

# **LOUISIANA CEMETERY BOARD**

STATE OF LOUISIANA

FINANCIAL AUDIT SERVICES

**Procedural Report**  
**Issued May 25, 2023**

**LOUISIANA LEGISLATIVE AUDITOR  
1600 NORTH THIRD STREET  
POST OFFICE BOX 94397  
BATON ROUGE, LOUISIANA 70804-9397**

**LEGISLATIVE AUDITOR**  
MICHAEL J. "MIKE" WAGUESPACK, CPA

**FIRST ASSISTANT LEGISLATIVE AUDITOR**  
ERNEST F. SUMMERVILLE, JR., CPA

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# Louisiana Legislative Auditor

Michael J. "Mike" Waguespack, CPA



## Louisiana Cemetery Board

May 2023

Audit Control # 80220135

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## Introduction

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The primary purpose of our procedures at the Louisiana Cemetery Board (Board) was to evaluate certain controls that the Board uses to ensure accurate financial reporting, compliance with applicable laws and regulations, and accountability over public funds. In addition, we determined whether management has taken action to correct the findings reported in the prior report.

The Board was created in 1974. The Board's purpose is to regulate cemeteries within the state of Louisiana.

## Results of Our Procedures

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We evaluated the Board's operations and system of internal control through inquiry, observation, and review of its policies and procedures, including a review of the applicable laws and regulations. Based on the documentation of Board's controls and our understanding of related laws and regulations, we performed procedures on selected controls and transactions relating to Board meetings and minutes, bank reconciliations, receipts and collections, non-payroll disbursements, credit cards, travel expenses, contracts, payroll and personnel, ethics, budget, and sexual harassment policies.

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## Follow-up on Prior-report Findings

We reviewed the status of the prior-report findings in the Board's Procedural Report dated June 26, 2019. The findings relating to Improper Expenses and Failure to Establish a Contract with a Vendor have not been resolved and are addressed again in this report.

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## Current Report Findings

### Improper Expenses

For the third consecutive engagement, the Board charged the Board credit card for four lunches that appeared to have no public purpose. In fiscal year 2022, the Board spent \$873 on lunches for board members and for non-board members. The lunches occurred on the same dates as the biannual board or executive meetings. In addition, the Board did not maintain an itemized receipt for two of these lunches. The Louisiana Constitution Article VII, Section 14(A) generally prohibits state entities from loaning, pledging, or donating public funds, assets or property to persons, associations or corporations, public or private.

Louisiana Revised Statute (R.S.) 8:63 allows board members to receive necessary traveling and other expenses directly related to the performance of their duties. However, based on the information reviewed, it was not evident that there was a public purpose when expending the funds, or that the Board received something of value in return.

The Attorney General, in *Opinion 08-0328*, explains that for an expenditure of public funds to be permissible under Article VII, Section 14(A), the public entity should ensure that there is a public purpose behind the expenditure, that the expenditure does not appear gratuitous, and that there is a reasonable expectation of some public benefits to the public entity in return for the expenditure. Based on the evidence provided by the Board, taking board members and non-board members to lunch does not appear to have a public purpose, appears gratuitous, and does not seem to provide something of value in return.

The Board should strengthen its procedures to ensure that all expenses are allowable and that adequate supporting documentation, such as itemized receipts, is maintained when expenses occur. Management did not concur with the finding and noted the Board members were present in their official capacity as it relates to the performance of their duties, and therefore in its opinion, the meals were authorized by statute as "other expenses." In addition, management's response mentions that going forward the Board will pay the costs for lunch for only those Board members who are traveling from out of town, will secure and retain an itemized receipt, and will maintain a record of those Board members whose lunch is a covered expense (see Appendix A, pages 1-2).

**Additional Comments:** We do not believe that payment of Board member lunches is directly related to the performance of any Board member's duties.

### Failure to Establish a Contract with a Vendor

For the third consecutive engagement, the Board did not obtain an appropriate approved contract for a vendor that was paid \$14,456 for providing information technology services during fiscal years 2021 and 2022. The only documentation the Board maintains with this vendor to support the current agreement is an invoice. The

invoice lacks basic elements of a contract, including a contract termination date; a description of circumstances under which the contract can be terminated, either with or without cause; remedies for default; goals and objectives; a monitoring plan; and a statement giving the legislative auditor the authority to audit records of the individual or firm.

Failure to obtain written contracts or agreements for professional or consulting services increases the risk of misunderstandings and/or nonperformance of needed services without any protection for the Board, including remedies for default. Good internal controls require that an agreement between parties should be in writing, signed and dated, and provide clarity of actions required by both parties.

The Board should ensure all contracts or agreements for services are written and signed by appropriate persons, and all relevant terms are included. Management did not concur with the finding, noting in its opinion services for back-up/cloud storage, antivirus protection, and monitoring are *de minimis* and do not require a contract. However, the response indicates that the host for the Board's email and website is retiring on June 30, 2023; as a result, the Board expects to enter into a contractual agreement for web and email hosting, as well as cloud backup to maintain the integrity of Board records and continuity of services in the event of a catastrophic event (see Appendix A, pages 3-4).

### **Lack of Written Policies and Procedures**

The Board did not have written policies and procedures regarding disaster recovery/business continuity. Good internal controls require an organization to prepare and maintain a written continuity of operations plan to address procedures, arrangements, and agreements to ensure that the organization will continue to carry out its mission in an emergency or disaster. In addition, a written plan should be established to address the identification of critical data and frequency of data backups, storage of backups in a separate physical location isolated from the network, periodic testing/verification that backups can be restored, use of antivirus software on all systems, timely application of all available system and software patches/updates, and identification of personnel, processes, and tools needed to recover operations after a critical event.

Having written policies and procedures also becomes critical when job duties must transition to new staff and board members as resignations and/or terms expire, as well as ensuring continuity during disasters/unexpected events. The Board was not aware it needed a disaster recovery/business continuity policy.

The Board should develop written policies and procedures for disaster recovery/business continuity to ensure consistency executing its processes. Management's response noted that the Board will initiate the adoption of a disaster recovery/business continuity plan and anticipates it will be available for Board review and action in the Fall of 2023. If approved, it will be placed in the Board's policies and procedures (see Appendix A, page 5).

### **Ineffective Bank Reconciliations**

The Board did not ensure bank reconciliations were properly prepared and reviewed, increasing the risk that errors and/or fraud could occur and not be detected in a timely manner. The bank reconciliations for the months of January 2021 through December 2022 did not balance and contained unexplained differences between bank balances and the general ledger balance. For example, the variance between the bank balance and the general ledger was \$6,280, as of December 31, 2022. In addition, there was no evidence of supervisory review on the reconciliations for May 2022 and December 2022.

Management did not place sufficient emphasis on implementing an effective bank reconciliation process. Good internal control requires accurate reconciliation of bank account balances to the accounting records as well as supervisor review of the completed bank reconciliations. Bank reconciliations provide management with a basis to ensure that all transactions that affect both the bank accounts and the accounting records agree.

The Board management should ensure that its bank accounts are properly reconciled and that completed bank reconciliations are reviewed by the appropriate level of management. Management will seek a review by the Board's CPA to determine where the variance originated and take corrective action necessary to ensure that all issues raised are resolved completely (see Appendix A, pages 6-7).

### **Noncompliance with Sexual Harassment Laws and Regulations**

The Board did not comply with R.S. 42:343-344, which requires all state entities to institute a policy to prevent sexual harassment that shall include annual training for board members and staff; annual reporting requirements to the Division of Administration (DOA); and posting the sexual harassment prevention policy, as well as complaint and grievance procedures, on the Board's website. The Board was unaware of these requirements.

Based on our review of annual certifications for sexual harassment training for board members and staff, no board members had completed annual sexual harassment training for 2021 or 2022. In addition, the Board's website did not include its sexual harassment policy or complaint procedures. Finally, we requested the annual sexual harassment compliance report required to be submitted to DOA; however, the Board did not complete a report for 2021 or 2022.

The Board should ensure all board members and staff complete annual training regarding prevention of sexual harassment; post the sexual harassment prevention policy, as well as complaint and grievance procedures, on its website; and complete and submit to the DOA the annual report on sexual harassment as required by state law.

Management's response mentioned that the Board was not aware that all members were required to complete annual sexual harassment training. Members of the Board

will initiate annual training beginning in 2023 and the website will be modified to ensure that a sexual harassment policy and complaint procedure is set forth on the website (see Appendix A, page 8).

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## **Other Results of Our Procedures**

### **Written Policies and Procedures**

The Board provided the following policies and procedures and we observed that they addressed each of the categories and subcategories as listed below except for Disaster Recovery/Business Continuity. An exception was noted; see Current Report Findings section.

- (a) **Budgeting**, including preparing, adopting, monitoring, and amending the budget.
- (b) **Purchasing**, including (1) how purchases are initiated; (2) how vendors are added to the vendor list; (3) the preparation and approval process of purchase requisitions and purchase orders; (4) controls to ensure compliance with the public bid law or state purchasing rules and regulations, as applicable to the entity; and (5) documentation required to be maintained for all bids and price quotes.
- (c) **Disbursements**, including processing, reviewing, and approving.
- (d) **Receipts/Collections**, including receiving, recording, and preparing deposits. Also, policies and procedures should include management's actions to determine the completeness of all collections for each type of revenue (e.g., periodic confirmation with outside parties, reconciliation of receipt number sequences, reasonableness of cash collections based on licenses issued).
- (e) **Payroll/Personnel**, including (1) payroll processing, and (2) reviewing and approving time and attendance records, including leave and overtime worked.
- (f) **Contracting**, including (1) types of services requiring written contracts, (2) standard terms and conditions, (3) legal review, (4) approval process, and (5) monitoring process.
- (g) **Credit Cards**, including (1) how cards are to be controlled, (2) allowable business uses, (3) documentation requirements, (4) required approvers of statements, and (5) monitoring card usage (e.g. determining the reasonableness of fuel card purchases).
- (h) **Travel and expense reimbursement**, including (1) allowable expenses, (2) dollar thresholds by category of expense,

(2) documentation requirements, (3) timeframe in which requests must be submitted and (4) required approvers.

- (i) **Ethics**, including (1) the prohibitions as defined in (R.S.) 42:1111-1121, (2) actions to be taken if an ethics violation takes place, (3) system to monitor possible ethics violations, and (4) requirement that all employees annually attest through signature verification that they have read the entity's ethics policy.
- (j) **Disaster Recovery/Business Continuity**, including (1) identification of critical data and frequency of data backups, (2) storage of backups in a separate physical location isolated from the network, (3) periodic testing/verification that backups can be restored, (4) use of antivirus software on all systems, (5) timely application of all available system and software patches/updates, and (6) identification of personnel, processes, and tools needed to recover operations after a critical event.

### **Board Meetings and Minutes**

We reviewed the board/committee minutes for the fiscal period, to determine whether the managing board met (with a quorum) at least twice per year in accordance with R.S. 8:65 and referenced or included monthly budget-to-actual comparisons. No exceptions were noted.

We accessed the Board's online information included in the Division of Administration's boards and commissions database to determine that the entity submitted board meeting notices and minutes for all meetings during the fiscal period. No exceptions were noted.

### **Bank Reconciliations**

The Board maintains an operating account and a money market fund account, which are used for general operations and investments respectively. Two Board staff participate in cash collection, disbursement, and reconciliation activities. Cash balances totaled \$95,333 at December 31, 2022. We performed procedures to reconcile cash balances to the Board's general ledger and confirmed the timely preparation and adequate approval of bank account reconciliations. During our review, we noted the bank reconciliations did not reconcile to the general ledger and two bank reconciliations (May 2022 and December 2022) had no evidence of supervisory review (see Current Report Findings section).

### **Receipts and Collections**

Approximately 80% of the Board's revenue collections were from annual licensing fees collections in fiscal year 2022. We traced selected licenses that were granted to supporting documentation to ensure the appropriate fees were collected in accordance with the fee schedule established by the Board. No exceptions were noted.



We performed procedures to determine if deposits were made timely and agreed to recorded collections, the bank, and the general ledger. We reviewed policies and procedures to determine if job duties for collections were properly segregated and that the procedures involved a process to ensure completeness of all revenue sources. We also determined if employees who have access to cash were covered by a bond or insurance policy. No exceptions were noted.

### **Non-Payroll Disbursements**

For all non-payroll disbursements (excluding credit card purchases/payments, travel reimbursements, and petty cash purchases), we obtained policies and procedures relating to the job duties of employees involved with non-payroll purchasing and payment functions and observed that the job duties were properly segregated. We also traced selected disbursements to supporting documentation and evaluated proper segregation of duties in the processing and approval of those disbursements. No exceptions were noted.

### **Credit Cards**

The Board has one credit card, which is used by the Director, for travel, general office supplies, and administrative expenses. We traced selected credit card purchases to supporting documentation and evaluated the purpose of the purchase and compliance with laws and regulations. We further confirmed the timely review of credit card statements. During our review, we noted the Board charged the Board credit card for four lunches that appeared to have no public purpose. In fiscal year 2022, the Board spent \$873 on lunches for board members and for non-board members. The lunches occurred on the same dates as the biannual board or executive meetings. In addition, the Board did not maintain an itemized receipt for two of these lunches (see Current Report Findings section).

### **Travel Expenses**

Travel expenses include conference travel for the Board's Director, as well as reimbursement of travel expenses for board members to attend meetings. Fiscal year 2022 travel expenses totaled \$9,409. We traced selected travel expense reimbursements to supporting documentation, evaluated compliance with laws and regulations, and observed evidence of proper review and approval. No exceptions were noted.

### **Contracts**

The Board contracted with The Derbes Law Firm, LLC; Kanner & Whiteley, LLC; and 3445 Causeway, LLC to perform legal and leasing services. Fiscal year 2022 contract expenditures totaled \$45,916. We traced selected contract payments to contract terms and evaluated compliance with laws and regulations. During our review, we noted that the Board did not have an adequate contract on file for a vendor (see Current Report Findings section).

**Payroll and Personnel**

Approximately 79% of the Board's expenditures in fiscal year 2022 relate to payroll costs. Board personnel include the director, an assistant to the director, and a compliance investigator. We traced selected employees' salaries to contract terms or pay structure, evaluated controls over time and attendance records, and evaluated termination payments. We also obtained management's representation that employer and employee portions of payroll taxes, retirement contributions, health insurance premiums, and workers' compensation premiums were paid, and associated forms were filed, by required deadlines. No exceptions were noted.

**Ethics**

We evaluated evidence to determine if required ethics training was completed by the Board's members and employees. We determined if the Board members and employees completed the required annual ethics training. We determined if the Board took appropriate actions on ethic violations reported to the Board during the engagement period. No exceptions were noted.

**Budget**

The Board annually adopts a budget by majority vote of its board of directors. Budgeted revenues for fiscal year 2022 were approximately 25% higher than the previous year because of an increase in anticipated fee revenues. Budgeted expenses for fiscal year 2022 were approximately 8% higher than the previous year because a new director was hired late in fiscal year 2022 while the previous director was retained as a consultant to ease with transition. We confirmed the adoption of the Board's budget and evaluated variances between budgeted amounts and actual revenues and expenditures for reasonableness. In addition, we obtained the budget information for the current fiscal period and determined if the information agreed with the budget information contained in the Division of Administration's boards and commissions database. No exceptions were noted.

**Sexual Harassment Policies**

We performed procedures to determine if the Board's sexual harassment policies and procedures address all requirements of R.S. 42:342-344 and that the policy and complaint procedure was posted on the Board's website or premises. We also performed procedures to determine if the Board's employees and board members completed the required training during the calendar year and that the Board's sexual harassment report was properly completed by the February 1<sup>st</sup> deadline. During our review, we noted the policy and compliant procedure was not posted on the Board's website or premises, the Board employees and board members did not complete the required training during the calendar years, and the Board's sexual harassment report was not properly completed by the February 1<sup>st</sup> deadline (see Current Report Findings section).

**Other Compliance Areas**

We evaluated evidence to determine if all misappropriations were reported to the legislative auditor and the appropriate parish district attorney. We also observed that the Board had posted on its premises and website, the notice required by R.S. 24:523.1 concerning the reporting of misappropriation, fraud, waste, or abuse of public funds. No exceptions were noted.

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**Comparison of Activity between Years**

We compared the most current and prior-year financial activity using the Board's general ledger and other system generated reports to identify trends and obtained explanations from management for any significant variances that could potentially indicate areas of risk. Management provided reasonable explanations for all significant variances.

Under Louisiana Revised Statute 24:513, this report is a public document, and it has been distributed to appropriate public officials.

Respectfully submitted,



Michael J. "Mike" Waguespack, CPA  
Legislative Auditor

AR:ETM:RR:EFS:aa

LCB 2022



## **APPENDIX A: MANAGEMENT'S RESPONSES**

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John Bel Edwards  
Governor

## STATE OF LOUISIANA

### LOUISIANA CEMETERY BOARD

3445 N. CAUSEWAY BOULEVARD, SUITE 509  
METAIRIE, LOUISIANA 70002  
TELEPHONE 504-838-5267 TOLL FREE 1-866-488-5267 FAX 504-838-5289

Jerry W. Sullivan  
Director

BY ELECTRONIC TRANSMISSION

April 28, 2023

Mr. Michael J. Waguespack, CPA  
Louisiana Legislative Auditor  
P.O. Box 94397  
Baton Rouge, LA 70804-9397

Re: Engagement for two years ending December 31, 2022

Dear Mr. Wageuspack:

This will serve as our official response and Corrective Action Plan, to the following finding: ***“Improper Expenses”***.

We do not concur with this finding as to past practices. However, a corrective action plan is set forth hereinbelow for future transactions.

This finding references La. R.S. §8:63 and Attorney General Opinion 08-0328 as support that the funds expended, and more particularly, the sums of \$125 on May 27, 2020, \$280 on May 27, 2022, \$245 on July 27, 2022, and \$223.39 on November 4, 2022, were prohibited under the Louisiana Constitution Article VII, Section 14(A) because *“Based on the evidence provided by the Board, taking board members to lunch does not appear to have a public purpose, appears gratuitous, and does not seem to provide something of value in return.”*

The interpretation of the above referenced laws and opinion can be subjective and for the reasons recited below we respectfully disagree with your office’s interpretation of same.

As you know, La. R.S. §8:63 states: *“The members of the board shall receive no compensation but shall receive necessary traveling and **other expenses** directly related to the performance of their duties.”* Further, Attorney General Opinion 08-0328 addresses the *“use of public funds to host strictly social gatherings for city employees”*. The meals that were the subject of this finding were not in the course of a social gathering. The meals occurred on the same dates as scheduled Board meetings, which are required by law, and Board members in attendance were present in their official capacity as it relates to the performance of their duties and are therefore, in our opinion, authorized by statute as *“other expenses”*.

As we have previously indicated, the Louisiana Cemetery Board makes every effort to conduct its meetings in the most efficient manner possible, trying to limit its meetings to one day rather than over the course of two days, when possible, which limits the overall expenses of the Board and thus provides “something of value in return.” For these reasons, the Board has dined together in order to avoid any wasted time and to ensure that all board business take place in one day. For these reasons, the board has disagreed in the past with your assertion that these expenditures violated Article VII, Section 14(A) of the Louisiana Constitution, which prohibits state entities from loaning, pledging, or donating public funds, assets or property to persons, associations or corporations, public or private, because they are authorized by La. R.S. §8:63.

However, to avoid future concerns that may arise, and as a corrective action plan going forward, the Board will pay the costs for lunch for only those Board members who are traveling from out of town, will secure and retain an itemized receipt in full compliance with Louisiana law, and will maintain a record of those Board members whose lunch is a covered expense.

Trusting this response is sufficient for your purposes, we remain.  
Yours very truly,

**LOUISIANA CEMETERY BOARD**

A handwritten signature in blue ink, appearing to read "Jerry W. Sullivan". The signature is fluid and cursive, with a long horizontal line extending to the right.

Jerry W. Sullivan  
Director

cc: Ryan M. Seidemann, Esq.





John Bel Edwards  
Governor

STATE OF LOUISIANA

LOUISIANA CEMETERY BOARD

3445 N. CAUSEWAY BOULEVARD, SUITE 509  
METAIRIE, LOUISIANA 70002  
TELEPHONE 504-838-5267 TOLL FREE 1-866-488-5267 FAX 504-838-5289

Jerry W. Sullivan  
Director

BY ELECTRONIC TRANSMISSION

April 28, 2023

Mr. Michael J. Waguespack, CPA  
Louisiana Legislative Auditor  
P.O. Box 94397  
Baton Rouge, LA 70804-9397

Re: Engagement for years ending December 31, 2021 and December 31, 2022

Dear Mr. Waguespack:

This will serve as our official response and corrective action plan to the following finding: "Failure to Establish a Contract with a Vendor."

We do not concur with the above referenced finding for the reason(s) stated below.

The itemization for amount paid to the referenced vendors (a total of \$14,456 over a two-year period) is as follows:

1. A monthly fee is paid for back-up/cloud storage, antivirus protection, and monitoring. This is for back-up/cloud storage and system protection that is a recurring charge on a monthly basis. We have reviewed the Office of State Procurement's policies and we are of the opinion that these such services, particularly in this de minimis amount, does not require a contract.
3. The Board has consistently purchased a pre-paid (40 hour) block of hours for IT Services and Support. The pre-paid block of hours does not expire and is good for the life of the agreement, e.g., 40 hours of services. The Board believes it is exercising good business practices by purchasing these services in advance as they are less expensive when pre-purchased. We have reviewed the Office of State Procurement's policies and we are of the opinion these services, particularly in this de minimis amount, does not require a contract.

Regarding concerns expressed about possible risks, misunderstandings and/or nonperformance of services without the benefit of a contract with the vendor, the agreement in place with this vendor was reviewed by the Board's legal counsel in 2018 and he expressed an opinion that the current agreement is clear and unambiguous.

Further, in the event of a breach, the Board can enforce the Agreement through a Petition for Specific Performance or for Damages for Breach of Contract.

I note that the host for the Board's email and website is retiring on June 30, 2023. As a Corrective Action Plan in the future, the Board expects to enter into a contractual agreement for web and email hosting, as well as cloud backup, in order to maintain the integrity of Board records and continuity of services in the event of a catastrophic event.

Trusting this response is sufficient for your purposes, we remain.

Yours very truly,

**LOUISIANA CEMETERY BOARD**

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Jerry W. Sullivan  
Director



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Jerry W. Sullivan  
Director

BY ELECTRONIC TRANSMISSION

May 1, 2023

Mr. Michael J. "Mike" Waguespack, CPA  
Louisiana Legislative Auditor  
P.O. Box 94397  
Baton Rouge, LA 70804-9397

Re: Lack of Written Policies and Procedures  
Regarding Disaster Recovery/Business Continuity

Dear Mr. Waguespack:

The Louisiana Cemetery Board acknowledges the finding of the Legislative Auditor. The Board is not aware of a state requirement for a disaster recovery/business continuity plan. It must be noted that, immediately following Hurricane Katrina, the Louisiana Cemetery Board undertook all necessary actions which allowed it to continue operations from a remote location while the New Orleans area recovered. The Board was extremely proactive and ensured that all documents were saved and that operations continued on a regular basis without interruption.

In light of the recommendation of the Louisiana Legislative Auditor, however, the Board will initiate the adoption of a disaster recovery/business continuity plan and anticipates that it will be available for Board review and action in the Fall of 2023. If approved, it will be placed in the Board's Policies and Procedures thereafter for the purpose of implementation in the event of a disaster.

Trusting this response is sufficient for your purposes, we remain.

Yours very truly,

**LOUISIANA CEMETERY BOARD**

Jerry W. Sullivan  
Director

cc: Ryan M. Seidemann, Esq.



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Jerry W. Sullivan  
Director

BY ELECTRONIC TRANSMISSION

May 1, 2023

Mr. Michael J. "Mike" Waguespack, CPA  
Louisiana Legislative Auditor  
P.O. Box 94397  
Baton Rouge, LA 70804-9397

Re: Engagement for two years ending December 31, 2022

Dear Mr. Waguespack:

This will serve as our official response to the following finding: ***"Ineffective Bank Reconciliations"***.

With regard to the May, 2022, and December, 2022, reconciliations, it is acknowledged that initials and signatures are not on the final reconciliations. However, Board procedures were followed every month and it was merely an oversight that Mrs. McCann did not initial the May reconciliation, nor did Mrs. McCann or Mr. Sullivan sign the reconciliation for December of 2022, as the Board was in transition from Mrs. McCann to Mr. Sullivan as Director.

Regarding the variances of the bank balance and the general ledger, there is a suggestion that there is a variance in January, 2021, which continued forward for the audit period. We have discussed the matter with the Board's CPA who has indicated that the bank reconciliations should tie to the General Ledger.

As a corrective action plan, we will immediately seek a review by the Board's Certified Public Accountant who annually reviews the Board's financials in order to determine where the variance originated and take whatever corrective action is necessary to ensure that all issues raised are resolved completely.

Trusting this response is sufficient for your purposes, we remain,

Yours very truly,

**LOUISIANA CEMETERY BOARD**

A handwritten signature in blue ink, appearing to read "Jerry W. Sullivan". The signature is fluid and cursive, with a long horizontal line extending to the right.

Jerry W. Sullivan  
Director

cc: Ryan M. Seidemann, Esq.



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Jerry W. Sullivan  
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BY ELECTRONIC TRANSMISSION

May 1, 2023

Mr. Michael J. "Mike" Waguespack, CPA  
Louisiana Legislative Auditor  
P.O. Box 94397  
Baton Rouge, LA 70804-9397

Re: Non-compliance with Sexual Harassment Laws and Regulations

Dear Mr. Waguespack:

The Louisiana Cemetery Board acknowledges the finding of the Legislative Auditor. The Board was not aware that all members of the Board were required to complete annual sexual harassment training.

As a corrective action plan, the members of the Board will initiate annual training beginning in 2023. Moreover, the website will be modified to ensure that a sexual harassment policy and complaint procedure set forth on the website, as well as ensuring that the website is ADA Compliant among other upgrades. We anticipate that these modifications and changes to the website will take several months, but hope that it will be completed no later than December 31, 2023.

Trusting this response is sufficient for your purposes, we remain.  
Yours very truly,

**LOUISIANA CEMETERY BOARD**

Jerry W. Sullivan  
Director

cc: Ryan M. Seidemann, Esq.

## APPENDIX B: SCOPE AND METHODOLOGY

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We conducted certain procedures at the Louisiana Cemetery Board (Board) for the period from January 1, 2021, through December 31, 2022. Our objective was to evaluate certain controls the Board uses to ensure accurate financial reporting, compliance with applicable laws and regulations, and accountability over public funds. The scope of our procedures, which are summarized below, was significantly less than an audit conducted in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States. We did not audit or review the Board's Annual Fiscal Report, and accordingly, we do not express opinions on that report. The Board's accounts are an integral part of the state of Louisiana's financial statements, upon which the Louisiana Legislative Auditor expresses opinions.

- We evaluated the Board's operations and system of internal control through inquiry, observation, and review of its policies and procedures, including a review of the laws and regulations applicable to the Board.
- Based on the documentation of the Board's controls and our understanding of related laws and regulations, we performed procedures on selected controls and transactions relating to Board meetings and minutes, bank reconciliations, receipts and collections, non-payroll disbursements, credit cards, travel expenses, contracts, payroll and personnel, ethics, budget, and sexual harassment policies.
- We compared the most current and prior-year financial activity using the Board's general ledger and other system generated reports and obtained explanations from the Board's management for any significant variances.

The purpose of this report is solely to describe the scope of our work at the Board and not to provide an opinion on the effectiveness of the Board's internal control over financial reporting or on compliance. Accordingly, this report is not intended to be and should not be used for any other purpose.