



JOHN NAIMO
AUDITOR-CONTROLLER

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

KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 525
LOS ANGELES, CALIFORNIA 90012-3873
PHONE: (213) 974-8301 FAX: (213) 626-5427

October 25, 2016

TO: Supervisor Hilda L. Solis, Chair
Supervisor Mark Ridley-Thomas
Supervisor Sheila Kuehl
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: John Naimo
Auditor-Controller

SUBJECT: **WATTS LABOR COMMUNITY ACTION COMMITTEE – A COMMUNITY
AND SENIOR SERVICES LOS ANGELES COUNTY YOUTH JOBS
PROGRAM PROVIDER – CONTRACT COMPLIANCE REVIEW**

We completed a contract compliance review of Watts Labor Community Action Committee (WLCAC or Agency), which included a sample of transactions during October 2014 through November 2015. Community and Senior Services (CSS) contracts with WLCAC to provide Los Angeles County Youth Jobs (LACYJ) Program services. The LACYJ Program provides assessments, paid work experience, and training to youth and young adults between the ages of 14 to 24 years old from the California Work Opportunity and Responsibility to Kids, Foster, Probation, Homeless, and General Relief Programs, and low-income households.

The purpose of our review was to determine whether WLCAC appropriately accounted for and spent LACYJ Program funds to provide the services outlined in their County contract. We also evaluated the Agency's financial records, internal controls, and compliance with their County contract and other applicable guidelines.

Our review covered one LACYJ Program contract with WLCAC, for which CSS paid the Agency approximately \$235,000 on a cost-reimbursement basis during October 2014 through November 2015. WLCAC provides services to residents of the Second Supervisorial District.

Results of Review

WLCAC did not maintain adequate controls over their fiscal operations and did not maintain an independent Board of Directors (Board) as required. For example:

- \$8,244 (99%) of the \$8,263 in non-payroll expenditures reviewed were unallowable, unsupported, or inappropriately allocated.

WLCAC's attached response indicates that they will reallocate all expenditures, provide documentation, and repay any unallowable or unsupported amounts.

- WLCAC's single audit report for the year ended June 30, 2014 included a qualified opinion on the Agency's financial statements. The single audit report indicated that WLCAC did not provide their independent auditors with documentation to support their historical cost of fixed assets owned at year-end, which is required by Generally Accepted Accounting Principles. Subsequent to our review, WLCAC's single audit report for the year ended June 30, 2015 was issued with a qualified opinion due to the same reasons identified in their prior single audit report.

WLCAC's attached response indicates that they will maintain documentation to support their financial statements.

- WLCAC's Board membership was not in compliance with California Corporations Code, Section 5227 (Section 5227). Section 5227 limits the number of Board positions assigned to the organization's employees to less than 50%. At the time of our review, WLCAC's employees held 57% of the Board positions. In addition, WLCAC's President and Chief Executive Officer also served as the Board's President and Chairman. We also noted that the other Board titled positions (Vice President, Treasurer, and Secretary) were held by WLCAC employees.

WLCAC's attached response indicates that they made changes to their Board's membership after our review, and are now in compliance with Section 5227.

Based on the results of our review, if the Agency does not correct the deficiencies and cannot support their billings, CSS should place the Agency in the County's Contractor Alert Reporting Database or terminate their contract.

Details of our review, along with recommendations for corrective action, are attached (Attachment I).

Review of Report

We discussed our report with WLCAC and CSS. WLCAC's attached response (Attachment II) indicates agreement with our findings and recommendations. CSS will work with WLCAC to ensure that our recommendations are implemented.

We thank WLCAC management and staff for their cooperation and assistance during our review. If you have any questions please call me, or your staff may contact Aggie Alonso at (213) 253-0304.

JN:AB:PH:AA:EB:pn

Attachments

c: Sachi A. Hamai, Chief Executive Officer
Cynthia D. Banks, Director, Community and Senior Services
Timothy Watkins, President and Chief Executive Officer, WLCAC
Michael P. Bishop, Board Member, WLCAC
Elton Blake, Program Director, WLCAC
Public Information Office
Audit Committee

**WATTS LABOR COMMUNITY ACTION COMMITTEE
LOS ANGELES COUNTY YOUTH JOBS PROGRAM
CONTRACT COMPLIANCE REVIEW
OCTOBER 2014 THROUGH NOVEMBER 2015**

GOVERNANCE

Objective

Determine whether Watts Labor Community Action Committee (WLCAC or Agency) maintained a Board of Directors (Board) in compliance with the California Corporations Code, Section 5227 (Section 5227).

Verification

We interviewed Agency personnel and evaluated whether the Board is in compliance with applicable guidelines.

Results

WLCAC's 14 Board consisted of eight (57%) members who were WLCAC employees, which is more than the 49% allowed by Section 5227. In addition, WLCAC's President and Chief Executive Officer also served as the Board's President and Chairman. We also noted that the other Board titled positions (Vice President, Treasurer, and Secretary) were held by WLCAC employees. The high percentage of Board positions assigned to Agency employees impacts their level of independence and internal controls over the Agency's fiscal operations.

Recommendation

1. **Watts Labor Community Action Committee management develop an appropriate Board of Directors in compliance with California State laws, and ensure that oversight committees consist of members who are not employees or individuals that have a financial interest in the Agency.**

ELIGIBILITY

Objective

Determine whether WLCAC maintained documentation to support the eligibility of clients that the Agency claimed received Los Angeles County Youth Jobs (LACYJ) Program services.

Verification

We reviewed the documentation stored in the case files for 20 (18%) of the 114 clients that the Agency claimed received LACYJ Program services during July through November 2015.

Results

WLCAC maintained documentation to support the eligibility of the 20 clients reviewed.

Recommendation

None.

PROGRAM SERVICES**Objective**

Determine whether WLCAC maintained documentation to support the services charged to Community and Senior Services (CSS).

Verification

We reviewed the case files for 20 (18%) of the 114 clients that the Agency claimed received LACYJ Program services during July through November 2015.

Results

WLCAC maintained documentation to support the services provided to the 20 clients reviewed. However, WLCAC did not provide the Personal Enrichment and Work Readiness Training to two (10%) of the 20 clients reviewed before they began their work experience as required.

Recommendation

2. **Watts Labor Community Action Committee management ensure that all clients enrolled in the Los Angeles County Youth Jobs Program receive the required Personal Enrichment and Work Readiness Training before they begin their work experience.**

CASH/REVENUE**Objective**

Determine whether WLCAC properly recorded revenue in their financial records, deposited cash receipts into their bank accounts timely, and if bank reconciliations were prepared timely, and reviewed and approved by Agency management.

Verification

We interviewed WLCAC's management, and reviewed their financial records and October 2015 bank reconciliations for three bank accounts.

Results

WLCAC properly recorded revenue in their financial records and deposited CSS cash receipts into their bank accounts timely. However, WLCAC did not always resolve outstanding items on their bank reconciliations for their operating accounts timely. Specifically, we noted one check totaling \$44,542 that had been outstanding for over six months. The check was not related to the LACYJ Program.

Recommendation

3. **Watts Labor Community Action Committee management resolve outstanding checks in a timely manner.**

COST ALLOCATION PLAN/EXPENDITURES**Objective**

Determine whether WLCAC developed their Cost Allocation Plan (Plan) using an appropriate cost allocation methodology, and if expenditures charged to the LACYJ Program were allowable, properly documented, and appropriately allocated.

Verification

We interviewed WLCAC personnel, and reviewed their Plan and financial records for six non-payroll expenditures, totaling \$3,393, that the Agency charged to the LACYJ Program from October 2014 through October 2015.

Results

WLCAC developed their Plan using an appropriate cost allocation methodology. However, WLCAC inappropriately charged \$3,374 (99%) of the \$3,393 in non-payroll expenditures reviewed to the LACYJ Program. We also expanded our sample, and noted an additional \$4,870 in unsupported indirect cost expenditures, resulting in questioned costs totaling \$8,244. Specifically, WLCAC:

- Billed \$6,202 to the LACYJ Program for unsupported indirect cost expenditures. Specifically, WLCAC could not support the percentage used to calculate their indirect costs, and did not have approval from CSS or another federal agency to support the rate used.

- Charged \$844 to the LACYJ Program for 100% of the shared office and cleaning supply expenditures, instead of allocating the expenditures to all benefitting programs as required.
- Did not provide adequate documentation, such as invoices, receipts, or cancelled checks, to support the \$775 in mileage and supportive services expenditures. In addition, WLCAC did not always obtain signatures from clients confirming the receipt of supportive services, such as bus tokens.
- Billed \$423 in unallowable supportive services expenditures for non-LACYJ Program clients.

Recommendations

Watts Labor Community Action Committee management:

4. **Reallocate all expenditures charged to the Los Angeles County Youth Jobs Program during October 2014 through October 2015, provide Community and Senior Services with supporting documentation, and repay any unallowable or unsupported amounts.**
5. **Repay Community and Senior Services \$423.**
6. **Ensure that all expenditures charged to the Los Angeles County Youth Jobs Program are allowable, properly documented, and appropriately allocated.**

ADMINISTRATIVE COMPLIANCE

Objective

Determine whether the Agency was in compliance with their LACYJ Program and other County contract administrative requirements.

Verification

We interviewed Agency management and personnel, reviewed their policies and procedures manuals, and conducted an on-site visit.

Results

WLCAC did not maintain adequate controls over their fiscal operations. WLCAC's single audit report for the year ended June 30, 2014 included a qualified opinion on the Agency's financial statements. The single audit report issued on March 31, 2015 indicated that WLCAC did not provide their independent auditors with documentation to support their historical cost of fixed assets owned at year-end, which is required by Generally Accepted Accounting Principles. Subsequent to our review, WLCAC's single

audit report for the year ended June 30, 2015 was issued with a qualified opinion due to the same reasons identified in their prior single audit report.

In addition, WLCAC did not always comply with all of their other LACYJ Program and County contract administrative requirements. Specifically, WLCAC did not:

- Use the required monitoring report form for two (50%) of the four worksites reviewed. As a result, the Agency did not review the worksites' compliance with Occupational Safety and Health Administration (OSHA) and Americans with Disabilities Act requirements, and Child Labor laws as required.
- Maintain documentation to substantiate that they monitored one (25%) of the four worksites reviewed.
- Ensure that one (25%) of the four worksites reviewed was in compliance with Child Labor laws prior to placing eight youth at the worksite. Specifically, the monitor reported that the worksite did not have the required signs or posters, such as the Cal/OSHA Safety Rules and Regulations Notice and a minimum wage poster, in clear view as required.

Recommendations

Watts Labor Community Action Committee management:

- 7. Maintain all documentation to support their financial statements as required by Generally Accepted Accounting Principles.**
- 8. Ensure that all Los Angeles County Youth Jobs Program worksites are adequately monitored in compliance with their County contract using the required forms, and maintain supporting documentation.**

PAYROLL AND PERSONNEL

Objective

Determine whether WLCAC maintained personnel files as required and charged payroll expenditures to the LACYJ Program that were allowable, properly documented, and appropriately allocated.

Verification

We interviewed employees, and reviewed personnel files for four new LACYJ Program employees. We also compared the payroll expenditures for five employees and five clients, totaling \$3,306 for October 2015, to the Agency's payroll records and time reports.

Results

WLCAC appropriately charged payroll expenditures to the LACYJ Program for the five employees reviewed. However, one (20%) of the five clients reviewed was underpaid due to a mathematical error on the client's timecard.

In addition, WLCAC did not obtain criminal background clearances for three (75%) of the four new LACYJ Program employees reviewed. We noted similar findings during our prior year's monitoring review.

Recommendations**Watts Labor Community Action Committee management:**

9. **Ensure hours reported on client timecards are accurately calculated, and clients are appropriately paid for their actual hours worked.**
10. **Obtain criminal background clearances for all Los Angeles County Youth Jobs Program employees.**

CLOSE-OUT REVIEW**Objective**

Determine whether WLCAC's Fiscal Year (FY) 2014-15 Close-Out Expenditure Reports reconciled to their financial records and CSS' payment records.

Verification

We compared the total revenues and expenditures from WLCAC's FY 2014-15 Close-Out Expenditure Reports to the Agency's financial records and to CSS' payment records.

Results

WLCAC's FY 2014-15 Close-Out Expenditure Reports reconciled to their financial records. However, WLCAC inappropriately charged the LACYJ Program for unsupported and unallowable expenditures as noted in the Cost Allocation Plan/Expenditures and Payroll and Personnel sections of this report.

Recommendation

Refer to Recommendation 4.



WATTS LABOR COMMUNITY ACTION COMMITTEE

"Changing the face of a community... Moving the lives of a people"

10950 South Central Avenue, Los Angeles, California 90059 • Telephone 323.563.5639 • Facsimile 323.923.1474

August 3rd 2016

TED WATKINS
FOUNDER/ ADMINISTRATOR
1965-1993

OFFICERS:
TIMOTHY WATKINS
PRESIDENT

DR. MESSELE NEGASH
VICE PRESIDENT

PAULETTE HUNTER
TREASURER

SHAMIKA SHOULDERS
SECRETARY

DIRECTORS:
MICHAEL P. BISHOP
SCHOOL DISTRICT OPERATIONS EXPERT

RACHEL BRASHIER
UCLA GOVERNMENT & COMMUNITY
RELATIONS

COREY BURNS
TECHNOLOGY SPECIALIST

GLADYS E JONES
REGISTERED NURSE

MARESSA MONTES DE OCA
CERTIFIED PROPERTY SPECIALIST

BONNIE RICE
KAISER FOUNDATION

JULYANA RODRIGUEZ
CERTIFIED PROPERTY SPECIALIST

DR. MATTHEW ROTH
AUTOMOBILE CLUB ARCHIVIST

TRACI WATSON
REAL ESTATE AND DEVELOPMENT
PROFESSIONAL

CHARLES STANDOKES
HR PROFESSIONAL

DIRECTORS EMERITI:
BERNICE WATKINS
COMMUNITY ADVOCATE AND SOCIAL
ACTIVIST

ELIZABETH "PAT" EASTMAN
SOCIAL ACTIVIST AND COMMUNITY
ORGANIZER

LILLIAN HARKLESSMOBLEY
SOCIAL ACTIVIST AND COMMUNITY ORGANIZER

PAUL SCHRADER
UNION ORGANIZER AND SOCIAL ACTIVIST

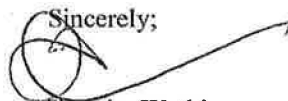
John Naimo
Auditor-Controller
County Of Los Angeles Department of Auditor-Controller
500 West Temple Street Room 525
Los Angeles, CA. 90012-3876

**SUBJECT: WATTS ALBOR COMMUNITY ACTION COMMITTEE- A
COMMUNITY AND SENIOR SERVICES LOS ANGELES COUNTY YOUTH
JOBS PROGRAM – COMPLIANCE REVIEW.**

The following is The Watts labor Community Action Committee (WLCAC) response to the above mentioned compliance review conducted by your office on a sample of transactions from July 2014 through November 2015.

WLCAC would like to thank your office for their cooperation and assistance during this audit process. If you have any question please contact the program Director at (323) 563-5683 on program matters and Arden Manacmul at (323) 563-4716 for fiscal.

Sincerely;



Timothy Watkins
President/CEO

"Great things are happening in Watts!"
www.wlcac.org

WATT LABOR COMMUNITY ACTION COMMITTEE
LOS ANGELES COUNTY YOUTH JOBS PROGRAMS
CONTRACT COMPLIANCE REVIEW
JULY 2014 THROUGH NOVEMBER 2015

OBJECTIVE	RESULTS	RECOMMENDATION	AGENCY RESPONSE
<p>~GOVERNANCE~</p> <p>Determine whether Watts Labor Community Action Committee (WLCAC or Agency) maintained a Board of Directors (Board) in compliance with the California Corporations Code Section 5227 (Section 5227).</p>	<p>WLCAC's 14 Board of Directors consisted of eight (57%) members who were WLCAC employees, which is more than the 49% allowed by California Corporation Code Section 5227. In addition, we noted that WLCAC's President and Chief Executive also served as the Board of Directors' President and Chairman, and that the three (100%) other individuals who held Board titles (Vice President, Treasurer, and Secretary) were also WLCAC employees. The high percentage of Board positions assigned to Agency employees impacts the level of independence and internal controls over the Agency's fiscal operations.</p>	<p>1. Develop an appropriate Board of Directors in compliance with California State laws, and ensure that oversight committees consist of members who are not employees or individuals that have financial interest in the Agency.</p>	<p>1. WLCAC will be submitting an updated list of Board of Directors, which complies with the California Corporation Code Section 5227. Currently, of the 15 members, 7 (47%) are employees (interested members) and 8 (53%) are non-interested members. The Independence and internal controls over the Agency's fiscal operations is ensured by hiring a Chief Financial Officer, and having a non-interested Board Member serving as a Co-Chair of the Board Finance Committee. This issue will also be further addressed by appointing a majority of the Finance Committee members who are non-Interested members of the Board at the next Board Meeting. Document will be submitted to CSS</p>
<p>~PROGRAM SERVICES~</p> <p>Determine whether WLCAC maintained documentation to support the services charged to Community and Senior Services (CSS).</p>	<p>WLCAC maintained documentation to support the services provided to the 20 clients reviewed. However, WLCAC did not provide the Personal Enrichment and Work Readiness Training to two (10%) of the 20 clients reviewed before they began their work experience as required.</p>	<p>2. Watts Labor Community Action Committee management ensures that all clients enrolled in the Los Angeles County Youth Jobs Program receive the required Personal Enrichment and Work Readiness Training before they begin their work experience as required.</p>	<p>2:WLCAC agrees with the finding and will implement a process to ensure all participants receive the required Personal Enrichment and Work Readiness Training before they begin their work experience as required.</p>

WATT LABOR COMMUNITY ACTION COMMITTEE
LOS ANGELES COUNTY YOUTH JOBS PROGRAMS
CONTRACT COMPLIANCE REVIEW
JULY 2014 THROUGH NOVEMBER 2015

OBJECTIVE	RESULTS	RECOMMENDATION	AGENCY RESPONSE
<p>~CASH/REVENUE~</p> <p>Determine whether WLCAC properly recorded revenue in their financial records, deposited cash receipts into their bank account timely, and if bank reconciliations were prepared timely, and reviewed and approved by Agency management.</p>	<p>WLCAC properly recorded revenue in their financial records, and deposited CSS cash receipts into their bank account timely. However, WLCAC did not always resolve outstanding items on their bank reconciliation for their operating account timely. Specifically, we noted one check totaling \$44,542 that had been outstanding for over six months.</p>	<p>3. Watts Labor Community Action Committee management resolve outstanding checks in a timely manner.</p>	<p>3. All checks mentioned in the finding have cleared or replaced. WLCAC will ensure that your recommendation is implemented immediately.</p>
<p>~COST ALLOCATION PLAN/EXPENDITURES~</p> <p>Determine whether WLCAC developed their Cost Allocation Plan (Plan) using an appropriate cost allocation methodology, and if expenditures charged to the LACYJ Program were allowable properly documented, and appropriately allocated.</p>	<p>WLCAC developed their Cost Allocation Plan (Plan) using an using an appropriate cost allocation methodology. However, WLCAC inappropriately charged \$3,374 (99%) of the \$3,393 in non-payroll expenditures reviewed to the LACYJ Program. We also expanded our sample, and noted an additional \$4,870 in unsupported indirect cost expenditures.</p> <p>Specifically, WLCAC:</p> <ul style="list-style-type: none"> Billed \$6,202 to the LACYJ Program for unsupported indirect cost expenditures. Specifically, WLCAC did not properly calculate their indirect costs, and did not have approval from CSS or another federal agency to support the rate used. Charged \$844 (100%) to the LACYJ Program for shared office and cleaning supply expenditures, instead of allocating the expenditures to all benefiting programs as required. Did not provide adequate documentation, such as invoices, receipts or cancelled checks, to support \$775 in mileage and supportive service expenditures. In addition, WLCAC did not always obtain signatures from participants confirming the receipt of supportive services, such as bus tokens. Billed \$423 in unallowable supportive service expenditures for non-LACYJ Program participants. 	<p>Watts Labor Community Action Committee management:</p> <p>4. Reallocate all expenditures charged to the Los Angeles County Youth Jobs Program during October 2014 through October 2015, provide Community and Senior Services with supporting documentation, and repay any unallowable or unsupported amounts.</p> <p>5. Repay Community and Senior Services \$423.</p> <p>6. Ensure that all expenditures charged to the Los Angeles County Youth Jobs Program are allowable properly documented, and appropriately allocated.</p>	<p>4. WLCAC concurs with your finding and recommendation and will reallocate all expenditures and provide CSS with documentation to substantiate this being done.</p> <p>5. \$423 will be paid - Check# 24587</p> <p>6. We agree and will implement your recommendation</p>

WATT LABOR COMMUNITY ACTION COMMITTEE
LOS ANGELES COUNTY YOUTH JOBS PROGRAMS
CONTRACT COMPLIANCE REVIEW
JULY 2014 THROUGH NOVEMBER 2015

OBJECTIVE	RESULTS	RECOMMENDATION	AGENCY RESPONSE
<p>~ADMINISTRATIVE COMPLIANCE~</p> <p>Determine whether the Agency was in compliance with their LACYJ Program and other County contract administrative requirements.</p>	<p>WLCAC did not maintain adequate controls over their fiscal operations. WLCAC's single audit report for the year ended June 30, 2014 included a qualified opinion on the Agency's financial statements. The single audit report (issued on March 31, 2015) indicated that WLCAC did not provide their independent auditors with documentation to support their historical cost of fixed assets owned at year-end, which is required by U.S. Generally Accepted Accounting Principles. The independent auditors concluded that the amount that this could affect the Agency's assets, net assets, and expenses could not be determined.</p> <p>In addition, WLCAC also did not always comply with all of their other LACYJ Program and County contract administrative requirements. Specifically, WLCAC did not:</p> <ul style="list-style-type: none"> • Use the required monitoring report form for two (50%) of the four worksites reviewed. As a result, the Agency did not review the worksites' compliance with Occupational Safety and Health Administration (OSHA) and Americans with Disabilities Act (ADA) requirements, and Child Labor laws as required. • Maintain documentation to substantiate that they monitored one (25%) of the four worksheets reviewed. • Ensure that one (25%) of the four worksheets reviewed was in compliance with Child Labor Laws prior to placing eight youth at the worksite. Specifically, the monitor reported that the worksite did not have the required signs or posters, such as the Cal/OSHA Safety Rules and Regulations Notice and a minimum wage poster, in clear view as required. 	<p>Watts Labor Community Action Committee management:</p> <p>7. Maintain all documentation to support their financial statements as required by U.S. Generally Accepted Accounting Principles.</p> <p>8. Ensure that all Los Angeles County Youth Jobs Program worksites are adequately monitored in compliance with the County contract using the required forms, and maintain supporting documentation.</p>	<p>7. Agree but these assets are solely WLCAC's property and not purchased through funded grants.</p> <p>8. WLCAC is now practicing the recommendation</p>

WATT LABOR COMMUNITY ACTION COMMITTEE
LOS ANGELES COUNTY YOUTH JOBS PROGRAMS
CONTRACT COMPLIANCE REVIEW
JULY 2014 THROUGH NOVEMBER 2015

OBJECTIVE	RESULTS	RECOMMENDATION	AGENCY RESPONSE
<p>~PAYROLL AND PERSONNEL~</p> <p>Determine whether WLCAC maintained personnel files as required and charged payroll expenditures to the LACYJ Program that were allowable, properly documented, and appropriately allocated.</p>	<p>WLCAC appropriately charged payroll expenditures to the LACYJ Program for the five employees reviewed. However, one (20%) of the five participants reviewed was not paid for their actual hours worked. Specifically, WLCAC underpaid one participant \$18 due to a mathematical error on the participant's timecard. In addition, WLCAC did not obtain criminal background clearances for three (75%) of the four new LACYJ Program employees reviewed. We noted similar findings during our prior year's monitoring review.</p>	<p>Watts Labor Community Action Committee management:</p> <p>9. Ensure hours reported on participant timecards are accurately calculated, and participants are appropriately paid for their actual hours worked.</p> <p>10. Obtain criminal background clearances for all Los Angeles County Youth Jobs Program employees.</p>	<p>9. Moving forward, WLCAC will implement your recommendation</p> <p>10. Since the audit was conducted, we have retained the services Freeman Professional Services to obtain criminal background clearances for all staff serving youth. They will perform more intensive background clearance than the one currently performed by WLCAC.</p>
<p>~CLOSE -OUT REVIEW~</p> <p>Determine whether WLCAC's Fiscal Year (FY) 2014-15 close-out expenditure reports reconciled to their financial records and CSS' payment records.</p>	<p>WLCAC's FY 2014-15 close-out reports reconciled to their financial records. However, as noted above WLCAC inappropriately charged the LACYJ Program for unsupported and unallowable expenditures.</p>		<p>see # 4 response</p>