



PRINCE WILLIAM COUNTY

Prince William County, Virginia Internal Audit Report – Boards, Commissions, and Committees – Phase I

November 19, 2019



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TRANSMITTAL LETTER



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November 19, 2019

The Board Audit Committee of
Prince William County, Virginia
1 County Complex Court
Prince William, Virginia 22192

Pursuant to the internal audit plan for calendar year ending (“CY”) 2019 for Prince William County, Virginia (“County” / “PWC”), approved by the Board of County Supervisors (“BOCS”), we hereby present the internal audit of boards, commissions, and committees Phase I. We will be presenting this report to the Board Audit Committee of Prince William County at the next scheduled meeting on December 10, 2019.

Our report is organized into the following sections:

Executive Summary	This provides a high-level overview and summary of the observations noted in this internal audit, as well as the respective risk ratings.
Background	This provides an overview of the County’s boards, commissions, and committees, as well as relevant background information.
Objectives and Approach	The objectives of this internal audit are expanded upon in this section, as well as the various phases of our approach.
Observations Matrix	This section gives a description of the observations noted during this internal audit and recommended actions, as well as Management’s response including responsible party, and estimated completion date.

As a product of this internal audit, a second internal audit will be performed (“Phase 2”) assisting the assessment of the overall effectiveness of each individual board, commission, or committee.

We would like to thank the staff and all those involved in assisting our firm with this internal audit.

Respectfully Submitted,

RSM US LLP

Internal Auditors



EXECUTIVE SUMMARY

Background

Boards, commissions, and committees (“BCC”) are an integral part of local government and representative democracy. BCCs stimulate participation and engagement from citizens. The primary role of these BCCs is to advise the governing body and provide insight to the local government from a citizen’s perspective. BCCs provide an inter-relationship between the citizenry and the Prince William County government, intended to be representative of, and responsive to, the communities they serve.

The County’s BCCs are created pursuant to the *Code of Virginia*, Federal legislation, and/or County ordinance / BOCS resolution, with the primary role of advising the BOCS and County staff on issues and policy, and serve as links to the community, ultimately assisting from an advisory or decision-making role.

Appointments are guided by the *BOCS Rules of Procedure amended February 19, 2019 Section C 5 – 6 and any applicable law*. A BOCS member will nominate a candidate, who is subsequently appointed by resolution of the entire BOCS. BCC members typically have a term limit that runs concurrently with the term of the BOCS member who appoints them, depending on the enabling authority. Certain BCCs have fixed term limits between one (1) and five (5) years. Other BCC members serve a term at the pleasure of the BOCS. Each BCC is assigned a County Staff Liaison.

The BCC inventory we have compiled includes seventy-seven (77) BCCs, representing the best currently available data, but should not be considered exhaustive. In addition, information on the list will change over time, as new entities are added, terminated, or consolidated.

The County utilizes the Granicus system as the tool to capture, store, and publish information regarding each active BCC.

For limited comparisons, we reviewed relevant BCC information from the following four (4) jurisdictions: Counties of Arlington, Chesterfield, Fairfax and Loudoun.

Fieldwork was performed April 2019 through October 2019.

Objectives and Scope

The primary objective of this internal audit was to compile an inventory of the known County BCCs and evaluate the effectiveness of controls surrounding the administrative tasks to manage the BCCs; as well as to perform a high-level analysis of the County’s BCCs as compared to a relevant County peer group. This phase did not include assessing the overall effectiveness of the operations of the individual board, commission, or committee. The scope of this audit entailed BCCs in existence as of March 31, 2019. Areas of focus included:

- Obtained and reviewed various aspects of *PWC Code*, *Code of Virginia*, BCC charters and bylaws, BCC meeting minutes/ agendas, and BOCS resolutions, where available;
- Compiled an inventory of all County boards, commissions, and committees;
- Determined the process for approving and documenting compensation and reimbursement amounts for BCC members;
- Assessed BCC members’ compliance with *PWC Code Article III Disclosure of Personal Interest by County Officers and Employees*; and
- Compared the County’s BCCs to peer jurisdictions, including transparency of the BCC process.

The process of obtaining the relevant information for this project was labor intensive and manual. We inquired and followed-up with each BCC County Staff Liaison.

Overall Summary / Highlights

The observations identified during our assessment are detailed within the pages that follow. We have assigned relative risk or value factors to each observation identified. Risk ratings are the evaluation of the severity of the concern and the potential impact on the operations of each item. There are many areas of risk to consider in determining the relative risk rating of an observation, including financial, operational, and/or compliance, as well as public perception or ‘brand’ risk’.

Summary of Observations Ratings

(See page 3 for risk rating definitions)

	High	Moderate	Low
Boards, Commissions, and Committees	1	3	1

We would like to thank all County team members who assisted us throughout this project.



EXECUTIVE SUMMARY – CONTINUED

Observations Summary

The following is a summary of the observations noted in the areas reviewed. Each detailed observation is included in the observations matrix section of the report. Definitions of the rating scale are included below.

Summary of Observations	
Observations	Rating
1. BCC Governance and Transparency	High
2. BCC System and Public Website	Moderate
3. Appointee Vetting and Disclosure of Personal Interests	Moderate
4. Policies and Procedures	Moderate
5. BCC Compensation and/or Expense Reimbursement	Low

Provided below is the observation risk rating definitions for the detailed observations.

Observation Risk Rating Definitions	
Rating	Explanation
Low	Observation presents a low risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of low importance to business success/achievement of goals.
Moderate	Observation presents a moderate risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of moderate importance to business success/achievement of goals. Action should be in the near term.
High	Observation presents a high risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of high importance to business success/achievement of goals. Action should be taken immediately.



BACKGROUND

Overview

Like other counties, Prince William County government includes those standing and special boards, commissions, and committees (“BCCs”), which provide various volunteer opportunities for the County’s citizenry to be directly involved and to serve as an integral part of the local county government. County BCCs are created by *Code of Virginia*, federal legislation, and/or County ordinance / BOCS resolution, with the primary role of advising the BOCS and County staff on issues and policy, and serve as links to the community, ultimately assisting from an advisory or decision-making role. BCCs provide an inter-relationship between the citizenry and the government of Prince William County, intended to be representative of, and responsive to, the communities they serve. One of the unique advantages of BCCs is that they are typically made up of individuals with wide-ranging interests and expertise. Some of the BCCs have a qualification requirement, such as a license in the respective field. For example, the Advisory Plans Examiner Board requires that one member be a licensed land surveyor.

BCCs can be ongoing in nature, while others are short-term task-oriented, created to accomplish specified objectives/tasks. Some BCCs have at-large appointments, where any member of the BOCS can nominate an appointee. Others have district appointments, where an individual BOCS member nominates one or more appointee, usually residents of his/her own magisterial district. In addition, some appointees are required to represent particular groups and/or interests. In all cases, the BOCS as a whole makes the final appointment by resolution. Appointments are guided by the *BOCS Rules of Procedure amended February 19, 2019 Section C 5 - 6*. Each BCC is assigned a County Staff Liaison.

The County utilizes the Granicus system as the tool to capture, store, and publish information regarding each active BCC. The information may be accessed online (<https://www.pwcgov.org/government/boards/Pages/default.aspx>) and includes description, size, vacancies, term limits, membership details, meeting details, resolution reference, notes, and the County liaison(s) contact information.

An objective of this project included compiling an inventory of the known County BCCs. The BCC inventory we have compiled, which includes seventy-seven (77) BCCs, represents the best currently available data, but should not be considered exhaustive. In addition, information on the list will change over time, as new entities are added, terminated, or consolidated.

Comparable Entities

Organizations of all types and sizes recognize the value of comparing themselves to other like organizations. This process of comparisons yields valuable information to leaders and decision makers. Identifying comparable peer groups can be extremely challenging, as no two jurisdictions are exactly alike. There are, however, risks inherent in comparisons, as organizations could account for data differently; thus, there are limitations to the comparisons to Prince William County and their various BCCs.

For limited comparisons, we reviewed relevant BCC information from the following four (4) jurisdictions: Counties of Arlington, Chesterfield, Fairfax and Loudoun.

Information reviewed included:

- Listing and number of BCCs
- Availability and transparency of BCC information on respective websites:
 - Vacancy reporting
 - Procedures for application
 - Appointment process
 - BCC related policies and procedures – ethics, attendance, meeting requirements, etc.

	Prince William	Arlington	Chesterfield	Fairfax	Loudoun
Number of BCCs reported	77	64	52	79	41



BACKGROUND – CONTINUED

Prince William County Boards, Commissions, and Committees Statistics

Utilizing the information stored in Granicus, the County’s BCC public system of record, along with additional research, we were able to obtain the following information regarding the County’s BCCs.

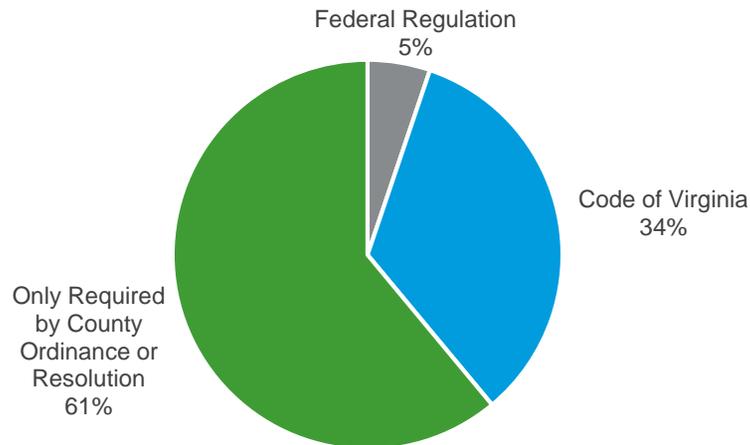
BCC Statistic	#	%
Active	77	n/a
Multi-jurisdictional	20	26%
Members appointed by the BOCS*	75*	97%
BOCS on BCC	9	12%
Citizens and County employees appointed by the BOCS**	402 of 528**	76%

* BOCS does not appoint members of: Commercial Development Committee and Board of Zoning Appeals

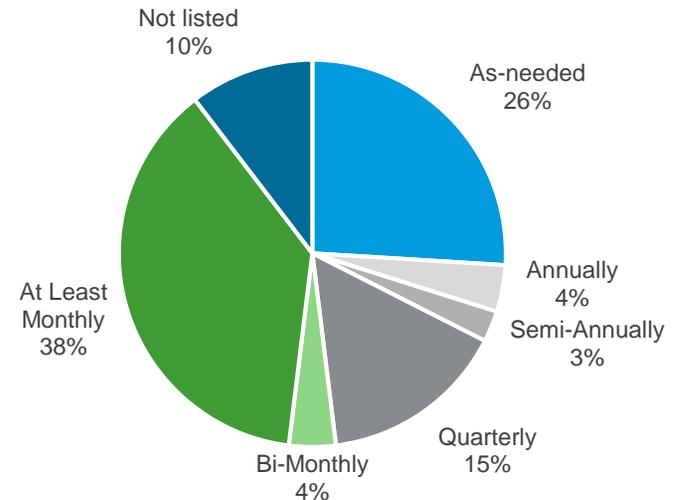
** The PWC website included 528 members within its 77 BCCs at the time of our review. Based off qualifications section of each BCC, 402 members were identified as citizen or County employee appointments.

All BCCs are required by Code of Virginia, Federal regulation, and/or County ordinance / BOCS resolution. In some cases BCCs are not required by the Code of Virginia, but guidance is provided if the BCC is created by the local jurisdiction.

BCCs as Required By:



BCC Meeting Frequency





BACKGROUND – CONTINUED

Prince William County Boards, Commissions, and Committees Statistics – Continued

Advisory vs Decision-making BCCs

Generally, the County’s BCCs are defined as:

- Advisory – “any board, commission, committee or post which does not exercise any sovereign power or duty, but is appointed by a governmental agency or officer or is credited by law for the purpose of making studies or recommendations, or advising or consulting with a governmental agency”
- Decision-making – powers that may include:
 - Department or agency oversight
 - Financial oversight, including debt issuance
 - Hearing appeals
 - Issuing permits
 - Makes formal findings

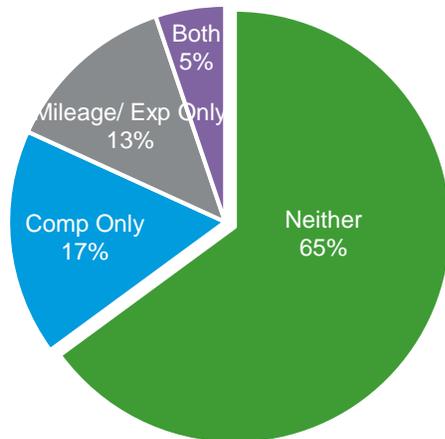
BCC Functionality	#	%
Advisory	39	49%
Decision-making	37	51%

Note: One (1) BCC was excluded from this portion of the analysis since the applicable information was not published or obtained.

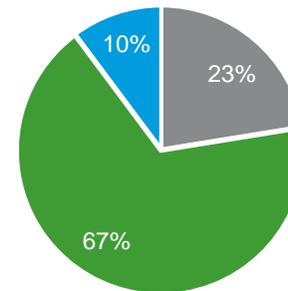
Compensation/Expense Reimbursement

Members of BCCs may or may not be monetarily compensated for their time and reimbursed for related expenses (mileage and/or actual expenses) depending on the respective Code of Virginia, PWC Code of Ordinance and/or BOCS resolution. BCCs members are required to submit expenses for approval to the appropriate County Staff Liaison prior to payment. Twenty-seven (27) BCCs, or 35%, were identified as providing compensation and/or reimbursement of mileage/expenses to BCC members. For those BCCs with a monetary compensation, not including mileage/expenses, total compensation ranges from \$300 to \$10,200, which is based on per meeting or an annual arrangement.

Breakdown of BCC Compensation / Expense Reimbursements



Breakdown of BCC Compensation by Meeting Frequency



- Compensated BCCs that meets > 4 times a year
- Not Compensated BCCs that meets > 4 times a year
- Compensated BCCs that meet < 4 times a year



BACKGROUND – CONTINUED

State and Local Government Conflict of Interests Act

The *State and Local Government Conflict of Interests Act*, § 2.2-3100 of the *Code of Virginia*, requires and authorizes the Board to require certain officers, employees and members of identified BCCs to file written disclosure statements of their economic interests, financial interests, and/or real estate holdings annually. Members of twenty-four (24) BCCs, 31%, are required to provide disclosure either explicitly per the *Code of Virginia* (10), or in addition per *PWC Code of Ordinance* (13).

State and Local Government Conflict of Interest Act, § 2.2-3100 of the *Code of Virginia*

§ 2.2-3100 Policy; application; construction

“The General Assembly, recognizing that our system of representative government is dependent in part upon (i) citizen legislative members representing fully the public in the legislative process and (ii) its citizens maintaining the highest trust in their public officers and employees, finds and declares that the citizens are entitled to be assured that the judgment of public officers and employees will be guided by a law that defines and prohibits inappropriate conflicts and requires disclosure of economic interests. To that end and for the purpose of establishing a single body of law applicable to all state and local government officers and employees on the subject of conflict of interests, the General Assembly enacts this State and Local Government Conflict of Interests Act so that the standards of conduct for such officers and employees may be uniform throughout the Commonwealth.”

§ 2.2-3115 Disclosure by local government officers and employees

§ 2.2-3115(A) states that *“members of every governing body and school board of each county and city and of towns with populations in excess of 3,500 shall file, as a condition to assuming office or employment, a disclosure statement of their personal interests”*. Furthermore, *“members of the governing body of any authority established in any county or city, or part or combination thereof, and having the power to issue bonds or expend funds in excess of \$10,000 in any fiscal year, shall file, as a condition to assuming office, a disclosure statement of their personal interests and other information.”*

BCCs members required to provide disclosure:

- | | |
|---|--|
| - Cherry Hill Community Development Authority | - Fairfax County Water Authority |
| - Heritage Hunt Community Development Authority | - Industrial Development Authority |
| - Service Authority | - Stafford Regional Airport Authority |
| - Upper Occoquan Sewage Authority | - Virginia Gateway Community Development Authority |

§ 2.2-3115(G) states that *“in each county and city and in towns with populations in excess of 3,500, members of planning commissions, boards of zoning appeals, real estate assessors, and all county, city and town managers or executive officers shall make annual disclosures of all their interests in real estate located in the county, city or town in which they are elected, appointed, or employed. Such disclosure shall include any business in which such persons own an interest, or from which income is received, if the primary purpose of the business is to own, develop or derive compensation through the sale, exchange or development of real estate in the county, city or town.”*

BCCs members required to provide disclosure:

- | | |
|-----------------------|------------------------|
| - Planning Commission | - Zoning Appeals Board |
|-----------------------|------------------------|

§ 2.2-3115(B) states that *“nonsalaried citizen members of local boards, commissions and councils as may be designated by the governing body shall file, as a condition to assuming office, a disclosure form of their personal interests and such other information as is required.”*

As such, members of the following additional BCCs are required to provide disclosure per *PWC Code of Ordinance Article III DISCLOSURE OF PERSONAL INTERESTS BY COUNTY OFFICERS AND EMPLOYEES Sec. 2-47.3*. - *Members of boards, commissions and councils as designated by the board of county supervisors required to disclose.*

- | | |
|--|--|
| - Board of Equalization | - Chesapeake Bay Preservation Area Review Board |
| - Innovation Owners Association Board of Directors | - Manassas Regional Airport Commission |
| - VA OPEB Master Trust Finance Board | - Parks & Recreation Commission |
| - Planning Commission | - Potomac and Rappahannock Transportation Commission |
| - Prince William Manassas Regional Jail Board | - Supplemental Retirement Board for Police and Fire |
| - Trails and Blueways Council | - Wetlands Board |
| - Workforce Development Board, Northern Virginia Manpower Consortium | |



BACKGROUND – CONTINUED

State and Local Government Conflict of Interests Act – Continued

The *State and Local Government Conflict of Interests Act*, § 2.2-3100 of the *Code of Virginia*, requires and authorizes the Board to require certain officers, employees and members of identified BCCs to file written disclosure statements of their economic interests, financial interests, and/or real estate holdings annually. Members of twenty-four (24) BCCs, 31%, are required to provide disclosure either explicitly per the *Code of Virginia* (10), or in addition per *PWC Code of Ordinance* (13).

State and Local Government Conflict of Interest Act, § 2.2-3100 of the *Code of Virginia*

§ 2.2-5205, related to Community Policy and Management Teams states, “*The community policy and management team to be appointed by the local governing body shall include, at a minimum, at least one elected official or appointed official or his designee from the governing body of a locality that is a member of the team... Any person serving on such team who does not represent a public agency shall file a statement of economic interests as set out in § 2.2-3117 of the State and Local Government Conflict of Interests Act (§ 2.2-3100 et seq.). Persons representing public agencies shall file such statements if required to do so pursuant to the State and Local Government Conflict of Interests Act.*”



OBJECTIVES AND APPROACH

Objectives

The primary objective of this internal audit was to compile an inventory of the known County BCCs and evaluate the effectiveness of controls surrounding the administrative tasks to manage the BCCs; as well as to perform a high-level analysis of the County's BCCs as compared to a relevant County peer group. This phase did not include assessing the overall effectiveness of the operations of the individual board, commission, or committee.

The scope of this audit entailed BCCs in existence as of March 31, 2019.

Approach

Our audit approach was consistent with our internal audit methodology, which consisted of the following phases:

Understanding and Documentation of the Process

During this phase of this audit, we conducted interviews with the appropriate representatives from the County's Clerk to the BOCS, the County Attorney's Office, members of the BOCS, and other members of County Management to discuss the scope and objectives of the audit work, obtained preliminary data, and established working arrangements. We obtained and reviewed 1) preliminary BCC listings; 2) applicable *Code of Virginia* and County policies related to this audit and 3) other documents deemed necessary; and performed walkthroughs of the process(es) and key controls to gain an understanding of the function and assess the design of the process/key controls.

Assessment of the Process Design and Inventory of Existing of Boards, Commissions and Committees

During this phase, we performed the following:

- Compiled an inventory of all County boards, commissions, and committees, including attributes such as federal/state mandates, membership composition, advisory/decision-making determination, charter, meeting minutes availability, term limits, residency requirements, reimbursement amounts, and compensation amounts, etc. The inventory was compiled through various mechanisms such as the County website, communication with all County Staff Liaisons, communication with members of the BOCS, etc, and then compared to various sources such as previous County analysis, *Code of Virginia*, *PWC Code of Ordinance*, BOCS resolutions, etc.
- Reviewed and assessed the adequacy of the BCC information listed on the County website.
- Determined the process for approving and documenting compensation and reimbursement amounts for BCC members.
- Assessed BCC members' compliance with *PWC Code of Ordinance Article III Disclosure of Personal Interest by County Officers and Employees*.
- Compared the County's BCCs to peer jurisdictions, including transparency of the BCC process.

Reporting

At the conclusion of this audit, we summarized our findings into this report. We conducted an exit meeting with the appropriate Management personnel and have incorporated Management's response into this report.



OBSERVATIONS MATRIX

Observation	1. BCC Governance and Transparency
High	<p>The following design gaps and exceptions were noted in the overall administration of the County's BCCs:</p> <ul style="list-style-type: none"> • Inconsistent or incomplete information listed on the website as compared to various BCC bylaws and other source documents (example: term lengths, roster size, etc.). • Lack of information about BCCs and the related process on the PWC website, such as: <ul style="list-style-type: none"> ○ An overview of BCC authority (federal, state, or BOCS). ○ Ways in which a member is appointed, other than knowing to review the BOCS Rules of Procedure document. ○ Appointment application process/form. ○ Common requirements such as residency or expertise. ○ Links to the schedule of BCC meetings and related minutes. • The Clerk to the BOCS, or designee, updates the BCC information on the County's website as needed and when the information is provided, but there is no monitoring of measures to support completeness and accountability of information. • Inconsistent structure and documentation of the BCC as it relates to determination of composition, compensation/expenses reimbursements, term limits etc. <p>Inaccurate, incomplete and unavailable information provided by the County can negatively impact public perception and involvement.</p> <p>The following BCCs are examples identified as potentially no longer necessary or are in need of further analysis/re-assessment due to inactivity and/or organizational changes:</p> <ul style="list-style-type: none"> • Economic Advisors Group; • Parkway District Advisory Board; • Potomac Hospital Board of Trustees – In 2009, Potomac Hospital was acquired by Sentara Northern Virginia Medical Center. No request for BOCS appointee or others to serve on an advisory board for Sentara Northern Virginia Medical Center; • Prince William Parkway Transportation Improvement District Commission; • Route 234 Bypass Transportation Improvement District Advisory Board; • Route 234 Bypass Transportation Improvement District Commission; and • Parks Commission – Park Authority dissolved; changed from an authority to a County department, but the commission remained in place without reassessment. <p>BCCs that have fulfilled their purpose or are operating ineffectively increase the risk of inefficiencies with local government practice, use of constituent and County staff time, thus increasing the risk of negative public perception. Each BCC has an issue, policy and/or program with overall goals to identify common ground on issues and achievement of goals. The effectiveness of BCCs is dependent on the appointees, along with the BOCS and County relationships.</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	1. BCC Transparency and Governance – Continued
Recommendation	<p>The County should perform a BCC refresh by setting structure, parameters and a unified framework for transparency, consistency and monitoring for all BCCs including those required by statute, regulation, and/or ordinance. To provide the County with a clean slate for establishment of a consistent structure, this refresh could include decommissioning BCCs that are not required or recently reformed (for example Tourism Industry Advisory Board) and deemed necessary. Each BCC should have a charter with a consistent structure outlining the duties, responsibilities and administrative aspects of the BCC.</p> <p>The County should implement an on-going independent process to monitor the governance and transparency. Aspects of this process should include:</p> <ul style="list-style-type: none"> • Determine qualifications for the make-up of the BCCs as well as standardized meeting schedules, term limits and sunset provisions. • Evaluate the on-going need and effectiveness of the BCC. • Perform consistent periodic reviews of all BCCs based on need, effectiveness, disclosures, and other relevant attributes (ex. compensation, expense reimbursements, etc.). To manage workload, cycle reviews may be utilized, enabling a portion of BCCs to be reviewed annually, but all BCCs to be reviewed, at minimum, every four years. <ul style="list-style-type: none"> ○ Evaluations could be brief and informative or they could be comprehensive performance evaluations examining efficiency and effectiveness. For example, reaching expected performance goals and targets, meeting attendance statistics, and duplicating activities performed by another BCC or source. • Perform periodic reviews and updates of BCC information provided on the County’s website for completeness and accuracy. • Update and expand information available on the County’s BCC website. For example, inclusion of: <ul style="list-style-type: none"> ○ Overview of the County’s BCCs from an overall perspective, ○ Link to BOCS Rules of Procedures, or other applicable guidance for BCCs, ○ Allow citizens to apply for vacancies online, and ○ Overview and/or link to BCC policies and procedures (see below). • Provide periodic reporting to the BOCS, such as status of vacancies, compliance with established policies and procedures, and outcome of periodic evaluation.
Management Action Plan	<p>Response: Management concurs with Observations #1 through #5 and recommends the Board Audit Committee, and ultimately the BOCS, include a second phase to this audit in the CY 2020 Internal Audit Plan. As this is major undertaking to address BCCs that have been created and evolved over decades, Management will work closely with RSM to identify and prioritize the workload to eliminate and/or mitigate risks. In addition, a detailed legal review will be required for any BCC considered for dissolution to determine if legal action is required to dissolve any BCCs deemed ineffective or no longer necessary to the operations of the BOCS and the County.</p> <p>Responsible Party: OEM & Clerk to the BOCS</p> <p>Estimated Completion Date: TBD – a detailed project plan will be developed in response to Phase II.</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	2. BCC System and Public Website
Moderate	<p>The County utilizes a system (Granicus) as the tool to capture, store, and publish information regarding each active BCC. The information may be accessed online (https://www.pwcgov.org/government/boards/Pages/default.aspx) and includes description, size, vacancies, term limits, membership details, meeting details, resolution reference, notes, and the County Liaisons contact information. The system and website are operating ineffectively for the following reasons:</p> <ul style="list-style-type: none"> • There is no centralized and defined position responsible for maintaining website information up-to-date. The County Clerk to the BOCS, or designee, updates the information as needed, but there is no monitoring of measures to support accountability. • There is no general information about BCCs and the related process on the PWC website. • There is no information related to the process for applying to become a member of a BCC. • Documentation, guidance and materials produced by each BCC, such as charter, resolution, meeting minutes, agendas, published plans/goals, etc., are not consistently published on the website. • Various inconsistencies and limited information included on the website. <ul style="list-style-type: none"> ○ Thirty-four (34) instances in which the term length published on the website does not agree with the length of terms included in the BCCs qualification description or by-laws. ○ One (1) instance in which member requirements published do not agree with the by-laws obtained. ○ A minimum of three (3) instances in which federal or state mandates (code references) were not included within the BCCs information on the website. ○ Seventy-two (72) instances, associated with twenty-four (24) BCC member roster pages, where members' terms appear expired. We did not confirm that these members have not been re-appointed to serve, just that the information included on the website appears to be outdated. • There are two (2) PWC web pages for BCC information: <ul style="list-style-type: none"> ○ The first is a landing page, which lists seven (7) BCCs and limited information on each (summary or purpose, appointment protocol, or size). ○ The second is the Granicus website, linked at the bottom of the first page, which includes a list of each active BCC and the corresponding details. <p>The absence of an effective system to manage and facilitate BCCs creates the following risks, at minimum:</p> <ul style="list-style-type: none"> • BCCs operating ineffectively leading to a failure to meet purpose, goals, and objectives; • Constituents inability to participate in BCCs; • Inefficient use of County staff time and resources due to manual processes in place to manage applications, correspondence, and information; • Appointees with expired terms may be in place; and • Lack of oversight and monitoring leading to an inability to take action, improve, decommission, or review BCCs consistently.
Recommendation	<p>A specific individual or team within County staff should be responsible for the maintenance and accuracy of the BCC system and website. Once assigned, the individual or team should make any corrections necessary to ensure the information published is accurate and complete.</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	2. BCC System and Public Website – Continued
<p>Recommendation – continued</p>	<p>In addition, we recommend that the County take action to improve the PWC BCC website (Granicus) to include the following elements:</p> <ul style="list-style-type: none"> • The landing page should include general information about BCCs and the related process on the PWC website. General information should include, at a minimum: <ul style="list-style-type: none"> ○ The overall purpose of BCCs. ○ An overview of the BCC’s authority (federal, state, and/or BOCS). ○ Common requirements such as residency or expertise. ○ Ways in which a member is appointed, including policies, appointment procedures, vacancies, and online application forms. ○ Links to the schedule of BCC meetings. • Published information should include policies, appointment procedures, vacancies, and online application forms. • An online application process and profiles (see below) should be enabled. All applications to become members of BCC should be submitted through the website. Within each BCCs specific web page, which includes all related information, there should be a button to apply which routes the individual to an online application profile page. Even if there are no vacancies, all application should be stored for a year in the case of unanticipated resignations. • Online application profiles should be enabled. This function allows information to be retained on all potential BCC members. Profiles should include: <ul style="list-style-type: none"> ○ General Information: Name, Gender, Email Address, Phone Number, Address, and Magisterial District. ○ A drop down to select which BCC(s) the individual is applying to. ○ Interests & experiences to capture: <ul style="list-style-type: none"> ▪ Why are they interested? ▪ Work experience ▪ Upload resume ▪ Education ▪ Volunteer experience ▪ Special qualifications ○ Background check: <ul style="list-style-type: none"> ▪ Do they agree to a background and/or credit check if necessary? ▪ Have they ever been convicted of a felony and/or sex-related crime? ▪ In the past five (5) years, have they been convicted of a misdemeanor, other than a minor traffic violation? ▪ In the past five (5) years, have they had a civil suit brought against you? ▪ Is there any other information that may disqualify them from serving on this BCC? ○ Statement of accuracy & signature • Within each BCCs sub-page, all relevant materials should consistently be uploaded for the public to access and record retention. Materials may include charter, resolution reference, meeting minutes, agendas, scheduled events, by-laws, published plans, recent news, etc.
<p>Management Action Plan</p>	<p>Response: See Observation #1 for Management Action Plan.</p> <p>Responsible Party: OEM & Clerk to the BOCS</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	3. Appointee Vetting and Disclosure of Personal Interests
Moderate	<p><u>Appointee Vetting Process</u> Appointee vetting is decentralized and protocols are informally established and managed by the respective BOCS.</p>
	<p><u>Personal Interests</u> As noted in the background section, disclosure of personal interests are to be made by members of identified BCCs as required by the <i>Code of Virginia</i> and <i>PWC Code</i>.</p> <p>The following three (3) disclosure form compliance exceptions were noted, from a sample of sixteen (16) BCC members:</p> <ul style="list-style-type: none"> • Disclosure of real estate holdings form was not returned for one (1) member of the Planning Commission, as required by <i>Code of Virginia § 2.2-3115</i>. • Financial disclosure statements were not returned for one (1) member of the VA OPEB Master Trust Finance Board and one (1) member of the Prince William Manassas Regional Jail Board, as required by <i>PWC Code Article III. Sec. 2-47.3</i>. • Two (2) forms were returned after the deadline, three (3) and six (6) days past due. <p>In addition, although within the County's authority, thirteen additional (13) BCCs are required to complete disclosure forms per <i>PWC Code Article III. Sec. 2-47.3</i>.</p> <p>Economic interest disclosures are an important control to avoid conflicts of interest and support the function of each BCC. Required disclosures minimize the risk of BCC members voting on issues that pose a private or business conflict of interest, thus minimizing the risk of negative public perception.</p>
Recommendation	<p>We recommend the following:</p> <ul style="list-style-type: none"> • Establishment of a standardized and consistent appointee vetting process, in which administrative aspects are handled by a centralized independent function within the County. Administrative aspects should include, at a minimum: <ul style="list-style-type: none"> ○ Performance of background checks for new appointees and on an established periodic basis for long-term BCC members. ○ Screening / verification of resume and qualifications. • Submission of additional reminders to those BCC members required to provide disclosure, as necessary. • As part of on-going BCC evaluations, as noted in Observation #1, the requirement and/or need for economic interest disclosure, per <i>PWC Code Article III. Sec. 2-47.3</i>, should be reviewed to determine continued necessity.
Management Action Plan	<p>Response: See Observation #1 for Management Action Plan.</p> <p>Responsible Party: OEM & Clerk to the BOCS</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	4. Policies and Procedures
Moderate	<p>There is no complete and defined system of protocols to facilitate and manage BCCs. For example, BCC administration roles / responsibilities and compensation / expense reimbursement for BCC members (ex. required attendance, frequency of meetings, etc.).</p> <p>Overall, the absence of a complete and defined system of protocols to facilitate and manage BCCs increases the risk of:</p> <ul style="list-style-type: none">• BCCs operating ineffectively leading to an inability to meet purpose, goals, and objectives;• Citizen inability to participate in BCCs;• Inefficient use of County staff time and resources due to manual processes in place to manage applications, correspondence, and information;• Appointees with expired terms remaining active;• Inconsistent and inequitable compensation for BCC members;• Limited transparency with the various BCCs; and• Lack of oversight and monitoring leading to an inability to take action, improve, decommission, or review BCCs timely and consistently.
Recommendation	Formal BCC policies and procedures should be established and posted, including topics such as General Policies, Compensation/Expense Reimbursement, Attendance, Terms, Conflict of Interest; Standard Meeting Procedures including agendas and minutes. See Observation #1.
Management Action Plan	<p>Response: See Observation #1 for Management Action Plan.</p> <p>Responsible Party: OEM & BOCS Clerk to the BOCS</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	5. BCC Compensation and/or Expense Reimbursement
Low	<p>As noted in the background section, certain BCCs are currently provided with monetary compensation and/or expense reimbursements. The following inconsistencies were noted from a sample of seven (7) BCCs that provide compensation and/or expense reimbursements as compared to the BCC's bylaw/charter tested:</p> <ul style="list-style-type: none"> • Three (3) BCCs, which compensate members, do not define the monetary compensation and/or expense reimbursement specifications within their respective bylaw/charter: <ul style="list-style-type: none"> ○ Historical Commission – Members receive \$50 per meeting ○ Planning Commission – Members receive \$800/month and the Chairman receives \$850/month; and ○ Social Services Advisory Board - Members receive \$100 per meeting • Attendance of meetings is only required for two (2) of seven (7) bylaws/charters reviewed. <p>The following inconsistencies were noted from a sample of ten (10) expense reimbursement:</p> <ul style="list-style-type: none"> • One of three (3) reimbursements was lacking a completed reimbursement form and approval for the expense. <p>Without documented authorized compensation guidelines and requirements of BCC members, inconsistent and inequitable compensation practices may be in place throughout the various BCCs.</p>
Recommendation	<p>Along with the BCC protocols recommendation within observation #1, the following is recommended:</p> <ul style="list-style-type: none"> • Establish policies and procedures for the allowance of compensation/expense reimbursement, if it is not explicitly stated in the <i>Code of Virginia</i>, <i>PWC Code</i>, and/or BOCS resolution. • The policies and procedures should also include the required reimbursement procedures, i.e. completion of a reimbursement form and proper approval in order for the reimbursement to be processed. • Each BCC's charter/bylaw should be updated for inclusion of the defined compensation structure and expense reimbursement allowed and the requirements to process the reimbursement. • Independent verification of compliance with the policies and procedures should be performed on periodic basis. See observation #1.
Management Action Plan	<p>Response: See Observation #1 for Management Action Plan. Responsible Party: OEM & Clerk to the BOCS</p>



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