

# DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

Deval L. Patrick, Governor Timothy P. Murray, Lt. Governor Tina Brooks, Undersecretary

April 20, 2011

Mr. Thomas D. Schiavone Board President Greater Lawrence Community Action Council, Inc. 5 Brookfield Road Methuen, MA 01844

RE: Risk Assessment Investigation Findings and Recommendations Report

Greater Lawrence Community Action Council, Inc. (GLCAC, Inc.)

Dear Mr. Schiavone:

On March 30 and March 31, 2011, the Massachusetts Department of Housing and Community Development (DHCD), Division of Community Services (DCS), in partnership with the Northeast Institute for Quality Community Action (NIQCA), performed an in-depth risk assessment and investigation into the allegations of fraud and mismanagement at Greater Lawrence Community Action Council, Inc. (GLCAC, Inc.). This investigation was designed to ensure that: 1) the management and leadership issues facing GLCAC, Inc., are fully identified, addressed, and resolved to the satisfaction of DHCD and other state agencies funding GLCAC, Inc. programs and services; and, 2) all GLCAC, Inc. programs continue to be appropriately delivered to needy clients.

Prior to the site visit, GLCAC, Inc., submitted copies of organizational documents and materials as part of the investigative team's in-house desk review process. GLCAC, Inc., documents deemed confidential were reviewed on-site. Additionally, on-site interviews were conducted with GLCAC, Inc. Board members and GLCAC, Inc., staff. A review of GLCAC, Inc., personnel files was also conducted during the investigation.

As a result of the assessment and investigation, DHCD has determined GLCAC, Inc., as a Troubled Agency, which will require the development and implementation of a Corrective Action Plan. The results of the investigation have been summarized in the attached report, along with the corresponding recommendations for Board and Agency action. GLCAC, Inc., shall have 30 days to respond to this letter. A written response is due to DHCD no later than May 20, 2011. If you have any questions, please contact me at (617) 573-1435.

DHCD staff would like to extend our gratitude to GLCAC, Inc.'s Board members and staff who participated in the investigation and for accommodating us into their schedules.

Sincerely,

Ditzah Wooden-Wade

Assistant Manager, Community Services Programs

DCS/DHCD

Re: Risk Assessment Investigation Findings and Recommendations Report
Greater Lawrence Community Action Council, Inc. (GLCAC, Inc.)

The following have received copies of this letter:

cc: Dr. Thomas S. Perrault, Sr., Board Vice-President, GLCAC, Inc.

Jerome A. Jozak, Board Treasurer, GLCAC, Inc.

Bruce T. Baril, Board Secretary, GLCAC, Inc.

Robert Bernier, Board Member, GLCAC, Inc.

Sharon Birchall, Board Member, GLCAC, Inc.

James L. Hermans, Board Member, GLCAC, Inc.

Helen Ann Knepper, Board Member, GLCAC, Inc.

Gabriel Ned Leone, Board Member, GLCAC, Inc.

James F. Lyons, Jr., Board Member, GLCAC, Inc.

Victor Martinez, Board Member, GLCAC, Inc.

Cheryl-Ann Matthews, Board Member, GLCAC, Inc.

Malinda McDonagh, Board Member, GLCAC, Inc.

Joseph Parolisi, Board Member, GLCAC, Inc.

Dawna Perez, Board Member, GLCAC, Inc.

Ruth Prolman, Board Member, GLCAC, Inc.

Jesse Ramirez, Board Member, GLCAC, Inc.

Maria Rosati, Board Member, GLCAC, Inc.

Joseph Shaheen, Board Member, GLCAC, Inc.

Evan Williams, Board Member, GLCAC, Inc.

Judith Yelle, Board Member, GLCAC, Inc.

U.S. Senator Scott P. Brown

U.S. Senator John F. Kerry

U.S. Representative Niki Tsongas

Senator Steven A. Baddour

Senator Barry R. Finegold

Senator Bruce E. Tarr

Representative Paul Adams

Representative Linda Dean Campbell

Representative Marcos A. Devers

Representative James L. Lyons, Jr

Representative David M. Torrisi

The Honorable William Lantigua, Mayor, City of Lawrence

Leonard Degnan, Chief of Staff for Mayor Lantigua, City of Lawrence

The Honorable William M. Manzi, III, Mayor, City of Methuen

Matthew A. Kraunelis, Chief of Staff for Mayor Manzi, City of Methuen

Town Manager Reginald S. Stapczynski, Town of Andover

Town Manager Mark H. Rees, Town of North Andover

George A. Nedder, Audit Manager, U.S. HHS, Office of Inspector General, Office of Audit Services

Attachment: GLCAC, Inc. Risk Assessment Investigation Findings and Recommendations Report



# DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

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Greater Lawrence Community Action
Council, Inc. (GLCAC, Inc.)
Risk Assessment Investigation Findings
and Recommendations Report

April 20, 2011



#### Context.

On Sunday, March 20, 2011, the Lawrence Eagle Tribune published an article alleging work schedule misrepresentation by GLCAC, Inc.'s now former Executive Director. Since GLCAC, Inc. is a recipient of Community Service Block Grant (CSBG) funding via the Department of Housing and Community Development (DHCD), DHCD undertook a full investigation into these allegations. In addition, DHCD resolved to fully investigate management and leadership practices at GLCAC. Inc., and to ensure that GLCAC, Inc. programs continue to be delivered appropriately to community residents. To assist in this process, DHCD partnered with the Northeast Institute for Quality Community Action (NIQCA), an organization dedicated to promoting excellence in the management policies and practices of Community Action Agencies (CAA). As per the U.S. Department of Health and Human Services, Administration for Children and Families (ACF), Office of Community Services (OCS) Information Memorandum No. 116 (see Appendix), this document will serve as the Corrective Action Plan for GLCAC, Inc. All corrective action recommendations in this document must be initiated immediately, and completed within the specified timeframes. Training and technical assistance to accomplish these recommendations will be provided to GLCAC, Inc. by DHCD and NIQCA. DHCD would expect GLCAC, Inc. to utilize additional professional guidance in this endeavor.

#### Purpose.

On March 30<sup>th</sup> – March 31<sup>st</sup>, 2011, the Department of Housing and Community Development conducted a risk assessment investigation of the Greater Lawrence Community Action Council, Inc. to:

- 1. Review the circumstances associated with the allegations of fraud related to GLCAC, Inc.'s former Executive Director's misrepresentation of his work schedule.
- 2. Assess the possible awareness and tolerance of this alleged fraudulent behavior by the agency leaders.
- 3. Examine the existence and possible violation of other DHCD contract requirements and agency policies related to agency governance, fiscal, program and personnel management.
- 4. Prepare recommendations to correct identified deficiencies, strengthen agency management leadership and adopt policies to mitigate the risk of future organizational violations of legal and ethical standards of behavior.

#### **Investigative Team.**

A seven member Team was appointed by the DHCD to carry out the investigations of allegations of fraud and mismanagement involving GLCAC, Inc. The Team included the following members:

- 1. Ditzah Wooden-Wade, Team Leader, Assistant Program Manager, DHCD Division of Community Services.
- 2. Glenn Bouchard, Program Representative, DHCD Division of Community Services.
- 3. Dharam Dixit, Deputy Finance Director, Fiscal Oversight, DHCD.
- 4. Michael Brannelly, Finance Assistant, Fiscal Oversight, DHCD.
- 5. James Hadley, Division of Community Services, Fiscal Representative, DHCD.
- 6. William Hunter, Executive Director, Northeast Institute for Quality Community Action (NIQCA).
- 7. Patsy Lewis, Management Resource Specialist, NIQCA and former MA. CAA Executive Director.

#### **Investigative Procedure.**

Upon appointment, the Investigative Team agreed on the following process to conduct the GLCAC, Inc. risk assessment:

- 1. Complete a Desk Review of Essential Documents (See Appendix for Listing).
- 2. Conduct a 2 Day Team Visit to Agency (3/30/11 3/31/11).
- 3. Conduct On-site Key Informant Interviews Involving 32 GLCAC, Inc. Board and Staff Members (See Appendix for Meeting/Interview Schedule).
- 4. Conduct On-site Fiscal and HR File Audits.
- 5. Summarize Team Findings and Recommendations.
- 6. Prepare Draft Report.
- 7. Finalize/Adopt Report Findings and Recommendations.
- 8. Publish Report.

#### Findings and Recommendations.

#### A. GLCAC, Inc. Community Services.

Programs and services provided by GLCAC, Inc. appear to fully meet or exceed professional and regulatory standards of practice, performance and accountability. Program Managers and staff appear competent, mission driven and fully committed to the highest standards of effective customer service.

The current crisis has understandably created a climate of confusion, anxiety and frustration for agency staff members. As part of the GLCAC, Inc. Corrective Action Plan, consideration must be given to providing both information and support to staff to help process the upheaval being experienced and allow for the restoration of trust and confidence in agency management and governance.

#### B. GLCAC, Inc. Governance.

#### Findings.

- Longstanding relationships and loyalties to the agency's former Executive Director by a number of Board members appear to have muted and frustrated efforts to exercise effective oversight and management of the one staff person the Board is responsible to supervise. Evaluations of the former Executive Director were not documented in his file, and those that were conducted appeared principally focused on questions of bonus compensation rather than job performance. Questions of retirement planning were left unresolved. Concerns expressed by staff to the Board about the former Executive Director's work schedule and management practices and style were largely discounted and dismissed.
- The Board appears to have failed to enforce agency Conflict-of-Interest policies with respect to immediate as well as extended family relationships between Board members and agency staff and contractors.
- The Board appears to have failed to enforce its own meeting attendance policy, allowing some members to miss over 40% of Board meetings between 2009 and 2011.
- The Board passed a Whistleblower Protection policy but has failed to assure that management actually distributed the policy to Board and staff members. Nine months after its passage, it had still not been distributed.
- Despite expressed DHCD concerns, the Board renewed a contract for auditing services with a firm that has provided auditing services to the agency for over 20 years.
- The agency's current President and Chairman of the Board has personal litigation pending against the City, which compromises the ability of the agency to establish and maintain effective working relationships with the largest municipality in its designated service area. Further the President, since his election in October of 2010, did not seem to have made concerted efforts to meet regularly with the former Executive Director to clarify accountability expectations, work schedules or to address personnel matters (e.g., retirement and succession planning).
- The Board's fiscal oversight is confused and complicated by differing and overlapping responsibilities designated to the Board's Treasurer

and the Chairman of the Board's Finance Committee. Responsibilities for reporting and oversight are shared by the two parties; however the Board's Treasurer inexplicably neither chairs nor serves on the Finance Committee. This fragmentation of duties and authority at best creates inefficiencies, but also poses the risk of confusion regarding fiscal controls and oversight.

- Virtually one-third of the agency's 21 member Board has served 15 or more years, with a few members having served over 30 years. In light of the communities served, the Board needs to strengthen its diversity (e.g., Hispanic/Latino membership, younger members) improve its fiscal literacy and recruit leadership with fundraising expertise and experience.
- The agency's Bylaws are in need of update and revision.
- Board members expressed the need for training in CAA governance roles and responsibilities.
- Multiple GLCAC, Inc. Executive Succession Plans were provided to the Team. The Plan confirmed as adopted fails to meet best practice standards.

### Recommendations – Timetable for Action.

- The President of the GLCAC, Inc. Board should resign and an interim President and Chairman of the Board should be elected to fill the vacancy until elections occur at the agency's next Annual Meeting. TIMETABLE FOR ACTION: 1 – 15 Days.
- Encourage the immediate voluntary resignation of Board members who wish to conclude their service on the Board in light of the resignation of the former Executive Director and/or demands of reforming agency management and governance policies and practices. <u>TIMETABLE FOR</u> <u>ACTION: 1 – 15 Days.</u>
- Adopt a Board Member Job Description and appoint a special hybrid Community/Agency Nominating Committee composed of 3 Board members and 3 non-Board members to recruit, screen and nominate Board members to fill existing Board Officer and Member vacancies. TIMETABLE FOR ACTION: 1 – 3 Months.
- Immediate Board action to examine and enforce existing Conflict-of-Interest policies associated with member immediate and extended

- family relationships with employees and contractors. <u>TIMETABLE FOR ACTION: 1-15 Days.</u>
- Review and strengthen existing GLCAC, Inc. Conflict-of-Interest policies and identify accountability for their enforcement. <u>TIMETABLE FOR</u> <u>ACTION: 1-3 Months.</u>
- Immediate Board action to enforce existing Board member attendance policies irrespective of the length of Board member service or sector representation. <u>TIMETABLE FOR ACTION: 1-15 days.</u>
- Adopt and implement a policy creating an upgraded agency-wide personnel payroll time documentation system which meets both legal compliance and best practice accountability standards. Review the current system used in the Finance Department as a model for this procedure. Clarify Board roles and responsibilities for review/authorization of Executive Director payroll documentation. TIMETABLE FOR ACTION: 1-3 Months.
- Request immediate resignation of the current Treasurer and elect the current Chairman of the Audit/Finance Committee to serve as agency Treasurer for the balance of the vacated term. <u>TIMETABLE FOR</u> ACTION: 1-15 days.
- Revise the agency's Bylaws to assign the Treasurer responsibility for chairing the agency's Audit and Finance Committee. <u>TIMETABLE FOR</u> ACTION: 1 – 3 Months.
- Develop a consistent and well documented policy and procedure for conducting Executive Director performance appraisals on an annual basis using best practice guidelines (e.g., 360 Assessment procedures, strategic deliverables, etc.). Assure appraisals are documented in the Executive Director's Personnel file and completion is reported to the Board. <u>TIMETABLE FOR ACTION: 4 – 6 Months.</u>
- Adopt and assure the implementation of a transparent, uniform policy for determining wage and salary adjustments within every employment classification. <u>TIMETABLE FOR ACTION: 4 – 6 months.</u>
- Complete a comprehensive review and update of the agency's Bylaws including the requirement for staggered Term Limits for Community and Private Sector member representatives. <u>TIMETABLE FOR ACTION:</u> 4 – 6 Months.
- Immediately distribute the agency's current Whistleblower policy to staff and Board members with clarification of compliance reporting contacts and responsibilities. <u>TIMETABLE FOR ACTION: 1-15 days.</u>

- Review the agency's existing Whistleblower policy to meet legal and best practice standards. <u>TIMETABLE FOR ACTION: 1 – 3 Months.</u>
- Seek consultation in reviewing and strengthening the agency's current Executive Succession Plan prior to implementation. <u>TIMETABLE FOR</u> ACTION: 1 – 2 Months.
- Schedule Board Training addressing the topic of agency governance roles and responsibilities. <u>TIMETABLE FOR ACTION: 1 Month.</u>
- Adopt a policy and procedure for conducting annual assessments of Board performance and productivity to help identify opportunities for strengthening knowledge, effectiveness and participation. <u>TIMETABLE</u> FOR ACTION: 1 – 3 Months.

#### C. GLCAC, Inc. Executive Leadership and Management.

#### Findings.

- The Team did not find compelling evidence to refute the allegations and the video testimony documenting that the former GLCAC, Inc. Executive Director routinely left the office between 11:00am and 12:00pm and socialized in a local club and/or returned home for the remainder of the work day while documenting a full work week for payroll purposes on his time sheet. The Team reviewed the former Executive Director's work calendars and time sheets. DHCD found evidence that the former Executive Director would, on occasion, come into the agency to sign documents on selected weekends. The crude time reporting procedure used within the agency made it impossible to identify when the former Executive Director was working and how many hours/day/week were being documented. The former Executive Director's apparent part-time work habits were observed by agency managers, and concerns were expressed about the apparent double standard of work expectations for the former Executive Director vis-avis other staff. There was no apparent review of the former Executive Director's work habits by the Board President or other Board members.
- Members of the agency's Board and selected senior staff members formally and informally encouraged the agency's former Executive Director to consider retirement; however, overtures and proposals were rejected by the former Executive Director, despite growing concerns about the Executive Director's health and leadership capacity.
- In response to repeated questions, the agency's Assistant Executive
   Director (ED) could not clearly define the structure of management

reporting relationships and responsibilities creating a sense of informality, confusion, anxiety and frustration among senior staff. The Organization Chart prepared by the Assistant ED and submitted to the Team seemed to bear little resemblance to actual supervisory and reporting relationships within the agency. The Assistant ED, in response to a question, could not identify who actually signed off on the timesheets of staff who, according to the organizational chart, reported to him.

- The team found evidence that the Assistant ED failed to assure that management implemented the Board approved Whistleblower Protection Policy which, if implemented, might have provided a secure and confidential resource for receiving and addressing staff concerns about the former Executive Director's work habits, etc.
- The Team found further evidence that concerns brought to the Assistant ED's attention in 2009 regarding a possible legal and regulatory violation (e.g., independent contractor designation of a current Program Director) was not addressed, despite possible sanctions for maintaining the designation. In this situation, the contractor has received occasional agency staff performance reviews, has a work schedule, assignments and supervision determined and carried out by agency management. It appears that a violation of the agency's Conflict-of-Interest policy may also exist with this individual.
- The Team was informed of and observed a management style which embraced informal loyalties, double standards for behavior and privileges and intolerance for constructive criticism, particularly affecting female managers. These practices have seriously undermined agency managers' trust and confidence in the agency's former Executive Director and Assistant ED's leadership.
- Effective HR management is undermined by a lack of staff, delegation of authority to help design and administer policies, and fragmentation of responsibilities (e.g., Personnel File management and protection).
- Existing policies and procedures regarding performance appraisal, payroll time tracking, and compensation adjustments appear incomplete and inadequate.

#### Recommendations – Timetable for Action.

 Address status of the agency's current Interim Executive Director who served as Assistant Executive Director during the period of the noted

- problems, was aware of same, and ignored or overlooked same. TIMETABLE FOR ACTION: 1 15 DAYS.
- The agency's Board meets with senior managers to designate immediate short term (e.g., 1-3 weeks) agency executive leadership to an individual(s) supported by an agency management leadership team to assist in oversight of operations and communications. <u>TIMETABLE</u> FOR ACTION: 1 – 15 Days.
- Agency leadership to seek assistance to identify and employ an Interim GLCAC, Inc. Executive Director to provide direction and support pending employment of a new, permanent Executive Director/CEO. TIMETABLE FOR ACTION: 1 – 30 days.
- Initiate legal assessment of possible fraud violations by the former Executive Director to assess possible liability for re-payment of state or federal funds and status of CPC Program Director's appropriate employment designation and Conflict status. <u>TIMETABLE FOR ACTION:</u> 1-30 Days.
- Immediately clarify reporting relationships and responsibilities for all agency senior managers, update and distribute an Organization Chart describing these relationships. <u>TIMETABLE FOR ACTION: 1 – 15 days.</u>
- When new Executive Director leadership is employed, conduct a thorough analysis of the agency's existing management structure and redesign operations to promote principles of knowledge management, transformational leadership, customer driven service management and delivery systems and strategic productivity assessment/reward. TIMETABLE FOR ACTION: 6 – 12 Months.
- Immediately initiate action to implement recommendations described under the Governance Section of this Report to: 1. Institute a new state of the art payroll time documentation/reporting system; 2. Design and implement a uniform, transparent and agency-wide policy and procedure for considering and awarding wage and salary adjustments including COLAS, Bonuses, Stipends, Merit Increments, etc. and, 3. Assure the conduct/documentation of annual performance appraisals for all staff including the Executive Director. <u>TIMETABLE FOR ACTION:</u> 4 – 6 months.
- Assess and, as needed, immediately correct the possible misclassification of the employment designation of an agency Program Director. <u>TIMETABLE FOR ACTION: 10 – 30 DAYS.</u>

- Add an HR Assistant Manager to focus on HR documentation, compliance monitoring/reporting, and employee relations, training and development. <u>TIMETABLE FOR ACTION</u>: hiring within 12 Months.
- HR Manager should be invited to attend and provide information and support to the agency's Personnel Committee and should be routinely included in meetings of senior managers and budget and planning deliberations. TIMETABLE FOR ACTION: 1 – 15 Days.

#### D. GLCAC, Inc. Fiscal Management.

#### Findings.

- The agency's overall fiscal management appears sound based on a review of the agency's Balance Sheet, Cash Flow, Accounting and Control policies/procedures and staffing capacity. The agency has an unqualified Audit Opinion and has access to but has not used its Line of Credit. The agency's CFO is well respected and trusted by his fiscal staff, senior managers and Board members. In response to management's refusal to upgrade the agency's overall payroll time documentation, the CFO authorized the installation of a new documentation system for the fiscal staff he supervises.
- The agency has not developed and adopted an agency-wide budget covering the agency fiscal year starting 10/1/10. An agency budget is required for agency's providing Head Start Program services.
- Policies and procedures for the lease, use and accounting for vending machines located throughout the 305 Essex Street facility need to be reviewed and revised to improve transparency, accountability and control.
- Controls around the protection and use of the agency's credit card assigned to the agency's Executive Director need to be clarified and strengthened.
- The Fiscal Review Team discovered two instances involving Annual Meetings where unallowable alcohol purchases were included in the agency's indirect cost rate in violation of OMB Circular A-122 paragraph #3 (See Appendix).
- It was identified that a Board member who has served on the Board for over a decade has an extended family relationship with a principal of the agency's current auditing firm, which has been contracted to provide auditing services for over 20 years. This relationship raises concerns about the appearance of a conflict of interest; no

- documentation was provided to assess whether the Board member participated in a vote renewing the firm's contract with the agency.
- Despite at least one of the agency's principal funder's expression of concern and existing best practice standards, the agency recently renewed the contract with the auditing firm which has provided auditing services for the agency for over two decades.

#### Recommendations - Timetable for Action.

- Retain CFO and fiscal staff to assure continuity of agency fiscal management. Upon employment of the agency's new Executive Director the CFO should be evaluated and an assessment made about the individual's competencies and ability to help adopt needed reforms in agency management and oversight. <u>TIMETABLE FOR ACTION: 4-6</u> Months.
- Assemble and review existing vending machine lease arrangements and income accounting policies and procedures. Develop new, and clarify existing, policies related to vending machine ownership, leasing and accounting, in order to promote transparency, accountability and to avoid any actual or perceived conflicts of interest. <u>TIMETABLE FOR</u> <u>ACTION: 1-2 Months.</u>
- Develop plans for the development and approval of an agency budget for the fiscal year beginning 10/1/11. <u>TIMETABLE FOR ACTION: 4 – 6</u> <u>Months.</u>
- Contract with a new audit firm at the earliest time possible, in conformance with best practices. <u>TIMETABLE FOR ACTION: 1-3</u>
   Months.
- Assure GLCAC, Inc. understanding and compliance with all OMB A-122 requirements. <u>TIMETABLE FOR ACTION: Immediate.</u>
- Update the current GLCAC, Inc. <u>Fiscal Policy Manual</u> to: 1. Clarify and strengthen policies and procedures for the protection and use of the agency's Credit Card and 2. Draft new policies to cover Use and Repayment of the agency's Line of Credit, Document Retention/Storage, Clarify Off-Site Cash Management Procedures and conduct of Internal Audits. <u>TIMETABLE FOR ACTION: 2 4 Months.</u>
- The Fiscal Review Team recommends that meetings where food is served for reimbursement by federal or state funds should document the meetings purpose and attendees.

#### E. Other Recommendations and Immediate Actions.

- Effective immediately, GLCAC, Inc. will no longer be permitted to draw down advance State contract payments, but will be required to invoice DHCD on a cost reimbursement basis only, pending future review of agency management and governance reforms.
- GLCAC, Inc. must immediately schedule and complete a full NIQCA Best Practices agency assessment. <u>TIMETABLE FOR ACTION: 3 – 4 Months</u>.
- DHCD will ask that the U.S. Department of Health and Human Services, Office of the Inspector General (OIG) perform an allowable cost audit of all HHS funded programs operated by the agency.
- GLCAC, Inc. officials should consider engaging an independent audit review of the agency's financial records in light of the agency's relationship with its current auditor of over 20 years.
- DHCD will report to the U.S. Department of Health and Human Services,
   Administration for Children and Families (ACF), Office of Community Services
   (OCS) that DHCD has designated GLCAC, Inc. as a "Troubled Agency." Such
   designation requires that a Corrective Action Plan be developed and implemented
   to address the serious deficiencies identified through the State Investigative
   assessment.

#### **Next Steps**

 Pursuant to the U.S. Department of Health and Human Services, Administration for Children and Families (ACF), Office of Community Services (OCS) Information Memorandum #116, DHCD and NIQCA to provide GLCAC, Inc. with training and technical assistance at a schedule to be determined.

# APPENDIX.

- **Essential Documents**
- ➤ Meeting Schedule
- **➢ OCS Information Memorandum No. 116**

http://www.acf.hhs.gov/programs/ocs/csbg/guid ance/im116.html

> OMB Circular A-122

http://www.whitehouse.gov/omb/circulars a122 2004



# DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

Deval L. Patrick, Governor • Timothy P. Murray, Lt. Governor • Tina Brooks, Undersecretary

### GLCAC, Inc. Document Request.

#### Governance:

- **Board Meeting Minutes .... 6 Months 2010**
- Board Roster Profile (NIQCA Chart)
- GLCAC Bylaws.
- > Board Member Attendance Records 2009, 2010, 2011.
- > Evaluations of ED ...2008, 2009 2010.....ON SITE REVIEW
- > ED/CEO Employment Contract .....ON SITE REVIEW
- **▶** Board Internal Assessment Board Orientation and Training Documentation 2010.
- ➤ Documentation of Board Action: 2010 and 2011 Agency Budgets ED Evaluation Audit 990 Report Submission.
- > GLCAC, Inc. Conflict-of-Interest and Ethics Policies.
- > Documentation of Board Conflict Disclosures/Voting 2009, 2010
- > Board Fiscal Program Reports (Examples, Monthly, Quarterly, Annual)
- ➤ ED and Deputy Director Compensation Adjustments 2008, 2009, 2010..ON SITE REVIEW....Board Executive Compensation Review Policy/Procedure...Documentation of Board Action on Salary Adjustment Recommendations for Executive Director 2008, 2009 and 2010.

#### Finance:

- Current Finance Committee Membership, Affiliations, # Meetings 2008, 2009, 2010.
- > Copies of GLCAC, Inc. 2010 and 2011 Agency Budgets.
- Check Signing Authorization Policy/Procedure.
- > Draft Audit forwarded to DHCD is not complete....Need to see CSBG contract broken out and listed with its CFDA #.
- > 990 Report 2009 with signatures.



- ➤ Payroll Time Sheets for ED 2008, 2009, 2010...and if not Signed Off by Board of Directors documentation of Board action (e.g., letter) which Exempts ED from Board Approval of Time Sheets. Payroll Time Sheets signed/approved for Assistant Executive Director and Finance Director 2008, 2009, 2010.....ON SITE REVIEW.
- > Copy of Updated Fiscal Policy Manual
- > Identification of Current Banking Relationships.
- > Credit Line Amt/Institution Use/Payment Experience 2009, 2010, 2011.
- > Credit Card Use/Assignment/Control Policies
- Copy of Bids for Auditor Services and Documentation of Vote/Rationale for Contracting with the Firm which has had the Contract for the past 20 years.

#### **Human Resources:**

- > Staffing Profile (NIQCA Chart) GLCAC, Inc. Salary/Wage Scale.
- > Approved Wage/Salary Adjustments for Non-Executive Staff 2008, 2009, 2010.
- > HR Policies-Procedures Manual
- > ED Performance Appraisal Policy/Procedure/Form/Timetable.
- > Documentation of Personnel Committee Completion of ED Performance Appraisals (2008, 2009, 2010).

#### Other:

Updated DHCD Program Profile Report.



# DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

Deval L. Patrick, Governor Timothy P. Murray, Lt. Governor Tina Brooks, Undersecretary

GLCAC, Inc Assessment Site Visit Protocol- Team Assignments

Day #1. Wednesday, March 30, 2011.

9:30 – 9:45am Team Entry Meeting: Board President, Deputy Director,

CFO, HR Director. (DHCD/NIQCA Assessment Team)

9:45 -11:00am Interview with Board President. (Ditzah and Bill)

Interview HR Director. (Glenn and Patsy)

Fiscal Audit. (Dharam/Mike/Jim)

11:00 – 12:15pm Interview with Board Members (2 Each Sector) Ditzah

and Bill)

Staff Interview: 5 Supervisors - 5 Line Staff. (Glenn and

Patsy).

Fiscal Audit. (Dharam/Mike/Jim)

12:15-1:00pm Working Lunch.

1:00 – 2:30pm Interview with Interim Exec. Director / Admin Assistant

(Ditzah and Bill)

Fiscal Audit. (Dharam/Mike/Jim)

Program Directors Interview: Early Ed., Energy, Housing and Homelessness, Community Service Center. (Glenn

and Patsy).

2:30 – 4:00pm CFO Interview. (Ditzah, Bill, and Dharam)

Assistant Planning Director. (Glenn and Patsy)

Fiscal Audit (Dharam/Mike/Jim)

Day # 2. Thursday, March 31, 2011.

9:30 – 10:15am Meeting Vice Chairman of the Board (Ditzah and Patsy)

Meeting with Assistant Fiscal Director. (Dharam/Bill)

HR File Audit (Glenn)

10:30 – 12:00pm Meeting with Past Board President: J. M. Yelle (Ditzah

and Bill)

Meeting with Planner (Glenn and Patsy)

12:00 – 1:00pm Working Lunch



1:00 – 2:15pm Meeting with Board Treasurer. (Ditzah, Dharam, Bill) Meeting with Personnel Committee Chair (Patsy and Glenn).

2:15 - 4:00pm Team Debriefing.