

December 31, 2025

Tomiquia Moss, Secretary  
California Business, Consumer Services and Housing Agency  
500 Capitol Mall, Suite 1850  
Sacramento, CA 95814

Dear Secretary Tomiquia Moss,

In accordance with the State Leadership Accountability Act (Leadership Accountability), the State Board of Optometry submits this report on the review of our internal control and monitoring systems for the biennial period ending December 31, 2025.

Should you have any questions please contact Gregory Pruden, Executive Officer, at (916) 574-7808, [Gregory.Pruden@dca.ca.gov](mailto:Gregory.Pruden@dca.ca.gov).

## **GOVERNANCE**

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### **Mission and Strategic Plan**

The mission of the Board is to protect the health and safety of California consumers through licensing, registration, education, and regulation of Optometry and Opticianry.

The Strategic Goals of the Board are:

1. **Licensing and Registration** – the Board provides applicants and licensees methods for obtaining and maintaining licensing and registration, business licenses, and certifications for optometry and opticianry.
2. **Examination** – the Board works to promote a fair, valid, and legally defensible exam process and licensing exam (California Law and Regulations Examination) to ensure that only qualified and competent individuals are licensed or registered to provide optometric or opticianry services in California.
3. **Law and Regulation** – The Board works to establish and maintain fair and just laws and regulations that provide for the protection of consumer health and safety and reflect current and emerging, efficient, and cost-effective practices.
4. **Enforcement** – The Board protects the health and safety of consumers through the active enforcement of laws and regulations governing the safe practice of optometry and opticianry in California.
5. **Outreach** – The Board proactively educates, informs, and engages consumers, licensees, students, and other stakeholders about the practices of optometry and opticianry and

the laws and regulations which govern them.

6. Organizational Effectiveness – The Board works to develop and maintain an efficient and effective team of professional and public leaders and staff with sufficient resources to improve the Board's provision of programs and services.

## **Control Environment**

Office guidelines were revised in 2022. They are read and signed by all staff, and are updated as needed. The Board is led by an Executive Officer (EO) and two Staff Services Manager I's (SSM I). One SSM I has responsibility over the Board's Licensing and Administration Units and the other SSM I has responsibility over the Enforcement Unit. Both managers' report directly to the EO. The EO reports to the 11 Board Members. The Board has a reporting structure that includes the Department of Consumer Affairs (Department) and the Business, Consumer Services, and Housing Agency (Agency), which will transition its name to the Business and Consumer Services Agency effective July 1, 2026.

The Board has established a Board Member Handbook for conducting Board business. All units and all major functions have process and procedure manuals that are periodically reviewed and updated as needed. All staff have regular and scheduled one-on-one meetings with their direct manager to review expectations and communicate concerns regarding performance. The EO meets weekly with the managers and monthly with each staff.

## **Information and Communication**

On a quarterly basis, staff communicates with the Board about operational, programmatic, and financial updates. These occur at regularly scheduled quarterly Board meetings.

At the public Board meetings, the EO provides an "EO Update" to the Board. Statistical reports, such as for licensing applications or enforcement complaints and cases, are prepared weekly and discussed monthly at team meetings. These statistical reports and other program update reports, such as budgetary documents, are used by staff and the Board for operational, programmatic, and financial decision making. The Board utilizes BreEZe and QBIRT for most of its reporting processes.

Board management utilizes daily, weekly, and monthly reports to monitor progress and timeframes for all units. This data is communicated to Board Members and data is also communicated within each unit so that staff are aware of workload priorities. All units within the Board have monthly staff meetings where workload and trends are discussed.

## **MONITORING**

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The information included here discusses the entity-wide, continuous process to ensure internal control systems are working as intended. The role of the executive monitoring sponsor includes facilitating and verifying that the State Board of Optometry monitoring practices are implemented and functioning. The responsibilities as the executive monitoring sponsor(s) have been given to: Gregory Pruden, Executive Officer.

Management reviews data to ensure that the data being reported is accurate. This analysis is done by reviewing data with staff including manual counts for cross-checking system generated data. The Board consistently reviews timeframes to determine if process improvement is available to improve workflow. Staff is also consulted on ways to improve efficiencies. All activities of the Board are monitored in statistical data form.

## **RISK ASSESSMENT PROCESS**

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The following personnel were involved in the State Board of Optometry risk assessment process: executive management, middle management, front line management, and staff.

The following methods were used to identify risks: brainstorming meetings, ongoing monitoring activities, audit/review results, external stakeholders, consideration of potential fraud, and performance metrics.

The following criteria were used to rank risks: likelihood of occurrence, potential impact to mission/goals/objectives, timing of potential event, potential impact of remediation efforts, and tolerance level for the type of risk.

## **RISKS AND CONTROLS**

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### **Risk: Information Communication**

As a consumer protection regulatory board, the timely communication of information is critical to carrying out the Board's mission. The Board's focus on improving its communication is an ongoing effort, and has been discussed during Sunset Reviews before the Legislature and strategic planning sessions with stakeholders. Easy access to clear and effective communication is key in serving the Board's stakeholders. Poor

communications result in ineffective, incomplete, and inaccurate information being released or relied upon in the decision-making process. It also causes confusion among consumers, applicants, and licensees. The Board will continue to develop new lines of communication and improve existing lines of communication to allow for continued process improvement.

#### **Control: Develop Communications Plan**

Create and keep current, an annual communications plan that guides the Board's communications both internally and externally. The purpose of the plan is to ensure that stakeholders are informed and aware of critical information timely.

The creation and development of the plan will be performed by Board staff and executed by executive leadership.

#### **Control: Utilize Surveys for Feedback**

Conduct surveys to identify topics of interest and the best method of delivering that information to stakeholders.

### **Risk: Board Member Handbook**

The purpose of a Board Member handbook is to provide guidance to appointed Board Members regarding general processes and procedures during their term of service on the Board and/or Committee. A handbook is also intended as a useful source of information for newly appointed Board Members as part of the onboarding process. Board Members are typically asked to create and review policy and administrative changes, make disciplinary decisions, and attend regular and special meetings. The existing handbook used by the California State Board of Optometry was last updated in 2019 and is outdated.

### **Control: Appoint Workgroup to Create New Handbook**

Appoint a two-Member workgroup to work with staff to create a revised and updated Board Member handbook. The workgroup should present its proposal at a future Board meeting for Board approval.

## **CONCLUSION**

The State Board of Optometry strives to reduce the risks inherent in our work and accepts the responsibility to continuously improve by addressing newly recognized risks and revising risk mitigation strategies as appropriate. I certify our internal control and monitoring systems are adequate to identify and address current and potential risks facing the organization.

### **Gregory Pruden, Executive Officer**

CC: California Legislature [Senate, Assembly]  
California State Auditor  
California State Library  
California State Controller  
Director of California Department of Finance  
Secretary of California Government Operations Agency