

Website Documents Approval Process

Overview

The website home page has seven (7) public segments. The purpose of this policy is to describe for each segment the purpose, review process, service standard (Help Desk), definitions and sources (Fraud, Waste and Abuse) and approval authority for a document to be uploaded to the website www.bondoversight.org. Also included is

The CABOC Digest electronic newsletter.

This policy will assure that documents/articles/audits/reports posted to the CABOC website reflect the best practices, current information supported by evidence and CABOC professional and ethical standards.

The Board Secretary is authorized to edit all documents as to style in consultation with the Chief Editor.

FAQs (Frequently Asked Questions)

Purpose: Write and answer questions of interest and value to Citizens' Bond Oversight Committee (CBOC) members.

Review Process: Questions and answers drafted by Training Materials Committee, ten (10) calendar days review period by Board and Advisors.

Approval Authority: Board

Best Practices

Purpose: Write Best Practices standards for the training of CBOCs.

Review Process: Draft prepared by Training Materials Committee. Draft published in The CABOC Digest (special edition Best Practices Proposal) for a fifteen (15) calendar day comment period. Draft posted on website home page News & Updates inviting comments with deadline. Then an additional fifteen (15) calendar day comment period by Board and Advisors of draft including all feedback because of publication of draft on website and newsletter. Unanimous email approval by Board.

Approval Authority: Board

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Resources

Purpose: Display documents/articles of interest to CABOC members prepared by CABOCs, CABOC Board and Advisors, districts, and other recognized organizations and individuals.

Review Process: Anyone can make a recommend to the Board that a document/article be uploaded to the website. Copyrighted material must be reviewed to determined if it can be posted on the website and written permission obtained, if needed. Obtain approval for documents/articles authored by an individual.

Approval Authority: Board

Help Desk

Purpose: Questions/service requests can be submitted to CABOC through the Help Desk segment on the website. These requests go to the CABOC Secretary email address.

Review Process: Referred to Training Materials Committee for preparation of answer after consulting published CABOC FAQs and Best Practices and subject matter experts as needed.

Service Standard: Acknowledgment of request within twenty-four (24) hours with an answer or status report within five (5) calendar days.

Approval Authority: Training Materials Committee

Poor Management Practices Can Lead to Fraud, Waste & Abuse

Purpose: Publish evidence of poor bond fund management practices that can lead to fraud, waste, and abuse and use these to support our legislative program. This segment was recently added to the website when a legislator staff member asked us, was there evidence of the need for our proposed legislative program? This segment will provide evidence from 2000 (when Proposition 39 was approved) to the current period to support our efforts to implement the February 2017 Little Hoover Commission recommendations.

Definitions: In this segment, “Fraud,” “Waste,” and “Abuse” are technical terms defined in *Government Accounting Standards* (also known as the *Yellow Book*), 2018 Revision, U.S. Government Accountability Office (an office of the U.S. Congress), Comptroller General of the United States¹:

Abuse: Behavior that is deficient or improper when compared with behavior that a prudent person would consider reasonable and necessary business practice given the facts and circumstances, but excludes fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements.

¹ <https://www.gao.gov/assets/gao-18-568g.pdf>

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Fraud: Involves obtaining something of value through willful misrepresentation. Whether an act is, in fact, fraud is determined through the judicial or other adjudicative system and is beyond auditors' professional responsibility.

Waste: The act of using or expending resources carelessly, extravagantly, or to no purpose. Waste can include activities that do not include abuse and does not necessarily involve a violation of law.

The links on this segment reference investigations, articles from major news organizations, audits, reports, and other studies concerning actions, conditions, and outcomes concerning the school construction bond-funded programs of California K-12 school districts and community college districts that display poor management practices, or could potentially be considered as, incidents of fraud, waste, and/or abuse.

Sources: District audit reports, district forensic investigation reports, Fiscal Crisis & Management Assistance Team (FCMAT) extraordinary audits, FCMAT Community College district reports, FCMAT Comprehensive Assessments, FCMAT Grades K-12 Management Assistance reports, California State Controller audit reports, California State Auditor audit reports, California Civil Grand Jury reports, community college accreditation reports, and press/media. Review Process: Anyone is welcome to make a request to have a document uploaded to this segment of the website. CABOC newsletter will include a link to submit nominations for consideration by the Board.

1. The primary objective is to provide a resource to CBOC Members, particularly those with little prior experience with major school construction programs, with examples of what can go wrong with such programs. Secondary users will include others with an interest in such matters and to assist CABOC in supporting our position as to why strong CBOCs are important to proper management of school construction bond programs.
2. To the greatest extent possible, CABOC will limit injecting its own interpretations into the components of this collection. This is for the dual purpose of CABOC maintaining a purely objective, factual stance towards such occurrences and attempting to minimize any possible exposure to claims of libel. For news media, the headline and the standard practice of the lead including who/what/where/when/why/how should allow users to quickly determine if the document is of interest.
3. For many of the documents included, the title of the document, such as a newspaper headline, along with the date, presented in a section with the name and location of the agency, will likely be sufficient to allow an unknowledgeable first-time reader to decide if this is worthy of their attention.
4. However, many formal reports, such as audit reports, have titles that only describe the type of work that was performed, such as, "Compliance Audit of the XYZ School District for the Year Ended June 30, 2019," do not provide much assistance to a new reader

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looking for items of interest – and the reader might have the time or inclination to go through many pages of introductory material, such as the signed audit opinion, before they find anything as to why the paper was posted in this section. In such cases, the preferred practice will be to take short excerpts, such as one or two sentences, directly from the document and present them in quotes over the link as the summary.

5. In what we hope will be only a few instances, it may be necessary for the person doing the posting to prepare a very summary of the topics comprehended – in a totally factual, non-judgmental manner.
6. The people authorized to post such papers should be given a reasonable degree of professional judgment as to what is necessary and appropriate as a summary (if necessary) for first-time users to understand the contents of each paper.

Approval Authority: Board

Website Display:

Poor Management Practices Can Lead to Fraud, Waste & Abuse

Below, CABOC presents a collection of documents collected from a variety of sources regarding poor construction bond management practices that can lead to fraud, waste, and/or abuse. They are sorted by the agency that is the subject of the report, presented in chronological order for each agency within the agencies presented in alphabetical order. General reports that involve multiple agencies are presented under the name of the sponsor or author of the report). It should be recognized that some of these reports are of interest because they call out practices that should be avoided that occurred in the past, in some cases many years in the past, but it should not be assumed that nothing has changed since the original report or article.

Poor management practices can lead to fraud, waste, and abuse as defined below by the Comptroller General of the United States:

Abuse: Behavior that is deficient or improper when compared with behavior that a prudent person would consider reasonable and necessary business practice given the facts and circumstances, but excludes fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements.

Fraud: Involves obtaining something of value through willful misrepresentation. Whether an act is, in fact, fraud is determined through the judicial or other adjudicative system and is beyond auditors' professional responsibility.

Waste: The act of using or expending resources carelessly, extravagantly, or to no purpose. Waste can include activities that do not include abuse and does not necessarily involve a violation of law.

Press/media articles, documents, and reports that provide examples of poor management practices are listed below in alphabetical order by government agency.

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In the News & Updates

Purpose: To display current news articles about and of interest to CBOCs throughout California and CABOC announcements about conferences, training workshops, annual membership meeting, etc. News articles will be from reputable news organizations.

Review Process: Board members and Advisors make recommendations to CABOC Public Relations Committee.

Approval Authority: Executive Committee

External Sites

Purpose: To have available in one location various external resources that could be helpful to CBOC members.

Review Process: Board members and Advisors make recommendations to CABOC Public Relations Committee.

Approval Authority: Executive Committee

The CABOC Digest Electronic Newsletter

Purpose: Communication with current and prior California CBOC members and other stakeholders.

Review Process: Draft prepared by newsletter editor and circulated to Executive Committee for review.

Approval Authority: Executive Committee

Online Training Videos

- Training Materials Committee prepares a proposal for a course: title, goal(s), objectives(s), target audience, presenter(s), length in minutes, use new or existing Zoom recording, or a combination of both.
- Executive Committee initial action on the proposal.
- Training Materials Committee produces video.

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- Executive Committee acts on the final video.
- Video uploaded to YouTube.
- Video uploaded to the website.
- Video promoted in newsletter.

History: Original approved June 13, 2020 amended September 12, 2020, January 9, 2021, June 12, 2021, August 21, 2021 and April 9, 2022.