9 – FINANCIAL INTERNAL CONTROLS NEED TO BE ESTABLISHED

- **Lockbox** – The Treasurer's lockbox was utilized by the Board through the 2008 renewal cycle. From the Board's perspective, the paperwork (renewal application and continuing education documentation) is equally as important as the monies received. Even though, the monies are processed at the Treasurer's office the day they are received, the documents we require for licensure were received at our office on a weekly basis via the US mail, creating a problem with timely turnaround of licenses. Because the Board verifies continuing education for every licensee renewing their license, a license cannot be processed without all the documents.

Having the Treasurer's office process and deposit the monies is a definite advantage for the Board, in more ways than one, but the renewal documents are an issue. If our office could receive the documents within 48 hours via email, I believe both issues would be rectified.

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~Patricia Nesbitt – Administrative Services Manager~

- **Table 6 - I take issue with the figures shown in Table 6 and at the same time understand, from an auditing paper trail perspective, why the figures were used. The licensee renewal number is taken from the 2010-2011 Annual Report Licensee Statistics page which includes all licensees as of June 30, 2011. The actual number of renewals for FY 2011 was:**

Speech Pathology	646
Audiology	124
Dual License	004
TOTAL	774

Based on these figures, the total projected revenue should be as follows:

Speech Pathology @ \$175.00	\$113,050.00
Audiology @ \$175.00	\$ 21,700.00
Dual @ \$250.00	\$ 1,000.00
TOTAL	\$135,750.00

Online Renewal Revenue	\$109,200.00	Treasurer's E-Gov Report
Board Office Deposits from Renewals	\$ 26,475.00	Check copies from FIMS Deposit Coversheets
TOTAL	\$135,675.00	

- **Accounting for Revenue** – From this point forward, a spreadsheet for each fiscal year will be maintained for all monies received at and deposited by the Board office. Because all monies received at and deposited by the Board office are entered into WVFIMS using one object code, the revenues received for different types of services are difficult to track. A spreadsheet breaking out the different services, e.g., application, license, verification, renewal & mailing lists, would help alleviate the tracking issue.

Page 11 – REVENUE NOT BEING DEPOSITED WITHIN 24 HOURS

- Same as above

Page 11 – PHYSICAL CONTROL OVER RECORDS NEEDS TO BE IMPLEMENTED

- This issue has been rectified. All files, pedestals and storage units are locked when leaving the office. The keys from the units are locked in the desk pedestal and the key for the pedestal is carried by the Administrative Service Manager, along with the office door lock and mail box key.

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 ~Patricia Nesbitt – Administrative Services Manager~

Page 12 – RECOMMENDATIONS #9

- When processing cash equivalents, the door to the office will be locked for entry until the task is complete.

Page 16 – RECOMMENDATIONS FOR WEBSITE IMPROVEMENT

- Our website is hosted by the Treasurer's Office. All the recommendations sited are acknowledged and will be discussed with our contact, Graphic Designer - Jason Philabaun.

When I filled the Administrative Services Manager position in May 2010, I continued the practices from previous years. Having said that, it was my responsibility to follow through to assure all applicable State Code and Rules were being followed.

Thank you for the opportunity to respond to the review. I am confident implementing the changes required to be in compliance with State Code, will improve the transparency and the overall functions of the WV Board of Speech-Language Pathology and Audiology.

Respectfully submitted,

Patricia Nesbitt,
Administrative Services Manager

cc: Michael Zagarella, Board President
Vickie Pullins, Board Secretary
Cinda Shaver, Board Member
Gary Vandevander, Board Member
Joe E. Richards, Citizen Member

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~Patricia Nesbitt – Administrative Services Manager~



WEST VIRGINIA LEGISLATIVE AUDITOR

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