



Prince William County, Virginia Internal Audit Report – Records Retention and Public Requests

June 1, 2017



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June 1, 2017

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Prince William, Virginia 22192

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Pursuant to the internal audit plan for Prince William County, Virginia (“County” / “PWC”), approved by the Board of County Supervisors (“BoCS”), we hereby present the internal audit of the County’s Records Retention and Public Requests process. We will be presenting this report to the Board Audit Committee of Prince William County at the next scheduled meeting on September 5, 2017.

Our report is organized in the following sections:

Executive Summary	This provides a high-level overview and summary of the observations noted in the internal audit of the Records Retention and Public Requests process.
Background	This provides an overview of the Records Retention and Public Requests process, as well as relevant background information.
Objectives and Approach	The objectives of this review are expanded upon in this section, as well as a review of our approach.
Observations Matrix	This section includes a description of the observations noted during our internal audit and recommended actions, as well as Management’s response including responsible party, and estimated completion date.

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

In the Commonwealth of Virginia, every government entity is responsible for the management of public records. These records are used to conduct the entity's business and to support agency communications, actions and decisions. Some of these records are historical and culturally important documents that need to be preserved as a record of significant actions and events. Other significant documents subject to preservation include contracts, memorandums of understanding (MOUs), and other legally binding agreements, some of which are date specific while others may be in effect until terminated by Board action. Under the authority of the *Virginia Public Records Act*, the Records Management section at the Library of Virginia assists state and local government in ensuring that public records are maintained and available throughout their life cycle. Records Management supports the efficient and economical management of public records by publishing records retention and disposition schedules, presenting workshops, monitoring the disposal of non-permanent records, and assisting with the transfer of permanent records to the Archives.

Per the *Virginia Public Records Act* (Virginia Code § 42.1-77), "public record" or "record" is defined as recorded information that documents a transaction or activity by or with any public officer, agency, or employee of an agency. Regardless of physical form or characteristic, recorded information is public record if it is produced, collected, received, or retained in pursuance of law or in connection with the transaction of public business. The medium upon which such information is recorded has no bearing on the determination of whether the recording is a public record.

The *Freedom of Information Act* ("FOIA") (Virginia Code § 2.2-3700 et seq.) grants Virginia citizens and media outlets the right to request access to public records. PWC implemented a comprehensive FOIA Policy effective December 1, 2016. The scope of the FOIA Policy articulates the procedures County departments and employees must follow when Virginia citizens and media request public records. The FOIA Policy addresses the FOIA Officer which is required by FOIA (a position of the Office of the County Attorney), Agency Liaisons ("FOIA Liaisons"), and public record requests, as well as training and process.

Objective and Scope

The primary objective of the internal audit of Records Retention and Public Requests was to analyze the design of the current processes including public records retention and disposition, and requests for public records per FOIA and the PWC FOIA Policy effective December 1, 2016. The areas of focus included: policies and procedures, governance, training, information technology, the retention and disposition schedules and process, destruction and release of information as well as the recovery of the County's actual, reasonable costs incurred in responding to public record requests, where applicable. Through this analysis we provided the County with examples of policies and procedures, best practices and process improvements under separate cover. The County's compliance with FOIA, Library of Virginia requirements, and other applicable regulations will be included in the follow-up phase of this audit.

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 Observation Ratings

(See page 11 for risk rating definitions)

	High	Moderate	Low
Records Retention and Public Requests Internal Audit	-	4	-

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



EXECUTIVE SUMMARY – CONTINUED

Observations Summary

There were four (4) observations that were identified during this internal audit. Below includes a listing of the observations that were identified. Detailed observations are included in the observations matrix section of the report.

Summary of Observations	
Observations	Rating
1. Records Management Policies and Procedures	Moderate
2. Records Oversight	Moderate
3. HP Records Manager (“HPRM”) System Access	Moderate
4. Centralized Accounting, Tracking and Billing	Moderate



BACKGROUND

Overview

In the Commonwealth of Virginia, every government entity is responsible for the management of public records. These records are used to conduct the entity's business and to support communications, actions and decisions. Some of these records are historical and culturally important documents that need to be preserved as a record of significant actions and events.

Freedom of Information Act

The *Virginia Freedom of Information Act* (FOIA) is a State law which provides for the disclosure of public records. FOIA, included at § 2.2-3700 et seq. of the Code of Virginia, guarantees citizens of the Commonwealth and representatives of the media access to public records held by public bodies, public officials, and public employees.

A public record is any writing or recording that is prepared or owned by, or in the possession of a public body or its officers, employees or agents in the transaction of public business. All public records are presumed to be open, and may only be withheld if a specific, statutory exemption applies.

The purpose of FOIA is to promote an increased awareness by all persons of governmental activities. In furthering this policy, FOIA requires that the law be interpreted liberally, in favor of access, and that any exemption allowing public records to be withheld must be interpreted narrowly.

Commonwealth of Virginia

Under the authority of the *Virginia Public Records Act*, the Records Management section at the Library of Virginia assists state and local government in ensuring that public records are maintained and available throughout their life cycle. Records Management supports the efficient and economical management of public records by publishing records retention and disposition schedules, presenting workshops, monitoring the disposal of non-permanent records, and assisting with the transfer of permanent records to the Archives.

Per the *Virginia Public Records Act* (Virginia § 42.1-77), "public record" or "record" is defined as recorded information that documents a transaction or activity by or with any public officer, agency, or employee of an agency. Regardless of physical form or characteristic, recorded information is public record if it is produced, collected, received, or retained in pursuance of law or in connection with the transaction of public business. The medium upon which such information is recorded has no bearing on the determination of whether the recording is a public record.



BACKGROUND – CONTINUED

Library of Virginia

Records management is the economical and effective administrative process for managing records and ensuring access throughout its life cycle, from creation to destruction and preservation. The Library of Virginia is responsible for ensuring that state and local governmental records are maintained and available throughout a record's lifecycle.

To create and maintain an effective records management program, each government entity must:

- Designate at least one (1) records officer through submission of the Records Officer Designation and Responsibilities (RM-25) Form.
- Develop policies and procedures for records management.
- Conduct a survey or inventory of records in all formats.
- Establish and follow the Library of Virginia approved records retention and disposition schedules.
- Use technology, as appropriate, to create, store, and retrieve records.
- Destroy records at the end of their retention period and document that destruction.
- Store inactive records in a cost-effective and secure location.
- Identify and protect essential records.
- Identify and preserve permanent records.
- Develop a records emergency response plan to protect and recover all records.
- Implement filing and indexing systems.

According to the Library of Virginia, the purpose of a public records management program is to:

- Aid and assist custodians of public records in making informed judgments about policy.
- Enable citizens to judge the conduct of the government by providing administrative, fiscal, and legal confidentiality.
- Allow information to be open for observation and access, while safeguarding privacy and confidentiality.
- Ensure the documentation of government actions.
- Maintain good business practices.

According to the Library of Virginia, the employee that is designated as a records officer must have the time and the ability to:

- Manage an agency-wide records management program to include the storage, retrieval, retention, and disposition of public records.
- Create agency-specific procedures that provide direction on complying with these mandated records management functions.
- Provide training and routinely educate staff on these procedures.
- Identify essential and archival records and ensure that those records are properly maintained, protected, and accessible.
- Coordinate the development of a records emergency response plan for the protection/recovery of records in the event of a disaster.
- Work with departments and agencies, including Information Technology, to identify and implement electronic records solutions and participate in decisions concerning records reformatting.
- Conduct records audits to ensure compliance with Library of Virginia-approved records retention and disposition schedules and agency procedures.



BACKGROUND – CONTINUED

County Requirements and Processes

There are currently two (2) individuals in the Office of the County Attorney who fulfill the role of the FOIA Officer. Additionally, there is a designated FOIA Liaison in each of the County's departments and/or agencies. Both the FOIA Officer and the FOIA Liaisons are required to be present during all business hours, therefore all departments and agencies have a FOIA Liaison backup in order to maintain continuity. According to the Virginia FOIA Council, it is a requirement that FOIA Officers have annual training, which is free. PWC has a training that is provided to FOIA Liaisons by the Office of the County Attorney annually. As required, the County has a link on the PWC.gov main page with a link to the County's FOIA page.

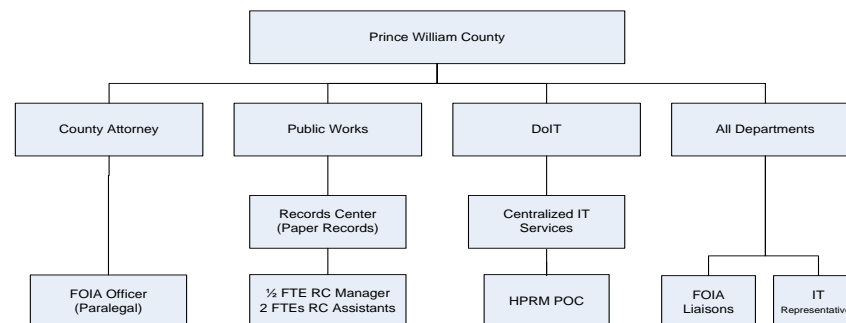
The County FOIA Policy was effective December 1, 2016. The policy outlines the requirements of County employees with regard to requests for public records under FOIA by Virginia's residents and media.

The departments and agencies within the County store their own records and use the space provided by the County Records Center ("RC") which is managed by the Department of Public Works. The County is required by the Library of Virginia to have a formal RC for paper files.

Records Center Responsibility

The centralized location for records storage within the County is the Records Center. Historically, the RC was under PWC Library's governance until 2009. The previous records manager was nearing retirement and, due to budget limitations, this position was eliminated. Since 2010, the RC was housed under the Public Works governance and the responsibility was delegated to the Fiscal Manager in Public Works. The County places the responsibility of the RC under the budget and guidance of the Department of Public Works. The RC follows the Library of Virginia's guidance pertaining to records retention and disposition. The Records Center consists of an RC Manager and two full time RC Assistants. The Records Center is strictly an internal service for the County and open to all departments and agencies, although space is limited. The respective departments or agencies request to utilize the RC to hold their paper records and other records in a tangible form (ex. CD, DVD), while still maintaining full ownership over the records. The RC uses the HP Records Manager (HPRM), previously called TRIM, which is an electronic database to house information regarding the types of records retained, the location of the records within the RC, the disposition schedule assigned to each record. Forms are available on the software (to those who are granted access) for records requests. Public Works pays for employee compensation, fleet costs, storage building lease, software expenditures, storage costs and document shredding costs.

**Records Management & FOIA Roles
(Current)**



DoIT: Department of Information Technology
FOIA: Freedom of Information Act
HPRM: HP Records Management Software
POC: Point of Contact
RC: Records Center



BACKGROUND – CONTINUED

County Requirements and Processes –continued

Storage of Records

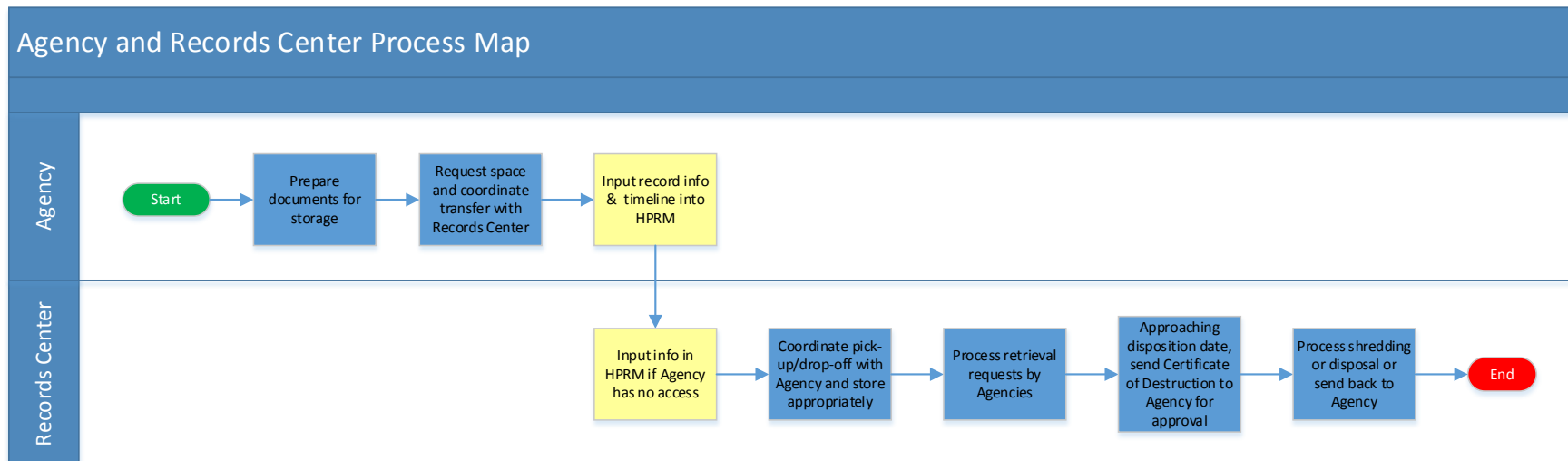
Currently, the physical custody of records is decentralized and retained with each department or agency. Most departments or agencies utilize the Records Center. However, the departments or agencies may also use different record management storage systems and locations. The RC stores physical documentation in boxes, as provided by the departments and agencies. The departments and agencies may also maintain additional documentation at their respective office locations. Electronic records are retained by the individual departments or agencies. Data collected from a survey of the departments and agencies reflect that most store their records in their respective offices in addition to using the Records Center.

Types of Records

Through a survey of Prince William County's departments and agencies, it was determined that the County has various types of records including: electronic, email, paper, audio recordings, microfilm, etc.

Process for Storing and Disposing of Records via the Records Center

External requests go to the appropriate department or agency. The department or agency then requests that the RC hold specific printed records. The RC and department or agency then confirm and assign the appropriate disposition schedule for the record(s). The RC enters into the HPRM the type of record, disposition schedule, and location of the box in the RC. When the date for disposition, as defined by the disposition schedule, approaches, the software sends an alert to RC employees and a certificate of destruction is automatically created. The certificate of destruction is sent to the department or agency for approval (Form RM-3). The RC then shreds the documents. The RC follows the guidelines provided by the Library of Virginia.





BACKGROUND – CONTINUED

County Requirements and Processes –continued

Process for Records Requests via the Records Center

External Requests come through to the individual department or agency. The department or agency then submits a record request to the RC via a centralized phone number, email, or via HPRM (if they have access). If the department or agency personnel who initiated the records request have authorized access to HPRM, all forms will be available within the system. The Records Assistants then retrieve the records and mail or deliver them to the department or agency. The Record Center uses a delivery van for larger requests (e.g. boxes, etc.). The department or agency then distributes the requested records to the external requester(s).

Charges Associated with the Record Center

All costs regarding the Record Center fall under the Department of Public Works budget. The annual FY2016 building lease cost for the RC is \$166,047. The RC spent \$8,640 on boxes to store and distribute records that are held in the RC. The RC spent an additional \$2,471 on shredding documents. When a certificate of destruction is sent back from the department or agency with approval, the RC Assistants then shred the documents that are stored in the building. If the department or agency wants to shred their documents independently, department or agency representatives can retrieve them from the RC or the RC may deliver the records to the department or agency. Transportation costs are paid for by the RC. Public Works pays for the HPRM IT software. The HPRM software costs \$8,640 annually for usage by the RC, and the departments and agencies.

Fees Associated with FOIA Requests

There is no initial fee charged to requester for submitting a FOIA request. However, FOIA does provide for the charging of certain types of fees in some instances. Fees are based on the amount of time it takes to obtain, review, and prepare the records to be released, delivery fees, for the amount of records (volume of information and number of copies), and any other actual, reasonable costs that the County incurs in responding to the request. Requests that require 30 minutes or more of staff time to process are charged the staff member's hourly rate for the time required to respond to the request. The cost of printing or duplication is \$0.08 per page for black and white pages or \$0.10 per page for color pages. When the requestor desires records to be shipped or mailed, they are responsible for the reasonable actual cost of the postage. When the requester submits a request, they can include a note stating how much they are willing to pay in fees. The County will not charge a requester when the estimated or actual total cost is \$50.00 or less. If the department or agency foresees that the total fees for processing the request will exceed \$50, but less than \$200, the staff will continue processing the FOIA request and notify the requester as soon as they make that determination. Staff will then provide the requested public records to the requester with a bill for the reasonable actual costs, which is due upon receipt. If the estimated cost for processing the request exceeds \$200, the FOIA Liaison will immediately notify the FOIA Officer. The FOIA Officer or FOIA Liaison will then notify the requester and require a deposit of the full amount of the estimate prior to supplying the requested public records.



OBJECTIVES AND APPROACH

Objectives

The primary objective of the internal audit of Records Retention and Public Requests was to analyze the design of the current processes including records retention and external requests of information as per FOIA and the PWC FOIA Policy effective December 1, 2016. The areas of focus included: policies and procedures, governances, training, information technology, the disposition schedule and process, destruction and release of information as well as recovering costs from record requests, where applicable. Through this analysis we identified potential opportunities for process improvement. The County's compliance with FOIA, Library of Virginia requirements, and other applicable regulations will be included in the follow-up phase of this audit.

Approach

Our audit approach consisted of the following three (3) phases:

Understanding and Documentation of the Process

The first phase of this cycle audit consisted primarily of inquiry, in an effort to obtain an understanding of the key personnel, risks, processes, and controls relevant to the objectives outlined above by:

- Reviewing existing procedures, and related documentation;
- Interviewing key personnel;
- Performing process walkthroughs; and
- Participating in discussions with representatives from the Office of the County Attorney County and the Department of Public Works, and others deemed necessary.

Evaluation of the Design and Effectiveness of Process and Controls

The purpose of this phase was to evaluate the design of the process and controls in place. In addition to the above, we performed the evaluation by:

- Reviewing the new FOIA Policy effective December 1, 2016 and discuss with the Office of the County Attorney;
- Survey other jurisdictions and County departments and agencies;
- Determining whether proper controls exist, and evaluate whether existing controls are appropriate for mitigating process risks; and
- Evaluating the existing design and control structure including applicable regulations, policies and procedures, as well as identification of process improvement opportunities and recommendations.

Reporting

At the conclusion of this internal audit, we summarized our findings into this report. We have reviewed the results with the appropriate persons in Management, and have incorporated Management's response into report.



OBJECTIVES AND APPROACH – CONTINUED

Approach – Continued

Reporting – continued

Provided below is the observation risk rating definitions for the detailed observations starting on the following page.

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.



OBSERVATIONS MATRIX

Observation	1. Records Management Policies & Procedures
<p>Moderate</p>	<p>PWC implemented a comprehensive FOIA Policy effective December 1, 2016. The scope of the FOIA Policy articulates the procedures County departments and agencies and employees must follow when Virginia citizens and media request public records. The FOIA Policy addresses the FOIA Officer which is required by FOIA, FOIA Liaisons, and public record requests, as well as training and process.</p> <p>However, there is not policies and procedures surrounding the records management function. Although the County requires all departments and agencies and their divisions to follow the Library of Virginia's record management guidelines, these guidelines are not articulated in the County's policies or procedures. We noted there is lack of consistency and/or reliable system used across the departments and agencies to maintain, track and dispose all relevant paper and electronic records, including email communications. This lack of consistency and ownership of the processes increases the risk of errors and irregularities as well as mismanagement. In the absence of effective policies and procedures for systematic control of recorded information, the County may keep some records too long, spend too many resources storing them, waste time looking for misplaced information, risk a public-relations misstep, and/or fail to protect critical information from breach or harm.</p> <p>Electronic records include, but are not limited to, files stored in individual desktops, on the email server, in flash drives and in audio format. These records are currently not being formally tracked or managed, and there is no assurance that a disposition schedule is being followed. DOIT has a backup of all electronic information in case of a catastrophe, but does not have a backup that can restore one document at a time if deleted or lost.</p>
<p>Recommendation</p>	<p>The County should establish policies and procedures for records management to compliment the new FOIA Policy. The growing use of email, the internet and online services is resulting in an ever increasing use of electronic systems to conduct government business. In this environment, it is important to have established adequate and up-to-date procedures and practices dealing with the management of electronic records and electronic systems with recordkeeping functionality in collaboration with the FOIA Officers and policy. The policy should build on the practices outlined in the FOIA Policy and include scope, ownership, department/agency responsibilities, definition and delineation of types of records, process as well as training requirements. We recommend that retention periods follow the Library of Virginia established general schedules. <i>We have provided the County with several sample policies and procedures.</i></p>
<p>Management's Action Plan</p>	<p>Response: Concur – Management concurs with this finding and will assess the effectiveness, cost, benefits and risks of the County's records retention function and develop a plan of action to address this finding. Any resource need(s) necessary to address the audit observations will be considered in the context of the FY 2019 – 2023 five-year budget and fiscal planning process.</p> <p>Responsible Party: Office of Executive Management</p> <p>Estimated Completion Date: FY 2019</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	2. Records Oversight
Moderate	<p>The County has a Records Center which is used by many of the departments and agencies to store physical records. The RC was under the County's Department of Library's governance until 2009. In 2010, the responsibilities were delegated to the Fiscal Manager in the County's Department of Public Works. The Records Center has one (1) Manager and two (2) Records Assistants. The document information (location in the RC) and disposition schedule (designated by the respective department or agency) is maintained on the HP Records Management system. All responsibility of the records with regards to contents or disposal schedule remains assigned to the respective department or agency. The utilization and existence of the RC is at the expense of the Department of Public Works. Expenses include employee compensation, fleet costs, storage building lease, storage costs, software, etc. We noted the following as it relates to records oversight;</p> <ul style="list-style-type: none"> • <i>Tracking Records</i> - The departments and agencies that utilize the RC send their physical records to the RC and they are logged in HPRM. Records physically stored within the departments or agencies are not consistently logged in a system for tracking and disposal. • <i>Decentralized Process</i> - Each department or agency has differing records management processes. These processes may not include all attributes of a sound functioning records management system. For example, they currently do not have a policy and/or procedures to follow, there is no defined management oversight, adequate resources may not be allocated across all departments or agencies, not all records are tracked via a consistent system. • <i>Disposal Process</i> – The County does not currently have a consistent process in place for disposing of records in compliance with the regulations. • <i>Records Management Officer</i> - The Library of Virginia recommends identifying a person with a full time responsibility as a records officer to lead the records management program. In 2009 the Records Manager position was eliminated due to budget cuts. Effective records management depends on the appropriate assignment of responsibility for records management within the County, senior management support for records management and recognition that records management is a key organizational function. Thus, for recordkeeping activities to operate as intended and there needs to be appropriate ownership, management and oversight.
Recommendation	<p>The County should establish a Records Officer ("RO"). A centralized custodian of all records management and communication activities as recommended by the Library of Virginia. The Records Officer Designation and Responsibilities form should be completed and submitted to the Records Analysis Section at the Library of Virginia. Management should send a clear message that cooperation and compliance are expected from everyone and actively participate in the annual awareness training conducted by the RO. The FOIA Liaisons could act as the records coordinators for larger departments and agencies, and leverage the County's current FOIA structure. These coordinators would act as FOIA Liaisons to divisions within the organization, manage the department/agency procedures, disposal and aid the RO. The RO should regularly monitor all records activities including disposal of records to ensure they remain effective and relevant. Based on review of other jurisdictions we noted these functions are often within General Services with strong support from the County Executive and Attorney's offices. The County should continue to consider re-alignment of the function and the costs versus benefits of making the paper records electronic, wherever possible. This will reduce storage and shipping costs, and minimize errors. <i>We have compiled a detailed, comprehensive checklist and it has been provided to management to help implement this recommendation.</i></p>



OBSERVATIONS MATRIX – CONTINUED

Observation	2. Records Oversight - continued
Management's Action Plan	<p>Response: Concur – Management concurs with this finding and will assess the effectiveness, cost, benefits and risks of the County's records retention function and develop a plan of action to address this finding. Any resource need(s) necessary to address the audit observations will be considered in the context of the FY 2019 – 2023 five-year budget and fiscal planning process.</p> <p>Responsible Party: Office of Executive Management</p> <p>Estimated Completion Date: FY 2019</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	3. HPRM System Access
<p>Moderate</p>	<p>Many of the County's departments and agencies use the Records Center, which requires the use of HPRM, for their electronic document management system. With regards to HPRM, there is currently no formal process or requirements for individuals at various departments or agencies to get access to HPRM. For HPRM's data to be accurate and reliable, it needs staff with appropriate knowledge of the records retention requirements, appropriate qualifications, skills and experience.</p> <p><i>Segregation of Duties</i> - We noted that some users with edit and delete access in HPRM are also authorized to dispose of paper records. A lack of segregation of duties may lead to an increased risk of records mismanagement.</p>
<p>Recommendation</p>	<p>The County should put restrictions on access to the HPRM system to promote appropriate segregation of duties keeping in mind that a recordkeeping system should have the following:</p> <ul style="list-style-type: none"> • Reliability (consistent capture, organization access to records), • Integrity (no unauthorized alteration, destruction, removal), • Permanence (cannot be tampered with, altered, or improperly deleted), • Comprehensiveness (management of all records created and stored as a normal continuous activity of all units in an organization), and • Compliance (created and maintained in a manner that is consistent with all policies and procedures that apply to organizational records). <p>The individuals who have direct access to HPRM should be knowledgeable in Library of Virginia regulations.</p>
<p>Management's Action Plan</p>	<p>Response: Concur – Management concurs with this finding and will assess the effectiveness, cost, benefits and risks of the County's records retention function and develop a plan of action to address this finding. Any resource need(s) necessary to address the audit observations will be considered in the context of the FY 2019 – 2023 five-year budget and fiscal planning process.</p> <p>Responsible Party: Office of Executive Management</p> <p>Estimated Completion Date: FY 2019</p>



OBSERVATIONS MATRIX – CONTINUED

Observation	4. Centralized Accounting, Tracking and Billing																													
Moderate	<p>The FOIA Policy, effective December 1, 2016, articulates the procedures County departments, agencies, and employees must follow when public requests are made. This includes addressing the costs the County may charge for its ‘reasonable actual costs’ in responding to a FOIA request. It also states that ‘all FOIA requests were costs will be charged shall be referred to the FOIA Officer’. This is an improvement and first step in the process to centralizing the accounting, tracking and billing of the process. All County departments and agencies were processing the billing for fees collection for their own records requests and we noted that processes were inconsistent across the departments and agencies prior to the FOIA policy becoming effective. Testing has not been completed post implementation.</p> <p>We understand the County discussed centralizing this function during the development of the FOIA policy. Without centralized tracking, the County cannot fully determine the volume, extent, cost or cost recovery stemming from records requests, or what departments and agencies are spending or charging for fulfilling record requests. Through our inquiry with other jurisdictions, we noted most of the other’s survey did not have the requested information</p>																													
	<table border="1" data-bbox="680 711 1598 1247"> <thead> <tr> <th data-bbox="680 711 1001 771">Jurisdiction</th> <th data-bbox="1001 711 1299 771">External Requests Received</th> <th data-bbox="1299 711 1598 771">Charges from Request Processed</th> </tr> </thead> <tbody> <tr> <td data-bbox="680 771 1001 831">Prince William County</td> <td data-bbox="1001 771 1299 831">Not tracked</td> <td data-bbox="1299 771 1598 831">Not tracked</td> </tr> <tr> <td data-bbox="680 831 1001 891">Fairfax County</td> <td data-bbox="1001 831 1299 891">9,500</td> <td data-bbox="1299 831 1598 891">\$3,300.00</td> </tr> <tr> <td data-bbox="680 891 1001 951">Chesterfield County</td> <td data-bbox="1001 891 1299 951">500</td> <td data-bbox="1299 891 1598 951">\$5,500.00</td> </tr> <tr> <td data-bbox="680 951 1001 1011">City of Virginia Beach</td> <td data-bbox="1001 951 1299 1011">13,741</td> <td data-bbox="1299 951 1598 1011">Not provided</td> </tr> <tr> <td data-bbox="680 1011 1001 1071">Winchester County</td> <td data-bbox="1001 1011 1299 1071">Not provided</td> <td data-bbox="1299 1011 1598 1071">Not provided</td> </tr> <tr> <td data-bbox="680 1071 1001 1131">City of Alexandria</td> <td data-bbox="1001 1071 1299 1131">Not provided</td> <td data-bbox="1299 1071 1598 1131">Not provided</td> </tr> <tr> <td data-bbox="680 1131 1001 1192">Frederick County</td> <td data-bbox="1001 1131 1299 1192">150</td> <td data-bbox="1299 1131 1598 1192">Not provided</td> </tr> <tr> <td data-bbox="680 1192 1001 1247">Arlington County</td> <td data-bbox="1001 1192 1299 1247">Not provided</td> <td data-bbox="1299 1192 1598 1247">Not provided</td> </tr> </tbody> </table>			Jurisdiction	External Requests Received	Charges from Request Processed	Prince William County	Not tracked	Not tracked	Fairfax County	9,500	\$3,300.00	Chesterfield County	500	\$5,500.00	City of Virginia Beach	13,741	Not provided	Winchester County	Not provided	Not provided	City of Alexandria	Not provided	Not provided	Frederick County	150	Not provided	Arlington County	Not provided	Not provided
Jurisdiction	External Requests Received	Charges from Request Processed																												
Prince William County	Not tracked	Not tracked																												
Fairfax County	9,500	\$3,300.00																												
Chesterfield County	500	\$5,500.00																												
City of Virginia Beach	13,741	Not provided																												
Winchester County	Not provided	Not provided																												
City of Alexandria	Not provided	Not provided																												
Frederick County	150	Not provided																												
Arlington County	Not provided	Not provided																												



OBSERVATIONS MATRIX – CONTINUED

Observation	4. Centralized Accounting, Tracking and Billing - Continued
<p>Recommendation</p>	<p>We understand the County considered and discussed centralizing the function during the development of the FOIA policy. We recommend that the County continue to consider moving towards a centralized process for:</p> <ul style="list-style-type: none"> • Accounting for fees for all public records requests. • Tracking requests through the FOIA Liaisons and Officer. • Billing to provide consistency within the County. <p>Centralizing these functions will allow for the County to collect data and monitor the volume of requests per year, how much time is being spent, and how much money is being spent to fulfill the requests. This data will assist the county determine the level of resources to allocate to the function.</p> <p>Understanding the effective date for the new policy was December 1, 2016, we will test the billing process compliance with the policy during our follow-up procedures to this report.</p>
<p>Management's Action Plan</p>	<p>Response: Concur – Management concurs with this finding and will assess the effectiveness, cost, benefits and risks of the County's FOIA policy and develop a plan of action to address this finding. Any resource need(s) necessary to address the audit observations will be considered in the context of the FY 2019 – 2023 five-year budget and fiscal planning process.</p> <p>Responsible Party: Office of Executive Management</p> <p>Estimated Completion Date: FY 2019</p>



APPENDIX - SAMPLE CHECKLIST

	Activity	Responsibility	Completed
1	Objectives and Policy		
1.1	Records management objectives, principles and priorities have been developed and documented.	RMO/ Agencies	
1.2	A records management policy has been developed that which:		
1.2.a	- outlines the agency's overall goals, vision and purpose of records management	Agencies	
1.2.b	- indicates the value the agency places on records management and outlines its commitment to the sound management of records.	Agencies	
1.2.c	- outlines the key records management functions (i.e., creation, capture, classification, access, storage, security, maintenance, transfer, disposal and preservation)	RMO/ Agencies	
1.2.d	- acknowledges that all staff have a responsibility for records management	Agencies	
1.2.e	- requires records management operational policies, procedures and systems to be compliant with legislation, standards and other requirements (i.e., information security).	RMO	
1.3	Records management objectives and policy are approved by the Records Management Officer (RMO), agency directors, CXO and the BOCS.	RMO/Agencies/ CXO/BOCS	
1.4	Records management objectives and policy are reviewed annually and updated where required.	RMO/Agencies	
1.5	Records management obligations are identified and acknowledged in other key policies including the privacy policy, freedom of information act policy, procurement policy, and information and communications technology policy.	RMO	
1.6	An information management framework has been established that:		
1.6.a	- outlines the long-term vision and goals for managing the agencies' information assets	RMO/Agencies/ DoIT	
1.6.b	- recognizes records management as a key component of information management	RMO/Agencies/ DoIT	
1.6.c	- identifies the agencies' information needs and strategies to meet them.	RMO/Agencies/ DoIT	



APPENDIX - SAMPLE CHECKLIST – CONTINUED

	Activity	Responsibility	Completed
2	Management and Oversight		
2.1	The Records Management Officer the agencies' liaisons are identified as having ultimate responsibility for records management in the agency.	RMO/ Agencies	
2.2	Senior management support and champion the management of records within the agency by:		
2.2.a	- approving the records management policy	RMO/Agencies/ CXO/BOCS	
2.2.b	- promoting sound records management at county wide meetings, in discussions with agency staff and in corporate communications	RMO/County Attorney	
2.2.c	- adequately resourcing the records management function	RMO/ Agencies	
2.2.d	- providing records management training, where required.	RMO	
2.3	The management of records is identified as a key organizational requirement and priority by:		
2.3.a	- recognizing the effective management of records as a key result area in organizational planning (i.e., within the corporate plan and business plans)	RMO/ Agencies	
2.3.b	- establishing key performance indicators for RMO and Records Liaisons	RMO/County Attorney	
2.4	- The organizational structure facilitates good management of records by:		
2.4.a	- assigning responsibility for the oversight of records management to a senior executive officer	County Attorney	
2.4.b	- assigning responsibilities for the development of records management policy, processes and systems to an appropriately skilled and experienced staff member	RMO	
2.4.c	- including consideration of records and information management requirements in other county-wide activities such as: - corporate governance - risk management - information technology.	RMO/County Attorney	
2.5	All audits and reviews of county's functions and activities include an assessment of the county's, and their external providers' compliance with its records management policy and procedures.	RMO/ Agencies	
2.6	Records management responsibilities are included in all staff position descriptions.	RMO/HR/County Attorney	
2.7	Key performance indicators are established for records management and the records management function.	RMO/County Attorney	



APPENDIX - SAMPLE CHECKLIST – CONTINUED

	Activity	Responsibility	Completed
3	Strategic Planning and Resource Allocation		
3.1	An understanding of the agency business has been obtained by:		
3.1.a	- identifying the legal, regulatory, business and political context of the agency	RMO/Agencies	
3.1.b	- defining the business functions, activities and processes for which records must be created and managed	Agencies	
3.1.c	- assessing the internal business environment of the county, including the identification of business systems used to store and manage records, their records management functionality and relationships between systems.	RMO	
3.2	Records management needs and requirements have been determined by:		
3.2.a	- identifying the legislative and other requirements that impact records management in the county	RMO/Agencies	
3.2.b	- identifying relevant internal and external stakeholders and their records management requirements	RMO/Agencies	
3.2.c	- assessing the agency's records management risks and identifying priorities. The priorities will be based on an evaluation of the likely impact of the agency not meeting its identified needs.	RMO/Agencies	
3.3	The systems used to keep records and the county's records management policies and procedures have been assessed to determine whether they are adequate to ensure the identified records management needs and requirements are met.	RMO/Agencies	
3.4	An agency-wide strategy or plan has been developed. This will facilitate the achievement of the agency's records management objectives, to address any gaps and risks identified in the records management framework and to outline and support new records management initiatives.	RMO/County Attorney	
3.5	The records management strategy or plan includes:		
3.5.a	- the county's records management objectives	RMO/County Attorney	
3.5.b	- a broad outline of the agencies' business context	RMO/Agencies	
3.5.c	- details of the agencies' major records management needs, requirements and risks	RMO/Agencies	
3.5.d	- actions required to achieve its records management objectives, address deficiencies identified in the agencies' records management framework and any poor records management outcomes identified	RMO/Agencies	
3.5.e	- timelines for the implementation of actions	RMO/Agencies	
3.5.f	- resource requirements, both physical and financial	RMO/Agencies	
3.5.g	- monitoring and reporting mechanisms	RMO	
3.5.h	- assignment of responsibilities for: <ul style="list-style-type: none"> - establishing the county records management framework - key records management functions (at a high level), including the creation, capture, classification, access, storage, security, maintenance, transfer, disposal and preservation of records - monitoring and reporting to senior management on records management activities, compliance with agency policies and procedures, and the performance of the records management function - establishing appropriate governance arrangements for major records management initiatives including a project steering committee, a project sponsor and a project manager 	RMO/County Attorney	
3.5.i	- prioritization of actions and initiatives on the basis of risk and materiality.	RMO	



APPENDIX - SAMPLE CHECKLIST – CONTINUED

	Activity	Responsibility	Completed
3	Strategic Planning and Resource Allocation - continued		
3.6	The strategy is endorsed by the CXO.	CXO/RMO	
3.7	The strategy is regularly reviewed and updated, where required.	RMO	
3.8	Relevant actions and initiatives are incorporated into the business plans of the agencies	RMO/Agencies	
3.9	For each major records management initiative (project):		
3.9.a	- a business case is prepared prior to commencing the project. (The business case outlines the need the initiative will address, an assessment of the options available to meet the need and an outline of the preferred option including the costs, benefits, issues, constraints and risks associated with that option.)	RMO/Agencies	
3.9.b	- a project plan is prepared. (The plan includes project objectives, details of stakeholders and their needs, resource requirements, project timelines and responsibilities and how the achievement of the project objectives will be assessed.)	RMO/Agencies	



APPENDIX - SAMPLE CHECKLIST – CONTINUED

	Activity	Responsibility	Completed
4	Operational procedures, practices and systems		
4.1	General	RMO/Agencies	
4.1.1	Operational records management procedures and practices are established that:		
4.1.1	- refer to records management requirements outlined in legislation, regulations and standards issued by Library of Virginia and other regulatory bodies		
4.1.1.a	- align with the county's records management objectives and policy		
4.1.1.b	- cover key records management functions such as the creation, capture, classification, access, storage, security, maintenance, transfer, disposal and preservation of records		
4.1.1.c	- include all record formats (physical and digital, including emails and websites)		
4.1.1.d	- apply to all of the county's operations		
4.1.1.e	- identify which systems are to be used to capture and manage the agency's records		
4.1.1.f	- outline and assign responsibility for compliance with the procedures and practices.		
4.2	Capture of records	RMO/Agencies	
4.2.1	Operational procedures exist to assist staff to decide what information to capture into the agency's records management system/s, when the information is to be captured and how the information is captured. The procedures should cover:	RMO/Agencies	
4.2.1.a	- management of physical records		
4.2.1.b	- management of digital records (e.g., emails, documents—Word, Powerpoint, Excel, Project)		
4.2.1.c	- management of source records		
4.2.1.d	- management of converted records		
4.2.1.e	- website pages and transactions		
4.2.1.f	- records of communications such as meeting notes and phone conversations		
4.2.1.g	- records generated by the agency's core business systems.		
4.2.2	Procedures have been established to ensure that records held by staff leaving the agency, such as emails and physical records, are appropriately managed.	RMO/Agencies	
4.3	Metadata		
4.3.1	Formal rules are in place to assist staff to assign appropriate metadata when records are created. This includes rules built into system design.	RMO/Agencies	
4.3.2	Metadata is assigned to the records when they are placed in any of the agency's systems that keep records.	RMO/DoIT/ Agencies	
4.3.3	A person/s with appropriate skills is responsible for determining the agency's metadata requirements and for maintaining its metadata schema.	RMO/DoIT/ Agencies	
4.4	Classification (Based on Library of Virginia guidelines)		
4.4.1	One or more comprehensive and current records classification schemes for grouping and retrieving records has been established.	RMO	



APPENDIX - SAMPLE CHECKLIST – CONTINUED

	Activity	Responsibility	Completed
4	Operational procedures, practices and systems - continued		
4.4.2	Each classification scheme is based on an up-to-date analysis of major activities undertaken by the county.	RMO	
4.4.3	Procedures or business rules have been established that outline how records are to be classified.	RMO	
4.4.4	Each classification scheme is linked to the county's: - retention and disposition. - security and access regimes for the records system(s).	RMO/Agencies /DoIT	
4.5	Access to Records and Security	RMO/Agencies /DoIT	
4.5.1	Where access to agency records needs to be restricted for security, privacy, commercial or other reasons, this need is identified and documented.		
4.5.2	Policies or business rules governing system security and user access permissions are in place.		
4.5.3	Appropriate levels of access to county records for staff, the public and others dealing with the agencies have been determined.		
4.5.4	Physical and system restrictions have been implemented to control access by staff and others to county systems and records, based on the predetermined access levels.		
4.5.5	Processes exist to prevent the deliberate destruction and/or theft of records and accidental damage caused by fire, flood, etc.		
4.5.6	User access restrictions and other security controls are regularly reviewed to ensure they remain appropriate.		
4.5.7	Mechanisms are in place to report breaches of security and inappropriate access to county information, to senior executives for action.		
4.6	Movement and use of records	RMO/Agencies	
4.6.1	The location and movement of physical and digital records are tracked and traceable.		
4.6.2	The use of records subject to security restrictions is tracked and traceable.		
4.6.3	Business rules and auditable processes are in place for the migration of records to near-line, offline and off-site storage.		
4.6.4	Procedures for copying, conversion and migration of records (and their associated metadata) are implemented and monitored.		
4.7	Storage of records	RMO/Agencies/ Records Center/DoIT	
4.7.1	The storage of records is regularly assessed. When records are no longer needed for administrative purposes they are transferred to off-site storage at the Records Center.		
4.7.2	Records are stored either onsite at the agencies or the Records Center.		
4.7.3	Records appraised as permanent are stored onsite at the agency, in accordance with Library of Virginia's records management standards.		
4.7.4	Comprehensive and up-to-date disaster preparedness and recovery strategies and procedures for all systems that store records have been established.		
4.7.5	Computer and other records management systems are regularly tested to determine whether they can recover appropriately from system malfunctions.		



APPENDIX - SAMPLE CHECKLIST – CONTINUED

	Activity	Responsibility	Completed
4	Operational procedures, practices and systems - continued		
4.7.6	Agency records are in a format that ensures their preservation and accessibility for as long as they are required.		
4.8	Disposal of records	Agencies/RMO/ Records Center	
4.8.1	Public records are disposed of in accordance with the relevant Library of Virginia and records management standards issued under the applicable regulatory bodies.		
4.8.2	The disposal of records is planned and undertaken on a regular basis, e.g., annually.		
4.8.3	Responsibility for authorizing the disposal of records has been assigned to an appropriate member of staff and the required approvals are obtained prior to the destruction of records.		
4.8.4	Procedures are in place to ensure:	RMO/Agencies	
4.8.4.a	- records identified for destruction have no further business need		
4.8.4.b	- there is no reasonable risk of the information being recovered after records are destroyed		
4.8.4.c	- the destruction of records is supervised by an agency staff member or by an authorized agent if destruction has been contracted out		
4.8.4.d	- the level of control over the destruction of records is commensurate with the sensitivity of the information being destroyed.		
4.8.5	Destruction of all records must be documented, which applies equally to physical and digital records. If a contractor performed the destruction then a destruction certificate must also be issued and kept on file.		
4.9	Email Records		
4.9.1	To manage email records, procedures have been established and implemented that:	RMO/DoIT	
4.9.1.a	- outline the employee's responsibility for managing business-related emails		
4.9.1.b	- explain in what circumstances emails are to be captured as a record (emails that have business and archival value should be captured)		
4.9.1.c	- list the agency locations and systems that may be used to capture emails		
4.9.1.d	- list locations that are not approved for storing business emails such as personal or shared drives and email folders		
4.9.1.e	- require relevant emails to be captured as a record, as soon as possible after staff create or receive them		
4.9.1.f	- provide guidance to staff on titling emails, to assist them with the subsequent retrieval and ongoing management of emails.		
4.10	Web-based Records	RMO/Agencies/ DoIT	
4.10.1	Procedures have been established and implemented to ensure web-based information recorded on public websites, private networks, extranets and intranets are created and captured as records and managed.		
4.10.2	The records management procedures for web-based records:		
4.10.2.a	- include a requirement to create, capture and manage metadata		
4.10.2.b	- stipulate that web-based records are to be kept as long as specified by Library of Virginia or regulating authorities.		
4.10.2.c	- require that documentation evidencing website management be captured as a record.		



APPENDIX - SAMPLE CHECKLIST – CONTINUED

	Activity	Responsibility	Completed
4	Operational procedures, practices and systems - continued		
4.11	Records Management System(s)	RMO/DoIT	
4.11.1	There are established processes and procedures to ensure all systems that keep records are adequately maintained.		
4.11.2	There are established standard operating procedures and mechanisms for its systems that keep records and they provide for:		
4.1.1.2.a	- the reporting of all system failures such as database corruption		
4.1.1.2.b	- specific actions to be taken when a system fails, including recovery and re-execution of all processes underway		
4.1.1.2.c	- major changes to systems to be comprehensively documented.		
4.11.3	There are standard processes for the copying, conversion or migration of records in the event of structural change (such as the restructure of government agencies and creation of new business units), system change, upgrade or decommissioning.		
4.11.4	Where external providers manage county information under contractual arrangements, the contract:		
	- recognizes the county's legal ownership of records held by the external party, and the information they contain		
	- enables the agencies to have full and timely access to relevant records held		
	- requires the external party to comply with the county's records management standards, policies, procedures and guidelines for as long as they hold the records.		



APPENDIX - SAMPLE CHECKLIST – CONTINUED

	Activity	Responsibility	Completed
5	Staff Responsibilities		
5.1	The human resource requirements for the records management function, in terms of staff numbers and skills, knowledge and capability, are periodically assessed.	RMO/County Attorney	
5.2	The competency and capability of staff with records management responsibility is periodically assessed and the information used to provide staff with feedback on their performance and to identify training and development activities to address any performance issues.	RMO/ Agencies/HR	
5.3	A human resource management plan has been developed, that:		
5.3.a	- includes strategies to recruit additional staff with records management capability where required and to train and develop staff to address capability deficiencies	RMO/ Agencies	
5.3.b	- identifies and plans for the provision of records management advice and specialist assistance to other areas within the agency as required. For example, records management advice when implementing a new business system.	RMO	
5.4	A training program for records management has been established for all staff, staff with records management responsibilities, liaisons and new employees.	RMO	
5.5	Training in recordkeeping and records management, as required, is provided to all staff, staff with records management responsibilities, liaisons and new employees.	RMO/Agencies	
5.6	Training programs are regularly monitored for attendance, effectiveness and relevance and changes are made to the programs where appropriate.	RMO	
5.7	Staff with records management responsibilities are encouraged to maintain their record management skills and knowledge through membership of professional bodies, regular contact with Library of Virginia and participation in relevant industry events and forums.	RMO/Agencies	




APPENDIX - SAMPLE CHECKLIST – CONTINUED

	Activity	Responsibility	Completed
6	Communications		
6.1	The importance of records management is promoted and staff informed of their responsibilities in relation to records management:	RMO/Agencies	
6.1.a	- in training programs		
6.1.b	- on the agency's intranet		
6.1.c	- in displays of information on good records management practice.		
6.2	Records management policies and procedures are:	RMO	
6.2.a	- communicated to all staff and contractors		
6.2.b	- available on the intranet for access by staff		
6.3	The records management training program is promoted to all staff, including consultants, contractors and volunteers.	RMO	
6.4	Information on records management issues impacting on the agency is distributed to appropriate staff.	RMO	



APPENDIX - SAMPLE CHECKLIST – CONTINUED

	Activity	Responsibility	Completed
7	Monitoring and Reporting		
7.1	Records management compliance reviews		
7.1.1	There is a records management compliance program that regularly monitors and assesses:	RMO/Internal Audit	
7.1.1.a	- compliance with the agency's records management policies and procedures		
7.1.1.b	- compliance with Library of Virginia's records management requirements		
7.2	Performance monitoring		
7.2.1	Sufficient and appropriate information is gathered on records management activities to facilitate monitoring of performance against agreed and defined service levels and key performance indicators.	RMO/Agencies	
7.2.2	The operation of information systems that keep records are regularly monitored and:	RMO/DoIT	
7.2.2.a	- the level and appropriateness of their use recorded		
7.2.2.b	- any procedures undertaken to address exceptions such as security or access breaches and lost documents are documented.		
7.2.3	Records management tools are regularly reviewed and updated as a consequence of changing business circumstances and requirements.	RMO/Agencies	
7.2.4	Mechanisms have been established to regularly assess and evaluate staff access to records.	RMO/Agencies/ DoIT	
7.2.5	Internal audits undertaken include periodic reviews of records management systems, procedures and practices.	RMO/Internal Audit	
7.2.6	Compliance with email and web-based records management policy and procedures is regularly monitored.	RMO/Agencies/ DoIT	
7.3	Reporting		
7.3.1	Reports are provided to County Attorney/CXO on:		
7.3.1.a	- records management activities	RMO	
7.3.1.b	- internal records management compliance reviews	RMO/Internal Audit	
7.3.1.c	- changes to existing systems and implementation of new systems which are used to manage records	RMO/DoIT	
7.3.1.d	- the delivery of records management strategies.	RMO	
7.3.2	Appropriate and timely corrective action is taken on report findings generated from records management monitoring and reporting activities, and a record of that action is maintained.	RMO/Agencies	
7.3.3	Mechanisms are in place to ensure that findings and recommendations from internal audit and other reviews relating to records management are addressed.	RMO	



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