



Date: March 5, 2018

To: Bob Wingenroth, City Manager

From: Carol Holley, Internal Auditor *CH*

Subject: City Clerk's Public Records Request Audit

As part of the FY2018 Annual Audit Plan, the Internal Auditor has completed the City Clerk's Public Records Request audit. The audit report contains 16 opportunities to strengthen and enhance internal controls over the City Clerk's procedures for processing public records request.

Internal Audit extends its appreciation to the City Attorney's Office, City Clerk's Office, Finance and Information Technology Department staff that assisted throughout the audit.

Attachment

CC: Diane Arthur, Marketing & Communications Director
Lindsey Duncan, Finance Director
Sherry Aguilar, City Clerk



SURPRISE

ARIZONA

City of Surprise

City Clerk's Public Records Request Audit

August 14, 2017

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EXECUTIVE SUMMARY

In June 2017, the Internal Auditor conducted an audit of the City Clerk's Public Records Requests Process. The objectives of the audit were to determine whether City of Surprise (City) policies and procedures were being complied with and to examine current practices for opportunities for improvements. While audit observations, testing, and interviews determined the City Clerk's Office is complying significantly with policies and procedures, opportunities exist to strengthen compliance with policies, procedures, regulations, and efficiencies in service.

City public records request can be submitted directly to the City Clerk's Office, City Court, Fire-Medical Department and the Police Department. The scope of this audit was limited to the records requests received and processed by the City Clerk's Office.

Over 670 public records requests were received by the City Clerk's Office during FY2017. The audit included interviews with staff members from various departments, review of 10% of requests received during FY2017, a review of policies and procedures, and an assessment of fees.

A critical component of the City Clerk's Office public records requests process is the timely and efficient completion of requests. Records requests were completed by the City Clerk's Office 49.9% of the time during FY2017 within the three-day period required by internal policies.

Results from audit procedures determined that policies and procedures related to the public records requests process are not current and fail to identify key tasks and responsibilities to foster ownership of processes. The manual nature of processes creates opportunities for automation of processes to decrease potential errors and duplication of efforts. Opportunities exist for the City Clerk's Office to enhance segregation of duties and strengthen controls over rates charged for copies.

BACKGROUND

As part of the approved FY2017 Annual Audit Plan, in June 2017 the Internal Auditor commenced with an audit of the City Clerk’s Public Records Request Process. The City Clerk serves as the City’s official records custodian. Records request can be submitted directly to the City Clerk’s Office, City Court, the Fire-Emergency Department and the Police Department. This report focuses on records requests processed by the City Clerk’s Office.

The City Clerk’s Office consists of one appointed staff member (City Clerk) and four full-time employees. FY2017 daily operations were supported by a City Council amended approved budget of \$389,000. A key departmental goal is to provide timely public access to City information. The City Clerk’s Office averages approximately 488 requests for public records annually, as summarized in the following chart:

Performance Measure	FY2017 Target	FY2016 Target	FY2015 Actual	FY2014 Actual
Number of Request for Public Records	500	500	400	550
% of Public Records Requests Completed in 3-5 days	95%	95%	95%	92%

(Data in table obtained from FY2017 Final Budget Book.)

Records requests are received by the City Clerk’s Office through online submission of the City’s request for a public records form, via email, fax, walk-ins, and subpoena. A manual process is in place for tracking and monitoring the status of requests.

Access to records is governed by Arizona Public Records Law, which is a series of laws that are designed to guarantee public access to public records of government bodies at all levels in Arizona. Arizona Revised Statutes (A.R.S.) §39-121 guides municipalities related to public records requests. Additional guidance for managing the City’s records request process includes the City Municipal Code, the Public Records Request Handbook (Handbook) created by the City Attorney’s Office in August 2009, internal City Clerk’s Office policy manual, and other applicable citywide daily operational policies and procedural manuals.

OBJECTIVES AND SCOPE

The objective of the audit was to determine whether City public records requests policies and procedures were being complied with and to examine current practices for opportunities for improvements.

The scope of the audit was from July 1, 2015 to June 30, 2017. Procedures included:

- ✦ Benchmarking local municipalities fee schedules and retention periods
- ✦ Interviews and discussions with City staff
- ✦ Review and analysis of documentation supporting the monitoring and tracking of public records requests
- ✦ Review of Arizona State Retention Schedule
- ✦ Review of City public records requests policies and procedures
- ✦ Review of copy revenues collected from public records requests

DETAILED OBSERVATIONS

POLICY and PROCEDURES

1. Policies and procedures should be updated to foster consistency in the processing of transactions.

Criteria

The Handbook provides guidelines for City departments and divisions when complying with public records requests.

Condition

The Handbook was created in 2009. Over the years, City practices have dictated the need to modify policies and procedures reflected in the Handbook to meet the needs of citizens and other public requests for records. Changes implemented to improve the effectiveness and efficiencies of the public records requests process are not reflected in the Handbook, including but not limited to the review process for emails and documents.

Through interviews and observations, it was determined that a clear understanding does not exist as to which department or staff member is tasked with the responsibility of performing a final cursory review of emails and documents before they are released. The City Clerk's Office relies upon the submitting departments or divisions to provide the required documents and a final cursory review for confidentiality or exemption items is not always performed before releasing documents to the requestor.

Guidelines for managing City records created by instant messaging, texting, and City owned social media sites are not addressed in the Handbook.

Cause

Staff address opportunities to improve the records requests process as they occur. Formalized policies and procedure are not always documented for future references and training.

Policies and procedure are in the process of being updated by staff.

Risk

Undocumented policies and procedures create an opportunity for individual interpretation of how to process a transaction. Awareness of assigned tasks and responsibilities may be unclear to staff. This may result in inconsistency in how

transactions are completed and may result in errors and negatively impact the public's perception of City operations.

Recommendation

City Clerk's Office:

- A. Develop a comprehensive automated training program using TargetSolutions to educate City staff on public records requests procedures. The training should incorporate updated records management policies and procedures.

Management Response

- A. Concur. After the Records Request policy has been updated, fee schedule approved by the City Council and Procedures Manual on records has been updated, then the City Clerk will proceed with training component. Estimated Completion date: August/September 2018.

2. Revising the current practice of indefinitely archiving all emails will allow for more efficient options for Citywide data storage and limit E-Discovery risk.

Criteria

Arizona State Library, Archives and Public Records General Retention Schedule require State and local agencies to retain electronic communications, including emails, for a period of one to six years based on the context of the document.

Section 8.5, Document Management, of the City's Employee Policy Manual references the retention period for archived email items as at least one year after the calendar year of the last calendar entry. A public record may be kept longer for pending or current litigation, progressive disciplinary actions, or an audit.

Condition

A copy of each received and sent electronic email, including drafts, are archived as part of the Information Technology Department's (IT) routine citywide backup procedures. All emails are currently on legal hold status and are not deleted. A request must be received by IT to obtain access to copies of archived emails. Archived emails are stored and maintained by IT for eight-plus years. In comparison, the retention period for ten local cities ranges from thirty days to seven years. Benchmarked cities with a retention period of less than one year, require departments to retain copies of applicable emails. The City of Phoenix maintains emails for 90 days and use Microsoft 365 to retain and manage emails placed on legal hold.

Key word search is the primary method used by IT to retrieve archived emails for public records requests. Searching by key word requires querying eight plus years of archived emails. Selected emails are forwarded to the City Attorney's Office (CAO) for management of the review process. CAO forwards the emails to the applicable City department(s) for review, input on redaction and comments on which emails are applicable to the records request. CAO staff performs a final review of emails and submit a request to IT to transfer the selected emails to the required media. IT forwards the media to the City Clerk's Office for distribution to the requestor. The procedures are currently in the process of being updated in the Handbook.

Cause

Key word searches are used as the method to identify and retrieve copies of archived emails. The inherent limitation of key word searches may not result in all desired emails being identified. As a result, all emails are retained as a potential litigation hold.

Risk

- ✚ Additional time required to review large quantities of emails when responding to public records requests
- ✚ Potential increase in cost associated with e-discovery
- ✚ Noncompliance with State retention policy, which requires retention based on content
- ✚ Storage cost and space inefficiently used to store over eight years of general purpose emails potentially could be allocated to store more operational beneficial City data

Recommendations

City Clerk's Office:

- A. Work with the City Attorney's Office to establish a precise retention period for City emails. If an extended period is required, initiate the process to obtain approval from the State to update the City's retention schedule. Communicate any changes in the retention period to the IT Department and City staff.

IT Department:

- B. Request authorization from the City Attorney's Office to release the legal hold on emails. Emails that exceed the approved retention period should be deleted.

Management Responses

- A. Concur. The City Clerk will work with the City Attorney's Office and the IT Department to determine the best solution for email. Estimated Completion date: January 2018.
- B. Concur. The Information Technology department will work with the City Attorney's Office and the City Clerk to determine and enact the solution decided upon. Estimated Completion date: January 2018.

3. Completed Request for Public Records forms should be periodically reviewed for accuracy and potential training opportunities.

Criteria

Forms should be periodically reviewed and updated to ensure the accuracy of transactions and to foster transparency of applicable service fees.

Condition

The “City of Surprise, Arizona Request for Public Records (A.R.S. Title 39) Form” is an online form used to request public records from the City Clerk’s Office. A sample of 70 out of 679 (10%) records requests for FY2017 were reviewed:

- ✚ The City Clerk or Deputy City Clerk did not sign the signature approval line on the forms as internal policy requires. The forms were signed by the Administrative Technician.
- ✚ 13 out of 70 (19%) public records request did not state the commercial purpose of the public records request as required by A.R.S. 39-121.03D.
- ✚ 7 out of 70 (10%) forms did not identify the request as commercial or non-commercial.
- ✚ Incorrect fees were accessed on 1 out of 70 (1.4%) record requests

A copy of the completed form and requested documents are held indefinitely in a pending file until picked up by the requestor.

Cause

The City Clerk’s Office has a small staff and has developed several informal and undocumented policies and procedures that are communicated via email or verbally.

A periodic review of a sample of completed forms to identify potential training needs is not performed.

Risk

- ✚ All required data is not collected in accordance with A.R.S. before records are released
- ✚ Potential training opportunities may go undetected
- ✚ Limited staff hours are used to track, monitor, and follow-up on completed record requests not picked up by requestors
- ✚ Incorrectly charging customers may impact the Public’s trust in staff reliability

Recommendations

City Clerk's Office:

- A. Periodically perform quality review checks on completed forms. The results of the reviews should be used as a training tool for staff. The reviews should include, but limited to, ensuring all requests are identified as commercial or non-commercial. All commercial requests should include a statement identifying the commercial purpose for the requested documents.

- B. Establish a time limit policy for holding completed public records requests. The policy should include, but not limited to:
 - ✚ The number of days completed documents are held for pickup before they are destroyed
 - ✚ Requiring the completion of new public records request if pickup attempts are made after documents are destroyed
 - ✚ Fees collected for documents destroyed after holding period should not be refunded, as service was performed
 - ✚ Updating the Form to reflect the new policy

Management Responses

- A. Concur. City Clerk staff has already met on this issue to verify Excel spreadsheets on a regular basis. This process will also be outlined in the Records Request Handbook. Completion Date: March 2018.

- B. Concur. City Clerk will review this section with the City Attorney and add this time limit policy to our Records Request Handbook. Completion Date: March 2018.

TECHNOLOGY

4. Manual procedures should be automated where applicable to increase efficiencies.

Criteria

The most effective and efficient processes should be implemented to reduce cost, errors and duplication of efforts.

Condition

Public records requests are tracked manually in an Excel spreadsheet. Staff use the spreadsheet to:

- ✦ Log receipt of records requests
- ✦ Track when requests are forwarded to City departments
- ✦ Track contact with requestors
- ✦ Track documents provided
- ✦ Track fees assessed

A review of the FY2015, FY2016, and FY2017 spreadsheets and processes identified the following:

- ✦ Efforts are sometimes duplicated by City departments and staff members
- ✦ Inaccurate fee rates, typographical errors, or incomplete fields were identified in the spreadsheets
- ✦ Draft emails are included in preliminary archived documents retrieved by IT and forwarded to the City Attorney's Office for review
- ✦ Archived emails stored on CDs do not include instructions on how to access the records
- ✦ Common public records request documents are not always reviewed for opportunities to post information online for easy public access

Cause

- ✦ Internal controls have not been developed to effectively review and manage the Excel spreadsheet.
- ✦ Appropriate levels of communication and coordination do not exist between the City Clerk's Office and other City departments that process public records requests independently of the City Clerk's Office.
- ✦ In lieu of available resources to automate record management processes, opportunities to capitalize on available City resources have not been fully explored.

Risk

- ✚ Manual procedures are time consuming, cumbersome, and increase the potential for errors
- ✚ Potential delay in the ability to timely process public records requests

Recommendations

City Clerk's Office:

- A. Develop and implement controls to enhance current procedures for managing the public records requests Excel spreadsheet. The controls should include, but not limited to:
 - ✚ Periodically reviewing the spreadsheet for accuracy, completeness, and training opportunities
 - ✚ Reconciling the fees column of the spreadsheet to the general ledger to ensure all fees assessed were correctly deposited promptly
 - ✚ Coordinate efforts with other departments when working on the same public records requests to eliminate duplicate efforts
 - ✚ Use Excel Data Validation function to format spreadsheet and eliminate keying errors
- B. Continue to work with the IT Department to assess the potential of automating tracking public records request utilizing current City applications, such as SharePoint, Council agenda software, or legal software. The selected software should allow applicable City staff view privileges to check the status of requests in an attempt to eliminate duplication of staff efforts.

Information Technology Department:

- C. Include instructions on how to access archived data stored on CDs provided to the City Clerk's Office as part of records requests response.

Management Responses

- A. Concur. This section is currently in progress. Will have the written procedures included in the Records Request Handbook. When an automated system is up and running, it may eliminate the need for Excel spreadsheets for tracking purposes. Estimated completion date: December 2017 to make sure our current process is updated.
- B. Concur. Meeting with the IT Department over the next few weeks to discuss utilizing SharePoint for an automated records request tracking system. Estimated completion date will be determined by the IT Department who will be setting up the program. Completion Date undetermined at this time.
- C. Concur. Effective October 31, 2017, data recovery instructions will be included in a separate file titled README.TXT with all responses provided on digital media.

FEE SCHEDULE

5. Duties and responsibilities are not adequately segregated to deter, prevent, and detect potential misappropriation of assets.

Criteria

Finance Department Standard Operating Procedure, Cash Handling Policies and Procedures No. 29 - "City management must assign cash handling duties to segregate cash receipting and cash recording functions. No individual should have control of both the assets and the records of the assets."

Condition

Accounts Receivable (A/R) invoices for public records requests are manually created, adjusted, processed, and managed through the City Clerk's Office by a single staff member. The remittance information on the invoices instructs customers to submit payments to the Finance Department. Payments are occasionally received through the mail by the City Clerk's Office for outstanding invoices and forwarded for processing internally to the staff member who created the invoice. A secondary level of review and monitoring of A/R transactions is not occurring. In August 2017, 25 invoices totaling \$114 were reflected as outstanding. Table 1 summarizes the outstanding invoices:

Table 1 – Public Records Requests A/R Balance

Year Invoiced	No. Invoices Outstanding	Summary Amount Due
2017	8	\$22.00
2016	10	\$82.50
2015	7	\$ 9.50
Total	25	\$114.00

(Note: The above information was provided by the City Clerk's Office. The Invoice number, name, and fee amount were traced back to the summary Excel records request log by the Auditor without exceptions.)

The invoices are not reflected in the City's financial system. During the audit, staff determined through research that an outstanding 2016 invoice (#RR16-060) for \$40.50 was paid on February 19, 2016. The invoice payment was incorrectly deposited to a miscellaneous revenue account and not recorded as payment in the City Clerk's Office A/R manual subsidiary ledger.

Cause

Staff was not aware of the appropriate segregation of cash handling duties and did not design internal controls appropriately.

Risk

- ✚ Limited staffing resources utilized to manage small dollar value A/R invoices
- ✚ Inability to identify potential fraud or misappropriation of assets
- ✚ Decentralization of A/R billing process
- ✚ Inaccurate A/R and financial records
- ✚ Noncompliance with citywide cash handling policies and procedures

Recommendations

City Clerk's Office:

- A. Ensure that cash handling and A/R billing duties are correctly segregate to prevent the opportunity for fraud or misappropriation of assets. Controls should include, but not limited to:
 - ✚ Prohibiting access to funds, including original checks, by the individual creating A/R invoices
 - ✚ Developing a process for tracking, monitoring, and balancing A/R invoices
 - ✚ Transferring and centralizing A/R billings through the Finance Department. Work with the Revenue Manager to transition the A/R billing process to the Finance Department. A/R invoicing should be recorded and managed in MUNIS, the citywide financial management system.
 - ✚ Prohibiting one person from having control over creating a transaction, managing the supporting documentation for the transaction, and processing the associated payment.
- B. Reconcile manual A/R balances to include:
 - ✚ Researching outstanding A/R billings
 - ✚ Reclassing any payments that were incorrectly posted to the miscellaneous revenue account, if incurred in the current fiscal year
 - ✚ Obtaining appropriate management review and approval to write off any invoices deemed uncollectible
- C. Ensure applicable staff reviews the Finance Department Cash Handling Policies and Procedures and periodically receive refresher cash handling training.

Management Responses

- A. Concur. City Clerk will discuss with the Finance Department. Completion date: January 2018.
- B. Concur. Staff is currently working on this with the Finance Department. Ongoing project.
- C. Concur. In the process of reviewing with City Clerk staff. Completion date: January 2018.

6. All fees charged for records request services are not reflected in the citywide fee schedule.

Criteria

City Municipal Code Sec. 26-24(b), Establishment of Business License Fee Schedule and Transaction Fee, requires City Council approval by resolution of all transaction fees.

Condition

In accordance with A.R.S. § 39-121, the City Clerk has established fees that are based on the number of pages and media for which each request is provided to the requestor. Fees related to services are referenced on the “City of Surprise, Arizona Request for Public Records (A.R.S. Title 39)” form (Form). A 15% administrative fee referenced on the Form is not listed on the citywide approved fee schedule. During the audit, City Clerk staff was not certain that all public records request fees for the City Clerk’s Office were presented to, reviewed, and approved by the City Council.

Cause

Staff oversight.

The Finance Department assists departments during the process of approving citywide fees. An informal, undocumented user fee policy and procedure was in place during the audit. The user fee policy and procedure was formalized, documented, and published for citywide access during the audit.

The approved citywide user fees schedule is separated by service areas. The format of the user fee schedule may mislead departments to think that each fee is unique to the identified service area instead of applicable to all City departments providing the service.

Risk

- ✚ City Council may not be aware of fee policy charged for services
- ✚ Noncompliant with City Municipal Code
- ✚ Undocumented policies and procedures may result in inconsistent application of approved fees

Recommendation

City Clerk's Office:

A. Work in conjunction with the Finance Department to:

- ✚ Submit a complete public records requests fee schedule to City Council for review and approval by resolution
- ✚ Replace the current copy fees statement on the bottom of the City Clerk Form with "Copy fees will be assessed in accordance with the adopted Citywide Fee Schedule"

Management Response

A. Concur. The City Clerk will work with the Finance Department Liaison to create a public notice and bring forward fee schedule recommendations for City Council approval in January 2018.

The current fee schedule was recommended by the City Attorney, but was never officially formalized in FY2013.

The City Clerk will update the Form by June 30, 2018.

7. Revenue practices should be formalized and documented.

Criteria

Government Finance Officers Associations Best Practice, Policies and Procedures Documentation, recommends the documentation of governmental accounting policies and procedures that are readily available for all applicable employees.

Section III.B.11 of the Handbook requires the collection of payment for requested documents before releasing the documents.

Condition

During FY2017, the City Clerk's Office received 679 public records requests and collected over \$3,900 in copying revenues associated with public records requests. The table below summarizes the City Clerk's Office copy revenue collected for the past three fiscal years:

Fiscal Year	Number of Requests	*Copy Revenue Collected
FY2017	679	\$3,981
FY2016	681	\$5,874
FY2015	537	\$3,166
Total	1,897	\$13,021

*Rounded to the nearest dollar.

There are several methods by which public records requests are received by the City Clerk's Office. This may include online, walk-in, email, mail-in, and subpoena. Requests may be submitted on the "City of Surprise, Arizona Request for Public Records" request form. Requests from the media may be submitted on their organization's letter head, or informally via email.

Fees established by the City Clerk's Office are not always assessed or collected before releasing documents. If requested, an A/R invoice is generated. Fees are occasionally waived via email or verbally by the City Clerk. Staff utilizes professional judgment in determining when to waive fees. Policy and procedures for waiving fees are not documented.

Cause

The City Clerk's Office consists of a small staff that has experienced an increase in the number of services provided to the public. Daily tasks are prioritized and staff hours are allocated first to tasks that are viewed as higher risk items. Staff hours are allocated toward administrative tasks, such as formalizing and updating policies and procedures, as time permits.

Risk

- ✚ Citizens may view inconsistency in the assessment of fees as unfair
- ✚ Similar transactions are treated differently, which may lead to confusion and increase in errors
- ✚ Noncompliance with City collection policy

Recommendations

City Clerk's Office:

- A. Formalized and document revenue policies and procedures to include, but not limited to:
 - ✚ Establishing when to assess fees
 - ✚ Identifying when and who can authorize fee waivers
 - ✚ Identify documentation required to waive fees
- B. Ensure staff complies with fee collection policy or update policy to reflect actual collection practice.

Management Responses

- A. Concur. This section will be outlined in the Records Request Handbook with review from the City Attorney's Office and the Finance Department. Estimated Completion date: March 2018.
- B. Concur. This section will be outlined in the Records Request Handbook with review from the City Attorney's Office and the Finance Department. Estimated Completion date: March 2018.

8. The cost recovery rate for public records request should be reviewed.

Criteria

Arizona Revised Statutes (A.R.S.) § 39-121 through 39-128 establishes State laws related to public records requests, including guidelines for assessing fees.

Condition

A \$0.50 per page fee is assessed for non-commercial purpose, black and white, letter size public records requests copies processed by the City Clerk’s Office. Customers are required to pay fees to the City’s Central Cashier and must provide the City Clerk’s Office with a copy of the receipt as proof of payment. Customers may also request to be invoiced for document copies. The City is restricted by A.R.S. as to what cost can be recovered and may not recover the cost of searching for non-commercial records. A comparison of five local entities of different sizes determined that the City Clerk’s Office rate for black and white letter copies is twice the rate of benchmarked entities. A summary of benchmarked rates is identified in the following table:

Service	AZ					
	Avondale	Attorney General	Glendale	Scottsdale	Surprise	Tempe
Black & White Letter Size Hard Copies -Per Page	\$0.25	\$0.25	\$0.20	\$0.20	\$0.50	\$0.25
Free Copies Page Limit	-	1 st 20 Pages	-	1 st 25 Pages	-	-
CDs/DVDs	\$5.00	\$10.00	\$10.00	\$5.00 ¹	\$5.00	\$10.00

¹ A \$25.00 fee is applied for DVDs of City Cable 11 programming.

A different rate is charged for commercial records requests that are intended to generate revenue for the requestor. A.R.S. permits the assessment of additional fees for these services. The City Clerk’s Office consults with the applicable City departments to determine the fee for commercial records requests.

In FY2017, 679 public records requests were initiated. Four hundred ninety-eight (498) out of 679 (73%) were assessed fees totaling \$4,229.00. The below table summarizes the fees assessed in FY2017:

Fee Range	Count	*Amount	Percentage of Total Count
\$0.50 - \$1.00	82	\$59	16%
\$1.01 - \$2.00	33	\$58	7%
\$2.01 - \$3.00	18	\$49	4%
\$3.01 - \$4.00	13	\$49	3%
\$4.01 - \$5.00	249	\$1,244	50%
\$5.01 - \$150.00	103	\$2,771	21%
Total	498	\$4,229	100%

*Rounded to the nearest dollar.

Cause

The cost recovery rate for record request fees has not been recently reviewed by reviewed by management and approved by City Council.

Risk

- ✚ The cashiering cost to process low volume public records request may exceed the fees assessed for copies.
- ✚ Inefficient use of staff hours

Recommendations

City Clerk's Office:

- A. Review the cost recovery rates charged for records requests and make adjustments as necessary. The review should include, but not limited to establishing a minimum service level at which fees will be assessed.
- B. Work with the Revenue Manager to implement online payments and establishing credit card acceptance as an option to improve customer service time, reduce the potential need for A/R billing, and limit the amount of cash and check handling.

Management Responses

- A. Concur. City Clerk will meet with the Finance Department. Completion Date: January 2018.

B. Concur. We have already met with the Finance Department and this is being worked on. Completion date: Will depend on the Finance Department.