

# State Board Member Per Diem Compensation and Expense Reimbursements

Annual Review  
Fiscal Year 2019

April 2020  
Report 20-301

A Report to the Arizona Legislature

Lindsey A. Perry  
Auditor General





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April 6, 2020

Members of the Arizona Legislature

The Honorable Doug Ducey, Governor  
State of Arizona

Transmitted herewith is a report of the Auditor General, *State Board Member Per Diem Compensation and Expense Reimbursements*, for fiscal year 2019. This report is in response to Arizona Revised Statutes (A.R.S.) §41-1279.03(A)(10) and was conducted under the authority vested in the Auditor General by A.R.S. §41-1279.03. I am also transmitting within this report a copy of the Report Highlights for this review to provide a quick summary for your convenience.

We discussed the recommendation for Finding 1 in this report with officials of the Public Safety Personnel Retirement System, and they agree with the finding and plan to implement the recommendation. We discussed the recommendation for Finding 2 in this report with officials of the Arizona Department of Administration, and they indicated that they will work with State boards, commissions, councils, and advisory committees to help them implement the recommendation.

My staff and I will be pleased to discuss or clarify items in the report.

Sincerely,

Lindsey Perry, CPA, CFE  
Auditor General

## State Board Member Per Diem Compensation and Expense Reimbursements

**CONCLUSION:** As required by law, we conducted an annual review of per diem compensation and expense reimbursement payments to members of State boards, commissions, councils, and advisory committees (collectively referred to as boards) for fiscal year 2019. In this review, we followed up on the recommendations from our prior reports, Reports 17-306 and 19-302, *State Board Member Per Diem Compensation and Expense Reimbursements* for fiscal years 2016 through 2018, which we issued in November 2017 and March 2019; presented a table of State boards with fiscal year 2019 payment information and prior and current review results; and examined fiscal year 2019 payments of per diem compensation and expense reimbursements for some boards' members. We found that the Public Safety Personnel Retirement System (PSPRS) did not pay its board members in accordance with State laws and State or PSPRS policies, which put public monies at risk of misuse. Further, we found that some boards lack written policies and procedures for paying per diem compensation, putting these boards at risk for making inaccurate, inappropriate per diem payments.

### PSPRS did not pay its board members in accordance with State laws and State or PSPRS policies, which put public monies at risk of misuse

During our fiscal year 2019 annual review, we found that the PSPRS Board of Trustees did not always pay its board members in a manner consistent with State laws and State or PSPRS policies. Specifically, PSPRS reimbursed one member \$1,598 more than another member for the same conference hotel. The additional reimbursement was for an additional night and an upgraded city view room. PSPRS also inappropriately reimbursed members \$556 for mileage because it used the incorrect rate and \$357 for meal expenses that were not in accordance with its policy.

In addition, PSPRS paid all per diem compensation and expense reimbursement payments to its Board of Trustees and Defined Contribution and Disability Committee members outside of the State's payroll system, placing the State at risk for noncompliance with applicable tax withholding requirements.

#### Recommendation

PSPRS should:

- Ensure that its Board of Trustees adheres to State laws and State and PSPRS policies and considers the best interests of its constituents to ensure per diem compensation and expense reimbursement payments to board members are appropriate and adequately supported.
- Work with its legal counsel to pursue reimbursement from its board members for any inappropriate payments, as it determines necessary.
- Ensure that all payments to its Board of Trustees and Defined Contribution and Disability Committee members are processed on the State's payroll system to ensure compliance with tax withholding requirements.

# Some boards still lack written policies and procedures for paying per diem compensation, putting these boards at risk for making inaccurate, inappropriate per diem payments

In our current and previous reviews, we examined 50 boards that pay per diem compensation and should have written policies and procedures governing those payments. Specifically, these policies and procedures should comply with each board's statutory requirements and define specific recommended elements. As of December 1, 2019, 3 of the 50 boards we have examined did not implement our recommendations to have written policies and procedures containing the recommended elements, putting these boards at risk for making inaccurate, inappropriate per diem payments that do not comply with State law and board rules.

47 boards implemented policies and procedures



3 boards still had not implemented policies and procedures

## Recommendation

Arizona's State boards, including the Board of Massage Therapy, PSPRS Board of Trustees, and Water Quality Appeals Board, that have not yet done so should develop and implement written policies and procedures for paying board member per diem compensation that comply with each board's statutory requirements and define the specific board-related activities eligible for compensation, the amount of time spent on board-related activities that will be compensated, and the process for paying compensation to board members.



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## State board members may receive per diem compensation and expense reimbursements, but amounts can vary

Arizona’s boards, commissions, councils, and advisory committees (collectively referred to as boards) are primarily authorized by statute or executive order. Board statutes or executive orders generally state the board’s purpose and other general information, including whether board members are eligible for per diem compensation and/or expense reimbursements (see textbox for definitions). Members of some boards may receive per diem compensation and/or be reimbursed expenses for each day engaged in service of the board, whereas members of other boards may not be permitted to receive any compensation.

**Per diem compensation**—Compensation paid to board members for attendance at board meetings and/or for time engaged in the service of the board.

**Expense reimbursements**—Reimbursement of expenses incurred by board members while attending board meetings or performing board work, including mileage, meals, lodging, airfare, cell phones, etc.

Source: Auditor General staff analysis of Arizona Revised Statute (A.R.S.) §38-611, A.R.S. Title 38, Ch. 4, Art. 2, State policy, and the specific statutes relating to the compensation for each board.

Some boards’ statutes prescribe that members are to receive compensation at a specific rate for each day engaged in the service of the board. We found that per diem compensation rates range from \$30 to \$300 per day. For example, the Arizona State Board of Barbers’ statutes allow per diem compensation of \$30 per day, while the State Board of Equalization’s statutes allow per diem compensation of \$300 per day.<sup>1</sup> Frequently, a board’s statutes refer to the State’s general statute for the compensation of certain State officers and employees, which authorizes board members to receive compensation at the rate of \$30 for each day engaged in the service of the board.<sup>2</sup>



Per diem compensation rates range from \$30 to \$300 per day

The board-related activities and time board members spent performing the activities to be eligible to receive compensation also varies among boards. Some boards’ statutes define specific activities for which members can be compensated. For example, the Arizona Board of Regents’ statutes specify that members shall receive compensation for each day they attend board meetings.<sup>3</sup> However, many boards’ statutes are general when describing board-related activities that are eligible for per diem compensation. They typically state that compensation is paid for each day engaged in the board’s service or each day while performing board business but do not define the activities the board members must perform or the amount of time to be spent on them to be eligible to receive this compensation.

<sup>1</sup> Auditor General staff analysis of A.R.S. §§32-303(D) and 38-611(C) for the per diem compensation allowed to be paid by the Arizona State Board of Barbers and A.R.S. §42-16153(D) and (E) for the per diem compensation allowed to be paid by the State Board of Equalization.

<sup>2</sup> A.R.S. §38-611(C).

<sup>3</sup> A.R.S. §15-1623(B) states that appointed members of the Arizona Board of Regents shall receive compensation as determined pursuant to A.R.S. §38-611 for each day of attendance at board meetings, except no individual board member’s compensation shall exceed \$500 in any year.

Most board members who are statutorily eligible for expense reimbursements while performing board activities are reimbursed in accordance with State laws and policies for expense reimbursements.<sup>4</sup> Expense reimbursements may include board members' costs for mileage, meals, lodging, airfare, cell phones, and other miscellaneous costs.

Board member per diem compensation and expense reimbursement payments are part of a board's normal operating budget and are paid for using the same revenue sources used to pay for other expenses such as staff salaries, professional and outside services, and other operating costs. State law may define a board's revenue source, which could include State General Fund appropriations, licensing fees, federal grant awards, or other public revenue sources.

## Boards required to pay per diem compensation and reimburse expenses through State payroll system

In December 2017, ADOA established policies and procedures in SAAM requiring State boards to process per diem compensation payments and expense reimbursements to board members using the State's payroll system. This policy was established to help ensure compliance with applicable tax withholding requirements.

### Review objective

In our review, we evaluated the propriety of per diem compensation and reimbursement of expenses to members of State boards. In order to meet this objective, we:

1. Verified that boards we reviewed have appropriate policies and procedures governing per diem compensation.
2. Examined a sample of board per diem compensation payments and expense reimbursements to ensure they appear proper and comply with State law and State or board policy, as applicable.
3. Verified that per diem compensation and expense reimbursements to board members were processed through the State's payroll system, as directed by the ADOA, helping to ensure compliance with applicable tax withholding requirements.

The results of our current and past reviews are presented in Appendix A on pages a-1 through a-9. The table presents the current status of each finding from our prior years' reviews. As noted in Finding 1 on page 3, we identified 1 board—the Public Safety Personnel Retirement System (PSPRS) Board of Trustees—that did not pay per diem compensation and reimburse expenses appropriately. In addition, PSPRS did not process per diem compensation payments or expense reimbursements to its Board of Trustees or Defined Contribution and Disability Committee members using the State's payroll system. As noted in Finding 2 on page 5, we identified 3 boards that still do not have appropriate policies and procedures governing the payment of per diem compensation to board members despite recommendations in our previous reports to do so.

## Arizona Game and Fish Commission has implemented prior year recommendation

In our previous report, we recommended the Arizona Game and Fish Commission (Commission) adhere to the State's internal control policies and procedures outlined in SAAM to ensure per diem and expense reimbursement payments to board members are properly supported, travel is scheduled at the most favorable cost benefit to the State, and all travel expenses are reasonable and necessary (see Report 19-302, *State Board Member Per Diem Compensation and Expense Reimbursements*). We followed up with the Commission during the current review and determined it has implemented this recommendation.

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<sup>4</sup> State laws governing expense reimbursement are included at A.R.S. Title 38, Ch. 4, Art. 2. State policies for expense reimbursement are included in the State of Arizona Accounting Manual (SAAM), published by the Arizona Department of Administration's (ADOA) General Accounting Office.



## PSPRS did not pay its board members in accordance with State laws and State or PSPRS policies, which put public monies at risk of misuse

Of the 16 boards we reviewed during fiscal year 2019<sup>5</sup>, 1 board—the Public Safety Personnel Retirement System (PSPRS) Board of Trustees—did not always pay its members in a manner consistent with State laws and State or PSPRS policies. During fiscal years 2018 and 2019, the PSPRS Board of Trustees paid its members \$42,338 in per diem compensation and expense reimbursements. We reviewed a judgmental sample of 43 payments totaling \$26,500 and determined:

- Two members attended the same conference in New York City, and both stayed at the conference hotel. PSPRS reimbursed 1 member \$2,778 for his hotel stay and reimbursed the other \$1,180. The additional \$1,598 was for an additional night and an upgraded city view room. According to PSPRS, the member did not reserve the room in time to receive the conference room rate and the city view room was the only room available. In 2 other instances at other conferences, PSPRS reimbursed members \$309 and \$176 for an extra night at a conference hotel. PSPRS did not obtain or maintain documentation to support that any of these expenses were for a necessary public purpose.
- For all conference hotel expenses we examined, PSPRS did not maintain documentation confirming the conference hotel room rate or investigate whether there were lower-priced, convenient options available.<sup>6</sup> According to PSPRS, it determined these expenses were reasonable and necessary, but it did not maintain documentation to support that determination.
- PSPRS inappropriately reimbursed members for some meal expenses that were not in compliance with PSPRS policy.<sup>7</sup> For example, PSPRS reimbursed 1 member for meals with business guests on multiple occasions without proper documentation to demonstrate the public purpose and benefit to PSPRS. We identified a total of \$357 of meal reimbursements that were unallowed or lacked the proper documentation.
- PSPRS inappropriately reimbursed members for mileage at the federal mileage reimbursement rate, which is higher than the State rate. Specifically, of the \$2,603 in mileage reimbursements in our sample, PSPRS over-reimbursed members \$556 because PSPRS did not follow the statutory requirement that members be reimbursed in accordance with the State's policies for mileage reimbursement.

<sup>5</sup> See Appendix A on pages a-1 through a-9 for the boards reviewed during fiscal year 2019.

<sup>6</sup> Convenient is defined as a hotel within a half mile of the event.

<sup>7</sup> PSPRS policy states, "Individuals will be reimbursed for meals for business guests only where it is necessary and clearly to the benefit of the system. The reason required and names of the guests should be reflected on an attached statement." Further, "Meals on trips of one day or less will not be reimbursed."

PSPRS did not have sufficient internal controls to ensure that reimbursements to board members were properly supported and adequately reviewed and in accordance with State laws and State and PSPRS policies. Adherence to these laws and policies would decrease the risk that public monies are misused.

In addition, PSPRS paid all per diem compensation and expense reimbursement payments to its Board of Trustees and Defined Contribution and Disability Committee members outside of the State's payroll system, placing the State at risk for noncompliance with applicable tax withholding requirements. PSPRS was not aware it was required to process these payments through the State's payroll system.

## **Recommendation**

1. PSPRS should:
  - a. Ensure that its Board of Trustees adheres to State laws and State and PSPRS policies and considers the best interests of its constituents to ensure per diem compensation and expense reimbursement payments to board members are appropriate and adequately supported.
  - b. Work with its legal counsel to pursue reimbursement from its board members for any inappropriate payments, as it determines necessary.
  - c. Ensure that all payments to its Board of Trustees and Defined Contribution and Disability Committee members are processed on the State's payroll system to ensure compliance with tax withholding requirements.



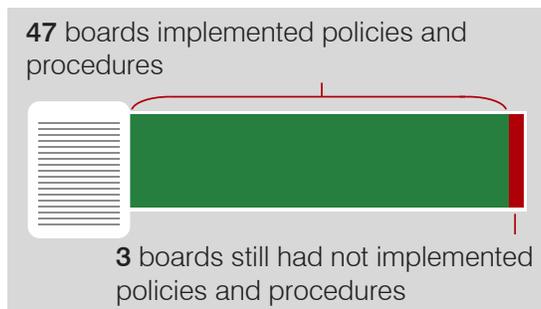
## Some boards still lack written policies and procedures for paying per diem compensation, putting these boards at risk for making inaccurate, inappropriate per diem payments

In our current and previous reviews, we examined 50 boards that pay per diem compensation and should have written policies and procedures governing those payments. Specifically, these policies and procedures should comply with each board's statutory requirements and define:

- Specific board-related activities eligible for compensation.
- Amount of time spent on board-related activities that will be compensated.
- Process for paying compensation to board members.

Written policies and procedures help ensure that per diem compensation payments are accurate, appropriate, and comply with statute.

As of December 1, 2019, 3 of the 50 boards we have examined—the Board of Massage Therapy, PSPRS Board of Trustees, and Water Quality Appeals Board—did not have written policies and procedures that contained the above elements because they reported they were unaware they needed written policies. The lack of written policies and procedures put these boards at risk for making inaccurate, inappropriate per diem payments that do not comply with State law and board rules. In addition, 6 boards we reviewed this year implemented policies and procedures subsequent to our review.<sup>8</sup>



### Recommendation

2. Arizona's State boards, including the Board of Massage Therapy, PSPRS Board of Trustees, and Water Quality Appeals Board, that have not yet done so should develop and implement written policies and procedures for paying board member per diem compensation that comply with each board's statutory requirements and define the specific board-related activities eligible for compensation, the amount of time spent on board-related activities that will be compensated, and the process for paying compensation to board members.

<sup>8</sup> Acupuncture Board of Examiners, Board of Dental Examiners, Naturopathic Physicians Medical Board, Nursing Care Institution Administrators and Assisted Living Facility Managers Board, Personnel Board, and Regulatory Board of Physician Assistants.



# SUMMARY OF RECOMMENDATIONS

## Auditor General makes 2 recommendations to State boards

1. PSPRS should:
  - a. Ensure that its Board of Trustees adheres to State laws and State and PSPRS policies and considers the best interests of its constituents to ensure per diem compensation and expense reimbursement payments to board members are appropriate and adequately supported.
  - b. Work with its legal counsel to pursue reimbursement from its board members for any inappropriate payments, as it determines necessary.
  - c. Ensure that all payments to its Board of Trustees and Defined Contribution and Disability Committee members are processed on the State's payroll system to ensure compliance with tax withholding requirements.
2. Arizona's State boards, including the Board of Massage Therapy, PSPRS Board of Trustees, and Water Quality Appeals Board, that have not yet done so should develop and implement written policies and procedures for paying board member per diem compensation that comply with each board's statutory requirements and define the specific board-related activities eligible for compensation, the amount of time spent on board-related activities that will be compensated, and the process for paying compensation to board members.



**Table 1**  
**List of State boards, per diem compensation and expense reimbursement payments to board members, and prior and current review results**  
**Fiscal year 2019**

Arizona board	Year last reviewed	Policies and procedures <sup>1</sup>	Sample of payments:		Total payments in fiscal year 2019
			Appropriate payment <sup>2</sup>	Processed in State payroll system	
<b>Accountancy, Board of</b>	2016	✓	✓	✓	\$ 14,355
Accounting and Auditing Advisory Committee	2016	✓	✓	✓	5,200
Certification Advisory Committee	2016	✓	✓	✓	6,600
Continuing Professional Education Advisory Committee	2016	✓	✓	✓	6,000
Peer Review Oversight Advisory Committee	2016	✓	✓	✓	2,200
Tax Advisory Committee	2016	✓	✓	✓	8,347
Law Review Advisory Committee	<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Acupuncture Board of Examiners</b>	2019	✓	✓	✓	6,383
<b>Administration, Department of</b>					
Governor's Regulatory Review Council	2019	✓	✓	✓	21,600
Water Quality Appeals Board	2019	✗	✓	✓	842
Central Arizona Independent Oversight Committee on the Mentally Ill	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
Central Independent Oversight Committee on Persons with Developmental Disabilities					
Debt Oversight Commission					
Eastern Independent Oversight Committee on Persons with Developmental Disabilities					
Independent Oversight Committee on Behavioral Health Services for Persons with Serious Mental Illness					
Independent Oversight Committee on Children, Youth and Families					
Information Technology Authorization Committee					
Lease Cost Review Board					
Northern Arizona Independent Oversight Committee on the Mentally Ill					
Northern Independent Oversight Committee on Persons with Developmental Disabilities					
Southern Arizona Independent Oversight Committee on the Mentally Ill					
Southern Independent Oversight Committee on Persons with Developmental Disabilities					
State Set-aside Committee					
Statewide Independent Oversight Committee on Persons with Developmental Disabilities					
Statewide Independent Oversight Committee on the Mentally Ill					
Western Independent Oversight Committee on Persons with Developmental Disabilities					
<b>African American Affairs, Commission of</b>					
<b>Agriculture, Department of</b>					
Agricultural Employment Relations Board	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
Animal Services Advisory Council					
Citrus, Fruit and Vegetable Advisory Council					
Citrus Research Council					

**Table 1 continued**

	Year last reviewed	Policies and procedures <sup>1</sup>	Sample of payments:		Total payments in fiscal year 2019
			Appropriate payment <sup>2</sup>	Processed in State payroll system	
<b>Arizona board</b>					
Department of Agriculture Advisory Council					
Department of Agriculture, Public Safety Personnel Retirement System, Local Board <sup>3</sup>					
Food & Agriculture Policy Advisory Committee					
Grain Research and Promotion Council					
Iceberg Lettuce Research Council					
Leafy Greens Food Safety Committee					
Organic Food Certification Program <sup>3</sup>					
Pesticide Advisory Committee					
Pest Management Advisory Committee					
Weights and Measures Advisory Council					
<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Arizona Health Care Cost Containment System (AHCCCS)</b>					
Advisory Council on Indian Health Care					1,705
Behavioral Health Planning Council					1,296
<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
Arizona Long Term Care System (ALTCs) Advisory Council					
Autism Spectrum Disorder (ASD) Advisory Committee					
Pharmacy & Therapeutics Committee					
State Advisory Council on the Seriously Mentally Ill					
State Medicaid Advisory Committee					
<b>Arizona-Mexico Commission<sup>4</sup></b>					
<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Arizona State Retirement System</b>					
Arizona State Retirement System Board of Trustees					
<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Arizona State University</b>					
Arizona State University, Public Safety Personnel Retirement System, Local Board					
<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Arts, Commission on the</b>					
State Poet Laureate Nomination Committee					
<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Athletic Training, Board of</b>	2019	N/A	✓	✓	1,147
<b>Attorney General</b>					
Arizona Civil Rights Advisory Board	2016	✓	✓	✓	1,530
Arizona Prosecuting Attorneys' Advisory Council					2,227
<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
Attorney General, Public Safety Personnel Retirement System, Local Board					
<b>Automobile Theft Authority</b>					
Automobile Theft Authority Board					
<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Barbers, Board of</b>	2016	✓	✓	✓	1,533
<b>Beef Council<sup>4</sup></b>					
<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Behavioral Health Examiners, Board of</b>					
Counseling Academic Review Committee	2016	✓	✓	✓	16,782
Marriage and Family Therapy Academic Review Committee	2016	✓	✓	✓	4,171
Social Work Academic Review Committee	2016	✓	✓	✓	1,743
Substance Abuse Academic Review Committee	2016	✓	✓	✓	1,376
					1,808
<b>Charter Schools, Board for</b>					
<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Child Safety, Department of</b>					
Department of Child Safety Community Advisory Committee					
<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Chiropractic Examiners, Board of</b>	2016	✓	✓	✓	9,860
<b>Citizens Clean Elections Commission</b>	2016	✓	✓	✓	10,975

**Table 1 continued**

Arizona board	Year last reviewed	Policies and procedures <sup>1</sup>	Sample of payments:		Total payments in fiscal year 2019
			Appropriate payment <sup>2</sup>	Processed in State payroll system	
<b>Commerce Authority<sup>4</sup></b>					
Commerce Authority Board Complete Count Committee Rural Business Development Advisory Council	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Companion Animal Spay/Neuter Committee</b>	2019	N/A	✓	✓	2,952
<b>Constable Ethics, Standards and Training Board</b> <i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Corporation Commission<sup>5</sup></b> <i>This board has not been reviewed yet.</i>					
Power Plant and Transmission Line Siting Committee	2016	✓	✓	✓	10,958 10,262
<b>Corrections, Department of</b>					
Arizona Correctional Industries (ACI) Advisory Board Constituent Services Advisory Committee Department of Corrections, Corrections Officer Retirement Plan, Local Board	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Cosmetology, Board of</b>	2016	✓	✓	✓	3,695
<b>Cotton Research and Protection Council</b> <i>This board has not been reviewed yet.</i>					
<b>Criminal Justice Commission</b> <i>This board has not been reviewed yet.</i>					
<b>Deaf and the Hard of Hearing, Commission for the</b> <i>This board has not been reviewed yet.</i>					
<b>Dental Examiners, Board of</b>					
Dental Audit Committee Dental Hygiene Committee	2019	✓	✓	✓	16,505
<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>					
<b>Dispensing Opticians, Board of</b>	2016	✓	✓	✓	5,761
<b>Early Childhood Development and Health Board</b>					
First Things First Regional Partnership Councils (28 individual partnership councils) <sup>6</sup>	2018 2018	N/A N/A	✓ ✓	✓ ✓	5,517 45,107
<b>Economic Opportunity, Office of</b>					
Finance Authority Board Water Infrastructure Finance Authority Advisory Board Workforce Arizona Council	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Economic Security, Department of</b>					
Developmental Disabilities Planning Council	2016	N/A	✓	✓	1,159
Governor's Advisory Council on Aging	2016	N/A	✓	✓	6,012
Governor's Council on Blindness and Visual Impairment	2016	N/A	✓	✓	965
Hunger Advisory Council	2017	N/A	✓	✓	196
Developmental Disabilities Advisory Council	<i>This board has not been reviewed yet</i>				
Advisory Council on Spinal and Head Injuries Arizona Achieving a Better Life Experience (ABLE) Act Oversight Committee Child Care Advisory Committee Economic Security Advisory Council Governor's Arizona Commission on Homelessness and Housing Interagency Coordinating Council for Infants and Toddlers State Rehabilitation Advisory Council Statewide Independent Living Council	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Education, Board of</b>					
Professional Practices Advisory Committee	2016 2016	N/A N/A	✓ ✓	✓ ✓	8,264 596
Alternate Educator Preparation Application Review Committee Certification Advisory Committee K-3 Literacy Ad Hoc Committee	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Education, Department of</b>					
Accountability Technical Advisory Committee Alternate Accountability Technical Advisory Committee	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				

**Table 1 continued**

Arizona board	Year last reviewed	Policies and procedures <sup>1</sup>	Sample of payments:		Total payments in fiscal year 2019
			Appropriate payment <sup>2</sup>	Processed in State payroll system	
Data Governance Commission Special Education Advisory Panel					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Emergency and Military Affairs, Department of</b> Department of Emergency and Military Affairs, Public Safety Personnel Retirement, Local Board Military Affairs Commission State Emergency Council					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Environmental Quality, Department of</b> Agricultural Best Management Practices Committee Emergency Response Commission Oil and Gas Conservation Commission Recycling Advisory Committee Water Systems Coordinating Council					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Equalization, Board of</b>	2016	✓	✓	✓	68,535
<b>Executive Clemency, Board of<sup>7</sup></b>					<i>This board has not been reviewed yet.</i> 496
<b>Exposition and State Fair Board</b>					<i>This board has not been reviewed yet.</i> 316
<b>Fingerprinting, Board of</b>					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Forestry and Fire Management, Department of</b> Forest Health Council					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Funeral Directors and Embalmers, Board of</b>					<i>This board has not been reviewed yet.</i> 1,443
<b>Game and Fish Department</b> Game and Fish Commission Game and Fish Commission Appointment Recommendation Board Game and Fish Commission, Public Safety Personnel Retirement System, Local Board Livestock Loss Board	2018	✓	✓	✓	29,438
					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Gaming, Department of</b> Racing Commission State Boxing and Mixed Martial Arts Commission					<i>This board has not been reviewed yet.</i> 1,230 <i>This board has not been reviewed yet.</i> 1,350
<b>Governing Committee for Tax Deferred Annuities and Deferred Compensation Plans</b>		N/A	N/A	N/A	<i>Unknown<sup>8</sup></i>
<b>Governor, Office of the</b> Governor's Commission On Service and Volunteerism Human Trafficking Council Juvenile Justice Commission Parents Commission On Drug Education and Prevention Commission to Prevent Violence Against Women Commission on Youth and Aging Council on Child Safety and Family Empowerment Governor's Council on the Sharing Economy Livestock and Agriculture Committee Medal of Valor Review Board Public School Credit Enhancement Eligibility Board Substance Abuse Partnership Council State Council on the Education for Military Children					<i>This board has not been reviewed yet.</i> 2,250 <i>This board has not been reviewed yet.</i> 109 <i>This board has not been reviewed yet.</i> 4,696 <i>This board has not been reviewed yet.</i> 1,024 <i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Governor's Office of Highway Safety</b> Oversight Council on Driving or Operating Under the Influence Abatement					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Health Services, Department of</b> Psychiatric Security Review Board	2016	✓	✓	✓	13,247

**Table 1 continued**

Arizona board	Year last reviewed	Policies and procedures <sup>1</sup>	Sample of payments:		Total payments in fiscal year 2019
			Appropriate payment <sup>2</sup>	Processed in State payroll system	
Advisory Committee for Medical Radiologic Technologists Clinical Laboratory Licensure Advisory Committee Council on Infectious Disease Preparedness and Response Emergency Medical Services (EMS) Council EMS Education Standing Committee EMS Pediatric Advisory Committee for Emergency Services Environmental Laboratory Advisory Committee Healthcare-Associated Infection (HAI) Advisory Committee Medical Direction Commission (MDC) MDC Protocols, Medications, and Devices Committee Newborn Screening Program Committee Sanitarians' Council Speech & Hearing Professionals Advisory Committee State Trauma Advisory Board (STAB) Tobacco Revenue Use Spending and Tracking Commission Trauma and EMS Performance Improvement (TEPI) Standing Committee					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Historical Society</b>					
Historical Society Board					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Homeland Security, Department of</b>					
Homeland Security Regional Advisory Council (Central Region) Homeland Security Regional Advisory Council (East Region) Homeland Security Regional Advisory Council (North Region) Homeland Security Regional Advisory Council (South Region) Homeland Security Regional Advisory Council (West Region) Homeland Security Senior Advisory Committee State Citizen Corps Council					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Homeopathic and Integrated Medicine Examiners, Board of</b>					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Housing, Department of</b>					
Board of Manufactured Housing					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Independent Redistricting Commission<sup>9</sup></b>					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Industrial Commission of Arizona</b>	2016	✓	✓	✓	13,644
Occupational Safety and Health Advisory Committee	2016	N/A	✓	✓	116
Special Fund Investment Committee	2016	✓	✓	✓	500
Boiler Advisory Board					
Occupational Safety and Health Review Board					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
Wage Board					
<b>Insurance, Department of</b>					
Continuing Education Review Committee <sup>3</sup> Insurance Consumer Advisory Board <sup>3</sup> Life and Disability Insurance Guaranty Fund Board Property and Casualty Insurance Guaranty Fund Board Uniform Employee Health Status Questionnaire Committee <sup>3</sup> Workers' Compensation Appeals Board <sup>3</sup>					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Juvenile Corrections, Department of</b>					
Department of Juvenile Corrections, Corrections Officer Retirement Plan, Local Board Religious Services Advisory Committee					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Land Department</b>					
Arizona Geographic Information Council	2018	N/A	✓	✓	3,117
Land Department Board of Appeals					<i>This board has not been reviewed yet.</i>
Grazing Land Valuation Commission					2,146
Public Lands Board of Review					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
Resource Advisory Council					

**Table 1 continued**

Arizona board	Year last reviewed	Policies and procedures <sup>1</sup>	Sample of payments:		Total payments in fiscal year 2019
			Appropriate payment <sup>2</sup>	Processed in State payroll system	
State Selection Board Urban Land Planning Oversight Committee					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Liquor Licenses and Control, Department of</b> Liquor Board	2016	✓	✓	✓	4,584
Department of Liquor Licenses & Control, Public Safety Personnel Retirement System, Local Board					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Lottery Commission</b>	2018	✓	✓	✓	1,410
<b>Massage Therapy, Board of</b>	2019	✗	✓	✓	6,771
<b>Medical Board</b> Regulatory Board of Physician Assistants	2016 2019	✓ ✓	✓ ✓	✓ ✓	64,581 7,398
<b>Mine Inspector</b> Mining Advisory Council					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Naturopathic Physicians Medical Board</b>	2019	✓	✓	✓	8,902
<b>Navigable Stream Adjudication Commission</b>	2016	✓	✓	✓	180
<b>Northern Arizona University</b> Northern Arizona University, Public Safety Personnel Retirement System, Local Board					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Nursing, Board of<sup>10</sup></b>	2016	✓	✓	✓	35,253
<b>Nursing Care Institution Administrators and Assisted Living Facility Managers, Board of</b>	2019	✓	✓	✓	5,655
<b>Occupational Therapy Examiners, Board of</b>	2019	✓	✓	✓	6,314
<b>Optometry, Board of</b>	2016	✓	✓	✓	2,446
<b>Osteopathic Examiners in Medicine and Surgery, Board of</b>	2016	✓	✓	✓	16,083
<b>Parks</b> AZSITE Consortium Advisory Committee AZSITE Consortium Board Conservation Acquisition Board Governor's Archaeology Advisory Commission Historic Preservation Advisory Committee Historic Sites Review Committee Natural Areas Program Advisory Committee Off-Highway Vehicle Advisory Group Outdoor Recreation Coordinating Commission State Committee on Trails State Parks Board State Parks, Public Safety Personnel Retirement System, Local Board <sup>3</sup>					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Personnel Board</b>	2019	✓	✓	✓	2,880
<b>Pharmacy, Board of</b>	2016	✓	✓	✓	22,573
<b>Physical Therapy, Board of</b>	2019	N/A	✓	✓	2,060
<b>Podiatry Examiners, Board of</b>	2016	✓	✓	✓	8,465
<b>Postsecondary Education, Commission for</b> Family College Savings (529) Program Oversight Committee					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Power Authority<sup>4</sup></b> Power Authority Commission					<i>This board has not been reviewed yet.</i> 23,546

**Table 1 continued**

Arizona board	Year last reviewed	Policies and procedures <sup>1</sup>	Sample of payments:		Total payments in fiscal year 2019
			Appropriate payment <sup>2</sup>	Processed in State payroll system	
<b>Prescott Historical Society</b>					
Prescott Historical Society Board	<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Private Postsecondary Education, Board for</b>	<i>This board has not been reviewed yet.</i>				
					2,150
<b>Psychologist Examiners, Board of</b>					
	2016	✓	✓	✓	12,984
Committee on Behavior Analysts	<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Public Safety, Department of</b>					
Peace Officer Standards and Training Board	2016	N/A	✓	✓	2,350
Law Enforcement Merit System Council	2016	✓	✓	✓	464
Automated Fingerprint Identification System Advisory Board	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
Department of Public Safety, Corrections Officer Retirement Plan, Local Board					
Department of Public Safety, Public Safety Personnel Retirement System, Local Board					
Private Investigator and Security Guard Hearing Board					
School Bus Advisory Council					
<b>Public Safety Personnel Retirement System<sup>4</sup></b>					
Public Safety Personnel Retirement System Board of Trustees	2019	✗	✗	✗	20,797
PSPRS Defined Contribution and Disability Committee	2019	N/A	✓	✗	8,100
<b>Real Estate, Department of</b>					
Real Estate Advisory Board	<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Regents, Board of<sup>11</sup></b>					
	2016	✓	✓	✓	4,250
Committee on Free Expression	<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Respiratory Care Examiners, Board of</b>	<i>This board has not been reviewed yet.</i>				
					3,138
<b>Revenue, Department of</b>					
Economic Estimates Commission	2016	✓	✓	✓	300
Property Tax Oversight Commission	<i>This board has not been reviewed yet.</i>				
					1,300
Education, Training and Certification Advisory Committee	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
Municipal Tax Code Commission					
<b>School Facilities Board</b>	2016	✓	✓	✓	10,533
<b>Schools for the Deaf and the Blind</b>					
State Schools for the Deaf and the Blind Board	2016	N/A	✓	✓	1,374
<b>Secretary of State</b>					
Board of Library Examiners	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
Historical Advisory Commission					
Historical Records Advisory Board					
State Board on Geographic and Historic Names					
<b>Supreme Court<sup>4</sup></b>					
Commission on Judicial Conduct	2016	N/A	✓	✓	7,204
State Foster Care Review Board <sup>12</sup>	2016	N/A	✓	✓	27,224
Commission on Appellate Court Appointments	<i>This board has not been reviewed yet.</i>				
					851
Commission on Judicial Performance Review	<i>This board has not been reviewed yet.</i>				
					2,509
Committee on Character and Fitness	<i>This board has not been reviewed yet.</i>				
					5,171
Committee on Examinations	<i>This board has not been reviewed yet.</i>				
					1,326
Pinal County Commission on Trial Court Appointments	<i>This board has not been reviewed yet.</i>				
					46
Achievement Awards Committee	<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
Arizona Judicial Council (AJC)					
AJC Commission on Access to Justice					
AJC Commission on Minorities in the Judiciary					
AJC Commission on Technology					
AJC Commission on Victims in the Courts					

**Table 1 continued**

Arizona board	Year last reviewed	Policies and procedures <sup>1</sup>	Sample of payments:		Total payments in fiscal year 2019
			Appropriate payment <sup>2</sup>	Processed in State payroll system	
AJC Committee on the Impact of Domestic Violence and the Courts					
AJC Committee on Judicial Education and Training					
AJC Committee on Limited Jurisdiction Courts					
AJC Committee on Superior Court					
Attorney Discipline Probable Cause Committee					
Attorney Ethics Advisory Committee					
Attorney Regulation Advisory Committee					
Board of Certified Court Reporters					
Board of Legal Document Preparers					
Capital Case Oversight Committee					
Committee on Improving Small Claims Processing					
Committee on Juvenile Courts					
Committee on Probation					
Committee on Probation Education					
Committee on Rules of Evidence					
Confidential Intermediary Board					
Court Automation Coordinating Committee					
Court Interpreter Program Advisory Committee					
Court Leadership Institute of Arizona Committee					
Defensive Driving Board					
Fiduciary Board					
Judicial College of Arizona Board					
Judicial Ethics Advisory Committee					
Judicial Staff Education Committee					
Maricopa County Commission on Trial Court Appointments					
Pima County Commission on Trial Court Appointments					
Steering Committee on Arizona Case Processing Standards					
<b>Tax Appeals, Board of</b>	2016	✓	✓	✓	2,100
<b>Tea Party Committee<sup>3</sup></b>	<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Technical Registration, Board of<sup>13</sup></b>	2016	✓	✓	✓	9,653
Enforcement Advisory Committee	2016	✓	✓	✓	
Home Inspector Rules and Standards Committee	2016	✓	✓	✓	
Legislation Rules Committee	2016	✓	✓	✓	
<b>Tourism, Office of</b>	<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
Tourism Advisory Council	<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>Transportation, Department of</b>					
State Transportation Board	2016	✓	✓	✓	32,489
Freight Advisory Council					
Overdimensional Permit Council					
Parkways and Historic and Scenic Roads Advisory Committee					
Priority Planning Advisory Committee					
Self-Driving Vehicle Oversight Committee					
<b>Treasurer, Office of the</b>	<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
Fallen Firefighter Memorial Committee					
Peace Officers Memorial Board					
State Board of Investment					
State Loan Commission					
<b>Uniform State Laws Commission</b>	<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>				
<b>University of Arizona<sup>4</sup></b>					
Area Health Education Centers Advisory Commission					
Board of Medical Student Loans					
Mining, Mineral and Natural Resources Educational Museum Advisory Council					

**Table 1 continued**

Arizona board	Year last reviewed	Policies and procedures <sup>1</sup>	Sample of payments:		Total payments in fiscal year 2019
			Appropriate payment <sup>2</sup>	Processed in State payroll system	
University of Arizona, Public Safety Personnel Retirement System, Local Board					<i>This board did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
<b>Veterans' Services, Department of</b>					
Veterans' Service Advisory Commission	2019	N/A	✓	✓	1,127
Hyperbaric Oxygen Therapy for Military Veterans Advisory Committee					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
Military Family Relief Fund Advisory Committee					
Post-9/11 Veteran Education Relief Advisory Committee					
Pre-9/11 Veteran Education Relief Advisory Committee					
<b>Veterinary Medical Examining Board</b>	2016	✓	✓	✓	17,449
<b>Water Resources, Department of</b>					
Water Banking Authority Commission					<i>This board has not been reviewed yet.</i> 622
Governor's Water Augmentation, Innovation and Conservation Council					<i>These boards did not pay per diem compensation or reimburse expenses in fiscal year 2019.</i>
Groundwater Users Advisory Council - Phoenix AMA					
Groundwater Users Advisory Council - Pinal AMA					
Groundwater Users Advisory Council - Prescott AMA					
Groundwater Users Advisory Council - Santa Cruz AMA					
Groundwater Users Advisory Council - Tucson AMA					
Water Protection Fund Commission					

<sup>1</sup> Policies and procedures are for per diem compensation payments only. The State has policies and procedures it expects boards to follow for expense reimbursements. As such, we indicated N/A for the boards reviewed that did not pay per diem compensation.

<sup>2</sup> We examined sampled payments to ensure they appeared proper and complied with State law and State or board policy, as applicable.

<sup>3</sup> According to the agency/board, this board is not currently active. It will be activated when needed.

<sup>4</sup> The agency/board does not process its transactions in the State's primary payroll system, the Human Resources Information Solution system. The agency/board reported any fiscal year 2019 payments presented.

<sup>5</sup> The Corporation Commission members are elected officials that receive a salary as determined by the Arizona Commission on Salaries for Elective State Officers. Those salaries are not included in the total payments in fiscal year 2019.

<sup>6</sup> The Early Childhood Development and Health Board (also known as First Things First) has 28 First Things First Regional Partnership Councils (partnership councils) made up of local volunteers that support the healthy development and learning of young children in the local community. Expense reimbursements for all 28 partnership councils are presented together.

<sup>7</sup> Effective fiscal year 2017, the per diem compensation for the Board of Executive Clemency was changed from an hourly rate to a salary as established by the Arizona Department of Administration. Those salaries are not included in the total payments in fiscal year 2019.

<sup>8</sup> The Governing Committee for Tax Deferred Annuities and Deferred Compensation Plans' members are not eligible for per diem compensation and the board's expense reimbursements are paid by Nationwide Insurance, the State's Deferred Compensation and Defined Contribution Plans provider.

<sup>9</sup> According to the Arizona Constitution Art. IV, Pt. 2, Sec. 1, an independent redistricting commission is established by February 28 of each year that ends in 1.

<sup>10</sup> The Board of Nursing has an Education Advisory Committee, Advanced Practice Committee, and Scope of Practice Committee that are made up of board members. Any payments to board members for work done on these committees would have been reviewed as part of our review of the board.

<sup>11</sup> The Board of Regents has an Academic Affairs and Educational Attainment Committee; Audit Committee; Finance, Capital, and Resources Committee; and Research and Health Sciences Committee that are made up of board members. Any payments to board members for work done on these committees would have been reviewed as part of our review of the board.

<sup>12</sup> The State Foster Care Review Board includes 146 local foster care review boards, which are reimbursed, nontaxable expenses through the Supreme Court Revolving Fund. Auditors were unable to readily identify whether payments were to State or local board members and therefore reported the amounts reimbursed to both State and local board members under the State board.

<sup>13</sup> The members of the Board of Technical Registration serve on the committees with other members. Because all payments to the board and committee members are processed using the same accounting codes, for audit efficiency, we reported the aggregated amount of the payments to board and committee members



## Objectives, scope, and methodology

The Office of the Auditor General has conducted an annual review of per diem compensation and expense reimbursement payments to members of State boards pursuant to A.R.S. §41-1279.03(A)(10). This review covers fiscal year 2019.<sup>9</sup> We issued Report 17-306 and Report 19-302 State Board Member Per Diem Compensation and Expense Reimbursements (prior reports) in November 2017 and March 2019, respectively, in which we reported the results of our review of the fiscal years 2016 through 2018 board member payments of per diem compensation and expense reimbursements. This report follows up on the recommendations from the prior reports; presents a table of State boards and fiscal year 2019 payment information; and examines payments of per diem compensation and expense reimbursements made to members of 16 boards during fiscal year 2019.<sup>10</sup>

As determined and reported in the methodology section of our prior reports, board member payments for per diem compensation and expense reimbursement are processed through multiple State systems and recorded under various expense categories. Therefore, a complete population of payments could not be identified in prior reviews. Since the process for recording payments was the same during fiscal year 2019, we were similarly unable to determine a complete population of all boards and payments to board members.

In addition, the State does not maintain a comprehensive list of boards. For fiscal year 2019, we compiled a list of 508 boards. To compile this list, we:

- Reviewed the most recent board listing produced by the Arizona Governor's Office at <https://bc.azgovernor.gov/>.
- Judgmentally selected 319 boards and agencies to help determine if our list was complete and accurate and determine if there were board member payments during fiscal year 2019.
- Analyzed board member payments in the State's or agencies' payroll and accounting systems to identify any additional boards.

For the fiscal year 2019 review, we judgmentally selected a sample of 88 payments of per diem compensation and expense reimbursements<sup>11</sup> to members of 16 boards that were processed through the State's payroll system or agency accounting system. To identify payments for review, we considered the following criteria:

- Boards that were not reviewed previously.
- Boards that do not process transactions in the State's payroll or financial system.
- Payments that appeared unusual.

We evaluated the payments to determine their propriety. Specifically, we reviewed the State's policies and the boards' statutes and policies and interviewed board management and staff to gain an understanding of policies, procedures, and internal controls governing board payments. We also reviewed the Arizona Financial Information

<sup>9</sup> We also selected per diem compensation and expense reimbursement payments from fiscal year 2018, when necessary.

<sup>10</sup> See table on pages a-1 through a-9 for the boards reviewed during fiscal year 2019.

<sup>11</sup> Each payment could include multiple per diem compensation and expense reimbursements transactions.

System for fiscal year 2019 to determine if the boards were processing payments in accordance with ADOA's policy regarding the payment of board per diem compensation in the State's payroll system.<sup>12</sup>

We selected our audit samples to provide sufficient evidence to support our findings, conclusions, and recommendations. Unless otherwise noted, the results of our testing using these samples were not intended to be projected to the entire population.

We express appreciation to the staff of ADOA and the boards, commissions, councils, and advisory committees for their cooperation and assistance throughout the review.

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<sup>12</sup> SAAM policy 5565 Compensation and Expense Reimbursements Paid to Board Members.

