From: Todd, Charles G. - DIT

To: Joy-Hogg, Sabrina B.

Subject: Fwd: Payment Register | History | Notes on Scrubbing Process

Date: Wednesday, August 7, 2024 6:22:07 PM

From: Todd, Charles G. - DIT < Charles. Todd@rva.gov>

Sent: Tuesday, October 31, 2023 12:13:00 PM

To: White, Sheila D. - Finance <Sheila.White@rva.gov>; Ivanovski, Aleksandar - Finance <Aleksandar.Ivanovski@rva.gov>; Rekas, David S. - Finance <David.Rekas@rva.gov>

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Just among us in Finance and DIT...

City Code regarding register:

https://library.municode.com/va/richmond/codes/code_of_ordinances?nodeId=PTIICICO_CH12FI_ARTIINGE_S12-16PUPARE

Paul Jez was the finance director when this ordinance took effect July 1, 2015. His 9-month tenure ended in August 2015. I forget how long it took to find John Wack. Anyway Lenora Reid prevailed upon me to find a way to get this done because Finance was in a ditch. Those were the days of backlogs of audits and annual financial reports. So I handled this personally. That was a ridiculous thing for me to try as director: not sustainable given all the manual work. But I had no staff who I perceived had the skills to tackle something like this. At best they could give me data, but I had nobody in a "analyst" role who could run with this.

I told John Wack repeatedly that I did not have capacity to do this and that, under the law (Code), it was his responsibility to make it happen. That never got traction. His staff was too busy. Etc. Anyway, I got way behind in the register and in light of non-cooperation from Finance, I stopped.

Just for the record: no issues with Sheila. I'm not sure that we've ever really discussed getting this back up and running.

But here we are.

I've dusted off my files to look at the laborious process it took to handle the register each month. The redactions are hell, quite frankly, to process. I suspect that Team Sheila can figure out a better approach!

1. Social Services – formulaic

When Invoice Num contains "PVDSS"

- Change vendor to "Social Services Provider"
- Change Invoice_Description to "Redacted per Section 63.2-104 of the Code of Virginia"
- Change Distdescription to "Redacted per Section 63.2-104 of the Code of Virginia"

2. Withholding - Formulaic

See attached.

Have to check each month to see the accounts being used in that withholding range, as "new" ones seem to pop up

3. Scrubbing – Manual

After 1 and 2 performed, then you are at the mercy of the individual agencies to read over their distributions (sometimes hundreds of lines!).

Pain Points and risks

- Social Services benefits payments that are performed manually (don't come through marked PVDSS) are a big risk if DSS does not catch.
- Account numbers are often present in the invoice or distribution text. Police is the only agency that chooses to scrub for that. No decision was ever made on a standard.
- Police insists upon redacting lots of things that I personally don't think qualify for redaction per intent of the Code. Some examples:
 - a. Removing the names of officers from vendor field from ANY reimbursement. (I'm not sure why reimbursing Detective X for a training course would warrant secrecy)
 - b. Removing the names of officers from invoice or distribution descriptions. (Not sure why "Boots for Officer Smith" warrants secrecy)
 - c. Removing information about cases (e.g., paying bounty hunters my term, not sure what else to call that; paying outside investigatory services; etc.)
- Never know for sure if other agencies are reading and redacting. Quizzing 30+ agency heads was simply not possible.

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