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Inspector General

STEVE QUISENBERRY
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Office of the Inspector General

July 30, 2021

Stacy L. Rodgers
County Administrative Officer
400 Washington Avenue
Towson, Maryland 21204

Re: OIG External Report 21-002

The mission of the Office of the Inspector General (hereinafter “the Office”) is to provide increased accountability and oversight in the operations of the Baltimore County government (hereinafter “the County”) by identifying fraud, abuse, and illegal acts, while also striving to find ways to promote efficiency, accountability, and integrity.

In March 2021, the Office received a complaint that several recreation councils, nature councils, and other entities participating in the Group Leadership Program (hereinafter “Group Leadership”), which is administered by the Department of Recreation and Parks (hereinafter “the Department”) had accumulated deficit balances totaling over \$300,000. Further, the complaint raised concerns that the County is limited in its ability to collect these outstanding funds and historically has not done so.

In response to the complaint, the Office initiated an investigation into Group Leadership. The investigation included witness interviews and a review of various documents obtained from the County. The documents included the Department’s Directives pertaining to Group Leadership; internal memorandums; correspondence between the County and certain Group Leadership participants regarding accumulated deficit balances; spreadsheets detailing the reconciliation of the Group Leadership balances for all of the recreation councils, nature councils, and other entities participating in Group Leadership; and pay-related records pertaining to certain employees who fall under Group Leadership.

The Office’s investigation revealed that as of July 9, 2021, eighteen (18) of the entities participating in Group Leadership owed the County \$139,021.63. Only about three months earlier, as detailed later in this report, that total deficit balance was \$420,353.13. While the investigation revealed the County is aware of the monies owed, there is no formal plan in place to enforce collection of these outstanding funds. The investigation also revealed, as discussed below, there are additional concerns with the program that are contributing to the deficit balances and potentially creating other financial issues for the County.

I. Background on Group Leadership

Currently, there are over 40 recreation, nature, agricultural, and environmental councils (hereinafter collectively “the Councils”) operating in the County. The Councils are 501(c)(3) non-profit organizations that must be certified by the County’s Board of Recreation and Parks on a regular basis. The mission of the Councils is to establish and operate programs, activities, and events to meet the needs of the communities they serve.

Historically, the County funded “part-time leadership” expenses, as defined below, for out-of-season youth activities, adult recreation programs, tournaments, childcare programs, and specialized activities such as dance and martial arts. Due to economic reasons, the County cut the funding for part-time leadership expenses in or about 1992. To ensure these types of activities could continue within the Councils, the County created Group Leadership, which shifted the funding for these expenses to the Councils.¹

Part-time leadership expenses involve two types of labor costs. First, all of the wages and fringe benefits of the childcare workers and the program leaders (e.g. the dance instructors, adult softball league coaches, and the aerobics instructors) are considered part-time leadership expenses. Second, only the portion of the wages and fringe benefits of the County’s part-time General Fund or “Standard Rate” employees (e.g. the Attendants and Activity Specialists) spent on Group Leadership activities are considered part-time leadership expenses. Examples of the second type of labor cost include time spent by Standard Rate employees lining ballfields for an adult softball league or opening and closing an elementary school on the weekends for an aerobics class. Because Standard Rate employees split their time between Group Leadership activities and General Fund activities, it is imperative they code their time properly, as discussed later in this report.

The County’s role under Group Leadership is to provide the facilities for the activities, to pay for the overhead costs, and to manage the logistics of the program. The County employs community supervisors or similar positions (e.g. naturalist, park ranger, and farm manager) within the Department to oversee the administration of Group Leadership. For purposes of this report, these individuals will be referred to as “Group Leadership Administrators.” There is typically one Group Leadership Administrator assigned to each of the Councils. The Group Leadership Administrators schedule the Group Leadership employees and document their hours worked. The Group Leadership Administrators are supervised by Regional Coordinators. The Group Leadership Administrators, Regional Coordinators, and their respective Administrative Aides, have offices in recreation centers and schools throughout the County. These individuals are all paid out of the General Fund, and they are often referred to as “permanent staff.”

Prior to about 2005, the size of Group Leadership was modest and most of the Councils utilized independent contractors, whom the Councils paid directly. Starting in or about 2005, the Councils stopped utilizing independent contractors and these individuals transitioned to becoming

¹ This change had no effect on in-season youth activities, which continue to be funded by the County out of the General Fund.

Baltimore County employees under Group Leadership. This transition was facilitated by the County allowing these workers to be compensated at “Special Rates,” which are different than the County’s traditional pay scales. As a result, the number of Group Leadership employees expanded significantly over the subsequent years as the Councils directed the County to hire an increasing number of Special Rate employees. Examples of Special Rate employees are dance instructors, gymnastics coaches, and yoga instructors.

Under the current structure of Group Leadership, the Councils tell the County which programs the Councils intend to offer, when the programs will operate, who will lead the programs, how many hours the program leaders will work, and how much the program leaders will be paid per hour. In turn, the County enters into an Agreement of Employment (see **Exhibit 1**) with each of the leaders and affords them all of the benefits of being County employees. The Agreement of Employment is supposed to be updated each year, or any time there is a pay rate change for the employee. Based on the investigation, it does not appear this is being done consistently.

In any given month, the County has several hundred employees classified under Group Leadership. While the County does perform background checks on these individuals before they are hired, the County plays no role in vetting their physical or professional qualifications, nor does the County monitor their performance after they have been hired. These employees also do not have to go through the County’s mandatory drug screening process. In addition, these employees do not participate in the County’s mandatory new employee orientation or any other training required by the County of its employees. Despite having no say in the hiring, retention, or training of the Group Leadership employees, the County assumes all of the risk and related liabilities that come with being their employer. This includes workers compensation claims and employment-related lawsuits.

Initially, Group Leadership employees were paid on a monthly basis. For the past few years, these employees have been paid on a bi-weekly payroll known as BPL. The BPL payroll, which is run at the same time as the County’s public safety payroll, alternates weeks with the bi-weekly general payroll. Every pay period, per the Directives, the Councils are supposed to issue full payments to the County for their Group Leadership expenses. As discussed further in the report, several of the Councils are not making full payments to the County and therefore, have accumulated significant deficit balances. It is worth noting, however, that since Group Leadership is titled and coded within the County as a grant program, the monies for any and all Group Leadership expenses should technically be paid in advance each fiscal year. This accounting distinction is not addressed by the Department’s Directives for Group Leadership.

Each pay period, Group Leadership employees are supposed to provide their hours worked to their respective Group Leadership Administrators. The Group Leadership Administrators input those hours into the Department’s Payroll Application. The Payroll Application, which was developed by the County’s Office of Information Technology (OIT), includes various identifying information about each of the Group Leadership employees, but it does not include the pay rates, which has been a source of frustration for some of the interviewees. The Regional Coordinators approve the time for the Group Leadership Administrators in their regions. A simplified example of how Group Leadership is supposed to operate is as follows:

Recreation Council A tells the County it wants to start a martial arts program. Council A says it wants Joe Kicks to run its program, which will operate on Mondays, Wednesdays, and Fridays from 5p to 7p at the local community center, for a total of 6 hours per week. Council A has agreed to pay Mr. Kicks \$50 per hour to operate its program. After performing the required background checks on Mr. Kicks, the County hires him as a Special Rate County employee under Group Leadership. Every pay period, the hours to be worked by Mr. Kicks are communicated to the County via a Group Leadership Liaison assigned to Council A, and entered into the Payroll Application. Using the activity schedule referenced above, Mr. Kicks' gross paycheck would be \$600 (6 hours/week x 2 weeks x \$50/hour). Prior to Mr. Kicks receiving his \$600 gross paycheck from the County every two weeks, Council A is supposed to ensure it has funded its Group Leadership account with the County for the \$600 in wages plus an additional amount to cover Mr. Kicks' fringe benefits.²

From its inception, Group Leadership was intended to run in a manner analogous to a debit card program. In other words, the Councils would fund their Group Leadership accounts with the County prior to the County paying the expenses on their behalf. Thus, no deficits should ever accumulate and be carried forward. In some instances, this does occur and some of the Councils actually make upfront payments to the County to ensure their Group Leadership balances stay in the black or positive. However, for a variety of reasons, some of the Councils have accumulated significant deficits, causing Group Leadership to become more like a credit card program that does not charge its customers interest or fees. According to interviewees, the County, unlike a credit card company, has essentially no recourse when a Council refuses to pay an outstanding balance other than refusing to process that Council's Group Leadership payroll. Because this would likely affect the Council's ability to offer programming, such an action could be perceived as contrary to the Department's mission, which is to provide recreation services to the communities via the Councils. Thus, the County continues to pay the expenses associated with Group Leadership regardless of whether it is reimbursed.

II. Factors Contributing to Group Leadership Deficit Balances

A. Disparities Among the Councils

Because the Councils are independent, stand-alone organizations, there is no requirement to have uniformity among the Councils provided they do what is mandated by the Board of Recreation and Parks to maintain their status as "certified."³ Therefore, each Council is at liberty to essentially operate as it chooses. As a result, Councils use different procedures to carry out their responsibilities under Group Leadership to include the tracking of hours worked by the Group Leadership employees, the submission of those hours to the Group Leadership Administrators, and the documentation of that data in the Councils' books and records.

² As of July 1, 2021 fringe benefits paid by the Councils to the County pursuant to Group Leadership were calculated at 9.81% of leadership expenses.

³ There are no contracts, agreements, memorandums of understanding, policies, or procedures that establish a legal or contractual relationship between the County and the Councils.

There are also varying degrees of sophistication among the Councils. Some of the Councils have more advanced bookkeeping practices and a better understanding of their financial stability and cash flows. Thus, these Councils are more likely to make timely payments to the County for their Group Leadership expenses and to resolve discrepancies as they arise through supporting documentation. Conversely, the Councils that are less sophisticated often have more financial issues and cash flow problems. Therefore, these Councils tend to be less likely to make timely payments to the County for their Group Leadership expenses and in some instances, have declined to pay outstanding balances.

As noted earlier in the report, the County plays no role in setting the hourly rate for Group Leadership Special Rate employees. According to one interviewee, there is a concern within the Department that the Councils are setting hourly rates for these employees without giving enough forethought as to how much money they can realistically collect from their members for the related activities. Consequently, this can impact the amount and timeliness of their payments to the County. Additionally, there is a concern that some of the Councils are not overly concerned with projecting cash flows because the County has a history of not enforcing collection of outstanding balances under Group Leadership.

B. Issues with the Group Leadership Data

i. Group Leadership Administrators are Expected to be Bookkeepers

Under Group Leadership, the Group Leadership Administrators are responsible for inputting the hours worked by Group Leadership employees into the Payroll Application, invoicing the Councils for monies owed under Group Leadership, and collecting the payments from the Councils. The information input by the Group Leadership Administrators is reviewed and approved by the Regional Coordinators and ultimately, it is compiled at the Department's headquarters by the Group Leadership Program Manager (hereinafter "the Program Manager").

Over the past several years as Group Leadership has grown, the Group Leadership Administrators, who are typically trained in recreational programming, have had to spend an inordinate amount of time on data entry, bookkeeping, and payroll management related to Group Leadership. Because these duties are not within a typical Group Leadership Administrator's area of expertise or training, the quality of the bookkeeping for Group Leadership can vary widely among the Group Leadership Administrators.

ii. Timesheets are not Required

One of the fundamental problems with the Group Leadership data is timesheets are not required to be submitted to the Group Leadership Administrators to justify Group Leadership expenses. Under the old payroll system, triplicate timesheet forms were completed for all Group Leadership employees, with copies being maintained by the Group Leadership Administrator, the Regional Coordinator, and the Program Manager. Several of the employees interviewed said that when the triplicate forms were in use, it was easier to record the hours worked by Group Leadership employees, ascertain how much money had been spent on a particular Group Leadership activity, and retrieve documentation when discrepancies arose.

Under the Payroll Application, which has been in place since approximately 2018, the hours worked by Group Leadership employees are collected and maintained by the Group Leadership Administrators in a variety of ways. While the Department has made a general timesheet available to the Councils to record Group Leadership hours, not all Councils utilize the form, and some do not use the form consistently. In some instances, emails, electronic calendar entries, and written notes documenting phone calls and in-person communications with the employees are the basis for recording the Group Leadership hours. In other cases, no written documentation exists, other than what is on the activity schedule, which does not necessarily equate to actual hours worked at the end of a pay period.

Each pay period, the Group Leadership Administrators log the hours worked into the Payroll Application for each of their Group Leadership employees. The Payroll Application pulls the pay rates for those employees from a separate database when the payroll is run. The Group Leadership Administrators also log these hours into a spreadsheet that contains the pay rates for the employees along with the appropriate percentage for fringe benefits. The Administrators are responsible for ensuring the pay rates and fringe benefits are always kept up-to-date. Based on the investigation, this is an administrative burden, particularly for the larger Group Leadership programs, which can have dozens of employees at multiple pay rates. The spreadsheet is used to calculate how much money the Councils owe the County each pay period for Group Leadership expenses.

iii. Lack of Standards and Uniform Processes

There are no standard procedures among the Group Leadership Administrators to ensure the hours worked by Group Leadership employees are collected, reviewed, and documented in the Payroll Application in a consistent and timely manner across the County. Therefore, when timesheets are submitted by Group Leadership employees, the Group Leadership Administrators have no guiding principles to reference when reviewing them for accuracy and completeness. This includes ensuring the hours worked by Standard Rate employees are accurately split between Group Leadership and General Fund activities each pay period. Currently, this responsibility falls on the Group Leadership Administrators. Ideally, any errors affecting Group Leadership expenses would be identified and resolved before the Councils are ever invoiced. Based on the investigation, this is not happening consistently. In addition, the lack of uniform processes among the Group Leadership Administrators is making it more difficult for the Program Manager to retrieve information from the field when needed to resolve discrepancies between the County and the Councils over Group Leadership expenses.

iv. Data is not Readily Accessible

Even though the Regional Coordinators are responsible for approving the Group Leadership hours in the Payroll Application each pay period, they do not have ready access to any of the supporting documentation (e.g. timesheets). This documentation is maintained by the Group Leadership Administrators. Also, if the Regional Coordinators want to validate the invoice amounts sent to the Councils each pay period, they need to reference a master list of the pay rates, which is published by the Program Manager. This process is cumbersome and time consuming. Consequently, when the Regional Coordinators perform their reviews of the pertinent Group

Leadership data, they generally look for obvious errors. Examples of obvious errors are the inadvertent coding of an instructor's time to the General Fund as opposed to Group Leadership, or submitting more hours in a pay period than permitted under Group Leadership rules.⁴

Also, there is no one place where a Group Leadership employee's name, identification number, hours worked, pay rate, gross pay, and associated activity, are listed under the current recordkeeping structure of Group Leadership. This data is fragmented among various records. Thus, each time the Program Manager has to research an issue or discrepancy, it is time consuming to locate the necessary information and more difficult to accurately resolve the matter.

v. Individual Group Leadership Balances Get Obscured

The Program Manager is responsible for combining the balances of all the Group Leadership accounts into one Group Leadership account for the Department. Therefore, the Councils with negative or deficit Group Leadership balances are combined with the Councils that have positive balances.⁵ Throughout the fiscal year as the combined Group Leadership figure changes, the Program Manager provides recommended journal entries to the accounting department so the Group Leadership figure can be more accurately reflected on the County's books and records. These recommended journal entries occur on a daily basis.

C. Lack of Communication Among Stakeholders

During several interviews, the Office was told there is a fundamental lack of communication between the Department's headquarters and the field staff concerning Group Leadership. While all of the interviewees agreed that Group Leadership has been a significant issue within the Department for a number of years, only recently has the Program Manager been invited to participate in the Department's monthly leadership meetings to discuss the outstanding balances. Additionally, there are no regular meetings between the Program Manager and the Regional Coordinators to specifically address Group Leadership issues.

The Program Manager does distribute multiple reports after each pay period to certain field staff, to include all of the Regional Coordinators, documenting how much the Department believes each of the Councils have spent on Group Leadership for that pay period, and whether any outstanding balances are owed to the County. The Program Manager requests that the recipients of these reports bring any discrepancies to the Department's attention. Based on the interviews conducted, it appears that not all field staff are communicating discrepancies back to the Program Manager and in some instances, the staff may not be reviewing the reports at all. This is likely because Department staff have no power to enforce collection of outstanding monies from the Councils. Because of the magnitude of Group Leadership and the fact that the numbers change regularly with the payroll runs, it is imperative that the field staff report discrepancies to the Program Manager as soon as practical, and that those issues get resolved as soon as possible. Failing to perform such timely reconciliations has contributed to the accumulation of the

⁴ Generally, Group Leadership employees are not permitted to work more than 20 hours per week.

⁵ Positive balances occur when Councils pay the County more money than required under Group Leadership at a given point in time. This typically occurs among the more financially stable Councils to help ensure their accounts never go negative.

significant deficit balances.

In addition, it is not uncommon for pay rate changes initiated within the Department to not get updated in the field. For example, when minors employed under Group Leadership turn 18, they automatically get a pay raise. One interviewee estimated there are about 100 minors working under Group Leadership. Because the Payroll Application does not include the pay rates for the Group Leadership employees, such changes in pay rates are often not communicated to the Group Leadership Administrators who are responsible for billing the Councils based on hours worked by the leaders and their respective pay rates. Thus, the invoices will be artificially low, causing discrepancies with the figures maintained at headquarters. According to interviewees, requests have been made to have the pay rates added to the Payroll Application. As of the date of this report, the pay rates are not included in the Application and therefore, changes to pay rates are not being updated automatically. Thus, Group Leadership Administrators are at risk of using outdated pay rates when performing labor calculations for Group Leadership. With hundreds of Group Leadership employees and wide-ranging pay rates, the lack of automation is problematic.

D. Payroll System Change

In the past five years, the Department has used three different methods to manage the Group Leadership payroll. As noted earlier, triplicate timesheets were utilized several years ago and since about 2018, the Payroll Application has been in effect. Subsequent to the use of triplicate timesheets and before the implementation of the Payroll Application, the Group Leadership Administrators utilized an Excel spreadsheet to track Group Leadership time. Each pay period, these spreadsheets were submitted electronically to headquarters where they had to be converted into a format that could be processed by the County's payroll system. According to several interviewees, there were numerous errors that occurred while the Excel spreadsheet method was in effect and as a result, much of the accumulated deficit balances that have been carried forward over the past several years, and which still existed into the spring of this year, can be traced back to that payroll process. Additionally, there is a general belief within the Department that the portions of the deficit balances that can be attributed to the payroll system errors are so complex, they will never be fully resolved.

III. Directives for Group Leadership

The only document that exists setting forth a policy or a business process for Group Leadership is the Department's Directives.⁶ Included in this document is Directive B-1 titled "Group Leadership Program" (see **Exhibit 2**), which was put into effect on March 26, 1992 and revised on November 4, 2012. Directive B-1 lists various procedures to be followed by Department staff and the Councils. None of these procedures address the collection of outstanding monies from the Councils. Also, the investigation revealed the following procedures set forth in Directive B-1 are not being followed:

- Procedure #2 states "Staff, with the cooperation of recreation council volunteers, will determine leadership costs..." In reality, leadership costs under Group Leadership are

⁶ It is worth noting that the Program Manager was unaware that Directives existed pertaining to Group Leadership.

driven by the number of hours worked and the hourly rate, both of which are set by the Councils.

- Procedure #4a states “Staff will be responsible for: Ensuring the recreation and parks council submits a check to the department to cover leadership costs with submittal of timesheets.” As can be seen from the accumulated deficit balances in the following section of this report, this procedure is not being consistently followed.
- Procedure #5 states “Area and local staff must use appropriate accounting method provided by Department to track the deposits and expenditures for this program.” As described in earlier sections of this report, there is a lack of consistency among the Councils and the Group Leadership Administrators with regard to procedures and recordkeeping for Group Leadership.

IV. Outstanding Balances Owed to the County

Between April and July 2021, the Office received five (5) spreadsheets from the Program Manager detailing the Group Leadership balances and related data for the Councils and other entities participating in Group Leadership at various points in time. To illustrate the changes on some of those Group Leadership balances over a relatively brief time period, the Office put the balances from those five spreadsheets onto one spreadsheet (see **Exhibit 3**). The black figures on the spreadsheet denote positive or surplus balances and the red figures represent negative or deficit balances.

As can be seen from Exhibits 3, some of the Group Leadership balances for the Councils have fluctuated significantly over the past few months. In several instances, significant deficit balances have gone down dramatically and in some instances, deficit balances that existed in April 2021 have become surplus balances in July 2021. The Office believes these changes are the result of a concerted effort within the Department, some of which is believed to be in response to the Office’s investigation, to resolve discrepancies in account balances that may have been distorting the true balances. Regardless, some of the deficit balances have persisted, and the sum of the eighteen (18) entities that have deficit Group Leadership balances as of July 9, 2021 equals \$139,021.63.

V. No Follow Through on Enforcement

Based on the investigation, the first documented concerns about Group Leadership were in a memorandum dated November 17, 2004 (see **Exhibit 4**). In the memorandum, which was addressed to the Group Leadership Program Coordinators, it stated it was “necessary to change the way the [deposits and expenditures monthly] report is produced.” The memorandum went on to explain “The current method of reporting deposits, expenditures, adjustments, and refunds does not allow [the County] to reconcile main office records with that of the recreation councils.” Attached to the memorandum were the Group Leadership balances for the various Councils and other entities in the program as of June 30, 2004, with a request to verify the balances and to report discrepancies.

Approximately five years later, an email dated October 30, 2019 was sent to the Group Leadership Program Coordinators and their assistants referencing letters to be sent out to all of the Councils regarding Group Leadership (see **Exhibit 5**). According to the email, there had been recent discussions about several of the Councils having deficit balances. To address the issue, the Department intended to send out two versions of a letter dated October 28, 2009 to all of the Councils. One version would go to the Councils that primarily have surplus Group Leadership balances (see **Exhibit 6**). The other version would go to the Councils that have had a deficit of \$5,000 or more in two of the past six months (see **Exhibit 7**). In both letters, it stated “in order for the program to continue, it is imperative that, at a minimum, group leadership funds are deposited **prior to** submission of timesheets.” The letter intended for the Councils that have had ongoing deficit issues stated “any account that has a deficit as of January 1, 2010 will be frozen and no future expenditures (timesheets) will be processed until the account has a positive balance.” The Office was unable to confirm if these two letters were in fact sent and what, if anything, occurred as a result of those letters.

The Office also located a memorandum dated February 12, 2010 that listed sixteen entities associated with Group Leadership that had negative Group Leadership balances as of January 1, 2010 totaling \$83,812.76 (see **Exhibit 8**). In the memorandum, there was a recommendation that these entities be advised that their accounts would be frozen effective February 21, 2010 if they did not resolve their deficits with the County.

The investigation also revealed letters dated August 22, 2011 on Department letterhead to two of the Councils notifying them of their deficit balances with a warning that if their accounts were not brought up to date, they would be frozen, and they would not be able to continue to participate in Group Leadership (see **Exhibits 9 and 10**). Again, the Office was unable to confirm if these letters were actually sent.

As of the date of this report, no Group Leadership account has ever been frozen, nor has any Council ever been precluded from participating in Group Leadership for any reason, to include for having a negative balance.

Also as of the date of this report, there are no written agreements in place between the County and the Councils addressing Group Leadership, or any other aspect of the relationships between the County and the Councils.⁷ Thus, there is no legally binding document addressing each of their responsibilities or the consequences that would be imposed for failing to meet those obligations.

Some of the Group Leadership deficit balances have continued to grow since 2009 with little to no legal remedy for the County. In fact, two of the Councils that had negative balances went defunct and are no longer certified. The negative balances for both of the defunct Councils continue to exist on the Group Leadership spreadsheets prepared by the Program Manager as referenced earlier in the report.

⁷ The Office has been told the Department is working on memorandums of understanding for the Councils that will address, among other things, Group Leadership.

VI. Conclusion

Based on the investigation, the Office has identified eighteen (18) entities participating in Group Leadership that owed the County approximately \$139,021.63 as of July 9, 2021. Based on the fluctuations of the Group Leadership balances over the past few months and for the reasons set forth in this report, the Office anticipates that several of these balances will continue to change as additional journal entries are made at the recommendation of the Program Manager. What is of concern to the Office is the probability, under the current structure of Group Leadership, that data-related errors will continue, disputes over invoiced expenses will persist, and the County will not try to enforce the collection of outstanding debts under the program.

The investigation revealed that the County's reluctance to enforce the collection of deficit balances under Group Leadership has historically been a three-part problem. First, the County for the past several years has not had total confidence in its own Group Leadership figures. Second, the County is concerned about the optics of canceling programming, which is currently its only option to try and enforce collections from the Councils. Third and most important, Group Leadership has operated strictly under a "handshake agreement" since its inception. Because there are no written contracts or binding documents setting forth the obligations of the parties and the consequences of not fulfilling those obligations, it would be extremely difficult to legally enforce the collection of debts.

Because the Councils mostly hired independent contractors in the early stages of the program, Group Leadership started out and remained a relatively small program for years. Over the last 15 years, Group Leadership has grown exponentially. Today, Group Leadership consists of 58 entities and hundreds of employees who are paid at a variety of rates. While these employees are given all of the rights and responsibilities of traditional County employees, they are subject to far less scrutiny when hired and while employed, thereby exposing the County to unnecessary risks and liabilities.

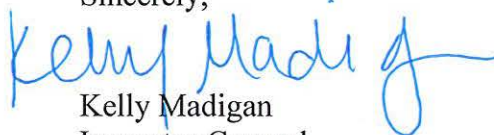
During the investigation, it was learned that some of the Councils have begun to hire independent contractors again. The Office recognizes that the more financially stable Councils with more sophisticated bookkeeping practices are in a much better position to utilize independent contractors. However, the Office consistently heard from the interviewees that the current system in place is not working the way it was intended. Therefore, the Office believes the threshold question for the County moving forward is whether Group Leadership employees should remain County employees, but be subjected to the same requirements, responsibilities, and oversight assigned to traditional County employees, or go back to being independent contractors working directly for the Councils.

The investigation also showed Group Leadership has outgrown the Directives that were initially drafted in 1992 and then revised in 2012. While the County cannot legally require the Councils to abide by its existing Directives, at a minimum, the Directives should be updated to help ensure there is uniformity among the participants in the program when it comes to recordkeeping and processes, particularly with the collection of hours worked by the Group Leadership employees. Further, efforts should be made to increase communication among all levels of participants in the program. Many of the interviewees expressed their frustration with Group Leadership, particularly regarding the amount of time they have to spend managing the

program, which takes away from their other duties and responsibilities. Uniformly, the interviewees wanted the program to work, but did not believe the program could ever fully succeed under its current structure.

This matter is being referred to you for an official response. Please respond in writing by August 13, 2021, indicating what action has been taken or what action you intend to take regarding this matter. Should you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,



Kelly Madigan
Inspector General
Office of the Inspector General

cc: John A. Olszewski, Jr., County Executive
Patrick H. Murray, Chief of Staff
James R. Benjamin, Jr., County Attorney
Roslyn Johnson, Director, Recreation & Parks

**BALTIMORE COUNTY DEPARTMENT OF RECREATION AND PARKS
AGREEMENT FOR EMPLOYMENT**

WHEREAS, the _____ Recreation and
Parks Council desires to conduct a _____ program
which requires the services of a qualified _____; and
(Job Title)

WHEREAS, _____, has offered to
(Name)
perform the services required for the above program as a non-merit, monthly
employee of the Baltimore County Department of Recreation and Parks to be
funded through the aforementioned recreation and parks council's donation to
the Baltimore County Gifts and Grants fund; and

As an employee of the Baltimore County Department of Recreation and
Parks I agree to comply with current state and county regulations. I further
understand and agree that failure to do so will result in my no longer being
considered for this position.

THEREFORE, the Baltimore County Department of Recreation and Parks
agrees to pay _____ for the required services at an hourly
(Name)
rate, as determined by the _____ Recreation and Parks Council, of
(\$ _____) for services performed during the period starting July 1, _____ and
ending June 30, _____.

WHEREAS, each party reserves the right to cancel this agreement upon
written notice of two weeks, and the parties have affixed their signatures below
on the date indicated.

Employee Date

Recreation Council Representative Date

County Representative Date

EXHIBIT 1

**BALTIMORE COUNTY DEPARTMENT OF RECREATION AND PARKS
AGREEMENT/CONDITIONS OF EMPLOYMENT**

GENERAL CONDITIONS OF EMPLOYMENT

1. The Baltimore County Department of Recreation and Parks will pay employees on a monthly basis with the payroll period starting on the 21st of the month and ending on the 20th of the following month.
2. The program length will determine the length of employment.
3. Baltimore County may dismiss the employee at any time for any reason.
4. The sponsoring Recreation and Parks Council must pay salary costs and associated fringe benefit charges or program and employment will be terminated.
5. Salary will be established by the Recreation and Parks Council and will not change unless approved by the Recreation Council and Parks Council.

Recreation and Parks Council: _____

Program/Activity Name: _____

Working Title: _____

Employee: _____

Hourly Rate: _____

Program/Employment Period: _____

Approved by:

Employee Date

Recreation and Parks Council Representative Date

County Representative Date

RECREATION AND PARKS DIRECTIVE B-1

TITLE: Group Leadership Program

DIRECTIVE: The Department of Recreation and Parks does not provide paid leadership for the following: adult programs, tournaments, out of season (See Directive B-4), tots and childcare programs, and program instructors (i.e. ballet, aerobics). The Group Leadership Program enables the County's Recreation and Parks Councils to donate funds to pay leadership for these programs or to expand other programs beyond funding.

Department staff and recreation and parks councils desiring to participate in this program shall follow the following procedures:

1. Staff will determine which programs to designate for participation in this process.
2. Staff, with the cooperation of recreation council volunteers, will determine leadership costs and complete the Agreement for Employment and the Conditions of Employment form.
3. Part-time staff members who are employed in the Group Leadership Grant Program may not have a current position of leadership with the local recreation council in accordance with Directive A-4.
4. Staff will be responsible for:
 - a. Ensuring the recreation and parks council submits a check to the department to cover leadership costs with submittal of timesheets. All checks are to be made payable to "Baltimore County, MD".
 - b. Forwarding all checks to the Regional Coordinator's Office who will check for accuracy, then forward to the appropriate staff member in the department's main office. All checks are to be accompanied by a pre-numbered miscellaneous cash receipt. These forms may be obtained from the appropriate staff member in the department's main office. A copy of the invoice verified by the Office of Budget and Finance will be returned to the Regional Coordinator.
4. All checks will be deposited into the Group Leadership account. Any surplus balance will be carried into the next year

and used for future programs or can be refunded to the recreation and parks council (minimum refund is \$100). Recreation council must request refunds via a written memorandum to the Department of Recreation and Parks.

5. Area and local staff must use appropriate accounting method provided by Department to track the deposits and expenditures for this program.

Revised 11/4/12
Originated 3/26/92

BALTIMORE COUNTY, MARYLAND
DEPARTMENT OF RECREATION AND PARKS
INTER-OFFICE CORRESPONDENCE

TO: Program Coordinators

FROM: [REDACTED]

DATE: November 17, 2004

SUBJECT: Gifts & Grants Group Leadership Deposits and Expenditures

In an effort to keep better track of the deposits and expenditures monthly report, it is necessary to change the way the report is produced every month. The current method of reporting deposits, expenditures, adjustments and refunds does not allow us to reconcile main office records with that of the recreation councils.

In order to do this, please verify the balance shown on the attached report with your records. If there is a discrepancy between your records and ours, please contact [REDACTED] or me so that we can reconcile our records.

As soon as this information is received from you, we will prepare and distribute the monthly report.

Thank you.

/laa

c: [REDACTED]

attachment

EXHIBIT 4

Recreation Council	Balance as of 6/30/04
[REDACTED]	
[REDACTED]	(2,525.19)
[REDACTED]	(172.12)
[REDACTED]	785.46
[REDACTED]	87.32
[REDACTED]	2,078.21
[REDACTED]	3,342.58
[REDACTED]	
[REDACTED]	1,221.91
[REDACTED]	471.97
[REDACTED]	(1,089.72)
[REDACTED]	146.92
[REDACTED]	393.15
[REDACTED]	
[REDACTED]	311.07
[REDACTED]	252.78
[REDACTED]	0.00
[REDACTED]	(131.20)
[REDACTED]	524.87
[REDACTED]	1,529.73
[REDACTED]	9,708.64
[REDACTED]	1,083.37
[REDACTED]	2.94
[REDACTED]	23.01
[REDACTED]	
[REDACTED]	14,404.21
[REDACTED]	214.21
[REDACTED]	(829.42)
[REDACTED]	2,996.74
[REDACTED]	5,396.21
[REDACTED]	245.14
[REDACTED]	
[REDACTED]	(4,836.80)
[REDACTED]	76.33
[REDACTED]	(1,851.69)
[REDACTED]	319.27
[REDACTED]	2,043.87
[REDACTED]	22.15

Recreation Council	Balance as of 6/30/04
██████████	
██████████	(28.26)
██████████	(2,343.68)
██████████	25.55
██████████	(4.46)
██████████	(378.85)
██████████	(8,453.99)
██████████	5,434.21
██████████	0.00
██████████	1,704.60
██████████	10.13
██████████	
██████████	(4,639.58)
██████████	0.00
██████████	1,951.62
██████████	(399.58)
██████████	
██████████	1,071.59
██████████	3,288.63
██████████	994.00

[REDACTED]

From: [REDACTED]
To: pc's and asst's
Date: 10/30/2009 2:53 PM
Subject: Group Leadership
Attachments: 20091030122850.pdf; 20091030122908.pdf; Mar 09 - Sept 10 deficit comparison.xls; President Merge labels 10-28-09.doc

As you know, there has been discussion recently regarding the deficits in the group leadership accounts of many of our recreation councils. One of two letters is being sent to all recreation council presidents; both are attached. Because the program was established so many years ago and many staff and leadership has changed since that time, the letter explains the intent of the program and the way it is supposed to be structured to run. If the council runs mostly in the black, they will receive a letter explaining the program and how the program needs to run to continue to be successful. If the council has had a deficit of \$5,000 or more in two months of the past six months, then they will receive the letter stating that the council will not be allowed to incur expenses if there is a deficit for two consecutive months. One other document attached is a spreadsheet that shows a comparison of group leadership balances from March '09 through September '09.

Please feel free to call me, [REDACTED] if you have any questions.

[REDACTED]

EXHIBIT 5

[REDACTED]



BALTIMORE COUNTY
M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

ROBERT J. BARRETT, *Director*
Department of Recreation and Parks

October 28, 2009



I hope that you and your council are enjoying a successful and enjoyable fall season.

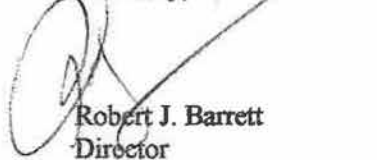
I am writing today in reference to the operation of the Group Leadership (Gifts and Grants) program. Since its inception, there has been a large turnover in volunteers, as well as staff, and a review of this process to ensure we are all on the same page would seem in order.

The Group Leadership program was established in 1992 in response to a downturn in the economy that forced Baltimore County to take action to reduce funding for activity leadership. As a result, certain activities, such as tot fun centers, tournaments, and adult programs, no longer received county funding. In order to maintain the level of leadership required for quality recreation, the department and recreation councils established the Group Leadership program, which enables recreation councils to transfer monies to the county to pay salaries for program leadership. It was structured to have department staff work with recreation councils to determine leadership costs and for councils to submit checks to offset payroll and fringe costs to the county prior to the start of the recreation program.

While this program has worked well for the past 17 years and in order for the program to continue, it is imperative that, at a minimum, group leadership funds are deposited prior to submission of timesheets. By acting proactively, we will ensure the success of the program and the availability of quality recreational opportunities for the citizens of Baltimore County.

If you have any questions about your council's group leadership account, please consult your community supervisor. If I can be of assistance, please feel free to contact me.

Sincerely,



Robert J. Barrett
Director



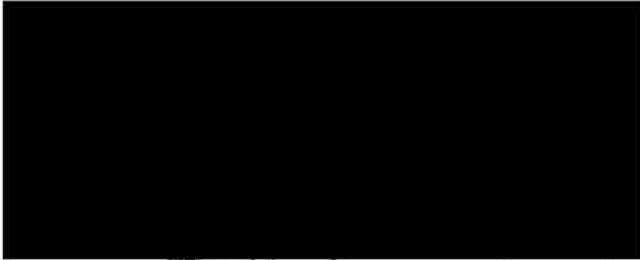


BALTIMORE COUNTY
M A R Y L A N D

JAMES T. SMITH, JR.
County Executive

ROBERT J. BARRETT, *Director*
Department of Recreation and Parks

October 28, 2009



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While this system has worked well for the past 17 years and in order for the program to continue, it is imperative that, at a minimum, group leadership funds are deposited prior to submission of timesheets. By acting proactively, we will ensure the continuance of the program and the availability of quality recreational opportunities for the citizens of Baltimore County.

For many recreation and parks councils, that is exactly how the Group Leadership program operates. However, some council accounts have accumulated deficits, which jeopardize the entire program. A review of program records indicates your council has accumulated a deficit of \$5,000 or more on occasion in the recent past.

Page 2
Group Leadership
October 28, 2009

If the deficits continue, I will be forced to take steps to ensure the solvency of the program. Therefore, any account that has a deficit as of January 1, 2010 will be frozen and no future expenditures (timesheets) will be processed until the account has a positive balance. After January 1, 2010, no account will be allowed to incur expenditures if there is a deficit for two consecutive months.

If you have any questions about your council's group leadership account, please consult your community supervisor.

If I can be of assistance, please feel free to contact me.



Sincerely,



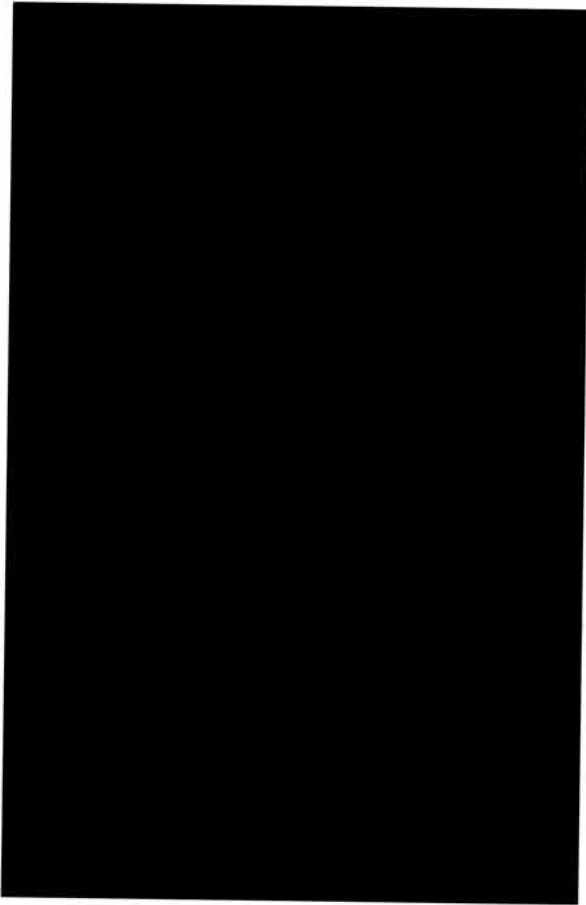
Robert J. Barrett
Director




BALTIMORE COUNTY, MARYLAND
INTER-OFFICE CORRESPONDENCE

TO: 
FROM: 
SUBJECT: Group Leadership
DATE: February 12, 2010

In accordance with the Director's letter to Recreation Council Presidents dated 10/28/2009, any recreation and parks council that has a group leadership deficit as of January 1, 2010 is to have their group leadership account frozen until that account has a positive balance. I have listed below the council's that have a deficit as of 1/1/2010.





I recommend that the council's be advised that as of 2/21/2010 their Group Leadership accounts will be frozen until they have a positive balance.

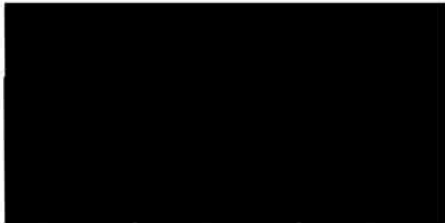
KHW



KEVIN KAMENETZ
County Executive

BARRY F. WILLIAMS, Director
Department of Recreation and Parks

August 22, 2011



I hope that you and your council are enjoying a successful and enjoyable summer.

I am writing today in reference to the operation of the Group Leadership (Gifts and Grants) program. Since its inception, there has been a large turnover in volunteers, as well as staff, and a review of this process to ensure we are all on the same page would seem in order.

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While this system has worked well for the past 17 years, recent difficult fiscal times have seen the program occasionally on the verge of insolvency. In order for this program to continue, it is imperative that, at a minimum, group leadership funds are deposited prior to submission of timesheets. By acting proactively, we will ensure the continuance of this program and the availability of quality recreational opportunities for the citizens of Baltimore County.

For many recreation and parks councils, that is exactly how the Group Leadership program operates. However, some council accounts have accumulated deficits, which jeopardize the entire program. A review of program records indicates that your council has accumulated a deficit of up to \$5,200 in each of the past three months.

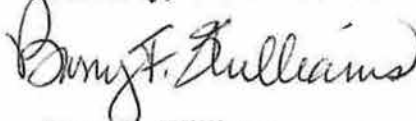
Page 2
Group Leadership
August 22, 2011

I am writing to remind you that any council with continued deficits will be subject to having their Group Leadership account frozen and no future expenditures (timesheets) will be processed until the account has a positive balance.

If you have any questions about your council's group leadership account, please consult your community supervisor.

If I can be of assistance, please feel free to contact me.

Sincerely,



Barry F. Williams
Director



KHW



KEVIN KAMENETZ
County Executive

BARRY F. WILLIAMS, Director
Department of Recreation and Parks

August 22, 2011



I hope that you and your council are enjoying a successful and enjoyable summer.

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While this system has worked well for the past 17 years, recent difficult fiscal times have seen the program occasionally on the verge of insolvency. In order for this program to continue, it is imperative that, at a minimum, group leadership funds are deposited **prior to** submission of timesheets. By acting proactively, we will ensure the continuance of this program and the availability of quality recreational opportunities for the citizens of Baltimore County.

For many recreation and parks councils, that is exactly how the Group Leadership program operates. However, some council accounts have accumulated deficits, which jeopardize the entire program. A review of program records indicates that your council has accumulated a deficit of up to \$8,600 in each of the past six months.

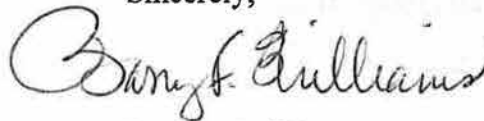
Page 2
Group Leadership
August 22, 2011

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If you have any questions about your council's group leadership account, please consult your community supervisor.

If I can be of assistance, please feel free to contact me.

Sincerely,



Barry F. Williams
Director





KELLY MADIGAN
Inspector General

STEVE QUISENBERRY
Deputy Inspector General

Office of the Inspector General

August 30, 2021

Stacy L. Rodgers
County Administrative Officer
400 Washington Avenue
Towson, Maryland 21204

Re: OIG External Report 21-002 – Reply

Thank you for your response dated August 13, 2021 to our External Report 21-002 concerning Baltimore County's Group Leadership Program (hereinafter "the Program"). The Office of the Inspector General (OIG) appreciates the efforts by the Department of Recreation and Parks (hereinafter "the Department") to resolve the various issues associated with the Program, particularly the reduction in debts owed by the Councils to the County. Additionally, the OIG looks forward to receiving copies of the documents referenced in your response.

The OIG would like to correct one point made in your August 13th letter. Director Roslyn Johnson was interviewed by the OIG about the Program. On March 8, 2021, Director Johnson and a senior member of her Department met with the OIG to discuss the Department in general. During that meeting, Director Johnson and her senior team member spoke at length about the various issues plaguing the Program, and they answered a number of questions posed by the OIG regarding the Program. Those issues were documented in notes taken by the OIG. Subsequently, several of the Department's employees, to include the Program Manager, were interviewed. Based on several factors, the OIG had reason to believe that Director Johnson was being kept apprised of our investigation as it progressed. If the OIG believed that Director Johnson could have provided any pertinent information beyond what was provided during the March 8, 2021 interview, she would have been contacted for a follow up interview.

Sincerely,

Kelly Madigan

Kelly Madigan
Inspector General
Office of the Inspector General

cc: John A. Olszewski, Jr., County Executive
Patrick H. Murray, Chief of Staff
James R. Benjamin, Jr., County Attorney
Roslyn Johnson, Director, Recreation & Parks



JOHN A. OLSZEWSKI, JR.
County Executive

STACY L. RODGERS
County Administrative Officer

August 13, 2021

Ms. Kelly Madigan
Baltimore County Inspector General
400 Washington Avenue
Historic Court House
Towson MD 21204

RE: OIG Report 21-002 Recreation and Parks
Group Leadership Program

Dear Ms. Madigan:

Please accept this communication as the Administration's response to your recent report (OIG External Report 21-002 issued on July 31, 2021) regarding the Department of Recreation and Parks' Group Leadership Program. As you mention in your report, yes the Department is aware of this long-standing issue. Department records reflect the various attempts made over the years to collect outstanding revenues. While your report states that "*there is no formal plan to enforce collection of the outstanding funds,*" I am pleased to advise that the Department does, indeed have a plan, not only for addressing collections, but for the Group Leadership Program in general.

I regret that you did not include Director Roslyn Johnson in your interviews regarding the Department's efforts to address this matter. Ms. Johnson has worked closely with me, and members of the Offices of Law and Budget and Finance to identify options to mitigate this current collections issue while supporting the needs of the Recreation and Nature Councils (Councils). Likewise, there are additional procedural steps that will be implemented over the next few months that will permanently resolve this longstanding issue. Summarized below is a brief history and highlights of the Department's actions and overall plans regarding the Group Leadership Program.

Background:

Upon her January 2020 appointment as Director of Recreation and Parks, Ms. Johnson was briefed by staff about the issue. In her initial meetings with the various Councils Ms. Johnson addressed the issue of Group Leadership Program outstanding balances and the need to resolve outstanding debts owed to the County. At Director Johnson's direction Department staff resumed communications and regularly discuss the outstanding debt with the Councils. As reflected in your report the overall outstanding balance for the Councils has decreased significantly over the last few months.

Current Balance Status:

- From 3/31/21 to 6/30/21 the overall outstanding balance was reduced from \$420,353 to \$139,021, (a 66.93% reduction). This reduction was the result of Department staff's diligent work with the Councils to reduce the outstanding debt.
- As of August 1, 2021 there are 14 Councils with remaining outstanding balances. Please note that one Council reflected in the IG report has been dissolved since 2017. Therefore this is no longer a legal entity and the County is unable to collect any outstanding revenues. The County will write off this debt (See attachment 1).

○ [REDACTED] - \$7,807

Kelly Madigan, Inspector General
OIG External Report 21-002
August 13, 2021

- One additional Council reflected in the IG report ([REDACTED]) was voluntarily dissolved in 2017. This Council merged with the [REDACTED] in 2017. The outstanding balance of \$4,836 reflected in the IG report was paid off by [REDACTED] when the Councils merged. Therefore, there is no outstanding balance for this Council (See attachment 1).
- Current Councils with remaining balances will be issued letters of outstanding debt and required to make payment plans to retire the debt within an agreed upon timeframe. The target date for letter distribution is September 1. Any Council who fails to establish a payment plan with the County or fails to make payments will be forwarded to the County's Collections Division managed by the Office of Budget and Finance in coordination with the Office of Law.
- All Councils have been directed to provide "pay-as-you-go" revenues to support all staff salaries. Councils will no longer be permitted to accrue balances throughout the remainder of the program.

Longer Term Planning

In consultation with the Office of Law the Department is developing a comprehensive Memorandum of Understanding (MOU) to address operational responsibilities of the Recreation and Nature Councils. Councils human resources is addressed as part of the MOU. Once the MOU has been finalized and shared with the Councils we will brief you on the overall plan for this program. We anticipate discussion with the Councils in October 2021.

Additional Consideration

We kindly request that the names of the Councils be redacted from your report prior to releasing to the public. The Councils have worked cooperatively with the Department to address this long-standing issue and have demonstrated a willingness to resolve the debt that has accumulated over time. We have implemented appropriate business processes to prevent the accumulation of debt and have a long-term strategy to address the broader issues of this program cited in the IG report through the MOUs that will be executed with the Councils. Thank you in advance for your consideration of this request.

Again, if you have questions or require additional information please feel free to contact me. Directors Johnson, Blades, County Attorney Benjamin and I are happy to talk with you further.

Sincerely,



Stacy L. Rodgers, MPA
County Administrative Officer

cc: John A. Olszewski, Jr., County Executive
Patrick H. Murray, Chief of Staff
James R. Benjamin, County Attorney
Edward Blades, Director, Office of Budget and Finance
Roslyn Johnson, Director, Department of Recreation and Parks



BOARD OF RECREATION AND PARKS

ERIC VAN DEN BEEMT, CHAIRMAN

July 15, 2016

On July 13, 2016, at our monthly board meeting, a vote was taken to decertify the [REDACTED] Recreation and Parks Council. The vote was passed with one abstention after hearing from multiple board members who have attended your meetings over the year, as well as numerous Baltimore County employees.

In light of continued council dysfunction and a lack of effective financial controls, our Board did not feel that the interests of the [REDACTED] were being properly served.

This action means:

- 1) No new programs can be started.
- 2) Existing programs have lost their facility permits.
- 3) Outstanding bills may be paid and families may be reimbursed for registration fees, but no new financial liabilities are to be incurred.
- 4) No new registration money or donations may be collected.

Existing programs have several options:

- 1) They can disband and refund registration money to families.
- 2) They can continue to operate independently but must reapply for facility permits. If this option is chosen, they must display liability insurance coverage as Baltimore County does not protect them. Permits may be granted but priority is given to certified recreation councils seeking use of the same facility.

- 3) They can choose to move their program to another recreation council. However, this council is not obligated to accept them.
- 4) A new group could propose to create a new recreation council. You would need a different slate of officers, a constitution and by-laws, as well as a 501(c)(3) status with the IRS. This must be approved by the Baltimore County Recreation and Parks Board.

We understand that you have requested an appeal to this Board and we have scheduled a special meeting to hear this appeal. The meeting will take place at Baltimore County Department of Recreation and Parks headquarters on Tuesday, August 9, 2016 beginning at 6:00 p.m.



Eric van den Beemt, Chairman
Board of Recreation and Parks of Baltimore County



BOARD OF RECREATION AND PARKS

ERIC VAN DEN BEEMT, CHAIRMAN

Meeting Minutes

November 8, 2017

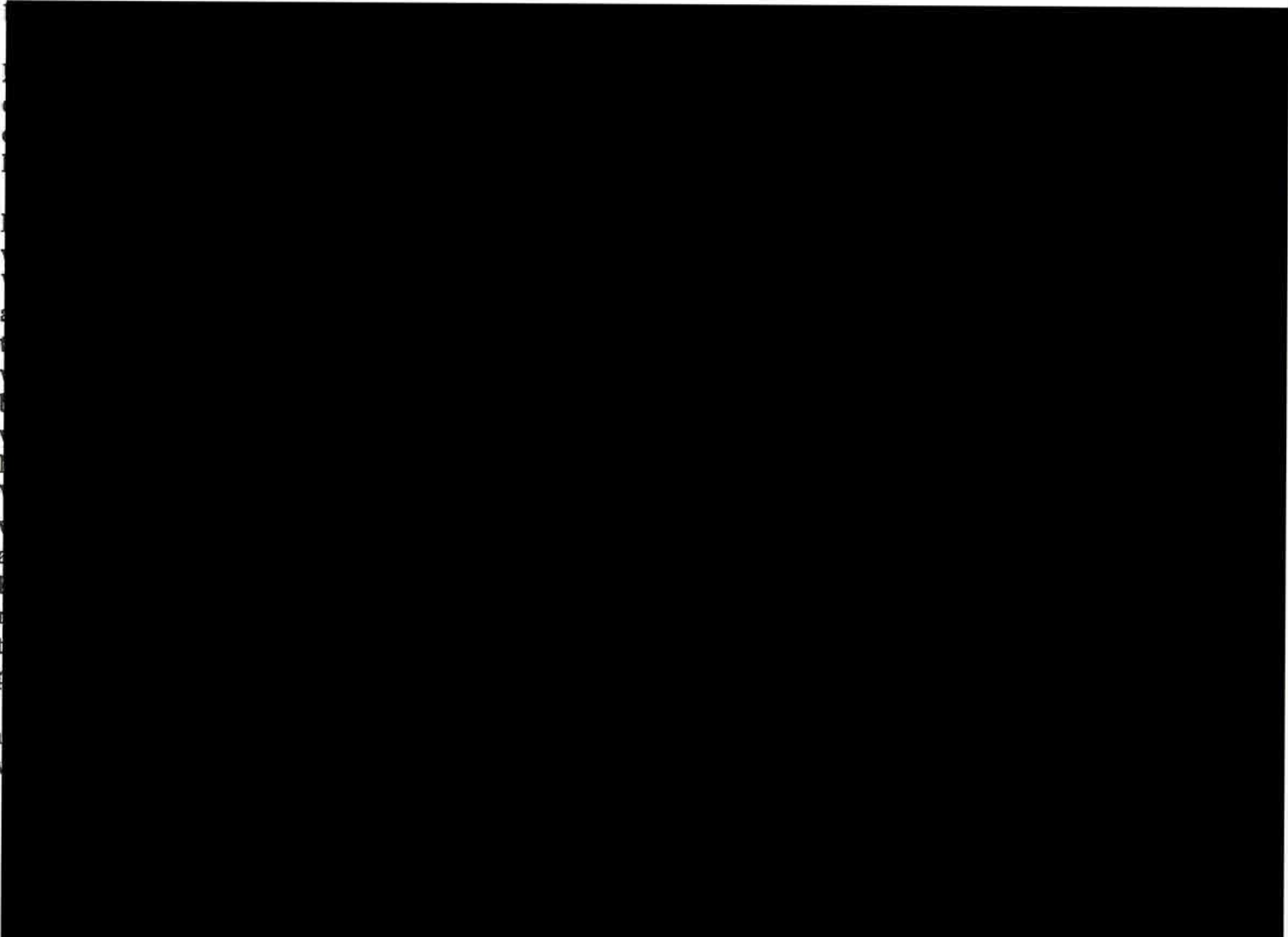
The regular monthly meeting of the Baltimore County Recreation and Parks Board was held on Wednesday, November 8, 2017, at 6:00 p.m. at the Department of Recreation and Parks administrative offices, Cockeysville, Maryland. In attendance were Eric van den Beemt, chairman, Chuck Munzert, vice chairman; board members Mike Milani, Leslie Monfred, Brian Weir, Chip Hiebler and Dylan Sloan. Recreation and Parks department staff included Barry F. Williams, director, Kara Burman, acting chief, Recreation Services and Mike Schneider, community outreach liaison.

Call to Order:

Chairman Eric van den Beemt called the meeting to order at 6:02 p.m. He apologized for missing last month's meeting.

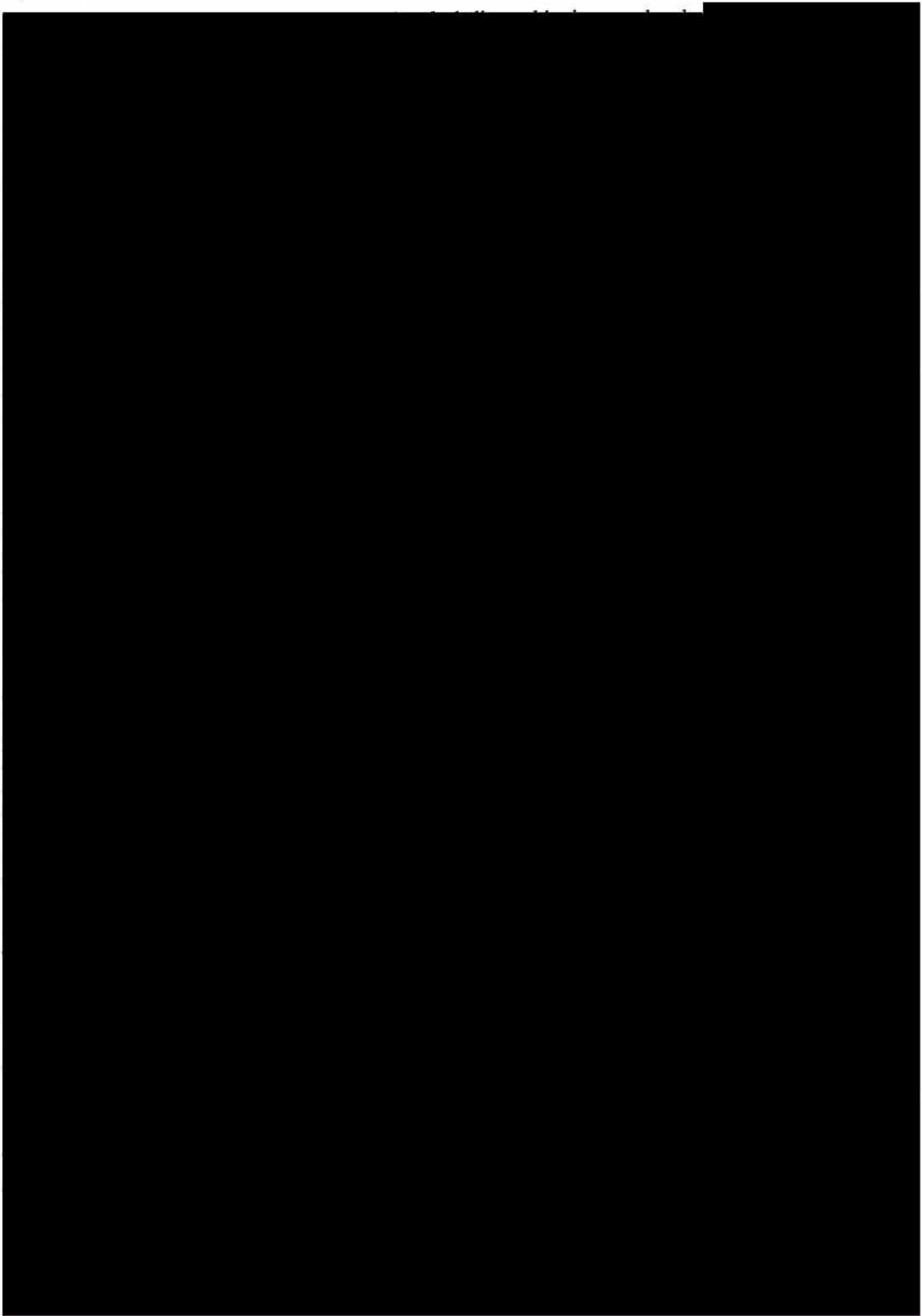
Approval of Minutes:

Chip Hiebler motioned to approve the October board meeting minutes, Vice Chairman Chuck Munzert seconded, and all were in favor.



Mr. Munzert recently attended the [REDACTED] meeting and reported that two programs from [REDACTED] changed their mind regarding the move: [REDACTED] and softball. [REDACTED] program decided to meet somewhere else, and the softball program disbanded. A check was written to those programs for the money each had. Mr. Munzert stated that the [REDACTED] account will remain open until [REDACTED] becomes a separate council. He reported that all programs seemed to be happy. In addition, Mr. Munzert reported that the court hearing, regarding restitution, is scheduled for November 15; he was summonsed to attend. He stated that they need to make sure the restitution goes to [REDACTED]. The council agreed, that after a year, whatever money comes in from restitution will be divided amongst the programs formerly with [REDACTED].

[REDACTED]



Adjournment:

There being no further business, Mr. Hiebler moved to adjourn the meeting, Mr. Munzert seconded the motion, and all were in favor. The meeting adjourned at 7:43 p.m.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'Lisa Winters', written in a cursive style.

Lisa Winters