

From: [Gregg Visineau](#)
To: [Facilities](#)
Cc: [Peggy Wilcox](#)
Subject: Public Comment on Forensic Accounting Investigation Final Report
Date: Saturday, October 15, 2016 9:33:26 PM

COMMENT #3

1. ***Please confirm receipt*** of our Comment (in addition to previous Comments #1 and #2, which included Attached Documents).
2. ***Please confirm*** that all Comments are now -- and will remain -- available for review, by the public, thruout your entire implementation of the Audit's Recommendations.

Agenda Item F.5 from the September 21st, 2016 WCCUSD Board Meeting approved:

"...the establishment and composition of the [Implementation] Task Force to include the (1) Superintendent, (2) Associate Superintendent, Operations & Bond Program, (3) the District's internal auditor, (4) Director of Contract Administration, (5) one member of the Citizens' Bond Oversight Committee, along with (6) one member from the Solutions Team."

This composition is at odds with all standing precedent for effectively overseeing and actually implementing the recommendations of an internal audit to correct long-running historic ill-practices in a public institution.

This Comment is not meant in any way to cast aspersions on the current organization or personnel or practices. But it is meant to support the fullest, most effective and most transparent Implementation coming out of the WCCUSD's Audit. No appearance of conflict-of-interest or appearance of lack of vigor in pursuing the Audit's Recommendations should be allowed to cross the public's mind.

We therefore urge you to reconstitute the Task Force along more effective, arms-length precedents such as:

- Those managed by an Inspector General-type function (e.g., for a government agency);
- Those managed by an Internal Affairs Bureau-like (IAB) function or an Internal Investigation Division-like (IID) function (e.g., for a public safety agency); or
- Those modeled after any one of several local Civilian Review Boards (San Francisco), Police Review Commissions (Berkeley), Police Review Commissions (Richmond) or Citizens Police Review Boards (Oakland).

These are all slightly different in make-up and reporting relationships. But they are all consistent in assuring that the implementation of change is held apart from the agencies being changed (unlike the currently-constituted WCCUSD Implementation Task Force).

Please accept this Comment in the spirit with which it is given: To help build full public support in the WCCUSD's efforts to rebuild its reputation with the public, wholly consistent with the Recommendations from your Audit.

Thanks,
Gregg Visineau
Peggy Wilcox

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