

STATE OF WEST VIRGINIA DEPARTMENT OF ADMINISTRATION PURCHASING DIVISION 2019 WASHINGTON STREET, EAST

CHARLESTON, WEST VIRGINIA 25305-0130

W. MICHAEL SHEETS DIRECTOR

December 17, 2018

Vanesse Myers, Procurement Officer Library Commission 1900 Kanawha Blvd East Charleston, West Virginia 25305

Dear Ms. Myers:

This is to transmit the final copy of the Purchasing Review of the West Virginia Library Commission.

No response was received to the draft report.

A Corrective Action Plan will follow requesting your response to all of the compliance issues identified in this report.

Should you have any questions, please contact Greg Clay at (304) 558-5780.

Respectfully,

W. Michael Sheets, CPPO

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Director

West Virginia Purchasing Division

Enclosure

cc. Jennifer Johnson, Library Administrative Director, Library Commission

WV PURCHASING DIVISION INSPECTION REPORT

Education and Arts

West Virginia Library Commission

FISCAL YEAR 2018

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INTRODUCTION

We conducted a review of the internal procurement policies and procedures of Library Commission. The inspection was conducted November 7 and 8, 2018 and was made under the authority provided by West Virginia Code §5A-3-4(a) (5) and the Code of State Rules §148-1-4.14.

The review was directed principally to determine whether agency purchasing transactions for the period under review were, in all material respects, in compliance with statute, rules and procedures.

Our review indicated that, for the period of July 1, 2017 through June 30, 2018, the Agency processed 1448 procurement transactions with a value of \$12,067,542.40. (These amounts are approximate, subject to reporting limitations from wvOasis (including possible data entry error) and errors caused by elimination of duplicate results).

SCOPE

We conducted our review in accordance with applicable provisions of Code and Rule; the Purchasing Division's Procedures Handbook; and guidelines, procedures and processes that govern the purchasing process. Our review encompassed an analysis of the internal procurement operating procedures of the spending unit and its related policies to the extent we deemed necessary to formulate an opinion on the adequacy of the system to properly manage procurement transactions.

For the stated period, we selected a judgmental sample of procurement transactions for compliance testing and performed other procedures that we considered necessary to formulate this opinion. Specifically, the scope of our review included, but was not limited to, an examination of the following:

- (1) Proper award (lowest responsible bidder meeting specifications),
- (2) Use of statewide contracts,
- (3) Use of internal resources,
- (4) Failure to Bid at Delegated Level,
- (5) Verification of vendor registration,
- (6) Verification of unemployment and workers' compensation, vendor status with Secretary of State's office, debarred vendor list,
- (7) Presence of signed, notarized Affidavit,
- (8) Issuance of wvOASIS procurement award document,
- (9) Fixed asset transactions,
- (10) Certification of Non-Conflict of Interest,
- (11) Evidence of stringing, and
- (12) Attendance of Purchasing Division training conferences.

RESULTS OF REVIEW

<u>Issue 1</u> (2 Findings)

<u>Date</u> 03/23/18

Description Cloud Plan

Vendor Adobe Systems Inc. <u>Amount</u> \$5,134.97

Invoice PRCC,PC18068217

• Finding – A

There was no indication that an wvOASIS procurement award document was issued.

Requirement

See Attachment A, point #8 – wvOASIS Procurement Award Document.

Recommendation

We recommend that approved document be used to make an award.

Finding – B

The listed file did not include the required Certification of Non-Conflict of Interest.

Requirement

See Attachment A, point #10 – Certification of Non-Conflict of Interest.

Recommendation

We recommend maintaining purchasing files with all documentation including the Certification of Non-Conflict of Interest (where applicable).

<u>Issue 2</u> (2 Findings)

Date	Description	Vendor	Amount	Invoice
01/09/18	Dues & Memberships	COSLA	\$5,000.00	PRCC,PC18052174
6/30/18	Dues & Memberships	COSLINE	\$3,000.00	GAX,1800028391

• Finding – A

There was no indication that an wvOASIS procurement award document was issued.

Requirement

See Attachment A, point #8 – wvOASIS Procurement Award Document.

Recommendation

We recommend that approved document be used to make an award.

• Finding – B

The listed file did not include the required Certification of Non-Conflict of Interest.

Requirement

See Attachment A, point #10 – Certification of Non-Conflict of Interest.

Recommendation

We recommend maintaining purchasing files with all documentation including the Certification of Non-Conflict of Interest (where applicable).

<u>Issue 3</u> (2 Findings)

<u>Date</u>	Description	Vendor	Amount	Invoice
12/15/17	Subscription	Envision Ware	\$4,260.00	PRCC,PC18043594
1/20/18	Subscription	Penguin Computing Inc	\$3,196.00	PRCC,PC18051944
02/28/18	Subscription	Value Line Publishing	\$2,675.00	PRCC,PC18061407

• Finding – A

There was no indication that an wvOASIS procurement award document was issued.

Requirement

See Attachment A, point #8 – wvOASIS Procurement Award Document.

Recommendation

We recommend that approved document be used to make an award.

Finding – B

The listed file did not include the required Certification of Non-Conflict of Interest.

Requirement

See Attachment A, point #10 – Certification of Non-Conflict of Interest.

Recommendation

We recommend maintaining purchasing files with all documentation including the Certification of Non-Conflict of Interest (where applicable).

Issue 4 (2 Findings)

<u>Date</u> <u>Description</u> <u>Vendor</u> <u>Amount</u> <u>Invoice</u> 10/26/17 Library Guides Springshare LLC \$4,134.00 PRCC,PC18033427

Finding – A

There was no indication that an wvOASIS procurement award document was issued.

Requirement

See Attachment A, point #8 – wvOASIS Procurement Award Document.

Recommendation

We recommend that approved document be used to make an award.

• Finding – B

The listed file did not include the required Certification of Non-Conflict of Interest.

Requirement

See Attachment A, point #10 – Certification of Non-Conflict of Interest.

Recommendation

We recommend maintaining purchasing files with all documentation including the Certification of Non-Conflict of Interest (where applicable).

<u>Issue 5</u> (5 Findings)

<u>Date Description Vendor Amount Invoice</u> 06/30/18 Subscription EBSCO \$105,566.25 GAX,1800116405

Summary:

Although the spending unit is declaring this transaction as an exemption under Section 9, the file still must contain all required documentation for that dollar amount. Due to this being a GAX payment, the standard Oasis verification searches and vendor registration were not completed.

Finding – A

The listed purchase did not include documentation showing that vendor registration had been verified.

Requirement

See Attachment A, point #4 – Vendor Registration.

Recommendation

We recommend verifying, prior to award, that successful bidders are registered with the Purchasing Division and retaining that documentation with the purchasing file.

Finding – B

The listed purchase did not include proof of coverage for either worker's compensation, unemployment compensation or Secretary of State Registration.

Requirement

See Attachment A, point #5 – Workers' Compensation/Unemployment Compensation and Secretary of State Registration.

Recommendation

We recommend verifying proof of Secretary of State Registration, workers' compensation and unemployment compensation coverage prior to award. Further, we recommend retaining this documentation with the purchasing file.

Finding – C

The listed file did not include the required purchasing "Affidavit."

Requirement

See Attachment A, point #6 – Affidavit.

Recommendation

We recommend maintaining purchasing files with all documentation including the Affidavit.

• Finding – D

There was no indication that an wvOASIS procurement award document was issued.

Requirement

See Attachment A, point #8 – wvOASIS Procurement Award Document.

Recommendation

We recommend that approved document be used to make an award.

Finding – E

The listed file did not include the required Certification of Non-Conflict of Interest.

Requirement

See Attachment A, point #10 – Certification of Non-Conflict of Interest.

Recommendation

We recommend maintaining purchasing files with all documentation including the Certification of Non-Conflict of Interest (where applicable).

<u>Issue 6</u> (3 Findings)

<u>Date</u> <u>Description</u> <u>Vendor</u> <u>Amount</u> <u>Invoice</u> 06/18/18 Books Recorded Books \$459.97 PRCC,PC18093189

Summary:

Although the individual transaction listed above falls below bid limits, the aggregated amount spent with the listed vendor exceeded \$5,000 for the fiscal year under review.

• Finding – A

The listed purchase did not include documentation showing that vendor registration had been verified.

Requirement

See Attachment A, point #4 – Vendor Registration.

Recommendation

We recommend verifying, prior to award, that successful bidders are registered with the Purchasing Division and retaining that documentation with the purchasing file.

Finding – B

The listed purchase did not include proof of coverage for either worker's compensation, unemployment compensation or Secretary of State Registration.

Requirement

See Attachment A, point #5 – Workers' Compensation/Unemployment Compensation and Secretary of State Registration.

Recommendation

We recommend verifying proof of Secretary of State Registration, workers' compensation and unemployment compensation coverage prior to award. Further, we recommend retaining this documentation with the purchasing file.

• Finding – C

The listed file did not include the required purchasing "Affidavit."

Requirement

See Attachment A, point #6 - Affidavit.

• Recommendation

We recommend maintaining purchasing files with all documentation including the Affidavit.

<u>Issue 7</u> (6 Findings)

<u>Date</u>	Description	Vendor	Amount	Invoice
06/30/18	System Maintenance	Ex Libris USA Inc	\$17,830.82	GAX,1800074331
06/27/18	System Equipment	Integration Technologies	\$19.807.17	GAX,1900001746

• Finding – A

Documentation showed no evidence of competitive bidding and no justification for a sole-source purchase.

Requirement

See Attachment A, point #3 – Bid Documentation.

Recommendation

We recommend maintaining purchasing files with all documentation, including, but not limited to: specifications used when making the purchase, listing of bids, all correspondence and any justification/explanation required for the transaction.

• Finding – B

The listed purchase did not include documentation showing that vendor registration had been verified.

Requirement

See Attachment A, point #4 – Vendor Registration.

Recommendation

We recommend verifying, prior to award, that successful bidders are registered with the Purchasing Division and retaining that documentation with the purchasing file.

Finding – C

The listed purchase did not include proof of coverage for either worker's compensation, unemployment compensation or Secretary of State Registration.

Requirement

See Attachment A, point #5 – Workers' Compensation/Unemployment Compensation and Secretary of State Registration.

Recommendation

We recommend verifying proof of Secretary of State Registration, workers' compensation and unemployment compensation coverage prior to award. Further, we recommend retaining this documentation with the purchasing file.

Finding – D

The listed file did not include the required purchasing "Affidavit."

Requirement

See Attachment A, point #6 – Affidavit.

Recommendation

We recommend maintaining purchasing files with all documentation including the Affidavit.

Finding – E

There was no indication that an wvOASIS procurement award document was issued.

Requirement

See Attachment A, point #8 – wvOASIS Procurement Award Document.

Recommendation

We recommend that approved document be used to make an award.

• Finding – F

The listed file did not include the required Certification of Non-Conflict of Interest.

Requirement

See Attachment A, point #10 – Certification of Non-Conflict of Interest.

• Recommendation

We recommend maintaining purchasing files with all documentation including the Certification of Non-Conflict of Interest (where applicable).

Issue 8 (3 Findings)

<u>Date</u>	Description	Vendor	Amount	Invoice
05/15/18	Subscription	In Niche Academy	\$10,000.00	PRCC,PC18081867
08/14/17	Subscription	Lex Lexis Nexis	\$10,000.00	PRCC,PC18010900
06/30/18	Subscription	OCLC Inc	\$34,160.00	GAX,1800128036
06/04/17	Subscription	Database LLC	\$6,365.00	PRCC,PC18008846

Summary:

Although the spending unit is declaring these transactions as an exemption under Section 9, the file still must contain all required documentation for that dollar amount.

• Finding – A

The listed file did not include the required purchasing "Affidavit."

Requirement

See Attachment A, point #6 – Affidavit.

Recommendation

We recommend maintaining purchasing files with all documentation including the Affidavit.

• Finding – B

There was no indication that an wvOASIS procurement award document was issued.

Requirement

See Attachment A, point #8 – wvOASIS Procurement Award Document.

Recommendation

We recommend that approved document be used to make an award.

• Finding – C

The listed file did not include the required Certification of Non-Conflict of Interest.

Requirement

See Attachment A, point #10 – Certification of Non-Conflict of Interest.

• Recommendation

We recommend maintaining purchasing files with all documentation including the Certification of Non-Conflict of Interest (where applicable).

Issue 9 (2 Findings)

<u>Date</u> <u>Description</u> <u>Vendor</u> <u>Amount</u> <u>Invoice</u>
05/21/18 Playing Device for Books

<u>Object of the proof of t</u>

Summary:

Although the individual transaction listed above falls below bid limits, the aggregated amount spent with the listed vendor exceeded \$5,000 for the fiscal year under review.

Finding – A

Documentation showed no evidence of competitive bidding and no justification for a sole-source purchase.

Requirement

See Attachment A, point #3 – Bid Documentation.

Recommendation

We recommend maintaining purchasing files with all documentation, including, but not limited to: specifications used when making the purchase, listing of bids, all correspondence and any justification/explanation required for the transaction.

Finding – B

The listed file did not include the required purchasing "Affidavit."

Requirement

See Attachment A, point #6 – Affidavit.

Recommendation

We recommend maintaining purchasing files with all documentation including the Affidavit.

<u>Issue 10</u> (3 Findings)

<u>Date</u> <u>Description</u> <u>Vendor</u> <u>Amount</u> <u>Invoice</u> 09/22/17 Books Junior Library Guild \$8,191.90 PRCC.PC18020778

Finding – A

The listed purchase did not include proof of coverage for either worker's compensation, unemployment compensation or Secretary of State Registration.

Requirement

See Attachment A, point #5 – Workers' Compensation/Unemployment Compensation and Secretary of State Registration.

Recommendation

We recommend verifying proof of Secretary of State Registration, workers' compensation and unemployment compensation coverage prior to award. Further, we recommend retaining this documentation with the purchasing file.

• Finding – B

There was no indication that an wvOASIS procurement award document was issued.

Requirement

See Attachment A, point #8 – wvOASIS Procurement Award Document.

Recommendation

We recommend that approved document be used to make an award.

• Finding – C

The listed file did not include the required Certification of Non-Conflict of Interest.

Requirement

See Attachment A, point #10 – Certification of Non-Conflict of Interest.

• Recommendation

We recommend maintaining purchasing files with all documentation including the Certification of Non-Conflict of Interest (where applicable).

Issue 11 (5 Findings)

DateDescriptionVendorAmountInvoice06/30/18Maint/Telecom MaintNat'l Federation of the
Blind\$8,595.25GAX,1800144287

Finding – A

Documentation showed no evidence of competitive bidding and no justification for a sole-source purchase.

Requirement

See Attachment A, point #3 – Bid Documentation.

Recommendation

We recommend maintaining purchasing files with all documentation, including, but not limited to: specifications used when making the purchase, listing of bids, all correspondence and any justification/explanation required for the transaction.

• Finding – B

The listed purchase did not include documentation showing that vendor registration had been verified.

Requirement

See Attachment A, point #4 – Vendor Registration.

• Recommendation

We recommend verifying, prior to award, that successful bidders are registered with the Purchasing Division and retaining that documentation with the purchasing file.

Finding – C

The listed purchase did not include proof of coverage for either worker's compensation, unemployment compensation or Secretary of State Registration.

Requirement

See Attachment A, point #5 – Workers' Compensation/Unemployment Compensation and Secretary of State Registration.

Recommendation

We recommend verifying proof of Secretary of State Registration, workers' compensation and unemployment compensation coverage prior to award. Further, we recommend retaining this documentation with the purchasing file.

• Finding - D

There was no indication that an wvOASIS procurement award document was issued.

Requirement

See Attachment A, point #8 – wvOASIS Procurement Award Document.

Recommendation

We recommend that approved document be used to make an award.

• Finding – E

The listed file did not include the required Certification of Non-Conflict of Interest.

Requirement

See Attachment A, point #10 - Certification of Non-Conflict of Interest.

Recommendation

We recommend maintaining purchasing files with all documentation including the Certification of Non-Conflict of Interest (where applicable).

Issue 12 (2 Findings)

Date 03/08/18 Description Audio Books

Vendor Overdrive Dist. Amount

Invoice \$140.00 PRCC,PC18065177

Summary:

Although the individual transaction listed above falls below bid limits, the aggregated amount spent with the listed vendor exceeded \$5,000 for the fiscal year under review.

Finding - A

Documentation showed no evidence of competitive bidding and no justification for a sole-source purchase.

Requirement

See Attachment A, point #3 – Bid Documentation.

Recommendation

We recommend maintaining purchasing files with all documentation, including, but not limited to: specifications used when making the purchase, listing of bids, all correspondence and any justification/explanation required for the transaction.

Finding – B

The listed file did not include the required purchasing "Affidavit."

Requirement

See Attachment A, point #6 – Affidavit.

Recommendation

We recommend maintaining purchasing files with all documentation including the Affidavit.

<u>Issue 13</u> (1 Finding)

<u>Date</u> <u>Description</u> <u>Vendor</u> <u>Amount</u> <u>Invoice</u> 01/19/18 Online Reference Oxford University Press \$2,420.00 PRCC,PC18051944

Summary:

Although the individual transaction listed above falls below bid limits, the aggregated amount spent with the listed vendor exceeded \$5,000 for the fiscal year under review.

• Finding – A

The listed file did not include the required purchasing "Affidavit."

Requirement

See Attachment A, point #6 – Affidavit.

Recommendation

We recommend maintaining purchasing files with all documentation including the Affidavit.

Issue 14 (5 Findings)

<u>Date</u> <u>D</u>

Description

Vendor

<u>Amount</u>

Invoice

06/11/18

Network Services

Teksavers Inc.

\$8,638.92 PRCC,PC18090961

• Finding – A

Documentation showed no evidence of competitive bidding and no justification for a sole-source purchase.

Requirement

See Attachment A, point #3 – Bid Documentation.

Recommendation

We recommend maintaining purchasing files with all documentation, including, but not limited to: specifications used when making the purchase, listing of bids, all correspondence and any justification/explanation required for the transaction.

• Finding – B

The listed purchase did not include proof of coverage for either worker's compensation, unemployment compensation or Secretary of State Registration.

Requirement

See Attachment A, point #5 – Workers' Compensation/Unemployment Compensation and Secretary of State Registration.

Recommendation

We recommend verifying proof of Secretary of State Registration, workers' compensation and unemployment compensation coverage prior to award. Further, we recommend retaining this documentation with the purchasing file.

Finding – C

The listed file did not include the required purchasing "Affidavit."

Requirement

See Attachment A, point #6 - Affidavit.

Recommendation

We recommend maintaining purchasing files with all documentation including the Affidavit.

• Finding – D

There was no indication that an wvOASIS procurement award document was issued.

Requirement

See Attachment A, point #8 – wvOASIS Procurement Award Document.

Recommendation

We recommend that approved document be used to make an award.

• Finding – E

The listed file did not include the required Certification of Non-Conflict of Interest.

Requirement

See Attachment A, point #10 – Certification of Non-Conflict of Interest.

Recommendation

We recommend maintaining purchasing files with all documentation including the Certification of Non-Conflict of Interest (where applicable).

SUMMARY

This review of 58 selected transactions from an approximate 1,448 total transactions yielded 43 findings associated with 21 of the selected transactions. This indicates that approximately 36% of the transactions reviewed had one or more problems of potential nonconformity with Purchasing Division laws, rules and/or regulations.

In August of 2017, the Purchasing Division conducted our annual purchasing conference for agency procurement officers at Canaan Valley State Park Resort. At this conference, attendees were offered the opportunity to attend 11 workshops focusing on more than 30 different topics.

Listed below, you will find the names of your agency employees who participated in our conference and the number of classes they attended:

There were no attendees from the West Virginia Library Commission.

Based on the findings contained in this report, we strongly suggest that the WV Library Commission comply with all recommendations and take appropriate action as required.

A Corrective Action Plan Request will follow requesting your response to all the compliance issues identified in this report

COMPARISON WITH PRIOR INSPECTION

A previous inspection of was conducted in December of 2015. The review consisted of 48 selected transactions from an approximate 1,208 total transactions from July 1, 2014 through June 30, 2015. This review resulted in 28 findings associated with 19 of the selected transactions. This indicated that 40% of the transactions reviewed during the inspection had one or more problems of potential nonconformity with Purchasing Division laws, rules, and/or regulations.

When comparing the statistics from 2015 to the current 2018 inspection, below is a summary of the issues identified during the 2015 inspection, as compared to the findings from the current inspection.

Summary of Problem Transactions			
Findings	2015	2018	
Stringing	2	0	
Statewide Contract	1	0	
Internal Resources	0	0	
Failure to Bid at Delegated Level	5	5	
Vendor Registration	0	4	
Verification Searches	7	6	
Affidavit	6	8	
wvOasis Award Document	4	10	
Asset Tag/Number	0	0	
Certification of Non-Conflict of Interest	3	10	
Miscellaneous Issue	0	0	
Total	28	43	

There are multiple training resources available from the Purchasing Division in-house training program, as well as, through on-line training modules. These training resources would assist in educating procurement staff in purchasing procedures/requirements. Additional information can be obtained by contacting Samantha Knapp, Staff Development Specialist, at (304) 558-7022 or by visiting the Purchasing Division's website http://www.state.wv.us/admin/purchase/training/default.html.



STATE OF WEST VIRGINIA DEPARTMENT OF ADMINISTRATION PURCHASING DIVISION 2019 WASHINGTON STREET, EAST CHARLESTON, WEST VIRGINIA 25305-0130

W. MICHAEL SHEETS
DIRECTOR

November 29, 2018

Vanesse Myers, Procurement Officer Library Commission 1900 Kanawha Blvd East Charleston, West Virginia 25305

Dear Ms. Myers:

The attached documentation following this letter is a grading system which the West Virginia Purchasing Division has developed as a mechanism for evaluating agency conformance to purchasing policies and procedures. This tool has been created with the intent of assessing the progress of those directly responsible for agency procurement related transactions to identify areas which are deficient. Several agencies were selected as a test case for review of this system.

The following is an explanation of the grading system:

"Transactions Reviewed" is the number of transactions under examination for the given fiscal year.

"Non-Conformance Rate" as found in the draft and final report summary pages, is the overall agency error-rate, as a percentage, in which the agency is not in compliance with purchasing policies and procedures. This figure is determined by summing the number of problem transactions then dividing that total by the number of transactions under review.

"Conformance Rate" is the percentage of overall agency compliance with purchasing policies and procedures.

"Finding Summary" is the collection of issues (i.e. "findings") discovered during the inspection of agency transactions. The finding categories are a weighted points system. Findings deemed to be more serious are allotted a larger possible point deduction than those of a more administrative nature. Deductions are based on the percentage of findings in relation to the number of transactions reviewed. See attached weight application chart.

As an example: If under the "Finding Category" of "Stringing" the "Number of Findings" were 6, and the number of "Transactions Reviewed" were 635, the "Finding Percentage" would be .94%. This percentage would yield a point deduction of -6 (as explained in the weight application chart). This number is then reduced from the "Points Possible" column.

"Overall Agency Score" is the total number of the "Findings Summary" "Points Received" column averaged with "Non-Conformance Rate" as determined by the following equation: ("Findings Summary - Points Received" column + "Non-conformance Rate") / 200))

"Overall Letter Grade" is the global result of inspection report.

Should you have any questions or require further clarification, please contact Greg Clay, at (304) 558-5780. Your assistance is greatly appreciated.

Respectfully,

Greg Clay, Contracts Manager

Purchasing Division

Enclosure

cc: Jennifer Johnson, Library Administrative Director, Library Commission

West Virginia Library Commission FY2018 Statistics

Transactions Reviewed 58

Non-Conformance Rate (See Summary Page) 36.0%

Conformance Rate 64.0%

Findings Summary				
Finding Category	Number of Findings	Finding Percentage	Points possible	Points Received
Stringing	0	0.00%	30	30
Statewide Contract	0	0.00%	15	15
Internal Resources	0	0.00%	15	15
Failure to Bid	5	8.62%	15	12
Vendor Registration	4	6.90%	5	4
Verification Searches	6	10.34%	5	3
Affidavit	8	13.79%	5	3
wvOasis Award Document	10	17.24%	3	1.2
Asset Tag/Number	0	0.00%	3	3
Certification of Non-Conflict of Interest	10	17.24%	3	1.2
Miscellaneous Issue	0	0.00%	1	1
Total	43		100	88.4

Overall Agency Score	
Non-Conformance & Findings Average	Overall Letter Grade
76.2%	C

Scale (See Weight Application*)

91.66 --100 = A 83.33 --91.65 = B 75 -- 83.32 = C 66.66 -- 74.99 = D <66.65 = F The Finding Summary and Number of Findings does not directly correlate with the Transactions Reviewed and Non-Conformance Rate because each transaction can yield multiple findings, and findings like stringing can include multiple transactions in a single finding.