

Montgomery County, Maryland
Office of the County Executive
Office of Internal Audit



Program Assessment of Community Use of Public Facilities
Reservation of Public Facilities Process

August 5, 2016

Highlights

Why MCIA Did this Audit

The accounting firm of SC&H, under contract with the County's Office of Internal Audit (MCIA), performed a Program Assessment focusing on two primary functions performed by the County's Community Use of Public Facilities (CUPF). In addition to other responsibilities, CUPF provides community users and public agencies with access to public facilities (including schools and other public facilities) for services, programs, and events; and administers this process while managing the placement of Before and After School Childcare Programs in Montgomery County Public Schools (MCPS) facilities, as defined by Montgomery County Executive Regulation 15-14 AMIII (the Regulation; subsequently revised and approved as 15-14 AMV, December 8, 2015). The current report focuses on findings and recommendations related to CUPF's responsibilities for the scheduling of community use in public schools, regional centers, libraries, and other public spaces. A separate report focuses on CUPF's administration of the Before and After School Childcare Programs. These areas were selected for review because they both support critical services provided to County residents, and have been the subject of stakeholder and client feedback. This program assessment was conducted in two phases: interviews with various stakeholders (including the Inter-Agency Coordinating Board (ICB) and various officials within Montgomery County) and with CUPF process owners; and limited testing of processes and controls to assess their efficiency and effectiveness.

What MCIA Recommends

MCIA is making 12 recommendations to CUPF to further improve internal processes, enhance customer service and community outreach, and improve transparency.

August 2016

Program Assessment of Community Use of Public Facilities - Reservation of Public Facilities Process

What MCIA Found

Community Use of Public Facilities (CUPF) is undergoing a major software implementation to move their existing reservation software to a new cloud-based application ("ActiveNet"). Since CUPF is transitioning to the new software, MCIA was unable to conclude on CUPF's efficiency and effectiveness as their processes were changing on an almost daily basis. Therefore, our program assessment focused on evaluating feedback that had been received to validate stakeholder and community concerns/complaints and identify opportunities for improvement. Common themes of feedback identified during interviews were:

- Process was difficult to understand and manual
- Fee structure was too complex
- Lack of transparency
- Poor customer service
- Lack of policy and procedure documentation
- Inability to adapt to meet the community's changing needs

The audit acknowledges that CUPF's role as a "broker" of services, and public perceptions that use of government facilities should be free pose inherent challenges. We determined that CUPF was performing their duties generally in compliance with regulations and documented policies and procedures. We identified several areas that CUPF would benefit from improving their internal processes. MCIA identified the following opportunities for improvement within the current Reservation of Public Facilities processes:

- Increased focus on strategic planning and performance measures to drive business practices
- Implementation of increased staff development, cross-training, and customer service training to continually improve CUPF's resources
- Improvement of issue tracking, resolution, and reporting
- Increased focus on community outreach to educate and improve relationships
- Improvement of website to be more transparent and user friendly
- Analysis of fee structure for more simplification

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Objectives

This report summarizes the review performed by SC&H Group under contract with the Montgomery County (County) Office of Internal Audit (MCIA) for a program assessment of Community Use of Public Facilities (CUPF) to identify opportunities for potential enhancements that would improve their efficiency and effectiveness in executing CUPF's responsibilities related to their processes for reservation of public facilities. Additionally, this program assessment was to assist the County in understanding current challenges facing CUPF, current processes and procedures CUPF has implemented to address these challenges, and recommended improvements that CUPF could implement to help optimize performance.

This internal audit was performed in accordance with the Statement on Standards for Consulting Services (SSCS) issued by the American Institute of Certified Public Accountants (AICPA). We also ensured that the audit performance was consistent with standards of the Committee of Sponsoring Organizations of the Treadway Commission (COSO) and the U.S. Government Accountability Office (GAO-14-704G), as applicable. SC&H Group's procedures were developed to meet the objectives stated above, and were reviewed and approved in advance by MCIA. The interviews of relevant parties, review of pertinent documentation, and field work testing were conducted from October 2015 to March 2016.

Background

Montgomery County's Community Use of Public Facilities provides community users and public agencies with access to public facilities (including schools and other public facilities) for services, programs, and events; and administers the process while managing the placement of Before and After School Childcare Programs in Montgomery County Public Schools (MCPS) facilities. Under CUPF's administration, over one million hours are reserved annually at public facilities to more than 5,000 user groups (in more than 550 public facilities). CUPF's mission is to maximize the community's use of these facilities, and identify and facilitate activities and programs that respond to the community's needs without disrupting the instructional program of the Montgomery County Public Schools or County operations. In fulfilling its mission responsibilities, CUPF faces numerous challenges, including negotiating among diverse groups of stakeholders, issuing permits for facilities owned by others, holding individuals and entities that do not report to CUPF accountable, assessing fees to groups (98% of which CUPF has identified as non-profits) to cover costs of operations, and enforcing ICB policies and guidelines related to fair access. CUPF is supported by an enterprise fund and does not receive tax dollars to support its operations. CUPF has three core functions:

1. Facilitate Use of Montgomery County Public Schools including scheduling of Before and After School Childcare Programs in MCPS as outlined in Executive Regulation 15-14 AMIII;

2. Facilitate Use of Government Facilities, including Maryland-National Capital Park and Planning Commission (M-NCPPC)¹, and Recreation Department fields, and the Silver Spring Civic Building;
3. Support Interagency Coordinating Board (ICB) Activities.

The program assessment focused on the first two core functions mentioned above, resulting in two reports: one focusing on CUPF's Reservation Processes for MCPS, Fields, Libraries, and other County Government Facilities (herein) and the other focusing on CUPF's administration of the Before and After School Childcare Programs in Public Schools (under a separate cover).

Related Regulation Overview

Montgomery County Code §44.3 *Interagency Coordinating Board* established the Interagency Coordinating Board (ICB) for Community Use of Public Facilities, and included among the ICB's responsibilities recommending fee schedules for County Council action, adopting regulations necessary to implement Article I (*School Facilities Utilization Act*) of Chapter 44 of the County Code, and recommending to appropriate County officials how to resolve any interagency differences and problems in implementing Article I. The Code of Montgomery County Regulations (COMCOR) Section 44.00.01 *Community Use of School and Other Public Facilities* (see ICB Regulation 20-05² (the Regulation), Community Use of School and Other Public Facilities, which was approved by the County Council in January 2006) made available to the community the use of schools and other public facilities, and defined CUPF's responsibility in administering this program.³

The Regulation establishes the process that CUPF is to follow to administer the scheduling of public facilities. Key provisions include the following:

- A completed application must be submitted to CUPF to use a facility.
- A Facility Use License Agreement (FULA) must be completed by the user to:
 - Certify the accuracy of information provided to CUPF;
 - Acknowledge that state law requires all activities to be open to the public;
 - Comply with all applicable laws and CUPF guidelines;
 - Pay an applicable fee as established in the fee schedule;
 - Restore the facility to its prior condition at the conclusion of the activity;
 - Promptly notify the County (and Board of Education in the case of public school facility use) of any accidents upon, or damage to, the facility.

¹ Maryland-National Capital Park and Planning Commission (M-NCPPC) is a bi-county agency empowered by the State of Maryland in 1927 to acquire, develop, maintain and administer a regional system of parks within Montgomery and Prince George's Counties, and to provide land use planning for the physical development of Prince George's and Montgomery counties.

² "ICB Regulation 20-05," Montgomery County, https://www.montgomerycountymd.gov/council/Resources/Files/res/2006/20060131res_15-1297.pdf, (Accessed April 20, 2016)

³ In addition, Maryland Code, Education Article §7-108, General Assembly of Maryland, <http://mgaleg.maryland.gov/webmga/fmStatutesText.aspx?article=ged§ion=7-108&ext=html&session=2015RS&tab=subject5>, requires each county to make its public school facilities available for community use upon written application as long as it does not interfere with school sessions or other school activities.

- Accept responsibility for accidents or damage and indemnify the County and the Board of Education; and
- Maintain certain minimum insurance requirements sufficient to meet its obligations.
- A priority of use schedule may be established by CUPF that is consistent with state law.

Fee Policy

CUPF's fee policy for use of public facilities was established consistent with County Council Resolution 12-595, User Fee Policy (adopted in 1992). The Council-adopted policy, and the criteria set forth therein for deciding whether a user fee should be charged, was developed to ensure that "County agencies have a consistent rationale for charging user fees." The policy states that "[u]ser fees can be charged to ration scarce resources, to cover the "privilege" costs of having a facility available, and to cover the costs of reserving a facility or program... User fees are payments for the use of a government service. The total cost to the user varies with the quantity of the [government] service used. Government services provide benefits to individuals and to society as a whole. The Council's policy on user fees is that "User fees should be charged which are proportional to the individuals benefit [subject to certain criteria set forth in the policy for deciding whether a user fee should be charged]. The starting point should be that 100% of the full cost [defined as "all direct costs of providing the service, plus indirect (overhead) costs, plus debt service"] should be reflected, with a reduction for the estimated public benefit." [p.1]

The ICB determines and approves all facility-use user fees in schools and County buildings, taking into consideration the costs incurred by the venue owner. [Note: CUPF's website uses the term "permitting fees."] User fees are based on activities conducted, facility type, and time of use. Fees apply for occupied time in a facility, including time needed for set-up, clean-up, and for participants to vacate the premises. The ICB's guiding principles recommended a tiered approach to fees that helps keep rates affordable for users by allowing customers to choose the services and only pay for what they need. Further, fees are lower Mondays through Friday before 6pm to support youth programs. Weekend costs are higher to reflect the operating costs associated with additional utility needs and having staff available at sites to open, close, and clean-up. Fees by type are available on CUPF's website⁴.

Responsibilities

CUPF is responsible for booking reservations in the following buildings or types of facilities⁵:

- Montgomery County Public Schools indoor facilities (i.e. including classrooms, auditoriums, all-purpose rooms, cafeterias, gymnasiums, etc.); representing over 200 schools with approximately 15,000 unique rentable spaces

⁴ "Fees and Refunds," CUPF, <http://www.montgomerycountymd.gov/cupf/fees/fees-overview.html> (Accessed April 20, 2016).

⁵ As previously acknowledged, CUPF's responsibilities involve booking over 1 million hours of space in Government facilities annually, and coordination with over 5,000 groups, public officials, venue owners (State and County), staff coordinating community use, contractors, and often members of the community living near the facility.

- All Montgomery County fields (including MCPS, M-NCPPC, and Recreation fields); representing over 600 fields and stadiums
- Library meeting rooms; representing over 20 public libraries
- Council Office Building (COB), Executive Office Building (EOB), Clarksburg Cottage, District 3 Police Station, and three Regional Services Centers
- Silver Spring Civic Building and Veteran's Plaza.⁶

CUPF is not responsible for booking reservations in Montgomery County Recreation Centers, or other Montgomery County M-NCPPC facilities such as Picnic Shelters or Park Activity Buildings. CUPF is also required to comply with conditions of use established by the venue owner; for example, fees, rules and regulations established by M-NCPPC can only be modified by M-NCPPC.

Process Overview -- Current

The current software used to process permits is CLASS. The process begins with a user submitting a form either electronically through the customer portal⁷, or via a paper form that is emailed, mailed or handed in to CUPF. Irrespective of whether the form is submitted electronically or in hard copy, CUPF must hard key the details into CLASS. The process frequently requires CUPF to contact the customer to ensure CUPF understands the intended use of the space and the customer's needs. If the space requested is available, the permit can be approved. However, only CUPF can see what space is available in CLASS. Therefore, if the customer's preferences were not available, CUPF would try to find a comparable space and time, and contact the customer before selecting that space and approving the permit. CUPF also ensures that all the fees are accurate and complete based on the customer type and their needs within the space (i.e. there are additional fees for additional services and/or equipment needs). The customer is alerted via email once their permit has been approved and that payment is required before the permit is valid.

Process Overview – Planned Transition to ActiveMONTGOMERY (ActiveNet)

CUPF is in the process of transitioning from their existing reservation software, CLASS, to ActiveNet. The customer e-portal for ActiveNet is called ActiveMONTGOMERY.

In May 2010, the Montgomery County Council passed Budget Resolution 16-1373⁸, which required that CUPF, M-NCPPC, and Recreation Department (MCRD) work together to consolidate facility and athletic field permitting; class and program registration; and the operation

⁶ Although CUPF does not rent the ice skating rink at Veteran's Plaza, CUPF administers the competitive bidding process to select the ice rink operator.

⁷ To submit forms electronically using the customer portal for CLASS, a new user must sign up online. New users are required to complete training, sign a FULA, and send a copy of their driver's license to CUPF. CUPF approves their new account, and alerts the customer once their account is active.

⁸ "Approval of and Appropriation for FY2011 Operating Budget of the Montgomery County Government, Action Item Number 61," p. 18, http://www.montgomerycountymd.gov/OMB/Resources/Files/omb/pdfs/fy11/psp_pdf/16_1373.pdf (Accessed April 20, 2016)

of classes, camps and trips.⁹ The intent of Council as stated in the Budget Resolution was to create a more streamlined and user-friendly system for County residents and over time achieve budget savings and operational efficiencies. CUPF, M-NCPPC, and MCRD each committed to working together to share resources, gain efficiencies, and streamline services in order to improve customer service. Workgroups comprised of staff from each of the three agencies researched various software options and determined the software package Active Network® (ActiveNet), a single database, could support all three departments. The workgroups met with consultants from ActiveNet to determine a plan to phase out the current reservation system, CLASS. The early advantages of ActiveNet were that it is web-based, full hosted, and accessible from any compatible computer with internet connectivity. Further, ActiveNet managed the credit card processing, storing of credit card information, and data security risks associated with credit card transactions. The use of ActiveNet was determined to meet the Council's requirements and provide better customer service to County and community users.

Once a contract was in place with ActiveNet, the original implementation process was projected to take approximately 18 months with a proposed go-live date of January 2016. MCRD and M-NCPPC went live August 18, 2015 beginning with activity registrations and memberships. In June 2015, CUPF delayed deployment to allow time to resolve a number of system performance and configuration issues for facility reservations. The system would frequently timeout and delete data, fees were not calculating properly, and a significant effort had to be made to get CUPF's data into the required format/fields in ActiveNet. CUPF decided to follow a phased-in approach aligned with the application window for each building type to submit applications through ActiveNet, as follows:

Go-Live Date	Building Type
October 15, 2015	Library meeting rooms
November 15, 2015	Council Office Building (COB), Executive Office Building (EOB), Clarksburg Cottage, District 3 Police Station, and Regional Services Centers
February 16, 2016	Montgomery County athletic fields
August 2016	Montgomery County Public School indoor facilities

Among the three departments implementing ActiveNet, CUPF's implementation has posed the biggest challenge. ActiveNet was designed as a recreation management system with five modules: Activity Registrations, Point of Sale (POS), Memberships, League Scheduling, and Facility Reservation. Throughout the various stages of trying to make CUPF's data fit into ActiveNet's module, it was determined that the Facility Reservation module works more efficiently for limited short term reservations, such as booking one day and one-time slot. A significant portion of CUPF's reservations want to book multiple days for multiple weeks (e.g. every Tuesday at 6pm for a 10-week program). Another challenge was that the Facility Reservation module was more effective in booking through the "Quick Reserve" feature when availability is on a fixed schedule, which works well for the M-NCPPC and the Recreation Department. M-NCPPC and MCRD simply reserve the space they need for their programs and whatever is remaining is

⁹ Certain classes were excluded from the intended consolidation including ice skating/hockey classes and programs; tennis classes and programs; and nature, interpretive, horticultural, and gardening programs and classes.

available to the public. However, CUPF's inventory of facilities has conditions of use (e.g. auditoriums require additional approvals, staff, and fees) and priority of use that must be considered before allowing automatic bookings. Also, CUPF's fee schedule was considered too complex to fit into ActiveNet's billing tables.

Due to these and additional challenges, CUPF was required to change their business processes to fit into ActiveNet's system. Fees had to be bundled or streamlined to fit ActiveNet's billing and payment requirements. Since allowing customers to check availability before submitting requests online was considered such an important functionality, CUPF had to create work-arounds to ensure their conditions of use and priority of use procedures were adequately integrated.

CUPF has received feedback on their processes and the transition to ActiveNet is expected to address many of the community's concerns, including the following:

- Ability to see what space is available online (excludes high school auditoriums)
- Self-service ability to secure available space online
- Quick confirmation of permits via email
- Elimination of bi-annual submission windows
- Elimination of four – six week waiting period for permit approval; goal is less than five business days
- Ability to book space for the entire school year instead of only six months at a time
- Monthly payment plans may be available
- Additional online payment options
- View account transactions online

However, CUPF has identified certain limitations with ActiveNet that may result in the system not addressing certain needs of stakeholders and users, thereby potentially leading to customer complaints specifically related to the process being inconsistent, too manual, and too difficult to understand and navigate. Examples of CUPF-reported issues and challenges are provided below as CUPF anticipates these areas to be the root cause of customer complaints upon their completed transition to ActiveNet.

- Certain reservations will not be able to be booked through ActiveNet, such as special or large events because these reservations frequently require additional information, multiple extra fees, site visits, and/or coordination with other entities. Further, regional fields, Great Hall, Veteran's Plaza, and auditoriums are also likely to only be able to be booked by CUPF staff after consultation with the requesting groups or individuals due to increased coordination and fees.
- There are no settings to establish application windows or priority based on group type or historical use. Therefore, priority groups and high-volume users will be invited to submit applications outside ActiveNet and be manually booked by CUPF through the use of fillable PDF forms automatically emailed to CUPF.
- The interface is not very user-friendly and requires a number of steps/clicks to be completed with every booking which can be burdensome for customers. Further, the booking of multiple spaces and/or days on one permit is difficult, which could lead to confusion and frustration by customers.

- Cancellations and modifications to existing permits cannot be handled online in ActiveNet, therefore requiring the use of PDF forms that must be filled out, emailed to CUPF, and then CUPF must manually make the changes.
- Reports to support MCPS Energy Management, overtime assignment/authorization, and program measures are not available in ActiveNet Reports. CUPF has had to download data from ActiveNet and filter/sort to create the reports it needs to support their internal and external reporting needs.
- The reporting functionality for customers to use is also lacking and can be difficult to manage. Complaints have already been received about the ability to view existing or pending permits in a comprehensive way.
- Online payment by check cannot be implemented due to absence of encryption and security controls. [CUPF advised us that the security issue has now been resolved; and that the County is currently working through operational changes prior to implementing online payment by check.]
- Users are not able to establish automatic payments under a payment schedule.

Communication

CUPF has been communicating the transition to ActiveNet to customers throughout the transition to alert them of changes and encourage them to set up their ActiveMontgomery accounts. The transition was announced on their website beginning in August 2015 and periodically through email blasts, monthly e-newsletters, text blast via GovDelivery, and web site updates. As the Go Live date for MCPS indoor use approaches, CUPF has amplified their communication plan in January 2016 by sending an email to over 9,000 past and present CUPF customers' email addresses alerting them of the transition and announcing the dates, times, and locations of nine Public Forums to be held between February 2016 and June 2016. Further, CUPF developed a presentation to overview the new facility reservation process (including screenshots of various instructions in ActiveNet), describe key process changes resulting from the transition, answer questions and address concerns, identify resources for more information (i.e. providing contact information and links to websites), and to receive community feedback and suggestions. The forums were provided during week days, evenings, and weekends to accommodate various user groups.

CUPF has also updated their "Resource" page¹⁰ on their website to provide users with helpful documentation including Customer Account Setup, a Reservation Guide, a How to Customer Guide, and Frequently Asked Questions. These documents are easy to use and include screen shots and detailed instructions for each step of the process. CUPF plans to incorporate how-to videos to further simplify the user's experience.

¹⁰ "Resources, ActiveMontgomery," CUPF, <http://www.montgomerycountymd.gov/cupf/info-cupf/resources.html>, (Accessed April 20, 2016).

Reservation Submissions

While the process for reserving space in each building is similar, there are differences due to the building type and complexity of the reservation. With CLASS, CUPF utilized scheduling windows to accept reservation requests for blocks of time for each building type. Users would be given two week windows to submit their reservation requests for the upcoming period of use. CUPF would collect the requests until the deadline and then begin approving permits once the submission window closed. With ActiveNet, once all priority users have been input for the period of use, the reservation software will open to the public to self-book their reservation requests, and users can self-book throughout the entire period of use. Priority users are given a deadline prior to the opening of the window (i.e. CLASS) or reservation database (i.e. ActiveNet) to submit all of their requests to CUPF. Under both software platforms, priority of use and high-volume use¹¹ bookings, both described further below, are manually input by CUPF to reserve the space¹². Building types have different opening dates for their periods of use so that CUPF can distribute the workload to be more manageable due to the volume of reservation requests received.

Building Type:	Date ActiveNet Opens to Public:	Period of Use:
Regional Service Center	5/15	7/1 - 12/31
	11/15	1/1 - 6/30
Building Type:	Date ActiveNet Opens to Public:	Period of Use:
Public Libraries	4/15	7/1 - 12/31
	10/15	1/1 - 6/30
EOB, COB, other County Government	5/15	7/1 - 12/31
	11/15	1/1 - 6/30
Athletic Fields	2/15	3/15 - 8/15
	7/15	8/16 - 11/30
MCPS Indoor Facilities	8/1	school year
	5/1	summer

Note: Silver Spring Civic Building space reservation opens on a first-come, first-serve basis 18 months out for the Full Great Hall, and 12 months out for Half Great Hall and all other meeting rooms. Veteran's Plaza opens on January 1 of each calendar year.

¹¹ High volume use will be the only historical use permits allowed. As a result of community feedback, software changes and past challenges for community groups, MCPS and CUPF, a Procedures and Guidelines Committee met in February 2016 to address concerns and clearly define what groups and activities should be given preferential treatment.

¹² CUPF began booking reservations in a phased approach, starting with libraries and regional centers, into ActiveNet beginning in October 2015 and November 2015, respectively. Ball fields were added to ActiveNet in February 2016. CUPF will continue to use CLASS to process reservations until August 2016, when ActiveNet goes live for MCPS indoor space.

Priority of Use

As allowed by the ICB Regulation 20-05, CUPF has established priorities in the booking of reservations. Due to limitations within ActiveNet to effectively handle priority bookings, CUPF streamlined its priority of use schedule combining and/or eliminating categories from the current Priority of Use Schedule (below, left) into the updated Priority of Use Schedule (below, right).

Priority of Use: Current	Priority of Use: Effective July 1, 2016
<ul style="list-style-type: none">• MCPS activities• Child Care (priority during the school year for before/after care only)• Parent-Teacher Association (PTA)• Government administrative bodies• Montgomery County and City Recreation Departments within their programming area (i.e., City of Gaithersburg, City of Rockville, City of Takoma Park)• Other publicly supported programs such as colleges or universities• All other community organizations• Non-county based groups and groups with less than two-thirds Montgomery County resident membership• Business/corporate organizations	<ul style="list-style-type: none">• Primary tenant to include school (K-12) activities or County department• Maryland State Department of Education licensed before and after school childcare selected by MCPS• Parent-Teacher Association (PTA) meetings and activities in schools• Government administrative bodies• Other publicly supported programs• High-volume use, meeting applicable criteria• General public (via customer e-portal, ActiveMONTGOMERY)

ActiveNet does not allow users to submit requests and process those requests based on priority. Therefore, priority users will submit requests via an online PDF form that is automatically routed to CUPF. CUPF will accumulate requests by priority group, and manually enter them into ActiveNet for these priority groups before opening the database for reservations to the general public.

High-Volume Use

As a result of community feedback, software limitations, and past challenges identified, a pilot program was created to address high-volume use in public facilities. Prior to the opening of scheduling windows to the public, these groups will submit a high-volume, historical use permit via an online fillable PDF form that will be processed by CUPF. High-volume users must meet one of the following categories¹³:

- Sports league*
- Athletic sports club*
- Weekly or weekend cultural/faith-based user groups
- Summer camps*
- Large events¹⁴

* Definition of these categories was mirrored after the Recreation Department's definition.

¹³ For further definitions of each of these categories, see: "High Volume Use" at: <https://content.govdelivery.com/accounts/MDMONTGOMERY/bulletins/1404b39>

¹⁴ Large events are defined in greater detail on page 8, under the heading of "Recent Process Changes."

CUPF receives reservation requests from priority groups based on established deadlines. Once all of the MCPS, Before and After School Child Care Programs, and PTA activities have been reserved, remaining requests are organized and recorded in the reservation software on a first-come first-serve basis by priority group. Once all priority groups have been reserved, the general public can access ActiveNet to reserve space.

Recent Policy Changes

The definition and processing of large events is a recent policy change effective April 1, 2016. Due to complaints from community users regarding untimely turnaround of permit approvals and feedback from MCPS regarding concerns over user accountability, CUPF has offered to launch a pilot program to handle all requests for large events at MCPS facilities. Further, CUPF has defined a large event to encompass any reservation request that has one or more of the following needs or requirements:

- Expected attendance of 500 or more persons
- Use of a school auditorium, regardless of attendance expected
- Use of athletic facilities including gymnasium, stadium, track or field use for tournaments, fundraisers, track meets or other similar events, regardless of attendance expected
- Advanced booking due to size, scope, or nature
- Significant set-up
- Extensive audio-visual equipment or services
- An amount of space or hours of use that requires multiple support staff.

CUPF has dedicated a single staff person to oversee the application and planning process for large events. Applicants must fill out an electronic application packet and schedule a meeting with CUPF to submit their application and all required documentation to assist MCPS and CUPF in their decision-making process to determine if available facilities will meet the large event's needs. Further, CUPF has agreed to respond to applicants within 10 business days of all required documentation being submitted regarding space availability at all site options; MCPS has agreed to respond to such requests within five business days regarding space availability at their specific facility; and CUPF will ultimately provide a final decision on a facility including staffing within 20 business days of receipt of all required documents.

CUPF is also developing a User Accountability policy to hold users that violate the FULA accountable based on the gravity of their violation, including an 18-month ban for serious violations (i.e. drugs, alcohol, weapons) and up to three warnings for lesser violations, with the third warning resulting in an 18-month ban.

Issue Resolution

Complaints are submitted to CUPF in a variety of ways including CUPF's direct line, Montgomery 311 line, the after-hours line, direct email or call to CUPF staff, or the centralized customer service email address. Calls that come in through the after-hours line are logged in an internal CUPF tracking database, the problems log. Calls come into one of two Weekend/After Hours Supervisors (MCPS employees that report to CUPF Director) who are responsible for entering

the facility, date, and problem type (e.g. heat, no show) into the problems log¹⁵. The database has limited reporting capabilities, such as counts by problem type, but is able to be exported into an excel document. Calls that come in through the other methods are investigated on a case-by-case basis. If CUPF staff are unable to resolve an issue, it will be escalated to their direct supervisor, then the CUPF Director. Unresolved issues will be reviewed and decided by the ICB or subcommittee therein.

Silver Spring Civic Building and Veteran's Plaza

The Silver Spring Civic Building opened in July 2010 and responsibility for managing operations at the facility was officially transferred to CUPF in 2012. Its main facilities include the Great Hall (a 5,000 square foot ballroom available for rental) and the outdoor plaza and ice rink (during winter months) known as Veteran's Plaza. The Civic Building has additional meeting rooms available for rental, as well.

The Silver Spring Civic Building has its own website¹⁶ and fee schedule¹⁷. Pricing is calculated based on actual time of permit at a per hour rate to include setup time, clean up time, and time to leave the premises. The hourly rates assume minimal staff coverage and additional fees may apply to large or special events. Large or special events are defined as those events or activities that require advanced planning, custom room set-up, and assignment of support staff. There are also additional costs for events involving alcohol, equipment, stages, etc. General Liability Insurance is required for all permits, and applicants are provided with a brochure to assist them with that process. Permits must be for a minimum of four hours on Fridays, Saturdays, & Sundays.

To make a reservation and obtain a permit, an application and FULA must be completed and submitted to Silver Spring Civic Building CUPF staff located in the Civic Building. All fees are due at time of reservation for room use, except for reservations of the Great Hall and Veteran's Plaza. These spaces require a \$250 deposit at the time of reservation which is applied to the total cost of the permit; the balance is due 90 days before the event date.

The plan to transition Silver Spring Civic Building online reservations to ActiveNet was still in process during the course of this assessment.¹⁸

Community Access Program (CAP)

The program is intended to provide financial assistance and increase opportunities for groups, organizations, and community members that meet the eligibility criteria to utilize the Silver Spring Civic Building. A review committee consisting of the Operations Manager of the Silver Spring Civic

¹⁵ The issues log contains many more detailed fields (i.e. time, caller name, group name, problem reported, action taken), but these three fields are the only required entries for each problem logged.

¹⁶ "Facility Reservation – Silver Spring Civic Building," CUPF, <http://www.montgomerycountymd.gov/cupf/info-reservation/sscb.html> (Accessed April 21, 2016)

¹⁷ "Fee Chart," CUPF, <http://www.montgomerycountymd.gov/CUPF/Resources/Files/FeeChart-SSCB.pdf> (Accessed April 21, 2016)

¹⁸ CUPF advised us that their Silver Spring Civic Building staff has been using ActiveNet since October 2015 to schedule dates beginning January 1, 2016; users were encouraged to create ActiveNet accounts and make payments under the new system.

Building (i.e. a CUPF employee), an Assistant Chief Administrative Officer, and the Director of the Silver Spring Regional Service Center, evaluates applications for eligibility. Each review committee member calculates the applicant's score (out of a total possible points of 50) as defined by the following criteria utilized for evaluation:

- Financial Need - Scale 0 to 10 points
- Not-for-profit Status - Scale 0 to 6 points
- Location/mission focuses on serving county residents – Scale of 0 to 4 points
- Addresses County's Eight Priority Objectives – Scale of 0 to 10 points
- Service delivery benefits target county population – Scale of 0 to 4 points
- Addresses unmet need/unique programming – Scale of 0 to 4 points
- Scope of impact to County – Scale of 0 to 10 points
- Criticality of space to program success – Scale of 0 to 2 points

All three raters' scores are then averaged and the average score determines the percentage of the permit fee subsidized by CAP (e.g., if an applicant received an average score of 42 – which is 84 percent of the total possible points – then the applicant would have 84 percent of their permit paid). Applicants are frequently successful in receiving assistance, as the CAP program has not denied an applicant in 2015 or through the end of February, 2016.

Scope and Methodology

To satisfy the stated objectives for this review, the audit was conducted during the period of October 2015 to March 2016. We completed the following tasks:

- Evaluation of CUPF's current role and their compliance with documented policies and procedures
- Assessment of the current reservation process for transparency, ease of use, and fairness
- Evaluation of CUPF's efficiency and effectiveness in overseeing the reservation of public facilities
- Assessment of CUPF's customer service and issue resolution process

Given the inherent diversity of customers and stakeholders for this core responsibility of CUPF, a broad and diverse information collection was conducted through interview with various stakeholder groups including MCPS, Montgomery County Government, and County Council in order to effectively assess the current challenges faced by CUPF. In addition, interviews with CUPF management and staff were conducted. Feedback received was categorized into the following major themes/complaints, which were evaluated for validity:

- The reservation process is not automated, too complex, difficult to navigate/understand, and inconsistent
- The fee structure is too complex and difficult to understand
- There is a lack of transparency related to CUPF's role and responsibilities
- There is a lack of policy and procedural documentation to assist users with questions, complaints, and/or are new to the process

- There is an inability or perceived unwillingness of CUPF to adapt to meet the community's changing needs
- CUPF's resources are inadequate to execute their duties effectively and efficiently
- Customer service provided by CUPF employees is perceived to be poor

This assessment was primarily completed through inquiry, observation, and inspection of CUPF's current and planned future processes. We reviewed the existing policy and procedure documentation, as well as draft versions of in-process documentation for changes resulting from the upcoming ActiveNet implementation. Additionally, we accessed CUPF's website and search functionality to determine if documentation was available, up-to-date, and understandable. We also evaluated Silver Spring Civic Building's policies, procedures and website to gain an understanding of their business processes and their similarities and differences as it relates to other CUPF processes. For the CAP program, we selected a sample of applications submitted and scoring forms to gain an understanding of the program, processes, accessibility, and fairness.

We were unable to assess CUPF's efficiency and effectiveness due to the ongoing transition to and complications related to the ActiveNet implementation. However, with the knowledge gained through the above interviews and observations, we assessed their plans and communication methods surrounding the transition/implementation. Through inquiry with CUPF staff, we also evaluated the training received and tools provided related to customer service and staff development. Finally, based on feedback received during interviews from stakeholders, we reviewed the CUPF's issue resolution process for adequacy, clarity, and consistency.

Additionally, we performed benchmarking by researching various other county governments of like population size/proximity to major city or similar geographic location. Since a significant focus of this program assessment was on CUPF's transparency and clarity of instruction, we identified an initial population of fourteen counties, seven local and seven national, that we were able to find a website similar to what CUPF's role in reservation of public school space. That population was narrowed to six counties that were determined to have more robust websites and information available online. The six county websites reviewed were:

- Anne Arundel County, MD
- Fulton County, GA (similar population size – one million and proximity to Atlanta, GA)
- Baltimore County, MD
- District of Columbia
- Fairfax County, VA
- Orange County, FL (similar population size – 1.2 million and proximity to Orlando, FL)

We reviewed each website for fee structure information, department/organization responsible for reservation of space, approval authority requirements, priority of use schedules, systems utilized (including existence of paper/manual processes and/or online bookings), and the availability of policy and procedures documentation online.

Findings and Recommendations

Overall

During the course of this program assessment, CUPF was actively booking the majority of their reservations in CLASS and gradually adding more building types into ActiveNet. Therefore, the program assessment was limited in some measure because of this ongoing transition from the legacy system and associated business processes to a new system with associated changes in business processes; consequently, our ability to fully complete the audit tasks discussed on the previous page was impacted as discussed below.

Compliance. We were able to evaluate CUPF's current role and their compliance with documented policies and procedures. We determined that CUPF was performing their duties generally in compliance with regulations and documented policies and procedures, including regulations and policies developed and issued by the ICB.

Due to the transition underway to ActiveNet and the ongoing changes in processes related to ActiveNet's workflow, we did not attempt to evaluate compliance of these in-progress processes with documented policies and procedures, since such policies/procedures largely had not been documented as yet.

Efficiency and Effectiveness. Similarly, because of the ongoing transition to ActiveNet, we were unable to assess CUPF's efficiency and effectiveness in processing reservation requests under the new system and associated business processes. However, we were able to assess certain core business management processes associated with most successful organizations, particularly those providing direct customer service to the public. It was in the performance of these core business management processes – most notably financial planning/management and workforce planning and development – that we identified opportunities for improvements needed to enhance overall organizational and mission success. These are discussed more specifically in **Table 2 – Findings and Recommendations** below.

Customer Service and Relations. We were able to assess CUPF's customer service and issue resolution processes, as well as issues raised during stakeholder and user community interviews regarding transparency, ease of use of CUPF's services, and fairness. Our assessment did not validate some of these concerns – CUPF appeared to be performing adequately in these areas. With respect to other areas of concern, our assessment did find that the concern had merit and have made recommendations designed to address these concerns and improve CUPF's service delivery and/or customer relations. See **Table 1** below for the results of our evaluation of common customer concerns/complaints.

Our assessment of whether a complaint was substantiated during our assessment is under the column header of "Validated?"

- "No" means that we did not observe during the program assessment instances that would substantiate the complaint as being valid.

- “Yes” or “Partial” means that during the program assessment we observed instances or circumstances that indicated the complaint could have been valid. If a complaint is marked as validated, a corresponding finding and process improvement was developed, which can be found below in **Table 2 – Findings and Recommendations.**

Table 1 – Results of Common Complaint Themes Evaluation

Common Complaint Theme:	Validated?	Observation:	Related Finding in Table 2 (below):
Process is not automated	No	Both CLASS and ActiveNet allow users to book reservations on-line and pay via credit card.	
Process is too complex and difficult to navigate	No	There is substantial and adequate documentation available for both CLASS and ActiveNet walking through the reservation process step-by-step.	
Process is inconsistent	Yes	The nature of CUPF's role in reserving space for various building and facility types (i.e. indoor and outdoor school space, county buildings, libraries, etc.) could be the root cause for this complaint as each building type could require different information and different fees. Further, the processes for reserving space for M-NCPPC and MCRD is also different, which could also be a root cause of this complaint.	Finding #6
Fee Structure is too complex and difficult to understand	Yes	Ensuring the fees are accurate and complete is a major step in approving permits in both CLASS and ActiveNet due to a variety of additional fees that could be applicable. While CUPF provides adequate documentation regarding their fees, the complexity could result in users being unable to easily calculate their own permit fees.	Finding #12
Lack of transparency - documentation	Partial	CUPF provides a vast amount of documentation on their website to assist and educate customers; including an interactive online training session for new users that covered conditions of use and application procedures. CUPF has expanded their communication as it relates to the ActiveNet transition by providing Frequently Asked Questions, Guides, and Account Setup instructions.	Finding #5
Lack of transparency – authority and roles	Yes	Due to uniqueness of CUPF's role and their organization structure, it appears	Finding #10.

		that customers do not understand CUPF's role or their organizational relationship to the public spaces they book reservations for.	
Lack of documentation – issue resolution	Yes	There is no clear policy or procedure documentation related to resolution of issues. Further, the receipt, investigation, and resolution of issues is inconsistent.	Finding #8 and #9
Poor customer service	Partial	There was nothing that we observed or examined that was considered to be poor customer service. However, inadequate resources are allocated to staff development and not all CUPF employees have received customer service training. Further, the inadequate tracking of issues results in CUPF being unable to accurately assess and report on their ability to respond to customer complaints.	Finding #7
Inadequate resources	N/A	We were unable to conclude on CUPF's efficiency or effectiveness. However, we identified some areas of improvement related to CUPF resources.	Finding #2 and #3
Inability / Unwillingness to respond to Community Needs	Yes	CUPF does not have a formal business/strategic plan mapping out areas they intend to focus on short and long-term. Further, CUPF does not have dedicated resources for community outreach which would be imperative to understand the community's changing needs.	Finding #1 and #10

Benchmarking – Fee Structure

Significant feedback was received regarding CUPF's current fee structure fees being too complex. We benchmarked several areas of focus against CUPF's practices, focusing on their fee structure, against the six counties identified above and found noteworthy similarities and differences.

Similarities:

- Most counties (4 of 6) charge significantly lower facility use rates for government, community, not-for-profit and youth programs than private/commercial rates.
- All counties charge different fees based on room type (e.g. all counties had different fees for Auditorium, Cafeteria, Classroom, and Gym use).
- All counties charge additional fees for required additional staff hours by position for services such as cleaning, kitchen, building services/maintenance, supervisor, and media services/technician (i.e. auditorium use); and for additional utility costs.

- Most counties provided a caveat on their fee schedules or within their fee policies noting that actual charges will be calculated by the responsible party within the school district.
- All counties utilized a priority of use schedule for reservations in school facilities; which allowed schools, PTAs, community and government groups, and not-for-profit entities priority over private/commercial entities.

Differences:

- This process was managed internally by a department within the school district in all of the counties. Since this process is managed internally, most of the schools had a caveat that the principal at each school could approve or reject applications if they determined the use to be inappropriate.
- All of the counties only provided reservation services for their schools (i.e. indoor and outdoor spaces); but not for other county facilities.
- None of the six counties charged higher weekend facility rental rates or differentiated between before and after 6pm rates as CUPF does. We did note that 2 of the 6 counties charged higher staff rates on weekends.
- Most counties (4 of 6) charge additional for utilities while CUPF bundled this into their fees. Additionally, most of the counties (4 out of 6) break down fees by school facility charging different rates for elementary school rooms, middle school rooms and high school rooms, which CUPF does not differentiate. The fees range by room type, with elementary school rooms being the least expensive and high school rooms being the most expensive.
- CUPF is required to recover 100 percent of its costs, including the costs incurred by (and reimbursed to) MCPS for the community use of MCPS facilities. In other jurisdictions, some costs of community use of school facilities are absorbed into the school district's budget, and reimbursement to an outside agency is not a factor.

Based on this analysis, we determined CUPF's fee structure to be more complex than other school systems benchmarked. CUPF does acknowledge that their fees structure can be difficult to understand but has stated that their purpose was to make it more affordable by allowing users to pick just what they need while still adequately covering their costs. For example, a decision was made to charge less for before 6pm during weekdays to make it more affordable for youth programming. Additionally, weekend rates were established to be higher to cover the additional costs associated with weekend use (i.e. opening and closing; staff overtime). Further, CUPF's fee structure can be perceived as more complex as they are responsible for multiple facility types, resulting in a total of seven fee schedules (i.e. MCPS, M-NCPPC fields, Regional Centers, Government and County Buildings, Libraries, Clarksburg Cottage, and Silver Spring Civic Building).

Other Observations

We identified two inherent factors that will continue to pose challenges ("risks") for how customers of CUPF's services perceive CUPF, the quality of services, and the fairness of fees charged for services.

Fee-Based vs. Free Services. Because CUPF is a self-supporting organization, funded through revenues collected from fees and deposited into an enterprise fund, CUPF has to administer a policy to charge community users a fee for use of public space.¹⁹ Some community users perceive such services (i.e., use of space in public facilities) should be free, as these facilities are “paid for” with their tax dollars.

CUPF as Broker of Services. Because CUPF is essentially a “broker” of services that are the responsibility of other county agencies, such as MCPS, CUPF is placed in a difficult position: directly between various community users/groups and county departments, such as MCPS. As such, CUPF must respond to complaints from the community, users, and individuals responsible for services provided in the buildings/facilities in which they place users. CUPF is reliant on other organizations to effectively provide services (clean, accessible facilities) for which CUPF does not exercise accountability. Since these organizations do not report to CUPF, the lack of accountability creates an inherent risk to effective/positive customer relations. Building relationships with the customers, community groups, school administrators, building services staff, and staff at other buildings is imperative to CUPF's effective management of this risk, and to mission success. Due to these inherent issues, CUPF could benefit from creative solutions to improve their presence and perception in the community. CUPF has been receiving the same feedback and complaints for multiple years. Therefore, there is an increased need to educate the community and users about their roles and responsibilities to clearly establish expectations, and to create more direct measures of accountability should the responsible departments fail to fulfill their responsibilities.

Specific findings and recommendations for improvement are summarized in **Table 2** below. We recognize that many of the recommendations below will require close coordination with (and, in some cases, approval by) the ICB and other organizations. Implicit in the recommendations is an assumption that CUPF will coordinate with appropriate organizations (including the ICB) and obtain ICB approval and support where appropriate.

¹⁹ It should be noted that CUPF's fee structure does not include any debt recovery association with construction of the facilities.

Table 2 - Findings and Recommendations

Finding	Risk	Recommendation
CORE MANAGEMENT		
1. CUPF does not have a formal business/strategic plan (or planning process) that define goals, strategies, and performance measures to drive their business practices and investment strategies, and to measure their progress and success. The only performance measures reported by CUPF are to the ICB (informal); and the County's Office of Management and Budget, and CountyStat.	1. Without a clearly defined and communicated business/strategic plan, tied to specific strategies (workforce and resources) and focused performance measures, it is difficult to assess whether adequate resources and efforts are properly allocated to accomplish goals and achieve success. This is particularly important for organizations that have a primary line of business/mission focused on customer service delivery.	1. CUPF should establish a short term and long term business/strategic plan, with specific goals/objectives, and strategies that can drive CUPF's resource (workforce and investment) planning. Further, CUPF should establish and communicate specific performance measures for key functions within CUPF, such as customer service, productivity, etc. By setting a desired goal of performance achievement, these metrics can serve as a way to clearly communicate the organization's objectives, successes and challenges, and to drive employee behavior in a consistent, focused manner.
2. CUPF has several key employees that will be reaching the age of retirement within the next five years. Collectively, their experience and institutional knowledge is critical to CUPF's operations. For many of these employees their individual duties are not adequately documented or cross trained.	2. Without adequate documentation and preparation for organizational changes, CUPF is at risk of not having adequate resources to meet business needs and continue operating efficiently and effectively.	2. CUPF should undertake a workforce/succession planning effort for the loss/transition of these key critical employees including documenting critical duties performed, enhancing procedural desktop documentation, and increasing opportunities for staff development and cross training.
3. CUPF Management team frequently has to work overtime to meet demands of the current workload. Further, CUPF Management team stated that they are unable to focus on strategic efforts, staff development, community outreach, training, site visits, and relationship building with key partners.	3. Inadequate resources dedicated to the strategic and forward thinking efforts could result in the organization's inability to respond effectively to changes. Further, the lack of resources dedicated to community outreach and relationship building could negatively impact CUPF's perception and reputation.	3. CUPF should undertake a workforce/resource planning effort to identify appropriate resource levels and needs to allow CUPF to fulfill their mission requirements effectively, including adapting to the changing service demands and needs of the County's community and to improve their perception and reputation by building relationships.

Finding	Risk	Recommendation
<p>4. CUPF has accumulated a significant surplus fund balance. A September 30, 1999 internal study conducted by the County ("Community Use of Public Facilities Fund Balance Policy Study") recommended that CUPF maintain a fund balance of 10% of annual resources for the CUPF enterprise fund, with specific suggestions for how this fund balance could be used to improve services; and a specific recommendation to regularly review fees/rates and the fund balance policy. The ICB has recently developed a plan to spend down the accumulated fund balance over the next several years. An annual review of the end-of-year fund balance, resource needs consistent with an approved business/strategic plan, and the impact on the fee structure would be consistent with sound business practices and good government/transparency.</p>	<p>4. Without a clearly defined plan on how funds should/will be invested to address strategic business plan needs, needed investments to enhance customer service delivery may not be made. Without an annual review being conducted of current and projected end-of-year fund balances, and an investment/rate restructuring plan developed based on these financials, CUPF could be viewed as inappropriately charging too much and/or not remitting enough funds to cover needed enhancements to customer service – with the consequently risk of diminution of customer confidence and relations.</p>	<p>4. CUPF should conduct an annual review of their actual prior end-of-year fund balance and their projected current end-of-year fund balance, and determine appropriate investments or rate structure changes to address strategic business plan needs and to remain compliant with the County's CUPF enterprise fund balance policy; or propose amendments to the policy.</p>
CUSTOMER SERVICE AND RELATIONS		
<p>5. CUPF's website is not very robust or user friendly. While there is a lot of valuable information available on the website, it can be difficult to find needed information/documentation.</p>	<p>5. Without a robust and easy to understand website, CUPF's customers could become frustrated or misinformed leading to poor customer satisfaction.</p>	<p>5. CUPF should explore options to enhance their website delivery of information and enhance the user's experience, especially for first-time/infrequent users. Their homepage can be enhanced to describe their roles, responsibilities, and clarify their mission, vision, and objectives. Further, links to frequently asked questions should be more easily accessible, such as its own menu item or on the homepage, instead of under the "Resources" Tab. Frequently asked questions should also address common questions or areas of complaints such as CUPF's roles and responsibilities, CUPF's organization, purpose of fees, etc.</p>

Finding	Risk	Recommendation
<p>6. Feedback received identified that the reservation process was inconsistent depending on the space and users expected a similar process for each reservation. This was determined to be true based on various requirements, such as building type or use of space requiring additional information, turnaround times, approvals, fees, etc. For instance, the process to reserve space at the Silver Spring Civic Building will be different than reserving a classroom at an elementary school. Further, the process to reserve space at school will be different than the process to reserve a picnic shelter at a park (by M-NCPPC staff). However, these differences are not documented in a clear, concise, and easy to understand manner for the community.</p>	<p>6. The lack of understanding of the reservation process and the perception of inconsistency could negatively impact CUPF's perception and reputation in the public resulting in increased complaints.</p>	<p>6. CUPF should seek opportunities to make the reservation process more consistent, simple, and streamlined. Key procedural differences between building types should be documented and shared with public on CUPF's website to increase transparency. CUPF should document why the process is different, how the process is different, key contacts for each type of reservation, different/additional fees associated with building types, and key timing, deadline, and turnaround time variances for permitting approvals. Including M-NCPPC and Recreation Department processes would also be helpful to improve clarity. These should be accumulated, documented, and communicated in a clear and concise way for users to easily access and understand.</p>
<p>7. CUPF's operations require frequent interaction with the community to meet their needs of securing space in public facilities. However, employees do not receive regular or targeted customer service training. Further, CUPF Management stated that there is not adequate time allocated to staff development and training due to the workload.</p>	<p>7. Inadequate training could potentially lead to procedural inefficiencies and inconsistencies, increased errors, and potential loss of customers due to inability to provide quality customer service.</p>	<p>7. CUPF should allocate necessary resources to develop a staff development plan and formal training program. Further, all employees that are required to communicate directly with customers should be required to attend periodic and targeted customer service training to enhance their skill sets.</p>
<p>8. The receipt, investigation, and resolution of issues is not centralized within CUPF.</p> <ul style="list-style-type: none"> Complaints can come into CUPF via centralized phone lines or email; or individually go directly to CUPF staff via phone or email. There is no formalized process to ensure all issues are aggregated or that issues are resolved consistently. 	<p>8. Issues are not resolved timely or consistently leading to poor customer service and public perception. If there is not automated trail defining the receipt and resolution of each issue, it is difficult to determine and report on responsiveness.</p>	<p>8. CUPF should research options to improve their issues resolution process, including opportunities for further automation and tracking. With additional tracking, CUPF should be able to analyze issues to continually improve business practices, evaluate their responsiveness, and communicate results to the public and the ICB more effectively.</p>

Finding	Risk	Recommendation
<ul style="list-style-type: none"> • CUPF utilizes their internal database, the Problems Log, to track issues that are reported to After Hours Supervisors; however, this system relies on manual data entry and lacks controls to effectively capture meaningful, consistent data. • There is no system/process permitting verification that all calls received on the After Hours line were documented in the Problems Log. • There is no automated timestamping of issue resolution as problems are manually entered when the After Hours Supervisor has time to input them. The date field can be backdated. Therefore, there is no way to accurately capture CUPF's responsiveness to issue resolution. • Issues that do not come in through the phone call to After Hours supervisors are not entered into the Problem Log. 		
<p>9. The policy or process to report issues or complaints is not clear on the website. Some information is provided to the user during training and the after-hours line is provided directly on the permit. Clicking on "Contact Us" on the website provides a centralized email address, phone number, and MC311 for questions or comments. Further, it provides a number for the after-hours hotline. However, there is no issue resolution policy or instructions under "Contact Us" or "Resources" to reinforce information provided in the new user training and periodic reminders in newsletters.</p>	<p>9. Without a formally documented and communicated issue resolution process, customers could become frustrated and use improper channels to report complaints resulting in inappropriate escalation of issues and poor public perception.</p>	<p>9. CUPF should create and communicate an issues resolution process including examples of types of issues and how they should be submitted to CUPF for resolution. This should be clearly documented on their website.</p>

Finding	Risk	Recommendation
10. CUPF does not have a longer-term strategy (with associated resources) to focus on community outreach or have dedicated staff to improve community relations.	10. A lack of community outreach/education function could negatively impact CUPF's perception and reputation in the community. Further, CUPF's growth could be negatively impacted if the community is unaware of their services.	10. CUPF should consider utilizing a public outreach/education campaign to effectively communicate their roles, responsibilities, and mission to the community. CUPF should consider dedicating resources to engaging communities, building relationships, and educating the County of their role and service offering. Having a more interactive role with the community it serves and educating the public on who they are and what they do, may alleviate the confusion and frustration faced by parties submitting complaints about CUPF. Further, a marketing and education campaign could lead to growth and increase in the community utilizing public facilities.
11. Due to the priority of use policy, users with approved permits could be forcibly cancelled from their reservation by MCPS or MCPS partner. CUPF will try to find another equitable location/date/time for the user, but this is not guaranteed. While this is within policy, CUPF does not track and report on when these issues occur.	11. Without appropriate tracking and documentation, there could be a perception of favoritism or unfair practices.	11. CUPF should maintain documentation, track, and report on the frequency, nature, and resolution of permits and users/groups that were forcibly cancelled for priority use. These results can be analyzed and used to improve business processes.
12. Feedback received from users noted that the fee structure was too complex and difficult to understand. Further, when benchmarking CUPF's fees against other agencies, we found multiple areas where CUPF's fee policy was more complex. [CUPF advised us that the ActiveNet system automatically calculates fees so that the user has a cost estimate prior to submitting an online reservation request.]	12. An overly complex fee structure can lead to errors and frustration by users which could dissuade them from using CUPF's services.	12. CUPF should seek opportunities to further streamline their fee structure. CUPF should consider having another fee study done to identify opportunities to change its fee structure to address feedback received from customers. Further, CUPF should consider providing more tools and assistance on their website to assist users in calculating their own fees.

Department and ICB Comments and MCIA Evaluation

We provided the Community Use of Public Facilities and the Interagency Coordinating Board with a draft of this report for formal review and comment on June 22, 2016. CUPF responded in a memorandum on July 7, 2016 (see Appendix A), emphasizing the unique role CUPF performs in administering the reservation of public facilities process and the challenges they face in performing this role; as well as sharing perspectives regarding limitations they perceived in the assessment and the resulting report. CUPF does not dispute any specific findings or recommendations, and indicates they will evaluate the recommendations in the context of resources, and state and local regulations and policies.

The ICB responded in a memorandum on July 18, 2016 (see Appendix B), providing their comments on both this report and the report prepared concerning the Before and After School Child Care Program. The ICB's response similarly emphasizes the unique role CUPF performs in administering the two programs and the challenges they face in performing this role. The ICB's comments also share the duality of perspectives within the ICB regarding the reports: both the opportunities identified in the reports to further strengthen current CUPF operations, as well as perspectives concerning perceived limitations of the assessments and the resulting reports.

Internal Audit has reviewed both the CUPF and ICB comments, and while we do not believe that substantive changes to the findings and recommendations contained in the reports are warranted, we want to note the following:

- The initial interviews conducted with selected stakeholders and customers were used both to refine the scope of the program assessment (i.e., to focus on the Before and After School Child Care Program, and the Reservation of Public Facilities Process) and to gain perspectives on the perceived challenges faced by CUPF and the concerns these customer/stakeholder groups had based on their experience with CUPF. No statements of fact are contained in the reports based solely on comments received during the interviews; if the audit firm's assessment confirmed that a risk existed, the risk was expressed and explained in the report, along with recommendation(s) on steps that could potentially be taken to address the risk. Interviewees were promised anonymity and non-attribution in order to encourage open and candid sharing of perspectives.
- We have attempted to acknowledge the unique role CUPF performs in administering these programs. Whether one characterizes CUPF's role as a "broker" of services or as a "middleman," the salient point is that CUPF performs its responsibilities for these programs in a challenging environment: where there are "winners" and "losers" from the provider community in competing for Before and After School Child Care program sites; where there are high expectations on the part of parents, community users and stakeholders regarding the level/quality of services to be provided; and where the majority of the parties key to the success of these programs are not under the direct control/supervision of CUPF. We have tried to acknowledge these challenges in the

reports, particularly reflecting the information and perspectives CUPF provided during the assessments.

- The reports provide background on the organizational and regulatory/legal framework within which CUPF administers these programs, and acknowledge the challenges CUPF faces and the improvements CUPF has already taken to enhance their administration of the programs. The reports are fundamentally an analysis of CUPF current processes and operations, and how improvements are possible that would enhance CUPF's mission success. It was not the intention of the reports to provide, however, an extensive historical perspective on how the programs have evolved over time; except where necessary to provide recent historical context for a program/policy change.
- Given the scale of the programs and the challenges faced, any program assessment of this nature will identify areas and activities that can be improved and some areas that require additional analysis and an improved approach. This program assessment is no different; the reports identify those areas where we believe CUPF should consider focusing additional attention to make improvements that could enhance customer service and relations, provide greater transparency, and improve overall program management and mission success.

Appendix A




COMMUNITY USE OF PUBLIC FACILITIES

Isiah Leggett
County Executive

Ginny Gong
Director

July 7, 2016

TO: William Broglie, Manager, Office of Internal Audit

FROM: Ginny Gong, Director, Interagency Coordinating Board/Community Use of Public Facilities 

SUBJECT: Community Use of Public Facilities Formal Comments Regarding the Program Assessment of the CUPF Reservation of Public Facilities Process

Community Use of Public Facilities (CUPF) appreciates the opportunity to respond to the assessment and incorporation of the many technical edits suggested by staff. We recognize the significant dedication of time by both members of the Interagency Coordinating Board (ICB), and CUPF staff in the assessments over the nine-month duration as they participated in multiple days of interviews and provided voluminous documentation to the audit firm. The narrow scope of the report does not fully reflect the limited staff resources with which the office books over one million hours of community use each year to more than 5,000 user groups. Nor does it acknowledge our challenges as the “middle-man” in negotiating among diverse groups of stakeholders, issuing permits for facilities owned by others, holding individuals and entities accountable whom we do not supervise, assessing fees of groups (98% of which are non-profits) to cover costs as an Enterprise Fund, and enforcing ICB’s policies and guidelines related to fair access. Nonetheless, we believe the overall generally positive outcome of the report illustrates these points.

It is significant that the report did not fully acknowledge CUPF’s unique layer of accountability that other County departments do not have – oversight of operations by the ICB, comprised of key County decision makers. The board, created by State law (Education/Title 7- Public Schools/Subtitle 1, General Provisions), approves policies, fee changes and recommendations regarding the Enterprise Fund Balance. CUPF staff reports quarterly to the ICB and provides in depth research/analysis on issues/fee changes and gives updates on all programmatic activities.

In addition, the relationship between CUPF and MCPS is barely illustrated, but, is very relevant to understanding the root causes of issues related to the reservation process. Since the creation of the ICB/CUPF in 1978, the acceptance of an outside entity booking their space has been a challenge for schools. The ICB/CUPF was created by the County Council to address the community’s concerns about fair access to schools and to improve accountability in the management of fees.

We note that a number of recommendations address changes already being made or planned and were shared with SC&H, without attribution. For example, the ICB had been discussing the disposition of the Enterprise Fund for more than a year before the audit started, and CE recommendations and County Council appropriations were finalized months ahead of the issuance of the report.



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CUPF has concerns about the audit methodology, which, appears to have only included a review of documents, partial benchmarking, and very limited interviews of stakeholders. Many studies indicate the category of people interviewed, if not the actual participants. Since the positions/categories of stakeholders are not included, it is not possible to determine if the interview feedback was representative and balanced.

CUPF is noted in the report as a “broker” of services, but it would be more accurate to describe our role as the “middle-man” or conduit managing a centralized reservation process that enables the public access to buildings owned by a variety of entities. Previously, community users had to go to each school or building tenant separately.

The report includes a comparison with several other jurisdictions and a finding that CUPF’s fees are more complex and higher. However, without inclusion of the actual data it is difficult to validate these assertions. Merely looking at an online fee chart without full understanding of how the fees are applied could result in misleading assumptions. CUPF is in contact with all the local school systems cited every few years to update our internal benchmarks. As a follow up, CUPF interviewed representatives from the out of area school systems cited in the report (Fulton County, GA and Orange County, FL) not normally contacted for benchmarking. Significant differences in operations were noted. For example, Fulton County’s procurement office contracts directly with after school program providers. Administrative and operational costs for managing community use are absorbed by the respective school systems and are not tracked in most jurisdictions (Fairfax at 50% cost recovery is the exception). CUPF, on the other hand, is non-tax supported and required to reimburse MCPS for cost impacts of community use. Unlike many school systems, MCPS is not expected to use its budget and resources to cover the cost impacts of community use.

Although CUPF has transitioned to a more consolidated fee structure (utilities and minimal staff coverage included), many of the jurisdictions noted in the study have additional charges for utilities and staff fees weekday evenings and weekends. CUPF does not distinguish fees based on school level as is often the case elsewhere. Once these additional charges are taken into account, CUPF’s community groups pay less on average.

Not fully explained in the report is that the organizations included in the benchmarks are only booking their own facilities – schools. The size of the inventory booked by CUPF (at 17,000 facilities) far exceeds the inventory of any other entity. CUPF is booking schools, local and regional park fields, synthetic and grass turf stadiums, County fields, libraries, regional centers, County buildings, special event center, and Council meeting rooms. Some of CUPF’s venue owners either set their own fees, have established minimal fee thresholds, and/or adhere to policy guidelines which CUPF must implement. Nearly all have different reimbursement arrangements and partnership agreements that must also be accommodated.

Every few years the County changes how department websites look. CUPF shared with the audit firm that it was already evaluating implementation of a site map format to ease transition from one venue or resource to another. It is also noteworthy that review of policies specific to the venue type has been embedded in the online [ActiveMontgomery.org](https://www.active-montgomery.org) reservation request workflow.

Much emphasis was noted throughout the report about CUPF’s outreach to customers. CUPF routinely interacts with representatives from over 5,000 groups, public officials, venue owners (State & County), staff supporting community use (nearly 300 employees), contractors, and often members of the neighborhood

living near a school or similar venue. CUPF’s communications with customers include New User Training (which covers the entire process) for which outreach was significant. Over 10,000 group representatives

completed the mandatory instructor-led training since 2002. Another 1,565 completed the online version. In addition, CUPF staff attends activities hosted by key user groups and continually strives to look for new ways to communicate with customers via eBlasts and newsletters. CUPF also convenes meetings of ICB's Advisory Committees comprised of stakeholders. In addition, meetings are held with focus groups to provide opportunities for categories of users to share concerns (for example, recent cricket field users meeting). We've also held (and continue to hold) numerous community forums on ActiveNet.

It appears customer expectations do not take into account that CUPF, in the management of its operations, has had to constantly balance many competing interests with great diplomacy, such as:

- ICB's policies and priorities based on equity, fairness and access;
- the community's perceptions of entitlement and often unrealistic expectations;
- the facility owner's concerns for safety and asset protection;
- the elected officials' interest in addressing constituent concerns;
- violations of facility use guidelines;
- users' issues related to fees, priorities, etc.; and
- neighboring communities' concerns regarding user groups related to noise, parking, inappropriate behavior, biases, etc.

With regard to the report's findings on CUPF's management of data, it is unfortunate that information on program measures was not requested by the audit firm. CUPF already tracks many metrics shared with the ICB, dataMontgomery and CountyStat, which include:

- Percentage of customers satisfied with the reservation process
- Estimated percentage of capacity used by community groups
- Customer inquiry response time
- Reservation processing time
- Utilization hours by groups and venues
- Problems reported after hours and on weekends

CUPF has a strong track record of streamlining services from a system where customers went from school to school to a centralized online request/payment system. We've doubled the hours booked, enabled stakeholders to access real time availability and fee information, elevated our "24/7" on-call customer support services, and helped reduce overtime and utility costs for MCPS.

CUPF continually looks for opportunities for improvement and will carefully evaluate the recommendations, but must balance this with restrictions on resources, state and local regulations and policies/procedures. As the independent conduit for community use access, the ICB/CUPF remains focused on making the County's public facilities affordable and accessible.

Appendix B



COMMUNITY USE OF PUBLIC FACILITIES


Isiah Leggett
County Executive

Ginny Gong
Director

MEMORANDUM

July 18, 2016

TO: William Broglie, Manager, Montgomery County Office of Internal Audit (MCIA)

FROM: Dr. Henry Lee, Chair 
Interagency Coordinating Board for Community Use of Public Facilities

SUBJECT: Comments on Two MCIA Program Assessments: Before and After School Childcare Programs in Public Schools, and Reservation of Public Facilities Process

The Interagency Coordinating Board (ICB) is composed of 12 members who represent County agencies and community users of school and other public facilities. We set the policies and procedures for the staff of the Office of Community Use of Public Facilities (CUPF) to implement. We are one of the nation's first such boards. The record achieved by the ICB and CUPF, in collaboration with County agencies, to make school and other public facilities available for community use is second to none.

The two subject MCIA program assessments represent a significant commitment of time and County resources. The detailed comments transmitted to you by CUPF Director Ginny Gong raise many important points. We strongly commend them to your attention. We note in particular the global observation made at the outset of CUPF's comments on both assessments:

The narrow scope of the report does not fully reflect the limited staff resources with which the office books over one million hours of community use each year to more than 5,000 user groups [in more than 550 public facilities]. Nor does it acknowledge our challenges as the "middle-man" in negotiating among diverse groups of stakeholders, issuing permits for facilities owned by others, holding individuals and entities accountable whom we do not supervise, assessing fees of groups (98% of which are non-profits) to cover costs as an Enterprise Fund, and enforcing ICB's policies and guidelines related to fair access.

Our comments as the policy-making entity for community use reflect two different perspectives on the MCIA program assessments. For some ICB members, the assessments generate several ideas that could help strengthen CUPF's excellent operations. For other ICB members, the assessments are flawed and fail to produce recommendations that are relevant or actionable.



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Comments in the first category highlight areas where additional resources could produce beneficial results. For example:

- Additional staff resources could provide greater depth for CUPF's work on management of the child care selection process, reservations, knowledge retention, and succession planning.
- Additional resources for and training in customer service could lead to higher skill levels and improved service.
- Additional marketing and public education, developed in conjunction with the Office of Public Information, could expand public awareness of CUPF's services and facilities.

Comments in the second category reinforce the global observation from CUPF noted above. For example:

- Both assessments seem largely complaint-driven. They do not address whether the complaints are valid in the first place and whether CUPF's current operating practices are sound, particularly when compared with those of other departments and agencies.
- The assessments do not specify the number and perspectives of the groups and individuals who were interviewed and what survey instruments, if any, were used to obtain reliable data. Nor do they quantify the costs of recommended improvements in staffing and other resources.
- The assessments do not delineate the duties – and the comments – of other key stakeholders, including the County Attorney's Office, DHHS, and especially the Board of Education/MCPS.

Outside assessments can be a valuable tool for any organization. These assessments of CUPF's operations make some useful points – for example, regarding enhancement of the conflict of interest policy in the child care selection process. Overall, however, the assessments do not seem adequately grounded in the history and complexity of the issues they address. Nor do they adequately reflect actions that CUPF and ICB have already undertaken, such as a consistent focus on the fund balance and ways to streamline the fund structure.

On behalf of the ICB, I appreciate the opportunity to comment on these assessments.