



**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

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JOHN NAIMO
MARIA M. OMS

January 14, 2009

TO: Supervisor Don Knabe, Chairman
Supervisor Gloria Molina
Supervisor Mark Ridley-Thomas
Supervisor Zev Yaroslavsky
Supervisor Michael D. Antonovich

FROM:

Wendy L. Watanabe
Acting Auditor-Controller

SUBJECT: **CITY OF COMPTON – COMPTON CAREERLINK CONTRACT REVIEW
– A COMMUNITY AND SENIOR SERVICES WORKFORCE
INVESTMENT ACT PROGRAM PROVIDER – FISCAL YEAR 2007-08**

We completed a program, fiscal and administrative contract compliance review of the City of Compton – Compton Careerlink (Compton Careerlink or Agency), a Community and Senior Services (CSS) Workforce Investment Act (WIA) Program provider.

Background

CSS contracts with Compton Careerlink, a government organization to provide and operate the WIA Adult, Dislocated Worker, Rapid Response and Youth Programs. The WIA Adult and Dislocated Worker Programs assist individuals obtain employment, retain their jobs and increase their earnings. The WIA Rapid Response Program provides assistance to companies that are facing a reduction in their work force and assists the soon-to-be dislocated workers cope with career transitions by providing orientation seminars, workshops and materials. The WIA Youth Program is a comprehensive training and employment program for in-school and out-of-school youth ages 14 to 21 years old. Compton Careerlink's office is located in the Second District.

Compton Careerlink was compensated on a cost reimbursement basis and had a contract for \$1,343,817 for Fiscal Year (FY) 2007-08.

Purpose/Methodology

The purpose of the review was to determine whether Compton Careerlink complied with its contract terms and appropriately accounted for and spent WIA funds in providing the services outlined in their County contract. We also evaluated the adequacy of the Agency's accounting records, internal controls and compliance with federal, State and County guidelines. In addition, we interviewed a number of the Agency's staff and clients.

Results of Review

Compton Careerlink billed CSS \$20,914 in questioned costs. In addition, Compton Careerlink did not always comply with WIA and County contract requirements. For example, Compton Careerlink did not:

- Conduct a criminal record clearance for all seven employees sampled.
- Obtain at least 85% of their planned performance outcomes as required by the County contract for the WIA Adult and Dislocated Worker Programs.
- Accurately report the participants' program activities on the Job Training Automation System for six (22%) of the 28 participants sampled.
- Follow-up with the participants after the participants exited the program on a quarterly basis for 12 (43%) of the 28 participants sampled.

Details of our review, along with recommendations for corrective action, are attached.

Review of Report

We discussed our report with Compton Careerlink and CSS on October 23, 2008. In their attached response, Compton Careerlink generally concurred with our findings and recommendations including repaying CSS \$20,546 (\$16,203 + \$4,343). The remaining \$368 (\$20,914 - \$20,546) in questioned costs, Compton Careerlink disagreed with our finding and indicated that the \$368 in printing charges were appropriately billed. However, according to their accounting records and the flyers printed, the flyers were specifically for the Youth Program not the Adult Program. The Agency inappropriately charged the Adult Program.

Board of Supervisors
January 14, 2009
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We thank Compton Careerlink for their cooperation and assistance during this review. Please call me if you have any questions or your staff may contact Don Chadwick at (213) 253-0301.

JTM:MMO:DC

Attachment

c: William T Fujioka, Chief Executive Officer
Cynthia D. Banks, Director, Department of Community and Senior Services
Barbara Kilroy, City Manager, City of Compton – Compton Careerlink
Charles Evans, City Manager, City of Compton – Compton Careerlink
Eric J. Perrodin, Mayor, Chairperson, City of Compton – Compton Careerlink
Public Information Office
Audit Committee
Workforce Investment Board

**WORKFORCE INVESTMENT ACT PROGRAM
CITY OF COMPTON – COMPTON CAREERLINK
FISCAL YEAR 2007-08**

ELIGIBILITY

Objective

Determine whether the City of Compton – Compton Careerlink (Compton Careerlink or Agency) provided services to individuals that meet the eligibility requirements of the Workforce Investment Act (WIA).

Verification

We reviewed the case files for 28 (15%) (ten youth, ten adults and eight dislocated workers) of the 184 participants that received services from July 2007 through May 2008 for documentation to confirm their eligibility for WIA services.

Results

Generally, Compton Careerlink maintained adequate documentation to support the participants' eligibility for program services. However, Compton Careerlink did not maintain adequate documentation to support the eligibility for one (4%) of the 28 participants sampled. Specifically, Compton Careerlink was unable to locate the participant's case file for review. Compton Careerlink may have billed CSS for direct and indirect services for the ineligible individual, such as supportive services, work experience and/or staff time. However, we were unable to determine the amount.

Recommendations

Compton Careerlink management:

- 1. Provide the participant's case file for review or repay CSS for any costs incurred on behalf of the ineligible participant.**
- 2. Ensure that the participants' case files are safeguarded and maintained at the Agency.**

BILLED SERVICES/CLIENT VERIFICATION

Objective

Determine whether the Agency provided the services in accordance with the County contract and WIA guidelines. In addition, determine whether the participants received the billed services.

Verification

We reviewed the documentation contained in the case files for 28 (15%) participants that received services from July 2007 through May 2008. We also interviewed six youth, five adults and five dislocated workers.

Results

The sixteen participants/guardians interviewed stated that the services they received met their expectations. However, Compton Careerlink did not always comply with WIA guidelines. Specifically, Compton Careerlink did not:

- Accurately report the participants' program activities on the Job Training Automation (JTA) System for four (40%) of the ten youth sampled and for two (11%) of the 18 Adult and Dislocated Worker participants sampled. The JTA system is used by the State of California Employment Development Department (EDD) and the Department of Labor to track WIA participants' activities. Specifically, Compton Careerlink:
 - Inaccurately reported one participant as an in-school youth participant instead of as an out-of-school youth participant.
 - Did not report training and/or work experience provided to four youth program participants on the JTA system. Similar findings were also noted during the prior two years' monitoring reviews.
 - Did not maintain documentation in the participants' case files to support the services reported in the JTA for two adult program participants. Similar findings were also noted during the prior two years' monitoring reviews.
- Follow-up with the program participants on a quarterly basis after the participants exited the program for 12 (43%) of the 28 participants sampled.
- Complete the Individual Employment Plans (IEPs) for two (11%) of the 18 Adult and Dislocated Worker participants sampled as required by WIA guidelines. Specifically, the participants' case files did not contain a completed IEP.

The IEP is an on-going plan, jointly developed by the participant and the case manager that identifies the participants' employment goals, achievement objectives and the services needed to achieve their employment goals. WIA guidelines require an IEP must be used to provide intensive services to unemployed workers unable to obtain employment through core services, and to employed workers who need additional assistance to obtain or retain employment. According to the participants' case files, both participants received intensive services.

Recommendations**Compton Careerlink management:**

3. Ensure that staff accurately update the Job Training Automation System to reflect the participants' program activities.
4. Ensure that staff follow-up with exited participants on a quarterly basis.
5. Maintain appropriate documentation in the participants' case files to support the program activities reported as completed on the Job Training Automation System.
6. Ensure that staff complete the Individual Employment Plans for the Adult and Dislocated Worker participants.

PERFORMANCE OUTCOME REVIEW**Objective**

Determine whether Compton Careerlink met the planned performance outcomes as outlined in the County contract and accurately reported the performance outcomes to the Workforce Investment Board (WIB). The performance outcomes included measuring the number of participants that enrolled in the program, exited the program, completed training and/or gained employment.

Verification

We compared the reported Fiscal Year (FY) 2007-08 actual performance outcomes to the planned performance outcomes outlined in the County contract and to the program activities reported on the JTA system.

Results**Youth Program**

Compton Careerlink met the planned performance outcomes as outlined in the County contract and accurately reported the performance outcomes to the WIB.

Adult and Dislocated Worker Programs

Compton Careerlink did not obtain at least 85% of their planned performance outcomes as required by the County contract for the WIA Adult and Dislocated Worker Programs. Specifically, Compton Careerlink:

- Enrolled 80% of the planned enrollments for the WIA Adult Program.
- Exited 78% of the planned exits for the WIA Adult Program.
- Exited 59% of the planned exits for the WIA Dislocated Worker Program.
- Placed 58% of the planned placements for the WIA Dislocated Worker Program.

Recommendation

7. **Compton Careerlink management ensure that planned performance outcomes are met as required by the County contract.**

CASH/REVENUE

Objective

Determine whether cash receipts and revenue are properly recorded in the Agency's records and deposited timely in their bank account. In addition, determine whether there are adequate controls over cash, petty cash and other liquid assets.

Verification

We interviewed Agency personnel and reviewed financial records. We also reviewed the Agency's March 2008 bank reconciliation.

Results

Generally, Compton Careerlink maintained adequate controls to ensure that revenue was properly recorded and deposited in a timely manner. However, Compton Careerlink did not adequately prepare their March 2008 bank reconciliation. Specifically, checks that were outstanding more than 180 days were not resolved. This finding was also noted during the prior year's monitoring review.

Recommendation

8. **Compton Careerlink management resolve outstanding checks older than 180 days and return funds to the appropriate funding source.**

EXPENDITURES/PROCUREMENT

Objective

Determine whether program related expenditures are allowable under the County contract, properly documented and accurately billed.

Verification

We interviewed Agency personnel, reviewed financial records and reviewed documentation for 43 non-payroll expenditure transactions billed by the Agency for July and November 2007 and March and May 2008, totaling \$43,261.

Results

Compton Careerlink billed Community and Senior Services (CSS) \$16,571 in questioned costs. Specifically, Compton Careerlink:

- Did not maintain adequate documentation to support allocated costs for rent, printing, postage and auto expenditures, totaling \$12,562.
- Inappropriately allocated 100% of their program facility expenditures to the WIA programs when according to the Agency's floor plan and our physical walk-through of the program facility, the WIA programs only occupied approximately 33% of the total facility. As a result, Compton Careerlink overbilled CSS \$3,641. A similar finding was also noted during the prior year's monitoring review.
- Incorrectly billed \$368 to the WIA Adult Program for printing charges related to the WIA Youth program. According to the description on the supporting documentation provided, the flyers were specifically for the WIA Youth Program.

Recommendations

Compton Careerlink management:

9. **Repay CSS \$16,571 or provide adequate documentation to support the program expenditures.**
10. **Ensure that expenditures are adequately supported by documentation.**
11. **Ensure that shared program expenditures are appropriately allocated in compliance with the County contract.**
12. **Ensure that the expenditures are accurately charged to the correct programs.**

ADMINISTRATIVE CONTROLS/CONTRACT COMPLIANCE**Objective**

Determine whether the Agency maintained sufficient internal controls over its business operations. In addition, determine whether the Agency is in compliance with other program and administrative requirements.

Verification

We interviewed Agency personnel, reviewed their policies and procedures manuals, conducted an on-site visit and tested transactions in various non-cash areas such as expenditures, payroll and personnel.

Results

Generally, Compton Careerlink maintained sufficient internal controls over its business operations.

Recommendation

There are no recommendations for this section.

FIXED ASSETS AND EQUIPMENT

Objective

Determine whether Compton Careerlink's fixed assets and equipment purchases made with WIA funds are used for the WIA programs and are safeguarded.

Verification

We interviewed Agency personnel and reviewed the Agency's fixed assets and equipment inventory listing. In addition, we performed an inventory and reviewed the usage of 15 items purchased with WIA funds, totaling \$19,345.

Results

Compton Careerlink could not locate five (33%) of the 15 items sampled, totaling \$6,279, and the inventory listing did not accurately reflect the correct locations for two (13%) of the 15 items sampled. In addition, according to Agency personnel, an inventory was last performed in 2006. The County contract requires Agencies to inventory their fixed assets and equipment at least once each year to ensure that all assets are accounted for and maintained in proper working order. A similar finding was also noted during the prior year's monitoring review.

Subsequent to our review, Compton Careerlink located the five missing items.

Recommendations

Compton Careerlink management:

- 13. Ensure inventory is safeguarded and used for the WIA programs.**

14. Update the Agency's inventory listing to accurately reflect the location of each property.
15. Annually inventory the Agency's fixed assets and equipment.

PAYROLL AND PERSONNEL

Objective

Determine whether payroll is appropriately charged to the WIA program. In addition, determine whether personnel files are maintained as required.

Verification

We traced payroll expenditures for ten employees and 12 participants totaling \$38,232 for March 2008 to the Agency's payroll records and time reports. We also interviewed two employees and reviewed the personnel files for seven employees assigned to the WIA programs.

Results

Compton Careerlink appropriately charged payroll expenditures to the WIA programs. However, Compton Careerlink did not conduct a criminal record clearance or maintain proof of employment eligibility for all seven employees sampled. In addition, Compton Careerlink did not conduct an annual performance evaluation for six (86%) of the seven employees sampled. This finding was also noted during the prior year two years' monitoring reviews.

Recommendations

Compton Careerlink management:

16. Obtain a criminal record clearance for all employees assigned to the WIA programs.
17. Maintain required documents in the employees' personnel files.
18. Ensure that performance evaluations are prepared annually and maintained in the personnel files.

COST ALLOCATION PLAN

Objective

Determine whether Compton Careerlink's Cost Allocation Plan was prepared in compliance with the County contract and the Agency used the Plan to appropriately allocate shared program expenditures.

Verification

We reviewed the Cost Allocation Plan and reviewed a sample of expenditures incurred by the Agency in July 2007, November 2007, and March 2008 to ensure that the expenditures were properly allocated to the Agency's programs.

Results

Generally, Compton Careerlink's Cost Allocation Plan was prepared in compliance with the County contract. However, as previously indicated, Compton Careerlink did not properly allocate program facility expenditures totaling \$3,641.

Recommendation

Refer to Recommendation 11.

CLOSE-OUT REVIEW**Objective**

Determine whether the Agency's Fiscal Year (FY) 2006-07 final close-out invoices for the WIA Adult, Dislocated Worker, Rapid Response and Youth Programs reconciled to the Agency's financial accounting records.

Verification

We traced Compton Careerlink's FY 2006-07 general ledgers to the Agency's final close-out invoices for FY 2006-07. We also reviewed a sample of expenditures incurred in April, May and June 2007.

Results

Compton Careerlink's FY 2006-07 general ledgers reconciled to the Agency's final close-out invoices for FY 2006-07. However, Compton Careerlink inappropriately charged \$4,343 to the WIA Adult Program for training costs provided to three dislocated workers. In addition, Compton Careerlink inappropriately billed CSS 100% of their May and June 2007 security expenditures instead of allocating the expenditures among all benefited programs as required by the County contract. Specifically, Compton Careerlink's other programs included the State of California Employment Development Department, WIA City, Compton Unified School District, Department of Rehabilitation and Title V.

Recommendations

Refer to Recommendations 11 and 12.

Compton Careerlink management:

- 19. Repay CSS \$4,343.**
- 20. Review security expenditures for FY 2006-07 and repay CSS for any overbilled amounts.**

PRIOR YEAR FOLLOW-UP

Objective

Determine the status of recommendations reported in the prior monitoring review completed by the Auditor-Controller.

Verification

We verified whether the outstanding recommendations from FY 2006-07 monitoring review were implemented. The report was issued on April 22, 2008.

Results

The prior year's monitoring report contained 17 recommendations. Compton Careerlink implemented nine recommendations. As previously indicated, the findings related to recommendations 3, 5, 8, 11, 12, 15 and 19 contained in this report were also noted during the prior year's monitoring review. The remaining recommendation required Compton Careerlink to implement the outstanding recommendations reported in FY 2005-06. Compton Careerlink indicated that they would implement the recommendations by February 27, 2009.

Recommendation

- 21. Compton Careerlink management implement the outstanding recommendations.**



Compton CareerLink
WorkSource California Center

November 12, 2008

Ms. Wendy L. Watanabe
Acting Auditor Controller
Department of Auditor-Controller
Countywide Contract Monitoring Division
Los Angeles World Trade Center
350 S. Figueroa Street, 8th Floor
Los Angeles, CA 90071
Attention: Yoon Bae

Dear Ms. Watanabe:

The City of Compton CareerLink WorkSource Center is submitting the following Corrective Action Plan in response to the PY 2007-08 Auditor Controller review conducted May 2008:

ELIGIBILITY

Recommendations

1. Provide the participant's case file for review or repay CSS for any costs incurred on behalf of the ineligible participant
2. Ensure that the participant's case files are safeguarded and maintained at the Agency.

Compton CareerLink Response:

Findings 1 and 2

Compton CareerLink formally notified the local law enforcement agency, Municipal Law Enforcement Services, via letter of the missing file. (**See Attachment 1**). The agency awaits the official report from MLES, which will be placed on file and forwarded to LA County CSS. There is no repayment to CSS required because the client was enrolled into staff assisted job referrals, job search and job placement and placement services. No training or supportive services was provided and billed to CSS.

Additionally, to safeguard and maintain all files at the agency, CareerLink has re-organized the central filing system and identified a dedicated room for all current

administrative and client files. New file cabinets were purchased and the room is scheduled for final completion by January 31, 2009.

BILLED SERVICES/CLIENT VERIFICATION

Recommendations

Compton CareerLink management:

3. Ensure that staff accurately updates the Job Training Automation system to reflect the participants' program activities.
4. Ensure that staff follow-up with exited participants on a quarterly basis
5. Ensure that staff maintains appropriate documentation in the participants' case files to support the program activities reported as completed on the Job Training Automation system.
6. Ensure that staff completes the IEP for the Adult and Dislocated Worker participants.

Compton CareerLink response:

Findings 3, 4, 5, and 6

Compton CareerLink management will ensure that staff accurately updates the JTA system to reflect the participants' program activities and ensure that staff follow-up with exited participants on a quarterly basis. To bolster this idea, CareerLink Management has instituted a weekly program review that examines elements of program activity such as; file review, enrollment issues and documentation including IEP completion and other MIS issues. CareerLink staff will also ensure that appropriate documentation is maintained in the participants' case files to support the program activities reported as completed on the JTA system. Finally, Compton Careerlink will ensure that staff completes the IEP for the Adult and Dislocated Worker participants.

PERFORMANCE OUTCOME REVIEW

Recommendation

7. Compton CareerLink management ensure that planned performance outcomes are met as required by the County contract.

Compton CareerLink Response

Finding 7

CareerLink Management has instituted a weekly program review that examines elements of program activity such as; file review, enrollment issues and documentation including IEP completion and other MIS issues. CareerLink staff will also ensure that appropriate documentation is maintained in the participants' case files to support the program activities reported as completed on the JTA system. CareerLink management will ensure that planned performance outcomes are met as required by the County contract. More emphasis will be placed on outreach and recruitment efforts at various locations throughout the city and surrounding areas to obtain the necessary enrollment needed to meet performance requirement. Additionally, CareerLink will utilize the media resources available via cable access, newspaper advertisement, and flyer distribution and poster announcements.

CASH/REVENUE

Recommendation

- 8 Compton CareerLink management resolve outstanding checks older than 180 days and return funds to the appropriate funding source.

Compton CareerLink response:

Finding 8

The City of Compton Controller's Office assists the Compton CareerLink with cash receipts and recording revenues. To date, the Controller's Office has resolved all outstanding checks older than 180 days and returned funds to the appropriate funding source.

EXPENDITURES/PROCUREMENT

Recommendations

Compton CareerLink management:

10. Repay CSS \$16,571 or provide adequate documentation to support the program expenditures.
11. Ensure that expenditures are adequately supported by documentation.

12. Ensure that shared program expenditures are appropriately allocated in compliance with the County contract.
13. Ensure that the expenditures are accurately charged to the correct programs.

Compton CareerLink response:

Findings 10, 11, 12, and 13

Compton CareerLink agrees and will repay CSS \$16,203 for program expenditures in question with the exception of the \$368 printing charges. The \$368 billed to the WIA Adult program for printing charges were appropriately billed because the flyer printed targeted adult and youth clients alike.

In the future, Compton CareerLink will ensure that expenditures are adequately supported by documentation, that shared program expenditures are appropriately allocated in compliance with the County contract and that expenditures are accurately charged to the correct programs

ADMINISTRATIVE CONTROLS/CONTRACT COMPLIANCE

Recommendation

There are no recommendations for this section.

FIXED ASSETS AND EQUIPMENT

Recommendations

Compton CareerLink management:

14. Ensure inventory is safeguarded and used for the WIA programs.
15. Update the Agency's inventory listing to accurately reflect the location of each property
16. Perform an annual inventory.

Compton CareerLink response:

Findings 14, 15 and 16

Prior to the review, Compton CareerLink management contacted the City's IT department reorganize and review older computer system to determine its capacity and prepare for disposition of equipment. The computers, although safeguarded were located in the locked storage bay and the serial and tag labels were not visible due to the arrangement of the equipment. At the time of the exit with the monitors the computers were rearranged and tags were visible for the monitor's view. Compton CareerLink will ensure that equipment is safeguarded, inventory list is updated, a yearly inventory is performed and that the listing accurately reflects the location of each property.

PAYROLL AND PERSONNEL

Recommendations

Compton CareerLink management:

- 17 Obtain a criminal record clearance for all employees assigned to the WIA programs.
18. Maintain required documents in the employees' personnel files.
19. Ensure that performance evaluations are prepared annually and maintained in the personnel files.

Compton CareerLink response:

Findings 17, 18 and 19

Compton CareerLink worked with the City's Human Resource Department to obtain the criminal record clearance for all employees assigned to the WIA programs; however unfortunately, some records were not available. The HR Director, Kareemah Bradford has provided an explanation (**See Attachment 2**). CareerLink management will continue to work the City's HR department to obtain criminal record clearance for all employees and maintain required documents in the employee' personnel files by January 30, 2009. Additionally, CareerLink Management will ensure that performance evaluations are prepared annually and maintained in the personnel files.

COST ALLOCATION PLAN

Recommendation

Refer to recommendation 12.

Ensure that shared program expenditures are appropriately allocated in compliance with the County contract.

Compton CareerLink response:

CareerLink management will ensure that shared program expenditures are appropriately allocated in compliance with the County contract.

CLOSE-OUT REVIEW

Recommendations

Refer to recommendations 12 and 13.

20. Repay CSS \$4,343

21. Review security expenditures for FY 2006-07 and repay CSS for any over billed amounts.

Compton CareerLink response:

Findings 20 and 21

CareerLink agrees and will repay CSS in the amount of \$4,343 for program facility expenditures by January 30, 2008. Training vendor payments are processed utilizing the City's purchase requisition – purchase order process. As a result, CareerLink has required that tuition payments be prepared utilizing separate purchase orders per program. Additionally, CareerLink will review security expenditures for FY 2006-07 and determine if repayment to CSS is necessary by January 30, 2009, as well.

PRIOR YEAR FOLLOW-UP

Recommendation

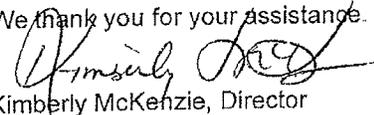
Compton CareerLink management implements the outstanding recommendations

Compton CareerLink response:

Finding 22

Compton CareerLink agrees and will implement the remaining recommendations by February 27, 2009

We thank you for your assistance.


Kimberly McKenzie, Director
Compton CareerLink WorkSource Center

Attachments

C: City Controller's Office Staff
CareerLink Staff
Charles Evans – City Manager

ATTACHMENT 1



Compton CareerLink
WorkSource California Center

October 22, 2008

TO: Officer Darryl Grimes
Code Enforcement Department

FROM: Deborah Daniels
Training & Services Coordinator
Compton CareerLink WorkSource Center

SUB: Missing Customer File

Officer Grimes, I am writing this memo to inform you of a missing or misplaced file on one of our customers. During an audit of the department's files earlier this year, May 2008, staff was unable to locate Mr. [REDACTED] file. It was suggested that a report be completed and forwarded to the code enforcement office.

Mr. [REDACTED] resides at [REDACTED] Compton, CA 90220. Social Security Number is [REDACTED] this information is being provided in the event that the file was not misplaced and the customer's personal information may be at risk

Should you need additional information pertaining to this letter, please feel free to contact me at (310) 605-3059 Tuesday thru Friday from 7:00 a.m. - 6:00 p.m

Thank you,

Deborah Daniels
Training & Services Coordinator

Cc: Director :Mrs. Kimberly McKenzie
Asst. Director: Maria Martin

ATTACHMENT 2

November 10, 2008

Yoon Bae, CPA
Principal Accountant-Auditor
Department of Auditor-Controller
Countywide Contract monitoring Division
1000 S. Fremont Avenue, Unit #51
Building A-9 East, First Floor
Alhambra, CA 91803

RE: Compton Careerlink Audit

The Human Resources Department received a copy of the audit finding issued to the City of Compton's Work Source Center (Careerlink). In response to the Payroll and Personnel objective, "to determine whether personnel files are maintained as required," the City of Compton maintains I-9 forms and criminal background clearance information for all employees. Pursuant to the City of Compton Personnel Rules and Regulation 9.5 Employee Reports and Records (November 1979) "The Personnel file for each employee shall contain reports of all personnel actions, including, but not necessarily limited to, every appointment, transfer, promotion, disciplinary action, merit pay adjustment, change in salary or wage rate or any other temporary or permanent change in status of employees."

The City of Compton maintains a separate file for all employee background documents and I-9 forms. The I-9 forms are maintained separately for the department's ease of pulling records for inspection to an officer of the Immigration and Naturalization Service (INS), the Department of Labor (DOL), or the Office of Special Counsel for Immigration Related Unfair Employment Practices (OSC) upon request, with three days advanced notice.

The Criminal background information is maintained separately for confidentiality and continuity. During the audit, unfortunately the audit team and the Human Resources staff did not communicate on any matter outside of which employee files were needed for review. The information listed below is available and would have been made available at the auditor's request. We have reviewed the I-9 file and the criminal background information for the following employees:

	<u>Hire Date</u>	<u>I-9 on file</u>	<u>Background</u>
Reginald [REDACTED]	5/26/1988	Yes	Yes*
Karen [REDACTED]	10/12/2005	Yes	Yes
Deborah [REDACTED]	3/3/86	No**	Yes*
Kimberly [REDACTED]	3/2/1987	No	Yes*

Kim [REDACTED]	5/4/1981	No**	No
Henry [REDACTED]	5/23/1994	Yes	Yes
Jo [REDACTED]	7/2/1993	Yes	No

Please be assured that the City's current practices include due diligence in completing criminal background checks for all candidates prior to hire, and completing an I-9 form prior to beginning work. From the list above, the records that we have not yet located are at least 15 years old; we are still reviewing files. It is worthy to note, the employees listed belong to a bargaining group, prior to changing a condition of employment i.e., completing post-hire background checks is a mandatory scope of bargaining, our current contract with the effected bargaining groups do not expire until June 30, 2009, the City will add this item to the upcoming negotiations

Please give me call at (310) 605-5635, if I can be of any further assistance to your agency.

Thank you,

Kareemah Bradford
Human Resources Director

*We have the documentation verifying criminal background check was completed an acceptable, however during this time it appears the Compton Police Department maintained the criminal background reports, the actual reports were not forwarded to the Human Resources Department when the LA County Sheriffs began providing law Enforcement services to the City of Compton.

**Deborah [REDACTED] and Kim [REDACTED] were hired prior to the November 6, 1986; therefore she would not have been required to complete an I-9 form