

DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION
PERIMETER CENTER
9960 MAYLAND DRIVE
RICHMOND, VIRGINIA 23233

COMMON INTEREST COMMUNITY BOARD

Tentative AGENDA

THURSDAY, JUNE 3, 2021, 9:30 A.M.

****VIRTUAL MEETING****

MEMBERS OF THE PUBLIC: PLEASE SEE PAGE TWO OF THE AGENDA FOR VIRTUAL MEETING ACCESS INSTRUCTIONS.

- I. CALL TO ORDER
- II. ANNOUNCEMENTS
- III. INTRODUCTION OF NEW BOARD MEMBER
- IV. APPROVAL OF AGENDA
 - a. Board Agenda, June 3, 2021
- V. APPROVAL OF MINUTES
 - a. Board Meeting, March 4, 2021
- VI. PUBLIC COMMENT PERIOD*
- VII. BOARD BUSINESS
 - a. Update on Regulatory Actions
 - b. 2022 Legislative Items for Consideration
- VIII. OTHER BUSINESS
 - a. Ombudsman Report
 - b. Discussion of Reserve Study Guidelines
 - c. DPOR Updates as it Relates to COVID-19 Response
 - d. Board Financial Statements
 - e. Consideration of Resolution for Service
 - f. Consider 2022 Meeting Dates
 - g. Other Board Business
- IX. ADJOURN

NEXT MEETING SCHEDULED FOR SEPTEMBER 23, 2021, at 9:30 A.M.

* Five minute public comment, per person, with the exception of any open disciplinary or application files.

** Agenda materials made available to the public do not include disciplinary case files or application files pursuant to §54.1-108 of the *Code of Virginia*.

Persons desiring to participate in the meeting and requiring special accommodations or interpretative services should contact the Department at (804) 367-8510 at least ten days prior to the meeting so that suitable arrangements can be made for an appropriate accommodation. The Department fully complies with the Americans with Disabilities Act.



COMMON INTEREST COMMUNITY BOARD
PUBLIC PARTICIPATION IN JUNE 3, 2021 BOARD MEETING

AUTHORITY | Virtual Meeting

Access to the Perimeter Center, where DPOR board meetings are normally held, is closed to the public as a result of the COVID-19 pandemic. The meeting will be conducted in accordance with the applicable provisions of the Freedom of Information Act (Chapter 37 of Title 2.2 of the Code of Virginia) and Amendment 28 to House Bill 29 (Budget Bill for 2018-2020).

ACCESSING THE MEETING | Google Meet

Members of the public may observe the meeting via the Google Meet platform using the link below:

Link:
meet.google.com/oqt-ivgn-wuq

The public can also listen to the meeting via audio by calling the number below and entering the PIN:

Phone number: 1-716-402-8337
PIN: 842 427 711#

PUBLIC COMMENT | Registration Required

Members of the public who would like to provide comments to the Board during the public comment period must notify the Board in advance of the meeting in order to be registered. Please email the Board at cic@dpor.virginia.gov by 12:00 p.m. on Wednesday, June 2, 2021 and provide your name and email address. You will receive an email confirmation once your registration is complete.

VIRTUAL BOARD MEETING INSTRUCTIONS

Providing Public Comment

- Members of the public who have registered to provide comment can do so after having their names announced during the public comment period.
- Commenters will be limited to 5 minutes.
- Participants are asked to call from a location without background noise.
- The public comment period is an opportunity to provide comments to the Board. If a member of the public has questions of the Board or needs information, please email your inquiry to the Board office at the email address above so that staff can handle it appropriately.
- At the close of the public comment period, all public participants' connections to the meeting will be muted, and they will only be able to view and listen to the meeting.
- Feedback on this electronic meeting can be provided to the FOIA Council on the *Electronic Meetings Public Comment* form at <http://foiacouncil.dls.virginia.gov/sample%20letters/welcome.htm>.

DURING THE MEETING | Broadcast Interruption

Should an interruption of the broadcast occur during the meeting, please email Tanya.Pettus@DPOR.Virginia.gov.

The Board and staff appreciate your patience as we work through any challenges associated with a virtual meeting. The safety of all participants is of utmost concern during these unprecedented times and we look forward to resuming in-person meetings once it is safe to do so.

ANNOUNCEMENTS

DRAFT AGENDA
Materials contained in this agenda are proposed topics for discussion
and are not to be construed as regulation or official Board policy.
DRAFT AGENDA

INTRODUCTION OF NEW BOARD MEMBER

DRAFT AGENDA
Materials contained in this agenda are proposed topics for discussion
and are not to be construed as regulation or official Board position
DRAFT AGENDA

COMMON INTEREST COMMUNITY BOARD

MINUTES OF MEETING

The Common Interest Community Board (Board) met virtually via Google Meet on March 4, 2021, at 9:30 a.m. Board staff was present at the Department of Professional and Occupational Regulation (DPOR), 9960 Mayland Drive, Richmond, Virginia 23233. The meeting was held virtually due to the current public health emergency related to COVID-19 declared by the Governor, which made it impracticable or unsafe for the Board to assemble in a single location. The purpose of meeting was to discuss or transact business statutorily required or necessary to continue operations of the Board.

The following members were present:

Drew Mulhare, Chair
Maureen Baker
Tom Burrell
Jim Foley
Amanda Jonas
David S. Mercer, Vice-Chair
Lori Overholt
Anne M. Sheehan
Scott Sterling
Katherine Waddell

DPOR staff present for all or part of the meeting included:

Mary Broz-Vaughan, Director
Trisha L. Henshaw, Executive Director
Joseph C. Haughwout, Jr., Board and Regulatory Administrator
Tanya M. Pettus, Administrative Assistant

Joshua Laws, Assistant Attorney General with the Office of the Attorney General, was present.

Mr. Mulhare, Chair, called the meeting to order at 9:30 a.m. Ms. **Call to Order** Henshaw took roll of Board members and advised those in attendance at the meeting of staff present.

Ms. Henshaw advised the Board of procedures in place for conducting **Announcements** the meeting virtually.

Mr. Mercer moved to approve the agenda as presented. Mr. Foley **Approval of Agenda** seconded the motion which was unanimously approved by: Baker, Burrell, Foley, Jonas, Mercer, Mulhare, Overholt, Sheehan, Sterling, and Waddell.

Mr. Mercer moved to approve the September 3, 2020, Board meeting minutes as presented. Ms. Overholt seconded the motion which was unanimously approved by: Baker, Burrell, Foley, Jonas, Mercer, Mulhare, Overholt, Sheehan, Sterling, and Waddell.

Approval of Minutes

There were no members of the public present to comment on matters other than the case files to be presented.

Public Comment Period

Ms. Baker recused herself from the meeting for deliberation and discussion of File Numbers 2019-02440, 2020-01152, and 2019-00655.

Recusal of Board Member

In the matter of **File Number 2019-02440, Association Community Services West Inc, t/a ACS West**, the Board members reviewed the Consent Order.

File Number 2019-02440, Association Community Services West Inc, t/a ACS West

Lawrence Dunn, counsel for ACS West, was present to address the Board. Mr. Dunn asked that the Board accept the Consent Order as written.

ACS West neither admits to, nor denies, four violations of 18 VAC 48-50-190.7 as outlined in Count 1, but agrees to the imposition of monetary penalties totaling \$600.00, and Board costs of \$150.00. Mr. Mercer moved to approve the Consent Order as presented. Mr. Foley seconded the motion which was unanimously approved by: Burrell, Foley, Jonas, Mercer, Mulhare, Overholt, Sheehan, Sterling, and Waddell.

In the matter of **File Number 2020-01152, Association Community Services West Inc, t/a ACS West**, the Board members reviewed the Consent Order.

File Number 2020-01152, Association Community Services West Inc, t/a ACS West

Lawrence Dunn, counsel for ACS West, was present to address the Board. Mr. Dunn asked that the Board accept the Consent Order as written, and added that ACS West takes responsibility for the violations within the Consent Order and would like to bring closure to this situation.

ACS West neither admits to, nor denies, a violation of 18 VAC 48-50-190.17 as outlined in Count 1, but agrees to the imposition of a monetary penalty of \$1,500.00, and Board costs of \$150.00. Mr. Mercer moved to approve the Consent Order as presented. Ms. Waddell seconded the motion which was unanimously approved by: Burrell, Foley, Jonas, Mercer, Mulhare, Overholt, Sheehan, Sterling, and Waddell.

Ms. Baker remained recused from the meeting, and Ms. Jonas, Mr. Mercer, and Ms. Sheehan recused themselves from the meeting for deliberation and discussion of File Number 2019-00655.

Recusal of Board Members

In the matter of **File Number 2019-00655, DCRE Management LLC**, the Board members reviewed the record which consisted of the investigative file, the transcript, and exhibits from the Informal Fact-Finding Conference, and the Summary of the Informal Fact-Finding Conference.

File Number 2019-00655, DCRE Management LLC

Dan Catlett, owner of DCRE Management LLC, was present to address the Board. Mr. Catlett stated he agrees with the recommended finding that there was no violation for Violations 1, 3, 4, and 5 of Count 1 outlined in the Summary. Mr. Catlett does not agree to the recommended finding of violation for Violation 2 of Count 1 outlined in the Summary and feels that a finding of a violation was due, in part, to the misrepresentation of the facts by the complainants. Mr. Catlett asked that the Board reject the finding of a violation in Violation 2 of Count 1 outlined in the Summary and advised that his actions were based on the advice of his attorney. Mr. Catlett also stated that this complaint as well the actions of the complainants has caused damage to his reputation.

Debra Storms, complainant, was present to address the Board. Ms. Storms asked the Board to consider evidence within the record and stated that she disputed Mr. Catlett's claim that he provided proper invoices to the complainants. Ms. Storms agreed with the recommended finding of a violation for Violation 2 of Count 1 outlined in the Summary, but did not agree with recommended findings of no violation for Violations 1, 3, 4, and 5 of Count 1 outlined in the recommendation.

The Board considered each of the five charged Violations under Count 1 individually.

After review of Violation 1 of Count 1, Mr. Foley moved to accept the recommendation of the Presiding Officer and find no violation as outlined in the Summary. Ms. Waddell seconded the motion which was unanimously approved by: Burrell, Foley, Mulhare, Overholt, Sterling, and Waddell.

After review of Violation 2 of Count 1, Mr. Foley moved to accept the recommendation of the Presiding Officer and find DCRE Management LLC in violation of 18 VAC 48-50-190.7 as outlined in the Summary.

Ms. Waddell seconded the motion which was unanimously approved by: Burrell, Foley, Mulhare, Overholt, Sterling, and Waddell.

After review of Violation 3 of Count 1, Mr. Burrell moved to accept the recommendation of the Presiding Officer and find no violation as outlined in the Summary. Mr. Sterling seconded the motion which was unanimously approved by: Burrell, Foley, Mulhare, Overholt, Sterling, and Waddell.

After review of Violation 4 of Count 1, Mr. Foley moved to accept the recommendation of the Presiding Officer and find no violation as outlined in the Summary. Mr. Burrell seconded the motion which was unanimously approved by: Burrell, Foley, Mulhare, Overholt, Sterling, and Waddell.

After review of Violation 5 of Count 1, Mr. Burrell moved to accept the recommendation of the Presiding Officer and find no violation as outlined in the Summary. Ms. Overholt seconded the motion which was unanimously approved by: Burrell, Foley, Mulhare, Overholt, Sterling, and Waddell.

Ms. Waddell then moved to accept the recommended sanction for the violation of 18 VAC 48-50-190.7 as outlined in the Summary as presented, which imposed a monetary penalty of \$1,000.00. Mr. Burrell seconded the motion which was unanimously approved by: Burrell, Foley, Mulhare, Overholt, Sterling, and Waddell.

Ms. Baker, Ms. Jonas, Mr. Mercer, and Ms. Sheehan returned to the meeting.

Return of Board Members

Mr. Mulhare recused himself from the meeting for deliberation and discussion of File Number 2020-01868. Mr. Mercer assumed Chair of the Board.

Recusal of Board Member

In the matter of **File Number 2020-01868, Debra Kaye Beagley**, the Board members reviewed the record which consisted of the application file, transcript and exhibits from the Informal Fact-Finding Conference (IFF), and the Summary of the Reconvened Informal Fact-Finding Conference.

File Number 2020-01868, Debra Kaye Beagley

Janeen Koch, attorney for Ms. Beagley, was present to address the Board. Ms. Koch thanked the Board and Mr. Mulhare for reconvening an IFF at its September meeting in order to present additional evidence for the

Board's consideration. Ms. Koch stated that the information Ms. Beagley supplied on her application was due to confusion and an honest mistake. Ms. Koch stated that Ms. Beagley continues to provide excellent service to her clients, and asked the Board to accept the recommendation of the Presiding Officer and approve Ms. Beagley's application.

Ms. Beagley was present to address the Board. Ms. Beagley thanked the Board for their time and stated that she has learned from her mistake. Ms. Beagley stated that she will work with honesty, integrity, and professionalism and asked the Board to accept the recommendation of the Presiding Officer and approve her application.

Mr. Sterling moved to accept the Presiding Officer's recommendation and approve Ms. Beagley's application for a principal or supervisory employee certificate. Ms. Overholt seconded the motion which was unanimously approved by: Baker, Burrell, Foley, Jonas, Mercer, Overholt, Sheehan, Sterling, and Waddell.

Mr. Mulhare returned to the meeting and resumed Chair of the Board.

Return of Board Member

Mr. Haughwout provided an update on the current status of the regulatory review processes for the Board's regulatory packages:

Update on Regulatory Actions

Final amendments to the Time-Share Regulations in order to conform to changes in the Virginia Real Estate Time-Share Act resulting from Senate Bill 584 became effective on December 1, 2020.

Final amendments to the CIC Management Information Fund Regulations are currently undergoing Executive Branch review, after which a final 30-public comment period be held, prior to becoming effective.

Mr. Haughwout presented the Board with staff recommendations for amendments to the Board's guidance document regarding the distribution of time-share public offering statements in order to conform to amendments made to the Virginia Real Estate Time-Share Act. After review and discussion, Mr. Mercer moved to accept staff recommendations for amendments to the guidance document. Ms. Jonas seconded the motion which was unanimously approved by: Baker, Burrell, Foley, Jonas, Mercer, Mulhare, Overholt, Sheehan, Sterling, and Waddell.

Staff Request for Authorization to Update Time-Share Guidance Document to Reflect Amendments to the Virginia Real Estate Time-Share Act

Mr. Haughwout and Ms. Henshaw asked the Board to consider a general review of the Common Interest Community Manager Regulations. Ms. Henshaw advised that a committee of Board members and other stakeholders would be formed in order to undertake the general review of the regulations. Mr. Foley moved to authorize staff to establish a committee for the general review of CIC Manager Regulations, to include members of the public, with membership selected in coordination with the Board Chair. Ms. Sheehan seconded the motion which was unanimously approved by: Baker, Burrell, Foley, Jonas, Mercer, Mulhare, Overholt, Sheehan, Sterling, and Waddell.

**Discussion on
General Review of
Common Interest
Community
Manager
Regulations**

Ms. Henshaw advised that as Chair of the Board, Mr. Mulhare would serve on the committee as an Ex-Officio member. Ms. Henshaw also advised that former Board member Paul Orlando had expressed interest in serving on the committee. Mr. Foley, Ms. Jonas, and Ms. Sheehan volunteered to serve on the committee. Ms. Henshaw advised that a meeting date would be decided within the coming months.

Mr. Haughwout asked the Board to consider authorizing staff to file a Notice of Intended Regulatory Action (NOIRA) for the general review of the CIC Manager Regulations after the formation of the committee. Mr. Mercer moved to authorize staff to file a NOIRA for the general review of CIC Manager Regulations. Ms. Jonas seconded the motion which was unanimously approved by: Baker, Burrell, Foley, Jonas, Mercer, Mulhare, Overholt, Sheehan, Sterling, and Waddell.

Ms. Henshaw provided the Board with a summary of current complaint and file statistics as of February 26, 2021.

Ombudsman Report

Ms. Henshaw advised the Board that going forward, time-share complaints will be handled by the Department's Complaint Analysis and Resolution team consistent with the handling of other regulatory complaints received by the Department. As background, the CIC Ombudsman, Heather Gillespie, agreed to handle time-share complaints during the early development of the Office of the CIC Ombudsman even though, per § 54.1-2300 of the Code of Virginia, time-shares are not a common interest community. Due to changes in resources, priorities, and operations, it is no longer feasible for the Office of the CIC Ombudsman to handle the preliminary review and processing of time-share complaints.

Discussion was held on outreach opportunities to address recurring complaint types.

Mr. Sterling departed the meeting at 11:00 a.m.

Departure of Board Member

Ms. Henshaw provided an update of legislative proposals that could affect DPOR and the Board.

2021 Legislative Update

Ms. Henshaw advised the Board that due to a vacancy on the Board, there is a vacancy on the Training Program Review Committee. In addition, Mr. Burrell will be moving outside the Commonwealth and will no longer be eligible to serve on the Board effective April 1, 2021, resulting in an additional vacancy on the Committee. Ms. Henshaw asked the Board to consider waiting to fill the vacancies on the Committee until the Board vacancies have been filled. The Board agreed by consensus.

Discuss Training Program Review Committee Membership

Ms. Henshaw advised the Board of temporary waivers of certain regulations pursuant to Executive Order 51 in response to COVID-19. During the current state of emergency, the validity of licenses, certifications, registrations, and other authorizations issued by the Board that would otherwise (i) expire during the state of emergency and (ii) be eligible for renewal or reinstatement during the state of emergency under applicable regulations, will be extended until the 30th day after the date by which the state of emergency is lifted. In addition, regulations that prohibit or limit online, electronic, or distance learning have also been waived until the 30th day after the date by which the state of emergency is lifted. Ms. Henshaw noted that the waivers do not apply to statutory requirements.

DPOR Updates as it Relates to COVID-19 Response

In addition, Ms. Henshaw advised the Board of a recent waiver that waives any regulatory requirement that a licensee be physically present at a place of business.

Ms. Henshaw advised the Board that in order to comply with public health emergency recommendations, the agency remains closed to the public and staff scheduling adjustments have been made, including telework for those employees who are eligible.

Mr. Mulhare commended Ms. Broz-Vaughan and DPOR staff for extraordinary efforts to maintain continuity during the pandemic.

Ms. Henshaw provided the Board with the most recent financial statements. There have been no claims from the Recovery Fund.

Board Financial Statements

Ms. Henshaw provided an overview of recent and upcoming virtual events attended by Board staff and the Ombudsman.

**Staff Event
Calendar**

Ms. Henshaw advised the Board that during a CIC Workgroup Meeting with the Virginia Housing Commission in December 2020, Delegate David Bulova was complimentary of the Board newsletter, *Common Interests*, which is written and assembled by staff.

Ms. Henshaw opened the floor for annual nominations of the Board Chair. Mr. Mercer moved to nominate Mr. Mulhare. Mr. Mulhare accepted the nomination. Ms. Overholt seconded the motion, which was unanimously approved by: Baker, Burrell, Foley, Jonas, Mercer, Mulhare, Overholt, Sheehan, and Waddell. By acclamation, Mr. Mulhare was named Board Chair.

Election of Officers

Mr. Mulhare opened the floor for annual nominations of Board Vice-Chair. Ms. Waddell moved to nominate Mr. Mercer. Mr. Mercer accepted the nomination. Ms. Sheehan seconded the motion, which was unanimously approved by: Baker, Burrell, Foley, Jonas, Mercer, Mulhare, Overholt, Sheehan, and Waddell. By acclamation, Mr. Mercer was named Board Vice-Chair.

There being no further business, the meeting was adjourned at 10:38 a.m.

Adjourn

Drew Mulhare, Chair

Mary Broz-Vaughan, Secretary

PUBLIC COMMENT PERIOD

Five minute public comment, per person, with the exception of any open disciplinary or application files.

DRAFT AGENDA
Materials contained in this agenda are proposed topics for discussion
and are not to be construed as regulation or official Board position
DRAFT AGENDA



Haughwout, Joseph <joseph.haughwout@dpor.virginia.gov>

RE: Plea for Regulatory and Guidance Simplicity

1 message

Joe Littleton

Tue, Mar 30, 2021 at 1:37 PM

To: "Haughwout, Joseph" <joseph.haughwout@dpor.virginia.gov>

Mr. Haughwout,

In reading my communication one more time I found it is missing one key work that changes the message substantially.

Please see the editorial change below.

Thank you,

Joe Littleton

From: Haughwout, Joseph <joseph.haughwout@dpor.virginia.gov>

Sent: Tuesday, March 30, 2021 10:36 AM

To:

Subject: Re: Plea for Regulatory and Guidance Simplicity

Dear Mr. Littleton,

Thank you for your email. Your email will be provided to the Board during the public comment period of the Board's next meeting, scheduled for June 3, 2021.

Should you have any questions, you may contact me directly. My contact information is listed below.

Have a nice day,

Joseph C. Haughwout, Jr.

Board Administrator, Common Interest Community Board
Regulatory Administrator
Dept. of Professional & Occupational Regulation
Perimeter Center, Suite 400
9960 Mayland Drive
Richmond, Virginia 23233-1463
Phone: (804) 367-2684
Fax: (866) 490-2723
E-mail: Joseph.Haughwout@dpor.virginia.gov

Governmental email is generally subject to disclosure pursuant to the Virginia Freedom of Information Act. However, if you have received this message in error, please notify the Sender and delete the message as well as all attachments.

----- Forwarded message -----

From: **Joe Littleton**
Date: Tue, Mar 30, 2021 at 10:20 AM
Subject: Plea for Regulatory and Guidance Simplicity
To: <CIC@dpor.virginia.gov>

Dear Common Interest Community Board Members,

I have been the Secretary for a small, 12 lot HOA since 2006. My Board of Directors and Association Members look to me for guidance on CIC compliance issues.

From 2006 to 2021, a period of fifteen years, I would estimate that the law, regulations any guidance imposed on Virginia Common Interest Communities has grown at least tenfold, if not more. I am not certain the benefit of this paperwork and compliance explosion outweighs the burden, unless of course you are a fee-based common interest property management company or a law firm. They have probably been the main drivers in the explosion as it creates more jobs and work for them.

I have told our Board and Members to prepare their pocketbooks for fees from both industries as we will soon **no longer** be able to remain self-managed. Twelve lots cannot support a lot of overhead. We will have to deal with that problem in the near future.

I strongly encourage you to view every proposed piece of new law, regulation and guidance that crosses your desk with an eye towards what it will mean to small, self-managed CICs.

Respectfully,

Joe Littleton

DRAFT AGENDA
Materials contained in this agenda are proposed topics for discussion
and are not to be construed as regulation or official Board position.
DRAFT AGENDA

Common Interest Community Board

Update on Regulatory Actions

(as of May 24, 2021)

Action: CIC Management Information Fund – General Review

Current Stage: Final

- Board adopted final amendments on 3/12/20.
- Submitted for Executive Branch review on 5/14/20.
- Executive Branch review still pending.

Next Step: Publication/Public Comment

- Completion of Executive Branch review.
- Submission to Registrar for publication in Virginia Register.
- Final 30-day public comment period.
- Regulation becomes effective following public comment period.

Action: CIC Manager Regulations – General Review

Current Stage: NOIRA

- Board authorized filing of NOIRA, and formation of regulatory review committee on 3/4/21.
- Regulatory review committee is being formed.
- NOIRA is in development.

Next Step: Committee Meeting/Executive Branch Review/Public Comment

- Convene regulatory review committee once formed.
- Submit NOIRA for Executive Branch review.
- Following completion of executive branch review, NOIRA to be submitted for publication in Virginia Register and open for public comment.

2022 LEGISLATIVE ITEMS FOR CONSIDERATION

DRAFT AGENDA
Materials contained in this agenda are proposed topics for discussion
and are not to be construed as regulation or official Board position
DRAFT AGENDA

OMBUDSMAN REPORT

DRAFT AGENDA
Materials contained in this agenda are proposed topics for discussion
and are not to be construed as regulation or official Board position
DRAFT AGENDA

I let Mr. Lion know that I would forward his comments to the Executive Director of the CIC Board.

Thank you,

Heather

Heather S. Gillespie

Common Interest Community Ombudsman

Department of Professional & Occupational Regulation

9960 Mayland Drive, Suite 400

Richmond, VA 23233

Phone (804) 367-0373

Fax (844) 246-2334

www.dpor.virginia.gov/cic-ombudsman

Governmental email is generally subject to disclosure pursuant to the Virginia Freedom of Information Act. However, if you have received this message in error, please notify the Sender and delete the message as well as all attachments.

----- Forwarded message -----

From: **Kent Lion**

Date: Mon, May 3, 2021 at 3:26 PM

Subject: Re: Reserve Study Problems

To: DPOR CIC Ombudsman, rr <cicombudsman@dpor.virginia.gov>

Ms. Gillespie,

Thank you very much for your time and your response. Looking through the Best Practices document you sent the link to, I did find some problems that suggest to me the group that created the document were given bad advice by someone.

The discussions of Timeframe on page 8 and of Baseline and Threshold Funding Models on pages 15 and 16 imply the assumption that cash-flow calculations in the present have relevance to the future in the context of a condominium's requirement to fairly distribute assessments, which mathematically, they do not.

I believe that the requirement to show 30 years of uninflated cash flow gives Boards of Directors the false impression that values in the distant future are as meaningful as values in the few years after a reserve study.

The section titled "Calculate the Reserve Deficit", beginning on page 16 and based on Appendix H, appears to attempt to calculate reserve deficit for a single component without adjusting for the change in the value of each year's assessments toward funding that component. Comparing the results of the equations in Appendix H with actual inflated calculations, for 6 random components, resulted in values from 20% under to 60% over the amounts that should have been actually collected by the study year if assessments are properly calculated and inflated each year. I would have to do a lot more experimenting to determine what affects how under or over the results are, but since it's trying to do something that's mathematical not possible if assessments are fairly distributed, and my calculations are theoretically exact, I'm not sure it's worth the time and effort.

It really should be pointed out to whoever developed the Best Practices that they have included requirements that actually conflict with the goals of a reserve study and that encourage use of techniques that are mathematically not possible for cash flows of funds from different years having different values.

Respectfully,

Kent Lion

On 4/12/21 8:00 AM, DPOR CIC Ombudsman, rr wrote:

Thank you for your email. I am not a reserve study expert as there is very little about reserve studies that falls under the authority of my office. I am not sure whether reserve study professionals are regulated in any way so do not know whether any agency or entity monitors reserve study specialists to determine if the information they provide is accurate or not. As to whether some reserve studies can actually harm associations, I simply don't have the knowledge or information available to me to make that conclusion.

I believe there is a National Reserve Study Specialist designation but am not certain if there is actual regulation of the profession. The CIC Board did release a Best Practices document for reserve studies (https://www.dpor.virginia.gov/sites/default/files/boards/CIC/Guidelines%20_Develop_Reserve_Studies_Capital_Components.pdf) but that does not provide regulation of the profession nor does that document require reserve studies to follow that document precisely. It is merely a best practices suggestion.

I am sorry I cannot provide you more information or be more responsive to your inquiry. This is simply not something that falls under my authority and therefore not an area of expertise for me.

Heather

Heather S. Gillespie

Common Interest Community Ombudsman

Department of Professional & Occupational Regulation

9960 Mayland Drive, Suite 400

Richmond, VA 23233

Phone (804) 367-0373

Fax (844) 246-2334

www.dpor.virginia.gov/cic-ombudsman

Governmental email is generally subject to disclosure pursuant to the Virginia Freedom of Information Act. However, if you have received this message in error, please notify the Sender and delete the message as well as all attachments.

On Sat, Apr 10, 2021 at 8:52 AM Kent Lion

wrote:

I am trying to find out how Facilities Advisors International LLC managed to get itself in a position of setting conceptually and mathematically faulty standards for performing Reserve Studies; whether its authority applies to the entire state of Virginia; whether that authority is absolute; and if there is a government organization that confirms that a standard-setting organization knows how to do what it's setting the standards for. Can you give me any advice on who to contact, to eliminate the requirement to pay for reserve studies of questionable value or to get the process fixed so they, at least theoretically, can be expected to do what they're supposed to do?

The background:

While I was on my condo association's Board of Directors (BOD) several years ago, we required a \$4,500 per unit (126 units) special assessment. When a reserve component requires a special assessment, the amount represents funds that were not assessed over the past (in our case 24) years. As an engineer, I wanted to understand why, in spite of having reserve studies, we required a special assessment, so I looked carefully at the past reserve studies I could get access to.

It wasn't difficult to figure out that our past studies omitted reserve components and incorrectly included the large component for which the assessment was required. Unfortunately, the last person in the community who had been on any of the boards before I purchased my unit passed away before we had the problem, so I couldn't ask anyone why; but it was clear to me that whoever created the inclusion of that particular project wasn't qualified to do so, even if the board had also intentionally pressured the study preparer to keep assessments low. In any case, the people who had owned here the longest, and for whom the special assessment represented funds they should have but did not pay (because they weren't assessed), complained the loudest, so the board ended up decreasing the special assessment by \$1,000, and "borrowing" \$126,000 from the reserves fund.

After leaving the BOD, I wanted to know how much we should have been assessed from the beginning for the special assessment to have been avoided. That meant figuring out what the goals of a reserve study should be and how to accomplish them. I concluded that a reserve study should:

1. Accounting for reasonably estimated inflation, recommend annual assessments that are at least theoretically sufficient to assure (with some cushion, of course) that regular assessments are not excessive, and that special assessments are never required.
2. Be able to determine what the current value of reserves accounts should be based on the inflation rate used in the current study, to allow adjusting for past under- or over-funding, to account for changes in inflation and to comply with 1.

3. Assure that recommended annual assessments share the projected costs of future projects equally among all owners in proportion to their duration of ownership and their percent of ownership interest in common elements as defined in their condominium documents, and measured in "constant dollars".

Using our latest study, I traced the results backwards to determine the calculations that were used. In the process, I uncovered the following elements of the process that should make no sense to someone with a command of algebra:

1. The method typically recommended to be followed uses a cash-flow analysis to determine minimum annual assessments required to accumulate a peak year project funding demand, based on current year project costs, to be adjusted for inflation after-the-fact. I had to learn what cash-flow is, and when I did, it was obvious that it may or may not ignore inflation, but assumes that payments are more or less equally distributed over the time to the peak requirement, and completely ignores the value of those payments in terms of the effort required to earn them (normally measured in constant dollars, but may be effectively measured in man-hours, which are easier for the average person to understand). Funding based only on the first peak requirement in the coming 30 years, ignores the fact that under inflation, peak funding requirements will always occur beyond 30 years. In other words, cash-flow is not suited to accomplishing the intent of goal 3., above, because it doesn't provide all the information necessary and is intended for one owner only.

2. Our reserve studies use current (study) year project costs as the year 1 costs instead of inflating them to year 1. The implicit assumption is that the cost of a project contracted for in the study year and constructed and funded the following year, is not subject to inflation. That may or may not be the case, however, if it is always assumed to be the case, then when the next study is performed 5 years later, that project's final cost will exclude one year of inflation, whether the inflation rate stays the same or not. If a project has a 30-year life, studies performed every 5 years will ignore 5 years of inflation, leaving the association with a shortfall that must be made up by borrowing from reserves (if it's not too large), or a special assessment. The result can cause problems with meeting requirement 1., above, and may fool the board of directors into gradually "borrowing" from reserves until a special assessment is required for every significant project.

3. The rate of inflation typically used is a generic inflation rate from a company that provides project unit cost data. But there is no one inflation rate that applies to everything; every component has its own inflation rate, and every association has its own mix and quantities of components, so every association has its own inflation rate. This means that an association inflation rate must be calculated, or the contribution to the assessment for every component must be calculated using its inflation rate, and added

together. With modern technology, if data from two reserve studies is available, the inflation rate is easy to calculate. If an inflation rate is used that is incorrect for the association, the annual assessments based on it cannot be expected to be correct, leading to over- or under-funding and difficulty meeting requirement 1., above.

4. For a reason that has not been explained to me, the year 1 assessment is then calculated as the inflated project year cost multiplied by the ratio of the study year cost to the inflated project year cost. This leads to the problems that result from the following step.

5. If the assessment calculated in 4, above, is inflated by the inflation rate, at the end of year 30, the project will be significantly under-funded. Possibly because the process of calculating the year 1 assessment doesn't give a correct result, the process has added what can only be described as a "fudge factor", labeled "assessment factor", by which the 1 year and all subsequent assessments are multiplied instead of by the inflation factor. This fudge factor is determined by trial and error (until the sum of assessments equals the inflated project cost). The result is that in every reserve study, the recommended annual assessments are inflated by more than the inflation factor on which the future project cost is based. This is the first thing about our reserve studies that made no sense to me, and it should be a warning to anyone, but apparently no-one understands inflation well enough to recognize it as such. The result is that early years are relatively under-funded and future years must make up the difference, preventing requirement 3., above, from being met.

6. Mostly because the actual assessments are based on a factor that has nothing to do with the study inflation rate, there is no way to determine how much replacement reserves should have already been assessed, assuming the current year inflation rate, to determine if reserves can still be considered adequately and not excessively funded. This prevents requirements 2. and 3., above, from being met.

When I discovered these things, I talked to the owners of 3 different companies that have done reserves studies for us, and realized that they were just following a standard set by some other company. When I contacted that company ("Facilities Advisors International LLC") and pointed out the problems I had found, their response was an example of how to do it "correctly", as described above. The person I've communicated with firmly maintains that current owners shouldn't be paying for future inflation, which shows a complete lack of understanding of inflation, and which implies he believes that future owners should be paying for the losses in value of funds contributed by past owners.

Since he obviously was unwilling (or unable) to understand what he's doing incorrectly, I finally quit trying to explain. Recently he contacted me again, still trying to convince me that what he was doing is correct and that I just don't understand Reserve Studies. I have responded three times with examples and

explanations of what's wrong, but three strikes is enough. I'm inclined to forget him as I previously did; however, considering all the people being harmed financially by the methods being used, I shouldn't complain about the method if I haven't done my best to get it fixed.

Because of the inconsistency built in to Reserves Studies by the use of methods that mathematically cannot be expected to work (I have also done examples of multiple studies in succession that showed they don't work), the Code of Virginia is requiring Reserve Studies that may or may not be of any benefit to the association and that clearly cheat future owners to benefit current owners. Converting the recommended annual assessments of any Reserve Study to constant dollars at the inflation rate of the study shows that the assessments are unjustly distributed. Is it really the job of government to require something that creates a false sense of security, while financially harming condominium owners?

Respectfully,

Kent Lion

DRAFT AGENDA
Materials contained in this agenda are proposed for discussion only and are not to be construed as official or final positions.
DRAFT AGENDA

DPOR UPDATES AS IT RELATES TO COVID-19 RESPONSE

DRAFT AGENDA
Materials contained in this agenda are proposed topics for discussion
and are not to be construed as regulation or official Board action
DRAFT AGENDA

Department of Professional and Occupational Regulation
Statement of Financial Activity

**Common Interest Community Board
954520**

2020-2022 Biennium

April 2021

	April 2021 Activity	Biennium-to-Date Comparison	
		July 2018 - April 2019	July 2020 - April 2021
Cash/Revenue Balance Brought Forward			15,716
Revenues	52,531	816,381	477,113
Cumulative Revenues			492,829
Cost Categories:			
Board Expenditures	33,022	373,194	369,893
Board Administration	0	0	0
Administration of Exams	0	0	0
Enforcement	11,384	115,712	121,488
Legal Services	523	636	2,092
Information Systems	5,901	68,721	63,870
Facilities and Support Services	6,012	62,453	62,697
Agency Administration	3,934	42,387	42,150
Other / Transfers	0	0	0
Total Expenses	60,776	663,103	662,190
Transfer To/(From) Cash Reserves	(14,258)	0	(175,374)
Ending Cash/Revenue Balance			6,014

Cash Reserve Beginning Balance	2,980,358	0	3,141,474
Change in Cash Reserve	(14,258)	0	(175,374)
Ending Cash Reserve Balance	2,966,100	0	2,966,100

Number of Regulants

Current Month	7,588
Previous Biennium-to-Date	7,321

DEPARTMENT OF PROFESSIONAL
& OCCUPATIONAL REGULATION

**VIRGINIA COMMON INTEREST
COMMUNITY MANAGEMENT
RECOVERY FUND**

FINANCIAL STATEMENTS

Cash Basis

FOR THE MONTH ENDED FEBRUARY 28, 2021

DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION
VIRGINIA COMMON INTEREST COMMUNITY MANAGEMENT RECOVERY FUND
BALANCE SHEET
GOVERNMENTAL FUNDS
FEBRUARY 28, 2021

	Special Revenue Funds		
	Principal	Interest	Totals
ASSETS			
Cash and Cash Equivalents	\$ 217,522	\$ 11,336	\$ 228,858
Total Assets	<u>\$ 217,522</u>	<u>\$ 11,336</u>	<u>\$ 228,858</u>
FUND BALANCES			
Reserved for Payment of Future Claims	\$ 217,522	\$ -	\$ 217,522
Reserved for Administration of Recovery Act	-	11,336	11,336
Total Fund Balances	<u>\$ 217,522</u>	<u>\$ 11,336</u>	<u>\$ 228,858</u>

The accompanying notes are an integral part of this statement.

DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION
VIRGINIA COMMON INTEREST COMMUNITY MANAGEMENT RECOVERY FUND
STATEMENT OF REVENUES, EXPENDITURES, AND CHANGES IN FUND BALANCES
GOVERNMENTAL FUNDS
FOR THE MONTH ENDED FEBRUARY 28, 2021

	MONTH ENDED FEBRUARY			YEAR TO DATE		
	Principal Fund	Interest Fund	Totals	Principal Fund	Interest Fund	Totals
REVENUES:						
Assessments	\$ 550	\$ -	\$ 550	\$ 3,925	\$ -	\$ 3,925
Investment Income		14	14		203	203
Total Revenues:	<u>550</u>	<u>14</u>	<u>564</u>	<u>3,925</u>	<u>203</u>	<u>4,128</u>
EXPENDITURES:						
Administrative Expenses	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Total Expenses:	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Net Change in Fund Balances	<u>550</u>	<u>14</u>	<u>564</u>	<u>3,925</u>	<u>203</u>	<u>4,128</u>
Beginning Fund Balance	<u>216,972</u>	<u>11,322</u>	<u>228,294</u>	<u>213,597</u>	<u>11,133</u>	<u>224,730</u>
Ending Fund Balance	<u>\$ 217,522</u>	<u>\$ 11,336</u>	<u>\$ 228,858</u>	<u>\$ 217,522</u>	<u>\$ 11,336</u>	<u>\$ 228,858</u>

The accompanying notes are an integral part of this statement.

DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION
VIRGINIA COMMON INTEREST COMMUNITY MANAGEMENT RECOVERY FUNDS
NOTES TO FINANCIAL STATEMENTS
FEBRUARY 28, 2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The following is a summary of certain significant accounting policies employed by the Department of Professional and Occupational Regulation in administering the Virginia Common Interest Community Management Recovery Fund.

A. Basis of Presentation

The accompanying financial statements have been prepared using governmental fund accounting as prescribed by the Governmental Accounting Standards Board (GASB). The financial statements are prepared on the cash basis of accounting, which is a comprehensive basis of accounting other than generally accepted accounting principles.

B. Reporting Entity

These financial statements report the financial activity of the Virginia Common Interest Community Management Recovery Fund, which is administered by the Department of Professional and Occupational Regulation. The Department exercises oversight authority over other funds which are not included in these financial statements.

C. Financial Statement Presentation

Special Revenue Funds account for transactions related to resources received and used for restricted or specific purposes. The Virginia Common Interest Community Management Recovery Fund, which is reported as a special revenue fund, is established under Section 55-530.1 of the *Code of Virginia* to reimburse associations for losses that occur when their community manager fails to perform his or her fiduciary responsibilities.

D. Measurement Focus and Basis of Accounting

The governmental fund financial statements are reported using the current financial resources measurement focus and the cash basis of accounting. Revenues are recognized when cash is received and expenditures are recorded when paid. The Department uses the cash basis of accounting during the year and prepares financial statements in accordance with generally accepted accounting principles at year end.

E. Cash and Cash Equivalents

Cash and cash equivalents consist of cash on hand, demand deposits, and investments in the Local Government Investment Pool (LGIP). Investments in the Local Government Investment Pool are reported as cash equivalents since they are readily convertible to cash.

2. RESTRICTED FUND BALANCES

Assets held in the Virginia Common Interest Community Management Recovery Funds are restricted to the payment of claims in accordance with Section 55.530.1H of the *Code of Virginia*. Interest earned on the deposits are used to pay the expenses of administering the fund, to pay claims, or may be transferred to the Common Interest Community Management Information Fund.

3. ASSESSMENTS

The Common Interest Community Management Recovery Fund is financed through assessments. Each new common interest community manager pays a \$25 assessment into the Recovery Fund at the time of application. Each association pays \$25 into the Recovery Fund at the time of filing its first annual report. After July 1, 2011, the *Code of Virginia* requires the Board to transfer funds from the Common Interest Community Management Information Fund and/or assess each association and each common interest community manager additional fees whenever the principal balance of the Recovery Fund is less than \$150,000. If the principal balance of the fund exceeds \$5,000,000 on June 30 of any year, the Board must transfer the excess to the Virginia Housing Partnership Revolving Fund.

*

These financial statements are prepared by Jordan Perryman, Fund Accountant. Please call 804-367-4003 if you have questions.

DEPARTMENT OF PROFESSIONAL
& OCCUPATIONAL REGULATION

**VIRGINIA COMMON INTEREST
COMMUNITY MANAGEMENT
RECOVERY FUND**

FINANCIAL STATEMENTS

Cash Basis

FOR THE MONTH ENDED 03/31/2021

DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION
VIRGINIA COMMON INTEREST COMMUNITY MANAGEMENT RECOVERY FUND
BALANCE SHEET
GOVERNMENTAL FUNDS
March 31, 2021

	Special Revenue Funds		
	Principal	Interest	Totals
ASSETS			
Cash and Cash Equivalents	\$ 218,222	\$ 11,350	\$ 229,572
Total Assets	<u>\$ 218,222</u>	<u>\$ 11,350</u>	<u>\$ 229,572</u>
FUND BALANCES			
Reserved for Payment of Future Claims	\$ 218,222	\$ -	\$ 218,222
Reserved for Administration of Recovery Act	-	11,350	11,350
Total Fund Balances	<u>\$ 218,222</u>	<u>\$ 11,350</u>	<u>\$ 229,572</u>

The accompanying notes are an integral part of this statement.

DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION
VIRGINIA COMMON INTEREST COMMUNITY MANAGEMENT RECOVERY FUND
STATEMENT OF REVENUES, EXPENDITURES, AND CHANGES IN FUND BALANCES
GOVERNMENTAL FUNDS
FOR THE MONTH ENDED 03/31/2021

	CURRENT MONTH			YEAR TO DATE		
	Principal Fund	Interest Fund	Totals	Principal Fund	Interest Fund	Totals
REVENUES:						
Assessments	\$ 700	\$ -	\$ 700	\$ 4,625	\$ -	\$ 4,625
Investment Income		14	14		217	217
Total Revenues:	<u>700</u>	<u>14</u>	<u>714</u>	<u>4,625</u>	<u>217</u>	<u>4,842</u>
EXPENDITURES:						
Administrative Expenses	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Total Expenses:	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Net Change in Fund Balances	<u>700</u>	<u>14</u>	<u>714</u>	<u>4,625</u>	<u>217</u>	<u>4,842</u>
Beginning Fund Balance	<u>217,522</u>	<u>11,336</u>	<u>228,858</u>	<u>213,597</u>	<u>11,133</u>	<u>224,730</u>
Ending Fund Balance	<u>\$ 218,222</u>	<u>\$ 11,350</u>	<u>\$ 229,572</u>	<u>\$ 218,222</u>	<u>\$ 11,350</u>	<u>\$ 229,572</u>

The accompanying notes are an integral part of this statement.

**DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION
VIRGINIA COMMON INTEREST COMMUNITY MANAGEMENT RECOVERY FUNDS
NOTES TO FINANCIAL STATEMENTS**

3/31/2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The following is a summary of certain significant accounting policies employed by the Department of Professional and Occupational Regulation in administering the Virginia Common Interest Community Management Recovery Fund.

A. Basis of Presentation

The accompanying financial statements have been prepared using governmental fund accounting as prescribed by the Governmental Accounting Standards Board (GASB). The financial statements are prepared on the cash basis of accounting, which is a comprehensive basis of accounting other than generally accepted accounting principles.

B. Reporting Entity

These financial statements report the financial activity of the Virginia Common Interest Community Management Recovery Fund, which is administered by the Department of Professional and Occupational Regulation. The Department exercises oversight authority over other funds which are not included in these financial statements.

C. Financial Statement Presentation

Special Revenue Funds account for transactions related to resources received and used for restricted or specific purposes. The Virginia Common Interest Community Management Recovery Fund, which is reported as a special revenue fund, is established under Section 55-530.1 of the *Code of Virginia* to reimburse associations for losses that occur when their community manager fails to perform his or her fiduciary responsibilities.

D. Measurement Focus and Basis of Accounting

The governmental fund financial statements are reported using the current financial resources measurement focus and the cash basis of accounting. Revenues are recognized when cash is received and expenditures are recorded when paid. The Department uses the cash basis of accounting during the year and prepares financial statements in accordance with generally accepted accounting principles at year end.

E. Cash and Cash Equivalents

Cash and cash equivalents consist of cash on hand, demand deposits, and investments in the Local Government Investment Pool (LGIP). Investments in the Local Government Investment Pool are reported as cash equivalents since they are readily convertible to cash.

2. RESTRICTED FUND BALANCES

Assets held in the Virginia Common Interest Community Management Recovery Funds are restricted to the payment of claims in accordance with Section 55.530.1H of the *Code of Virginia*. Interest earned on the deposits are used to pay the expenses of administering the fund, to pay claims, or may be transferred to the Common Interest Community Management Information Fund.

3. ASSESSMENTS

The Common Interest Community Management Recovery Fund is financed through assessments. Each new common interest community manager pays a \$25 assessment into the Recovery Fund at the time of application. Each association pays \$25 into the Recovery Fund at the time of filing its first annual report. After July 1, 2011, the *Code of Virginia* requires the Board to transfer funds from the Common Interest Community Management Information Fund and/or assess each association and each common interest community manager additional fees whenever the principal balance of the Recovery Fund is less than \$150,000. If the principal balance of the fund exceeds \$5,000,000 on June 30 of any year, the Board must transfer the excess to the Virginia Housing Partnership Revolving Fund.

*

These financial statements are prepared by Jordan Perryman, Fund Accountant. Please call 804-367-4003 if you have questions.

Commonwealth of Virginia



Department of Professional and Occupational Regulation Common Interest Community Board

Resolution for **Tom Burrell**

WHEREAS, **Tom Burrell**, did faithfully and diligently serve as a member of the Common Interest Community Board from 2018 to 2021;

WHEREAS, **Tom Burrell**, did devote generously of his time, talent and leadership to the Board;

WHEREAS, **Tom Burrell**, did endeavor at all times to render decisions with fairness and good judgement in the best interest of the citizens of the Commonwealth and these professions; and

WHEREAS, the Common Interest Community Board wishes to acknowledge its gratitude for devoted service of a person who is held in high esteem by the members of the Board and the citizens of the Commonwealth;

NOW THEREFORE BE IT RESOLVED, by the Common Interest Community Board this third day of June 2021, that **Tom Burrell** be given all honors and respect due him for his outstanding service to the Commonwealth and its citizens; and

BE IT FURTHER RESOLVED, that this Resolution be presented to him and be made a part of the official minutes of the Board so that all may know of the high regard in which he is held by this Board.

Drew R. Mulhare, Chair

Mary Broz-Vaughan, Secretary

2022 TENTATIVE BOARD MEETING SCHEDULE

CIC BOARD	
Training Program Review Committee	Board Meeting
Wednesday, March 2, 2022 @ 9:00 am Board Room 3	Thursday, March 3, 2022 @ 9:30 am Board Room 3
Wednesday, June 8, 2022 @ 1:00 pm Board Room 3	Thursday, June 9, 2022 @ 9:30 am Board Room 3
Wednesday, September 21, 2022 @ 1:00 pm Board Room 3	Thursday, September 22, 2022 @ 9:30 am Board Room 3
Wednesday, December 7, 2022 @ 1:00 pm Board Room 3	Thursday, December 8, 2022 @ 9:30 am Board Room 3

OTHER BUSINESS

DRAFT AGENDA
Materials contained in this agenda are proposed topics for discussion
and are not to be construed as regulation or official Board position
DRAFT AGENDA

COMPLETE CONFLICT OF INTEREST FORMS

DRAFT AGENDA
Materials contained in this agenda are proposed topics for discussion
and are not to be construed as regulation or official Board action
DRAFT AGENDA

ADJOURN

DRAFT AGENDA
Materials contained in this agenda are proposed topics for discussion
and are not to be construed as regulation or official Board position
DRAFT AGENDA