

Fairfax-Falls Church Community Services Board
Compliance Committee Meeting Minutes
October 16, 2019

The Compliance Committee of the Fairfax-Falls Church Community Services Board met in regular session at the Merrifield Center, 8221 Willow Oaks Corporate Drive, Fairfax, VA.

The following Committee members were present: Bettina Lawton, Board Chair; Jennifer Adeli; Ken Garnes; Sheila Coplan Jonas; and Diane Tuininga

The following Committee members were absent: Suzette Kern

The following staff were present: Daryl Washington, Bill Hanna, Luann Healy, and Lyn Tomlinson

1. Meeting Called to Order

The meeting was called to order at 4:07 p.m.

2. Review of Meeting Minutes

Meeting minutes of the September 18, 2019 Compliance Committee were provided for review and revision. As no recommendations were forthcoming, Nancy Scott made a motion to approve the minutes as presented, which was seconded by Ken Garnes and unanimously approved.

3. Follow up items from the prior Compliance Committee Meeting

CSB Board Policy Review

It was noted that this review will be provided under agenda item #5.

Update to the meeting with DPMM (Department of Purchasing and Material Management) to define roles and responsibilities of absorbed DAHS (Department of Administration of Human Services) staff
Confirming attendance at a recent meeting with DPMM, Mr. Washington reported that there is an ongoing realignment with staff absorbed from DAHS that will further clarify roles.

Acknowledging the CSB Board's interest in statutory responsibilities related to contracts, the Director of DPMM offered to attend a CSB Board meeting to offer clarification of DPMM contract responsibilities. Following Committee discussion, it was decided that regular updates from executive staff was sufficient reporting at this time. It was further clarified that DPMM performs regular contract audits, while both agencies share responsibility for monitoring performance of the contracted vendor.

4. Updates

ComplyTrack

Bill Hanna directed attention to the Audit Scope Definitions document in the meeting materials, noting this document was developed in response to a request at the September Compliance Committee meeting. To illustrate use of the definitions, the previously provided reports containing mock data were also included to demonstrate how the terms are used and in which report. Mr. Hanna clarified that as an independent ID number is generated for each entry, automatic tracking of related reports is not possible. However, it is possible to include this information in a verbal report. Following robust discussion, it was determined that tracking reported events and follow up through the three ComplyTrack reports via a verbal report was sufficient to the Committee's needs.

Additionally, it was confirmed that the report data elements can be organized as requested by the Committee without the further involvement of ComplyTrack.

Recognizing the Compliance Program Organizational Chart was outdated, members requested an update to the Chart including job responsibilities related to each position.

Credible Operation Update

Mr. Hanna provided an update to CSB efforts to amend the Credible contract. A list of five identified areas of concern was forwarded to DPMM for development of a letter for Credible that will include a request for a CAP (Corrective Action Plan). An overview of the five areas was provided, including:

- 1 *Uptime*; the RFP (Request for Proposal) included a request for an uptime deliverable of 99.9%, that the Credible technical response offered but lacked a time frame reference A monthly measure timeframe will be requested.
- 2 *Response Time*; the time for a page to load was clarified to meet the parameters stated in the RFP. However, there is no measure, penalty, or time frame recorded for non-compliance.
- 3 *Anticipation of a Credible CAP*;
 - a. *Product support for priority service levels*, reporting that the recent and ongoing problems are considered priority one, it was confirmed that the communication requirements were not observed. A priority one problem is defined in the contract and includes no connectivity.
 - b. *Third-Party Hosting*; involves fail-over, in which standby equipment automatically takes over when the main system fails, and redundancies, a method of protecting computer systems from failure. Both responses are out of compliance. This was demonstrated when the Dulles data center failed and did not automatically, within minutes if not seconds, connect to the Chicago data center. This process should have appeared nearly seamless from our perspective. However, this did not happen and the CSB was without service for nearly two hours before a manual process was activated to move to the Chicago data center.
- 4 *Data Storage Option*; a reminder was offered of the investigation into the CSB copying data to local storage to ensure the data is available if needed during interrupted communication with Credible. Noting the vast amount of initial data to be transferred and stored, it was clarified that the CSB is working with the Department of Information Technology (DIT) to identify a means for secure and encrypted transfer and storage of the data. Follow up data pulls can be managed with available Web Services.

Luann Healy provided the CSB Serious Incident (Level III) Report for September 2019. Following discussion, committee members requested a change to the information provided, recognizing that the strict standards of confidentiality limit what can be provided. The CSB Internal Compliance Committee will review the information reported to the CSB Board Compliance Committee. Staff will respond with recommendations for revision at the November CSB Board Compliance Committee.

5. CSB Board Policy Review Update

Sheila Jonas directed attention to the compliance related CSB Board policies in the meeting materials. Members were asked to review the documents for further edits, noting they will be submitted for review as an Information Item at the October CSB Board meeting.

Bettina Lawton inquired whether there any matters that required discussion in closed session. As no one raised any matters or need for a closed session and there being no further business to come before the Committee, the meeting was adjourned at 5:12 p.m.

Actions Taken –

- Minutes of the September 18, 2019 Compliance Committee meeting were reviewed and approved.
- Bill Hanna will forward recommendations from the CSB Internal Compliance Committee for serious incident reporting guidelines.
- Luann Healy will update the Organizational Chart and add a report that lists the job duties for each position.



Clerk to the CSB Board

November 13, 2019

Date Approved