



September 2018
PE 18-06-612

REGULATORY BOARD REVIEW BOARD OF OPTOMETRY

AUDIT OVERVIEW

The West Virginia Board of Optometry Complies With Most of the General Provisions of Chapter 30 of the West Virginia Code.

The West Virginia Board of Optometry's Website Needs Only Modest Improvements to Enhance User-Friendliness and Transparency.



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Note: On Monday, February 6, 2017, the Legislative Manager/Legislative Auditor's wife, Elizabeth Summit, began employment as the Governor's Deputy Chief Counsel. Most or all the actions discussed and work performed in this report occurred after this date. However, the Governor's Deputy Chief Counsel was not involved in the subject matter of this report, nor did the audit team have any communications with her regarding the report. As Deputy Chief Counsel, the Legislative Auditor's wife is not in a policy making position within the Executive Branch. Therefore, the Performance Evaluation and Research Division does not believe there are any threats to independence with regard to this report as defined in A3.06.a and A3.06.b of the Generally Accepted Government Auditing Standards. Furthermore, the Legislative Auditor has instructed the Director of Performance Evaluation and Research Division to document and discuss any issues he believes are a threat to the division's independence with the President of the Senate and the Speaker of the House due to Ms. Summit's position.

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EXECUTIVE SUMMARY

The Performance Evaluation and Research Division (PERD) within the Office of the Legislative Auditor conducted a Regulatory Board Review of the West Virginia State Board of Optometry (Board) pursuant to West Virginia Code §4-10-10(b)(2). Objectives of this audit were to assess the Board's compliance with the provisions of Chapter 30 and other applicable laws, and evaluate the Board's website for user-friendliness and transparency. The issues of this report are highlighted below.

Frequently Used Acronyms in This Report:

PERD – Performance Evaluation and Research Division.

ARBO – Association of Regulatory Boards of Optometry

FARB – Federation of Associations of Regulatory Boards

CE – Continuing Education

Report Highlights:

Issue 1: The West Virginia Board of Optometry Complies With Most of the General Provisions of Chapter 30 of the W. Va. Code.

- The Board is financially self-sufficient, accessible to the public, has established continuing education requirements, and maintains due process rights for licensees.
- On two occasions, the Board failed to adhere to *W. Va. Code §30-1-5(c)* and submit status reports to the party filing the complaint within six months after the complaint is initially filed. Therefore, the Board should comply with statutory language and submit status report updates and close complaints within the appropriate time period.
- The Board does not have adequate segregation of duties due to having only one full-time staff member. However, the Board has established internal controls to reduce the risk of fraud. To additionally further reduce the risk of fraud, the Board should consider utilizing the West Virginia State Treasurer's Office Lockbox System.
- Most members of the Board have attended the West Virginia Annual Seminar for State Licensing Boards at least once during their terms, however, the chairperson has not attended. Therefore, the chairperson should comply with *W. Va. Code §30-1-2a(c)(2)* and attend the West Virginia Annual Seminar for State Licensing Boards annually.

- The Board may want to consider being more conservative in expenditures for attending national conferences.

Issue 2: The West Virginia Board of Optometry’s Website Needs Only Modest Improvements to Enhance User-Friendliness and Transparency.

- The Board’s website needs modest improvements to enhance user-friendliness and transparency. Additional features should be considered to further improve user-friendliness such as a site map, RSS feeds, and an online survey/poll to gauge user feedback.
- The Board’s website could benefit from additional transparency features such as a website update status, FOIA information, and performance measures.

PERD’s Response to the Agencies’ Written Response

PERD received the Board’s response to the draft copy of the regulatory board review on September 10, 2018. The Board’s response can be seen in Appendix D. The Board agrees with recommendations one, two, three, four, seven, and eight. Per recommendation five, the Board has eliminated travel to the Federation of Regulatory Boards annual conference, however, the Board indicates that the expertise shared at the Association of Regulatory Boards of Optometry (ARBO) are well worth the investment. PERD acknowledges that national conferences such as ARBO can be beneficial but PERD maintains that the Board should consider decreasing the number of individuals that attend. Per recommendation six, the Board has indicated that it will evaluate the annual meeting at the Greenbrier Resort for possible discontinuation at the Board’s next meeting on November 1, 2018. The Board will also examine the cost of the meeting to determine if the benefits outweigh the costs. The Board does report that having the meeting at the location allows for licensees to ask questions to the Board’s Executive Director. However, the Board does not have any documentation showing the number of licensees who attend the meetings.

Recommendations

1. *The Board should comply with West Virginia Code §30-1-5(c) and submit reports to the party filing the complaint within six months after the complaint is initially filed.*
2. *The Board’s chairperson should adhere to W. Va. Code §30-1-2a(2) and attend the Seminar for State Licensing Boards annually.*
3. *The Board should consider utilizing the West Virginia State Treasurer’s Office lockbox to process licensure fees and annual license application and renewal to further reduce risk.*
4. *The Board should consider decreasing the amount of expenditures for out-of-state national conferences.*

5. *The Board should consider discontinuing having one of its annual meetings at the Greenbrier Resort unless there is evidence that the benefits to licensees exceed the additional costs.*
6. *If the Greenbrier meetings are continued, the Board should reimburse lodging expenses consistent with the policies of the Travel Management Office of the Department of Administration.*
7. *The Board should make improvements to its website to provide a better online experience for the public.*

ISSUE 1

The West Virginia Board of Optometry Complies With Most of the General Provisions of Chapter 30 of the West Virginia Code.

Issue Summary

The Board of Optometry (Board) is financially self-sufficient, accessible to the public, has established continuing education requirements, and maintains due process rights for licensees. However, the Board has had two instances in which a status report was not sent to the complainant within six months of the complaint being filed. Furthermore, because the Board only has one staff member, the Board does not have adequate internal control. However, the Board has reduced the risk of fraud by assigning the staff member and various Board members with certain responsibilities. The Board receives the majority of its fees via its website and the West Virginia State Treasurer's eGov system, but some licensees still pay via paper documents, which must be handled and processed by the Board. Therefore, the Board should further minimize the handling of revenue by completely utilizing the West Virginia State Treasurer's Office lockbox system. PERD also found that during the scope of the audit, the chairperson has not attended the annual seminar for state licensing boards as required by law (§30-1-2a(c)(2)). Finally, after review of expenditures during the scope of the audit, it is the Legislative Auditor's opinion that the Board should consider reducing the number of questionable expenditures for out-of-state travel to national meetings and discontinuing the annual Greenbrier Resort Board meeting unless there is evidence that the benefits to licensees exceed the costs. However, if the meetings continue the Board should reimburse lodging expenses consistent with the policies of the Travel Management Office of the Department of Administration.

The Board of Optometry (Board) is financially self-sufficient, accessible to the public, has established continuing education requirements, and maintains due process rights for licensees.

The Board Complies With Most of the General Provisions of Chapter 30 With One Exception.

The Board is in satisfactory compliance with most of the general provisions of Chapter 30 of *West Virginia Code*. These provisions are important for the effective operation of regulatory boards. The Board is in compliance with the following provisions:

- The Board has adopted an official seal (§30-1-4).
- The Board meets at least once annually (§30-1-5(a)).
- The Board's complaints are investigated and resolved with due process (§30-1-8).
- The Board has promulgated rules specifying the investigation and resolution procedure of all complaints (§30-1-8(k)).

The Board is in satisfactory compliance with most of the general provisions of Chapter 30 of West Virginia Code.

- The Board is financially self-sufficient in carrying out its responsibilities (§30-1-6(c)).
- The Board has established continuing education requirements (§30-1-7a).
- The Board has a register of all applicants with appropriate information specified in code, such as the date of the application, name, age, education and other qualifications, place of residence, examination required, whether the license was granted or denied, any suspensions, etc. (§30-1-12(a)).
- The Board has submitted an annual report to the Governor and Legislature describing transactions for the preceding two years (§30-1-12(b)).
- The Board has complied with public access requirements as specified by (§30-1-12(c)).
- A roster has been prepared and maintained of all licensees that includes names and office addresses (§30-1-13).

The Board is not in compliance with the following provisions:

- The Board shall 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 and within one year of the status report's return receipt date issue a final ruling unless the party filing the complaint and the board agree in writing to extend the time for the final ruling (§30-1-5(c)).
- The Board's chairperson and executive director are to annually attend the West Virginia Annual Seminar for State Licensing Boards (§30-1-2a(c)(2)).

The Board maintains an end-of-year cash balance that is in excess of one year of expenditures.

The Board Is Financially Self-Sufficient.

The Board maintains an end-of-year cash balance that is in excess of one year of expenditures (see Table 1). *West Virginia Code §30-1-6(c)* requires boards to be financially self-sufficient. It is the Legislative Auditor's opinion that cash reserves in the amount of one to two times a board's annual expenditures are an acceptable level.

Fiscal Year	Beginning Cash Balance	Revenue	Disbursements	Ending Cash Balance
2016	\$251,391	\$135,300	\$152,244	\$234,447
2017	\$234,447	\$144,650	\$132,160	\$246,937
2018	\$246,937	\$138,354	\$118,124	\$267,167
Average	\$244,258	\$139,435	\$134,176	\$249,517

Source: West Virginia OASIS

The Board's annual revenues come from fees for application, licensure, and renewals. Annual disbursements include staff salaries and benefits, utilities, and travel costs. According to the Board's FY 2017 Annual Report, there are 287 licensees.

West Virginia and surrounding states' licensure and renewal fees can be seen in Table 2. Though Kentucky has a higher initial licensure fee, West Virginia has the highest renewal fee on an annual basis. When adjusted for annual fees, West Virginia's renewal fee is \$100 higher than Maryland and at least double that of the rest of the neighboring states.

State	Initial Licensure Fee*	Renewal Fee*	Renewal Cycle
Kentucky	\$500	\$200	Annual
Maryland	\$300	\$600	Biennial
Ohio	\$175	\$135	Annual
Pennsylvania	\$25	\$135	Biennial
Virginia	\$250	\$150 - \$200 [^]	Annual
West Virginia	\$300	\$400	Annual

Source: State licensure boards' websites and W.Va. Code of State Rules §14-5-2.

** For fees with ranges, the fee depends on the type of license.*

[^] Virginia has two separate license fees for TPA-certified optometrist and non TPA-certified optometrist

The Board Resolves Complaints in a Timely Manner, but Status Reports Need to Be Sent in All Cases Within Six Months of the Complaint Being Filed.

The Legislative Auditor reviewed disciplinary data and complaints investigated by the Board for FY 2016 – 2018. Per *W. Va. Code of State Rules (CSR) 14-4-5.1*, complaints against licensees can be filed with the Board by any person, firm, corporation, member of the Board, or public official. The Board provides a complaint form on its website, though

complaints may be filed in any written form. Of the 20 grievances filed during the audit scope, none resulted in disciplinary action taken by the Board. This includes two ongoing complaints from earlier in FY 2018. Table 3 provides an overview of the complaints received, disciplinary action taken, and average time to resolve the complaints.

Table 3 Complaint Decision Statistics FY 2016-2018			
Fiscal Year	Number of Complaints Received	Number of Disciplinary Actions	Average Resolution Time in Days
2016	12	0	147
2017	5	0	117
2018	3	0	108

Source: Board of Optometry Complaint Statistics

According to *W. Va. Code §30-1-5(c)*, each Chapter 30 board is required to close a complaint within 18 months of the initial filing. Furthermore, the Board is required to send status reports to the complainant six months after the complaint was initially filed if the case has not been resolved prior to six months. As shown in Table 3, the Board complies with closing complaints within the 18-month guideline. During the scope of the audit, the Board had six cases in which status reports were to be sent to the complainant six months after the complaint was initially filed. The Board adhered to the statutory requirement on four occasions. **The Board should comply with *West Virginia Code §30-1-5(c)* and submit reports to the party filing the complaint within six months after the complaint is initially filed.**

The Board complies with closing complaints within the 18-month guideline.

The Board Has Established Continuing Education Requirements.

The Board has established continuing education (CE) requirements for its licensees. *W. Va. CSR §14-10-3.1* states that individual licensees shall accrue a minimum of 43 hours of continuing education for each even numbered, two-year cycle. Table 4 provides the CE requirements in West Virginia and the surrounding states.

Table 4
Continuing Education Requirements for Optometrist
In Surrounding States

State	CE Hours*	Renewal Period
Kentucky	15	Annual
Maryland	50	Biennial
Ohio	25	Annual
Pennsylvania	30	Biennial
Virginia	20	Annual
West Virginia	43	Biennial

Source: Each state's licensing board website and regulations.
** For hours with ranges, the number of hours depends on the type of license.*

Licensees have a period of two years to acquire 43 CEs relevant to the practice of optometry. Licensees are required to utilize a tracker system to log the courses they have completed and submit this information for review. The Board performs an audit of all licensees every two years. Per the Board of Optometry:

The audit begins in July/August with a letter congratulating those who have met the criteria for CE. Those who do not have the appropriate number of hours in the database are sent an email listing the number of deficit hours in OE Tracker and a final deadline to get their paperwork turned in to OE Tracker. Once the deadline passes a list is developed with the deficit totals and presented to the Board to begin the complaint procedure for disciplinary action.

The Board performs an audit of all licensees every two years.

The Board Should Ensure Board Members Receive the Required Orientation Sessions.

Board members are required to have a background in a variety of fields. Per *W. Va. Code §30-8-4(b)*, membership must consist of five licensed optometrists and two citizen members. According to *W. Va. Code §30-1-2a (2)*, the chairperson, the executive director or the chief financial officer of the board shall annually attend the State Auditor's Seminar on Regulatory Boards. The Executive Director is in compliance by attending this orientation in 2016 and 2017. However, the Board's Chairperson has been absent from the annual orientation during those same years. Also, according to *W. Va. Code §30-1-2a (3)*, each board member shall attend at least one seminar during each term of office. Although the majority of board members have attended required orientation, two members have not yet attended the seminar during their current and ongoing terms. The

State Auditor’s Seminar on Regulatory Boards has not yet occurred for 2018, so there is still an opportunity for this issue to be rectified. **The Board’s chairperson should adhere to W. Va. Code §30-1-2a(2) and attend annually the Seminar for State Licensing Boards.**

The Board’s Financial Management of Expenditures Lacks Internal Controls Because of an Inadequate Number of Staff; However, the Risk of Inappropriate Use of Resources Is Relatively Low.

The Board has one full-time staff member who serves as the executive director. With only one employee, it is impossible to segregate duties for proper internal control. Segregation of duties is important because it safeguards against improper use of loss of the Board’s resources. In order to have adequate segregation of duties, there should be controls in place that prevent one person from performing two or more control activities associated with purchasing and receiving revenue, such as authorizing transactions, receiving merchandise, receiving and depositing revenue, recording transactions, and maintaining custody of assets.

As an example of appropriate segregation of duties for handling cash, the West Virginia State Treasurer specifies in its *Cash Receipts Handbook for West Virginia Spending Units*, “Unless otherwise authorized by the State Treasurer’s Office, an individual should not have the sole responsibility for more than one of the following cash handling components:”

- collection,
- depositing,
- disbursement, and
- reconciling.

Because the Board only has one full-time staff member, efforts are taken to minimize the direct handling of funds. Upon receipt of paper checks, the Board’s sole staff member opens the envelopes and files checks in a folder. Staff then endorses the checks with a rubber stamp, prepares the bank deposit slip, copies the checks, and takes the checks to the bank for deposit. Lastly, carbon copies of the deposit slip are attached to a copy of the State Treasurer’s Office transmittal form with the copies of the checks to be filed into a deposit record folder to be entered into the OASIS system. The vast majority of license renewal fees are paid electronically through the eGov system as approximately 7 percent of licensees pay with a paper check. Initial licensure application fees are only accepted by paper check as the Board has not established a

The Executive Director is in compliance by attending this orientation in 2016 and 2017. However, the Board’s Chairperson has been absent from the annual orientation during those same years.

Because the Board only has one full-time staff member, efforts are taken to minimize the direct handling of funds.

payment process through eGov for the \$300 application fee. Additionally, of the estimated \$12,000 collected annually for license verification fees, approximately 15 percent is paid by check. The Board does not currently utilize the State Treasurer's Office lockbox system, but would be willing to examine and implement the program for future use. To minimize the handling of any revenue, the Board should consider the utilization of the State Treasurer's lockbox system. The State Treasurer's Office provides a lockbox operation whereby remittances can be picked up from a post office box, opened and sorted, imaged, deposited, and the information forwarded to the Board by the Treasurer's Office for a fee. Use of the lockbox operation helps to mitigate the risk of fraud and is beneficial to boards with little or no staff to handle such procedures. **Therefore, the Legislative Auditor recommends the Board consider utilizing the State Treasurer's lockbox to further reduce risk.**

The Board does not currently utilize the State Treasurer's Office lockbox system, but would be willing to examine and implement the program for future use.

Expenditures are made by the Board through the West Virginia State Auditor's P-card policies and procedures. All items with a value of \$500 or more require prior approval from the board chairperson and internal resources and statewide contracts are utilized to purchase items or services when available. The executive director is responsible for obtaining goods from the appropriate vendor and ensuring that all required documentation is attached to each P-card transaction. The Board's secretary-treasurer reviews all documentation for each transaction and the executive director uploads these items to the OASIS system. Expenses incurred by the Board are documented in the P-card log and are reviewed as part of the financial report of each regularly scheduled board meeting. Upon final approval, documents are secured at the Board's office for review and audit purposes. On March 16th, 2018, the West Virginia Purchasing Division completed an audit of the Board and had no material findings.

Expenses incurred by the Board are documented in the P-card log and are reviewed as part of the financial report of each regularly scheduled board meeting. Upon final approval, documents are secured at the Board's office for review and audit purposes.

In order to assess the risk of fraud and gain a reasonable assurance that fraud has not occurred, PERD examined the Board's revenue and expenditures. For revenue, PERD calculated the minimum expected revenue for the Board by multiplying annual fees by the number of licensees for FY 2016 – 2018 and found that actual revenue exceeded expected revenue. There would be concern if expected revenues were significantly higher than actual revenues and would require additional inquiry by PERD. Table 5 provides a comparison of actual and expected revenues for the Board.

Table 5
Board of Optometry
Expected and Actual Revenues
FY 2015-2018

Fiscal Year	Number of Active Licensees	Annual Renewal Fee	Expected Revenues	Actual Revenues
2016	285	\$400	\$114,000	\$135,300
2017	296	\$400	\$118,400	\$144,650
2018	299	\$400	\$119,600	\$138,354

Source: PERD calculations based on each FY Board Annual Report which documents the Board's active licensees.

PERD also calculated the percentage of low-risk expenditures. PERD evaluated the Board's expenditures for FY 2016 – 2018 and determined that, on average, 79 percent of the Board's expenses consisted of expected and required expenditures to vendors. The Legislative Auditor's opinion is that when the Board's required expenditures are 90 percent or more of the Board's total annual expenditures, the likelihood of fraud having occurred on the expenditure side is relatively low. If, however, expected/required expenditures are significantly below 90 percent, then other expenditures are unduly high, which suggests the possibility of fraudulent, questionable or abusive expenditures. Table 6 shows the annual percentage of expected and required expenditures.

Table 6
Board of Optometry
Percentage of Expected and Required Expenditures

Fiscal Year	Percent of Expected & Required Expenditures
2016	72
2017	81
2018	83

Source: PERD calculations based on State Auditor's Office data.

Since the percentage of expected/required expenditures were, on average, significantly below 90 percent, PERD conducted a detail review of the Board's total expenditures from FY 2016-2018 to assess the likelihood that fraud occurred. Upon examining these expenditures, the Legislative Auditor determined that the Board's expenditures to attend national conferences and annual board meetings held at the Greenbrier Resort in White Sulphur Springs, West Virginia contributed to required/expected expenditures being below 90 percent. Tables 7-9 document the Board's travel for the annual Association of Regulatory

Boards of Optometry (ARBO) meeting, the Federation of Associations of Regulatory Boards (FARB) meeting, and annual board meetings at the Greenbrier Resort. The Legislative Auditor concludes that the travel expenses were legitimate and that fraud has not likely occurred; however, there is concern that these expenses may be excessive.

Table 7 FY 2016 Board of Optometry Attributed Spending for Travel Out of State and the Greenbrier		
Destination	Reason	Cost
Greenbrier Resort	FY 2015 and 2016 Board Meetings	\$9,870
Seattle	FY 2015 ARBO National Meeting	\$5,611
Tampa	FY 2016 FARB National Meeting	\$1,314
Boston	FY 2016 ARBO National Meeting	\$9,797

Source: OASIS
**Legislative Auditor calculated attributed spending such as airfare, registration fees, meals, lodging, and miles traveled to and from the Greenbrier from the OASIS system.*

Table 8 FY 2017 Board of Optometry Attributed Spending for Travel Out of State and the Greenbrier		
Destination	Reason	Cost
Greenbrier Resort	FY 2016 and 2017 Board Meetings	\$3,726
Boston	FY 2016 ARBO National Meeting	\$1,052
Washington DC	FY 2017 ARBO National Meeting	\$5,324
San Antonio	FY 2017 FARB National Meeting	\$4,077

Source: OASIS
**Legislative Auditor calculated attributed spending such as airfare, registration fees, meals, lodging, and miles traveled to and from the Greenbrier from the OASIS system.*

Table 9
FY 2018 Board of Optometry Attributed Spending for Travel Out of State and the Greenbrier

Destination	Reason	Cost
Greenbrier Resort	FY 2017 and 2018 Board Meetings	\$3,794
Washington, DC	FY 2017 ARBO National Meeting	\$643
Denver	FY 2018 ARBO National Meeting	\$5,594

Source: OASIS
**Legislative Auditor calculated attributed spending such as airfare, registration fees, meals, lodging, and miles traveled to and from the Greenbrier from the OASIS system.*

Required/expected expenditures are those that are legally required or contractually binding; reasonably expected or essential for the normal operation of an agency. It is the Legislative Auditor's opinion that out-of-state travel for national association meetings can assist board members with knowledge that may assist in better operations of the agency. However, the cost to have several board members and the executive director attend these conferences each year imposes a significant cost for a relatively small board. Consideration should be given to reducing the number of national conferences and/or reducing the number of individuals attending. The gained knowledge from those who attended can be shared with the rest of the members. For example, the FY 2016 ARBO meeting in Boston had four board members and the executive director attend, the FY 2017 ARBO meeting in Washington, D.C. had three board members and the executive director attend and the FY 2018 ARBO meeting in Denver had four board members and the executive director attend. During the FY 2016 ARBO meeting, Boston hotel charges for the four days spent in attendance per person were \$1,094, the FY 2017 hotel charges in Washington, D.C. for three days per person were \$910, while the hotel charges for the three days at the FY 2018 ARBO meeting in Denver were \$656 per person. **Therefore, the Board may want to consider being more conservative in expenditures for attending national conferences.**

Also, the Legislative Auditor finds that the Board is not reimbursing the expenses incurred for annual board meetings held at the Greenbrier Resort in a manner consistent with state travel policy as stipulated in W. Va. §30-1-11(c). The Board's meeting at the Greenbrier Resort are in conjunction with the West Virginia Association of Optometric Physicians. According to the Board, "The Board does this so licensees may observe a board meeting and ask questions. The Board also has a display at the

Consideration should be given to reducing the number of national conferences and/or reducing the number of individuals attending.

Also, the Legislative Auditor finds that the Board is not reimbursing the expenses incurred for annual board meetings held at the Greenbrier Resort in a manner consistent with state travel policy as stipulated in W. Va. §30-1-11(c).

display hall so licensees may pick up information on regulations, such as CE requirements, license renewal instructions and any changes that have taken place in regulations.” The Board’s Executive Director is also at the display to answer questions licensees or members of the public may ask.

The West Virginia Travel Rule 6.4 states “*Employees are reimbursed for lodging up to the maximum per diem established by the federal government. Travelers may request reimbursement above the per diem rate, not to exceed 300 percent (300%) of the maximum per diem allowance.*” During the scope of the audit, the standard lodging per diem rates for West Virginia ranged from \$89-\$93. Greenbrier room rates reimbursed by the Board ranged from \$325-\$370 per night. These rates exceeded the standard lodging rates even when the 300% maximum allowance is applied. Additional costs for the Greenbrier meetings include a meeting room and hospitality items for those who attend. Board hospitality expenditures for the FY 2018 Greenbrier meeting cost a total of \$554, which also includes a \$169.35 Greenbrier Historic Preservation Fee. The hospitality items provided included 24 brownies, 24 assorted cookies, coffee, decaf coffee, hot tea, 15 cans of soda, and 15 bottled waters.

It is implied that reimbursing lodging expenses up to 300 percent of the standard lodging rates is for justifiable reasons. The Legislative Auditor questions having an annual board meeting at the Greenbrier Resort for the reasons given by the Board, given the expenses. The Board does not have any documentation showing the number of licensees who attended the Greenbrier meetings. **The Board should evaluate the cost and benefits of these Greenbrier meetings to determine if they should be continued. However, if the Board continues having Greenbrier meetings, the Board must reimburse the actual lodging expenses consistent with the guidelines of the Travel Management Office of the Department of Administration, pursuant to W. Va. Code §30-1-11(c).**

It is implied that reimbursing lodging expenses up to 300 percent of the standard lodging rates is for justifiable reasons.

The Legislative Auditor questions having an annual board meeting at the Greenbrier Resort for the reasons given by the Board, given the expenses.

Conclusion

The Board complies with most of the general provisions of Chapter 30. However, the Board should adhere to *W. Va. Code §30-1-2a(c)(2)* and ensure that the Chairperson and Executive Director attend the State Seminar on Regulatory Boards annually. The Board should comply with *W. Va. Code §30-1-5(c)* and send official status reports to complainants within six months after the complaint is initially filed. Due to the lack of staff, the Board does not have adequate segregation of duties, however, steps have been taken to reduce the risk of fraud. The West Virginia State Treasurer’s Office lockbox should be utilized by the Board to process licensure fees and annual application and renewals to

further reduce risk. Finally, the Board should consider decreasing the number of questionable expenditures for out-of-state travel for national conferences and discontinuing having one of its annual meetings at the Greenbrier Resort unless there is evidence that the benefits to licensees exceed the costs. However, if the meetings continue the Board should reimburse lodging expenses consistent with the policies of the Travel Management Office of the Department of Administration.

Recommendations

1. *The Board should comply with West Virginia Code §30-1-5(c) and submit reports to the party filing the complaint within six months after the complaint is initially filed.*
2. *The Board's chairperson should adhere to W. Va. Code §30-1-2a(2) and attend the Seminar for State Licensing Boards annually.*
3. *The Board should consider utilizing the West Virginia State Treasurer's Office lockbox to process licensure fees and annual license application and renewal to further reduce risk.*
4. *The Board should consider decreasing the amount of expenditures for out-of-state national conferences.*
5. *The Board should consider discontinuing having one of its annual meetings at the Greenbrier Resort unless there is evidence that the benefits to licensees exceed the additional costs.*
6. *If the Greenbrier meetings are continued, the Board should reimburse lodging expenses consistent with the policies of the Travel Management Office of the Department of Administration.*

ISSUE 2

The West Virginia Board of Optometry’s Website Needs Only Modest Improvements to Enhance User-Friendliness and Transparency.

Issue Summary

The office of the Legislative Auditor conducted a literature review on assessments of governmental websites and developed an assessment tool to evaluate West Virginia’s state agency websites (See Appendix C). 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 some state agencies. Table 10 indicates the Board integrates 56 percent of the checklist items in its website. This measure indicates that the Board has a good website and only modest improvements in user-friendliness and transparency are needed.

The Board integrates 56 percent of the checklist items in its website. This measure indicates that the Board has a good website and only modest improvements in user-friendliness and transparency are needed.

Table 10 West Virginia State Board of Optometry 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%
		56%	

Source: The Legislative Auditor’s review of the West Virginia State Board of Optometry website as of July 10, 2018.

The Board’s Website Scores Moderately High in User-Friendliness and Transparency

In order to actively engage with the agency online, citizens must first be able to access and comprehend the information on government websites. Therefore, government websites should be designed to be user-friendly. A user-friendly website is understandable and easy to navigate from page to page. Government websites should also provide transparency of an agency’s operation to promote accountability and trust.

The Legislative Auditor reviewed the Board’s website for both user-friendliness and transparency and found that the website is in need of modest enhancements in these areas (see Table 11). **The Board may want to consider adding some elements that could be beneficial to the public.**

Table 11
Website Evaluation Score

Category	Possible Points	Agency Points	Percentage
User-Friendly	18	10	56%
Transparency	32	18	56%
Total	50	28	56%

Source: The Legislative Auditor's review of the Board's website as of July 10, 2018.

The Board's Website Is Navigable, But Additional User-Friendly Features Should Be Considered.

The Board's website is easy to navigate as there is a link to every page on the top of the website; however, the website lacks a site map, social media links, and a foreign language accessibility tool. According to the Flesch-Kincaid Reading Test, the average readability of the text is on a 7th grade level for readability, making it easy to understand.

User-Friendly Considerations

Although some items may not be practical for this board, the following are some attributes that could improve user-friendliness:

- **Foreign Language Accessibility** – A link to translate all webpages into languages other than English.
- **Site Map** – A list of pages contained in a website that can be accessed by web crawlers and users.
- **Online Survey/Poll** – A short survey that pops up and requests users to evaluate the website.
- **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.
- **RSS Feeds** – This allows subscribers to receive regularly updated work (i.e. blog posts, news stories, audio/video, etc.) in a standardized format.

The Board's website is easy to navigate as there is a link to every page on the top of the website; however, the website lacks a site map, social media links, and a foreign language accessibility tool.

The Website Has Good Transparency Features but Some Improvements Can Be Made.

A website that is transparent should promote accountability and provide information for citizens about how well the Board is performing, as well as encouraging public participation. The Board's website has 56 percent of the core elements that are necessary for a general understanding of the Board's mission and performance. The Board's website contains important transparency features such as email contact information, its telephone number, and public records such as rules, disciplinary actions, and meeting minutes.

Transparency Considerations

The Board should consider providing additional elements to the website to improve the Board's transparency. The following are some attributes that could be beneficial:

- **Administrator(s) Biography** – A biography explaining the administrator(s) professional qualifications and experience.
- **Privacy Policy** – A clear explanation of the agency/state's online privacy policy.
- **Graphic Capabilities** – Allows users to access relevant graphics such as maps, diagrams, etc.
- **Audio/Video Features** – Allows users to access and download relevant audio and video content.
- **FOIA Information** – Information on how to submit a FOIA request, ideally with an online submission form.
- **Performance Measures/Outcomes** – A page linked to the homepage explaining the agency's performance measures and outcomes.
- **Website Updates** – The website should have a website status on screen and ideally for every page.

The Board's website has 56 percent of the core elements that are necessary for a general understanding of the Board's mission and performance. The Board's website contains important transparency features such as email contact information, its telephone number, and public records such as rules, disciplinary actions, and meeting minutes.

Conclusion

The Legislative Auditor finds only modest improvements are needed to the Board's website in the areas of user-friendliness and transparency. The website can benefit from incorporating several common features. The Board has pertinent public information on its website including its mission statement, rules and regulations, and an agency history. The Board's contact information is also provided, as are downloadable items such as annual license renewal forms. However, providing website users with additional elements and capabilities, as suggested in the report, would improve user-friendliness and transparency.

Recommendation

7. *The Board should make improvements to its website to provide a better online experience for the public.*

Appendix A Transmittal Letter

WEST VIRGINIA LEGISLATURE *Performance Evaluation and Research Division*

Building 1, Room W-314
1900 Kanawha Boulevard, East
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(304) 347-4890
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John Sylvia
Director

August 27, 2018

Pamela Carper, Executive Director
West Virginia Board of Optometry
179 Summers Street, Suite 231
Charleston, WV 25301

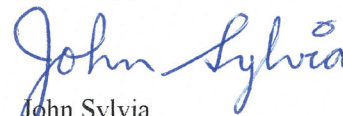
Dear Ms. Carper:

This is to transmit a draft copy of the regulatory board review of the Board of Optometry. This report is tentatively scheduled to be presented during the September 16-18, 2018 interim meetings 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 committee members may have during or after the meeting.

We need to schedule an exit conference to discuss any concerns you may have with the report. We would like to have the meeting between Thursday, August 30th and Tuesday, September 4th, 2018. Please notify us to schedule an exact time. In addition, we need your written response by noon on Friday, September 7th, 2018, 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 304-340-3192 by Thursday, September 13, 2018, 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,


John Sylvia

Enclosure

Joint Committee on Government and Finance

interviews or discussions with the Board's staff and confirmed by written statements. PERD staff made multiple visits to the Board's office to review files and meet with staff. PERD collected and analyzed the Board's meeting minutes, complaint data, budgetary information, annual reports, procedures for investigating and resolving complaints, continuing education, and procedures for collecting revenue and disbursing expenditures. Information was gathered from the Ohio, Virginia, Pennsylvania, Kentucky, and Maryland regulatory board regarding their continuing education requirements and license fee structures.

The Legislative Auditor also tested the Board's expenditures for fiscal years 2016 through 2018 to assess risks of fraud on the expenditure side. The test involved determining if low-risk expenditures were at least 90 percent of total expenditures. Some low-risk expenditures include various payroll expenses, board member compensation, and office rent and utilities.

Additionally, the Legislative Auditor compared the Board's actual revenue to expected revenue in order to assess the risks of fraud, and to obtain reasonable assurance that revenue figures were sufficient and appropriate. Expected revenues were approximated by applying license fees to the number of licensees for the period of fiscal years 2016 through 2018.

In order to evaluate state agency websites, the Legislative Auditor conducted a literature review of government websites, reviewed top-ranked government websites, and reviewed the work of groups that rate government websites in order to establish a master list of essential website elements. The Brookings Institute's *"2008 State and Federal E-Government in the United States,"* and the Rutgers University's 2008 *"U.S. States E-Governance Survey (2008): An Assessment of State Websites,"* helped identify the top ranked states in regard to e-government. The Legislative Auditor identified three states (Indiana, Maine, and Massachusetts) that were ranked in the top 10 in both studies and reviewed all 3 states' main portals for trends and common elements in transparency and open government. The Legislative Auditor also reviewed a 2010 report from the West Virginia Center on Budget and Policy that was useful in identifying a group of core elements from the master list that should be considered for state websites to increase their transparency and e-governance. It is understood that not every item listed in the master list is to be found in a department or agency website because some technology may not be practical or useful for some state agencies.

Appendix B

Objective, Scope and Methodology

The Performance Evaluation and Research Division (PERD) within the Office of the Legislative Auditor conducted this Regulatory Board Review of the West Virginia Board of Optometry (Board) as required and authorized by the West Virginia Performance Review Act, Chapter 4, Article 10, of the *West Virginia Code (WVC)*, as amended. The purpose of the Board, as established by its mission, is to “ensure that all applicants for licensure and all Doctors of Optometry currently licensed, practice their profession in a manner that benefits and protects the public, and to ensure that the highest quality optometric eye and vision care is provided in a professional, competent and ethical manner.”

Objectives

The objectives of this regulatory board review are 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 (*WVC* §30-8-et al.); and the Board’s handling of complaints. Finally, it is also the objective of the Legislative Auditor to assess the Board’s website for user-friendliness and transparency.

Scope

The regulatory board review included an assessment of the Board’s financial internal controls; policy and procedures regarding internal controls and complaints; meeting minutes; complaint files from fiscal years 2016 through 2018; complaint-resolution process; disciplinary procedures and actions; revenues and expenditures for the period of fiscal years 2016 through 2018; continuing education requirements and verification; the Board’s compliance with the general statutory provisions (*WVC* §30-1-et al.) for regulatory boards and other applicable laws; and key features of the Board’s website.

Methodology

PERD gathered and analyzed several sources of information and conducted audit procedures to assess the sufficiency and appropriateness of the information used as audit evidence. The information gathered and audit procedures are described below.

Testimonial evidence was gathered for this review through interviews or discussions with the Board’s staff and confirmed by written statements. PERD staff made multiple visits to the Board’s office to review files and meet with staff. PERD collected and analyzed the Board’s meeting minutes, complaint data, budgetary information, annual reports, procedures for investigating and resolving complaints, continuing education, and procedures for collecting revenue and disbursing expenditures. Information was gathered from the Ohio, Virginia, Pennsylvania, Kentucky, and Maryland regulatory board regarding their continuing education requirements and license fee structures.

The Legislative Auditor also tested the Board’s expenditures for fiscal years 2016 through 2018 to assess risks of fraud on the expenditure side. The test involved determining if low-risk expenditures were at least 90 percent of total expenditures. Some low-risk expenditures include various payroll expenses, board member compensation, and office rent and utilities.

Additionally, the Legislative Auditor compared the Board’s actual revenue to expected revenue in order to assess the risks of fraud, and to obtain reasonable assurance that revenue figures were sufficient and

appropriate. Expected revenues were approximated by applying license fees to the number of licensees for the period of fiscal years 2016 through 2018.

In order to evaluate state agency websites, the Legislative Auditor conducted a literature review of government websites, reviewed top-ranked government websites, and reviewed the work of groups that rate government websites in order to establish a master list of essential website elements. The Brookings Institute's "2008 State and Federal E-Government in the United States," and the Rutgers University's 2008 "U.S. States E-Governance Survey (2008): An Assessment of State Websites," helped identify the top ranked states in regard to e-government. The Legislative Auditor identified three states (Indiana, Maine, and Massachusetts) that were ranked in the top 10 in both studies and reviewed all 3 states' main portals for trends and common elements in transparency and open government. The Legislative Auditor also reviewed a 2010 report from the West Virginia Center on Budget and Policy that was useful in identifying a group of core elements from the master list that should be considered for state websites to increase their transparency and e-governance. It is understood that not every item listed in the master list is to be found in a department or agency website because some technology may not be practical or useful for some state agencies. Therefore, the Legislative Auditor compared the Board's website to the established guidelines for user-friendliness and transparency so that the Board can determine if it is progressing in step with the e-government movement and if improvements to its website should be made.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix C

Website Criteria Checklist and Points System

West Virginia State Board of Optometry			
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	10
		Individual Points Possible	Individual Agency Points
Search Tool	The website should contain a search box (1), preferably on every page (1).	2 points	2
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
Foreign language accessibility	A link to translate all webpages into languages other than English.	1 point	0
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
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	0
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	1
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
FAQ Section	A page that lists the agency's most frequent asked questions and responses.	1 point	1

West Virginia State Board of Optometry			
Feedback Options	A page where users can voluntarily submit feedback about the website or particular section of the website.	1 point	1
Online survey/poll	A short survey that pops up and requests users to evaluate the website.	1 point	0
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
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
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	18
		Individual Points Possible	Individual Agency Points
Email	General website contact.	1 point	1
Physical Address	General address of state agency.	1 point	1
Phone Number	Correct phone number of state agency.	1 point	1
Location of Agency Headquarters	The agency's contact page should include an embedded map that shows the agency's location.	1 point	0
Administrative officials	Names (1) and contact information (1) of administrative officials.	2 points	2
Administrator(s) biography	A biography explaining the administrator(s) professional qualifications and experience.	1 point	0
Privacy policy	A clear explanation of the agency/state's online privacy policy.	1 point	0

West Virginia State Board of Optometry			
Public Records	<p>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:</p> <ul style="list-style-type: none"> • Statutes • Rules and/or regulations • Contracts • Permits/licensees • Audits • Violations/disciplinary actions • Meeting Minutes • Grants 	2 points	2
Complaint form	A specific page that contains a form to file a complaint (1), preferably an online form (1).	2 points	2
Budget	Budget data is available (1) at the checkbook level (1), ideally in a searchable database (1).	3 points	2
Mission statement	The agency's mission statement should be located on the homepage.	1 point	1
Calendar of events	Information on events, meetings, etc. (1) ideally imbedded using a calendar program (1).	2 points	1
e-Publications	Agency publications should be online (1) and downloadable (1).	2 points	2
Agency Organizational Chart	Anarrativedescribingtheagencyorganization (1), preferably in a pictorial representation such as a hierarchy/organizational chart (1).	2 points	1
Graphic capabilities	Allows users to access relevant graphics such as maps, diagrams, etc.	1 point	0
Audio/video features	Allows users to access and download relevant audio and video content.	1 point	0
FOIA information	Information on how to submit a FOIA request (1), ideally with an online submission form (1).	2 points	0
Performance measures/outcomes	A page linked to the homepage explaining the agency's performance measures and outcomes.	1 point	0

West Virginia State Board of Optometry			
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	1
Website updates	The website should have a website update status on screen (1) and ideally for every page (1).	2 points	0
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	1

Appendix D Agency Response



WEST VIRGINIA BOARD OF OPTOMETRY

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September 8, 2018

Mr. John Sylvia, Director
West Virginia Legislature
Performance Evaluation and Research Division
1900 Kanawha Boulevard, Bldg. 1, Rm. W-314
Charleston, WV 25305

PERFORMANCE EVALUATION

SEP 10 2018

AND RESEARCH DIVISION

Dear Mr. Sylvia:

Thank you for the draft copy of the audit report to be submitted to the Joint Committees on Government Operations and Government Organization during the Legislative Interim Meetings in September. The Board thanks you and your staff for stating that the WV Board of Optometry complies with most of the general provisions of Chapter 30.

The Board wishes to thank the Performance and Evaluation Research Division staff, Brandon Burton and Daniel Kanner, for their professionalism and willingness to ask and answer questions as they evaluated the Board's performance. The evaluation was a great learning experience for the Board and me.

In response to the recommendations provided by the Performance Evaluation Division, our comments are as follows:

Recommendation 1: The Board should comply with West Virginia Code, §30-1-5(c) and submit reports to the party filing the complaint within six months after the grievance is initially filed.

- The Board agrees with the findings. The Board will be more diligent in sending its six-month notices.

Recommendation 2: The Board's chairperson should adhere to W.Va. Code §30-1-2a(c)(2) and attend the Seminar for State Licensing Boards annually.

- The Board believed that the phrase, "The chairperson, executive director or the chief financial officer of the board shall annually attend a seminar provided under this section." to mean one of the three that are listed in the phrase should attend annually. The Board will comply with this recommendation.

Recommendation 3: The Board should comply with W.Va. Code, §30-1-2a(c)(3) and ensure that all members attend the Seminar for State Licensing Boards at least once per term.

- All Board members have attended the Seminar for State Licensing Boards at one time. However, three members did not participate in the orientation during their present terms. The Board will comply with this recommendation and has informed these Board members of the upcoming orientation given on November 27, 2018. They will attend this meeting

Recommendation 4: The Board should consider utilizing the West Virginia State Treasurer's Office lockbox to process licensure fees and annual license application and renewal to further reduce risk.

- The Board processes a vast majority of its annual renewals and license verification fees through our website using the West Virginia State Treasurer's Office eGov system that processes payments electronically. I want to thank Daniel Kanner for sending information to me on the lockbox program that the Board can use to set up this program for license application fees, a small number of license renewal fees and a small amount of license verification fees.

Recommendation 5: The Board should consider decreasing the amount of expenditures for out-of-state national conferences.

MISSION STATEMENT

To ensure that all applicants for licensure and all Doctors of Optometry currently licensed, practice their profession in a manner that benefits and protects the public, and to ensure that the highest quality optometric eye and vision care is provided in a professional, competent, and ethical manner.

- Board travel expenses for meetings and conferences have decreased by more than 50% since FY 2016. The Board has eliminated travel to the Federation of Regulatory Boards annual conference. The information was helpful, but the Board felt that the knowledge gained did not justify the cost.
- The annual meeting of the Association of Regulatory Boards of Optometry (ARBO) contains both theoretical and practical applications in the governance of the profession of Optometry. ARBO emphasizes the role of optometry boards as a protection for the public. The meeting contains both joint sessions and breakout sessions for Board members and for executive directors regarding the administrative side of governance. The conference also provides for multiple group discussions involving several states together regarding issues of governance allowing boards to share the practical applications of governance and real-world problems in optometric governance. The result of one of these sessions was used by the Board just this week.
- ARBO has given an opportunity to our Board members for West Virginia to participate fully in the policies and testing that shape the practice and governance of optometry on the national stage. Some of our Board members have ascended to the Board of Directors of ARBO as well as President of the organization and representation on the evaluation of the quality of continuing education through ARBO's Council on Professional Education (COPE). Board member's participation in the ARBO annual meeting has led to West Virginia's representation with the National Board of Examiners in Optometry (NBEO), the entity that forms the standards and testing of applicants for adequate knowledge and skill in practicing optometry. A former West Virginia Board of Optometry Board President became the Executive Director of the NBEO. A Board member is a part of the Accreditation Council on Optometric Education that evaluates the programs of graduate optometry schools including site visits to optometry school campuses. Once a board member is named to the Board of Directors of ARBO or some of the above-named organizations, travel may be paid by those organizations, not our Board.
- The amount of expertise shared in the ARBO Annual Meeting, the formation of professional relationships and West Virginia's representation in so many levels of optometry regulation on the national stage are well worth the investment. West Virginia has great respect in optometric governance.

Recommendation 6: The Board should consider discontinuing having one of its annual meetings at the Greenbrier Resort unless there is evidence there is evidence that the benefits to the licensees exceed the additional costs.

- The Board will evaluate the meeting at the Greenbrier Resort for possible discontinuation. It will be on the Board's agenda on November 1, 2018, at 5:30 p.m. Having the meeting at a location convenient to licensees, the board's display, informational materials on regulations and the opportunity to ask questions of the Board's Executive Director are helpful to licensees. However, the Board will examine the cost of the meeting to determine if the benefits outweigh the costs.

Recommendation 7: If the Greenbrier meetings are continued, the Board should reimburse lodging expenses consistent with the policies of the Travel Management Office of the Department of Administration.

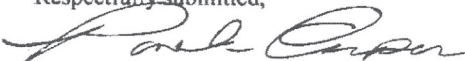
- If the meeting is continued after a thorough review of the costs and benefits, the Board will reimburse travel at the appropriate rates.

Recommendation 8: The Board should make improvements to its website to provide a better online experience for the public.

- The Board supports the findings of your staff regarding the Board's modest improvement of its website. The Board has been refining its website. Some of the new elements will include a site map, a location map, online survey/poll, administrators biography, privacy policy posting, FOIA information, and listing the date of updates on each page.

Thank you once more for your thorough review of the Board's performance and your recommendations for improvement. If you or the Joint Committees need any further information, please do not hesitate to contact me.

Respectfully submitted,



Pamela Carper
Executive Director



WEST VIRGINIA LEGISLATIVE AUDITOR

PERFORMANCE EVALUATION & RESEARCH DIVISION

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