

City of Compton Annual Financial Report of its

Proposition A Local Return Fund Proposition C Local Return Fund Measure R Local Return Fund Measure M Local Return Fund

As of and for the Year Ended June 30, 2018 with Report of Independent Auditors

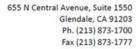




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#### **Report of Independent Auditors**

To the Honorable Members of the City Council of the City of Compton, California and the Los Angeles County Metropolitan Transportation Authority

#### **Report on the Financial Statements**

We have audited the accompanying financial statements of the Proposition A Local Return Fund, the Proposition C Local Return Fund, the Measure R Local Return Fund and the Measure M Local Return Fund (collectively, the Funds) of the City of Compton, California (the City) which comprise the Funds' balance sheets as of June 30, 2018, and the related statements of revenues, expenditures and changes in fund balances for the year then ended, and the related notes to the financial statements.

#### Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

#### Auditors' Responsibility

Our responsibility is to express opinions on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the City's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the City's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified and unqualified audit opinions.



# Basis for Qualified Opinions on Proposition A Local Return Fund (PALRF), Proposition C Local Return Fund (PCLRF) and Measure R Local Return Fund (MRLRF)

During our audit of the Funds' 2018 financial statements, the City has made adjustments to the PALRF, PCLRF and MRLRF's beginning fund balances for expenditures not reported in those funds in prior years. The adjustments resulted from the audits of the City's financial statements as a whole. As of the date of this report, the audits of the City's financial statements as of and for the fiscal years ended June 30, 2015, 2016, 2017 and 2018 are still ongoing. Consequently, we were unable to determine whether additional adjustments will still be necessary as a result of the audits being conducted on the City's financial statements.

#### Qualified Opinions on PALRF, PCLRF and MRLRF

In our opinion, except for the possible effects of the matter described in the Basis for Qualified Opinions paragraph, the financial statements referred to above present fairly, in all material respects, the respective financial position of the Proposition A Local Return Fund, the Proposition C Local Return Fund and the Measure R Local Return Fund as of June 30, 2018, of the City of Compton, California, and the respective changes in financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

### Unmodified Opinion on the Measure M Local Return Fund (MMLRF)

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Measure M Local Return Fund as of June 30, 2018, of the City of Compton, California, and the change in its financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

#### Emphasis of Matter

As discussed in Note 2, the financial statements are intended to present only the Proposition A Local Return Fund, the Proposition C Local Return Fund, the Measure R Local Return Fund and the Measure M Local Return Fund of the City of Compton, California and do not purport to, and do not present the financial position of the City as of June 30, 2018, and the changes in its financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

#### Supplementary Information

Our audits were conducted for the purpose of forming opinions on each of the Funds' financial statements as a whole. The supplementary information identified in the table of contents is presented for purposes of additional analysis and is not a required part of the basic financial statements.

The supplementary information identified in the table of contents is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the Funds' basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the Funds' basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the Funds' basic financial statements or to the Funds' basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, except for the possible effects of the matter described in the Basis for Qualified Opinion paragraph, the supplementary information is fairly stated, in all material respects, in relation to each of the Funds' basic financial statements as a whole.



#### Other Reporting Required by Government Auditing Standards

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In accordance with Government Auditing Standards, we have also issued our report dated January 24, 2019 on our consideration of the City's internal control over the Funds' financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over the Funds' financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the City's internal control over the Funds' financial reporting or on compliance. That report is an integral part of an audit performed in accordance with Government Auditing Standards in considering the City's internal control over the Funds' financial reporting and compliance.

Glendale, California

January 24, 2019

# City of Compton Proposition A Local Return Fund Balance Sheet June 30, 2018

Cash and investments Accounts receivable Interest receivable	ASSETS \$  Total assets \$	2,947,372 549 11,867 2,959,788
	S AND FUND BALANCE	
<b>Liabilities</b> Accounts payable	\$_	114,520
	Total liabilities	114,520
Fund balance		
Restricted	<u>-</u>	2,845,268
	Total fund balance	2,845,268
	Total liabilities and fund balance \$	2,959,788

# City of Compton Proposition A Local Return Fund Statement of Revenues, Expenditures and Changes in Fund Balance Year ended June 30, 2018

Revenues  Drangaitian A	Φ.	1 000 105
Proposition A Proposition A Discretionary Incentive Program Grant	\$	1,888,195 55,740
Interest income		32,266
Project generated revenues		46,364
	Total revenues	2,022,565
Expenditures Various projects		1,534,159
	Total expenditures	1,534,159
Excess of revenues over expenditures		488,406
Fund balance at beginning of year, as restated		2,356,862
Fund balance at end of year	\$	2,845,268

Project Code	Project Name	_	_ACMTA Budget	_	Actual		Variance Positive (Negative)
110-07	Fixed Route Transit System \$	5	992,578	\$	915,241	\$	77,337
130-04	Dial-A-Ride Transit System		400,000		66,240		333,760
180-40	Bus Purchase		332,795		332,795		-
280-29	Marketing and Promotions of the Compton						
	Renaissance Fixed Route Transit		10,000		5,737		4,263
480-01	Memberships, Gateway Cities,						
	I-710 Corridor (Formerly, 19-270)		354,226		152,250	*	201,976
500-07	Self Insured Compton Employer		90,000		61,896	*	28,104
	Total expenditures \$	<b>5</b>	2,179,599	\$	1,534,159	\$	645,440

<sup>\*</sup> See Compliance Matrix and Schedule of Findings and Questioned Costs.

Date Acquired	Description		Balance July 1, 2017	Additions	Deletions	Balance June 30, 2018
1987-91	MLK Transit Center	\$	2,069,970	\$ - \$	- \$	2,069,970
1989	Ford Falcon		36,082	-	-	36,082
1987	Ford Econoline		40,949	-	-	40,949
1986	Ford Econoline		39,565	-	-	39,565
1984	Ford Escort Van		36,070	-	-	36,070
1984	Ford Escort Van		36,070	-	-	36,070
1984	Ford Escort Van		34,540	-	_	34,540
1991	Paratransit Bus		44,770	-	-	44,770
1992	Ford Challenger Van		43,371	-	-	43,371
1992	Gestetner Copies		3,404	-	-	3,404
1993	Ford Challenger Van		47,072	-	-	47,072
1993	Communication Equipment		833	-	-	833
1993	Furniture and Equipment		8,596	-	-	8,596
1994	Ford Challenger Van		49,445	-	-	49,445
1994	Communication Equipment		1,290	-	-	1,290
1995	Ford Champion Challenger Bus		46,803	-	-	46,803
2001	NEC Computer		3,127	-	-	3,127
2001	Motorola Radio		1,951	-	-	1,951
2002	Furniture and Equipment/MLK		1,131	-	-	1,131
2002	Communication - Curb Side Ramp		241,540	-	-	241,540
2002	Champion Paratransit Bus		99,544	-	-	99,544
2002	Motorola Wireless Base Control					
	Antenna Kit, Two-Way Radios		3,414	-	-	3,414
2002	Land/Land Improvement		1,219,525	-	-	1,219,525
2003	Natural Gas Transit Buses		149,000	-	-	149,000
2004	5 CNG Buses		347,112	-	-	347,112
2005	Quadrant Gate at 4 Blue Line Arterial					
	Street		165,748	-	-	165,748
2005	MLK Transit Center Renovation		986,798	-	-	986,798
2005	Machinery and Equipment		17,862	-	-	17,862
2005	7 Ford Vehicles		173,405	-	-	173,405
2007	MLK Transit Center Renovation		42,532	-	-	42,532
2007	Transit Vehicle		159,055	-	-	159,055
2008	Transit Vehicle		115,704	-	-	115,704
2010	Bus Stop Shelter Construction		29,870	-	-	29,870
2010	Bus Stop Improvement Project		103,043	-	-	103,043
2014	5 Buses		310,735	-	-	310,735
2018	2 Clean Air Buses	_		332,795	<u>-</u>	332,795
	Tot	tal \$_	6,709,926	\$ <u>332,795</u> \$	\$	7,042,721

# City of Compton Proposition C Local Return Fund Balance Sheet June 30, 2018

Cash and investments Interest receivable	<b>**TS</b>	2,477,686 4,977
	Total assets \$	2,482,663
LIABILITIES AND F	FUND BALANCE	
Liabilities		224 524
Accounts payable	\$	631,564
Contract retention payable		130,045
Due to General Fund		58,361
YMCA contribution payable		26
Accrued liabilities		704,113
	Total liabilities	1,524,109
Fund balance		
Restricted		958,554
	Total fund balance	958,554
	Total liabilities and fund balance \$	2,482,663

# City of Compton Proposition C Local Return Fund Statements of Revenues, Expenditures and Changes in Fund Balance Year ended June 30, 2018

Revenues Proposition C Interest income	\$ Total revenues	1,566,259 14,190 1,580,449
Expenditures Various projects	Total expenditures _	1,838,846 1,838,846
Deficiency of revenues over expenditures		(258,397)
Fund balance at beginning of year, as restated	_	1,216,951
Fund balance at end of year	\$_	958,554

Project Code	Project Name		LACMTA Budget		Actual		Variance Positive (Negative)
270-01	Compton Creek Regional Bikeway Master Plan	\$	45,000	- <u>-</u>	_	\$	45,000
270-02	Proposal for FASB 34 Compliance Insfrastructure	Ψ	10,000	Ψ		Ψ	10,000
	Valuation Services		45,000		-		45,000
270-03	Gateway Cities Council of Governments		-		70,000	*	(70,000)
420-01	2005 Congestion Management Program (CMP)		10,000		-		10,000
440-31	Los Angeles County Public Works Traffic						
	Signals and Lane Lines and Markings						
	Project		300,000		166,099		133,901
450-51	Wilmington Avenue Safe Street Pedestrian/						
	Bicycle Improvement		1,391,199		20,917		1,370,282
450-52	Central Avenue Pavement Rehabilitation						
	Project Phase II		1,392,578		1,334,488		58,090
470-43	Updated Pavement Study Project		77,907		35,321		42,586
480-01	Memberships, Gateway Cities, I-710						
	Corridor (Formerly 19-270)	_	293,821		212,021	*	81,800
	Total expenditures	\$_	3,555,505	\$	1,838,846	\$_	1,716,659

<sup>\*</sup> See Compliance Matrix and Schedule of Findings and Questioned Costs.

Date Acquired	Description		Balance July 1, 2017	Additions	 Deletions	Balance June 30, 2018
1995	Computer Hardware/Software	\$	14,893	\$ -	\$ - \$	14,893
1998	Buses/Van		491,277	-	-	491,277
1998	Machinery and Equipment		2,565	-	-	2,565
1998	Machinery and Equipment		5,053	-	-	5,053
1998	Fire Resistance		9,872	-	-	9,872
1998	Reconstruction of the Bus Turnouts and					
	Driveways at MLK Transit Center		50,600	-	-	50,600
1998	Rosecrans Avenue Rehabilitation Project		576,218	-	-	576,218
1998	Computer Hardware/Software		8,013	-	-	8,013
1998	Machinery and Equipment		4,998	-	-	4,998
1998	Rosecrans Avenue Rehabilitation Project		1,010,607	-	-	1,010,607
2001	Bus Shelter Benches		65,941	-	-	65,941
2001	Computer Hardware/Software		12,606	-	-	12,606
2001	Rehabilitation Project		177,117	-	-	177,117
2001	Rosecrans Avenue Rehabilitation Project		8,716	-	-	8,716
2001	MLK Park and Ride		42,528	-	-	42,528
2005	Computer Hardware/Software Upgrade		2,749	-	-	2,749
2006	Design Quadrant Gates		14,310	-	-	14,310
2006	Compton Creek		120,000	-	-	120,000
2006	Kingston Computer Hardware		23,064	-	-	23,064
2006	Trails, Greenleaf Boulevard		253,535	-	-	253,535
2006	Compton Creek Multi-Purpose Trail		93,129	-	-	93,129
2006	Painting of the Dollaride Community					
	Center		19,175	-	-	19,175
2006	Machinery and Equipment		29,209	-	-	29,209
2010	MLK Transit Center		483,937	-	-	483,937
2010	Safe Route to School Project	_	130,622		 <u> </u>	130,622
	Total	\$_	3,650,734	\$	\$ \$	3,650,734

# City of Compton Measure R Local Return Fund Balance Sheet June 30, 2018

ASSETS		
Cash and investments	\$	1,890,727
Interest receivable	_	3,929
	Total assets \$	1,894,656
	_	
LIABILITIES AND FUND BA	ALANCE	
Liabilities		
Due to General Fund	\$	1,023,215
Contract retention payable		16,292
Accrued liabilities	_	409,501
	Total liabilities	1,449,008
Fund balance		
Restricted		445,648
	Total fund balance	445,648
Tota	I liabilities and fund balance \$	1,894,656

# City of Compton Measure R Local Return Fund Statement of Revenues, Expenditures and Changes in Fund Balance Year Ended June 30, 2018

Revenues			
Measure R		\$	1,173,073
Interest income			10,242
Other revenue			1,925
	Total revenues		1,185,240
Expenditures			
Various projects			540,770
	Total expenditures		540,770
Excess of revenues over expenditures			644,470
Fund balance (deficit) at beginning of year, as restated			(198,822)
		_	
Fund balance at end of year		\$	445,648

Project Code	Project Name	LACMTA Budget	Actual	Variance Positive (Negative)
1.05	Street and Road Repair and Maintenance \$	1,101,843 \$	- 9	1,101,843
1.05	Central Ave Rehabilitation Project	-	325,830 *	(325,830)
3.20	Compton Creek Walking Path-ADA			
	Compliance	-	2,210 *	(2,210)
8.10	Fund Administration	-	212,730 *	(212,730)
	Total expenditures \$	1,101,843 \$	540,770	561,073

<sup>\*</sup> See Compliance Matrix and Schedule of Findings and Questioned Costs.

City of Compton Measure R Local Return Fund Supplementary Information Schedule of Capital Assets Year ended June 30, 2018

Date Acquired	Description		July 1, 2017	Additions	_	Deletions	June 30, 2018
5/31/2011	Mona Boulevard Project		\$ 26,800	\$ - ;	\$	-	\$ 26,800
		Total	\$ 26,800	\$ -	\$	-	\$ 26,800

# City of Compton Measure M Local Return Fund Balance Sheet June 30, 2018

ASSETS		
Cash and investments	\$	1,063,073
Total assets	\$ \$	1,063,073
LIABILITIES AND FUND BALANCE (DEFICIT)		
Liabilities		
Accounts payable	\$	-
Total liabilities	·	
Fund balance		
Restricted		1,063,073
Total fund balance (deficit	)	1,063,073
Total liabilities and fund balance (deficit	\$	1,063,073

# City of Compton Measure M Local Return Fund Statement of Revenues, Expenditures and Changes in Fund Balance Year ended June 30, 2018

Revenues		
Measure M	\$	1,063,073
Total revenues	S	1,063,073
Expenditures Various projects		
Total expenditures		
Excess of revenues over expenditures		1,063,073
Fund balance at beginning of the year		
Fund balance at end of year	\$	1,063,073

City of Compton Measure M Local Return Fund Supplementary Information Schedule of Capital Assets Year ended June 30, 2018

Project Code		Project Name	LACMTA Budget	Actual	Variance Positive (Negative)
	None	 \$	- \$	_	\$ -
		Total expenditures \$_	- \$	-	\$

City of Compton Measure M Local Return Fund Supplementary Information Schedule of Capital Assets Year ended June 30, 2018

Date Acquired		Description		_	Balance July 1, 2017		Additions	 Deletions		Balance June 30, 2018
	None			\$		- \$	-	\$ - ;	\$	-
			Total	\$		- \$	-	\$ - ;	\$_	-

#### NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

#### **Fund Accounting**

The operations of the Proposition A Local Return Fund (PALRF), the Proposition C Local Return Fund (PCLRF), the Measure R Local Return Fund (MRLRF) and the Measure M Local Return Fund (MMLRF) (collectively, the Funds) of the City of Compton (the City) are accounted for in separate sets of self-balancing accounts that comprise their assets, liabilities, fund balance, revenues and expenditures.

PALRF and PCLRF represent 25% and 20%, respectively, of the ½ cent Proposition A and ½ cent Proposition C sales taxes which are distributed to the jurisdictions within Los Angeles County based on population and must be used exclusively for transportation related programs and projects.

MRLRF is derived from 15% of the county-wide ½ cent Measure R sales tax which is distributed to the jurisdictions within Los Angeles County based on a per capita basis and must be used exclusively for transportation purposes.

MMLRF is derived from 17% of the county-wide ½ cent Measure M sales tax which is distributed to the jurisdictions within Los Angeles County based on a per capita basis and must be used exclusively for transportation purposes.

#### **Basis of Accounting and Measurement Focus**

The PALRF, PCLRF, MRLRF and MMLRF are reported as Special Revenue Funds of the City and are accounted for using the modified accrual basis of accounting. Revenues are recognized when they become "susceptible to accrual", that is, measurable and available to finance expenditures of the current period. Expenditures are recorded when the liability is incurred.

Special Revenue Funds are reported on a spending or "financial flow" measurement focus. This means that generally, only current assets, current liabilities and deferred inflows and outflows of resources are included on their balance sheets. Statements of revenues, expenditures and changes in fund balances for Special Revenue Funds generally present increases (revenues and other financing sources) and decreases (expenditures and other financing uses) in net current assets.

#### **Budgets and Budgetary Accounting**

The budgeted amounts presented in this report for comparison to the actual amounts are based on budgets approved by LACMTA and are presented in accordance with accounting principles generally accepted in the United States of America.

#### NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

#### **Fair Value Measurement**

In accordance with GASB Statement No. 72, Fair Value Measurement and Application, the City categorizes its fair value measurement within the fair value hierarchy that is based on the valuation inputs used to measure the fair value of the investment. Level 1 inputs are quoted prices in active markets for identical investments; Level 2 inputs are significant other observable inputs; Level 3 inputs are significant unobservable inputs. Accordingly, the City reports its investments at fair value and recognizes unrealized gain (loss) on investments.

Refer to the City's Comprehensive Annual Financial Report for detailed disclosures regarding the City's investments policy and fair value measurement disclosures.

#### **Fund Balance Reporting**

Governmental Accounting Standards Board (GASB) Statement No. 54, Fund Balance Reporting and Governmental Fund Type Definitions, establishes the fund balance classifications that comprise a hierarchy based primarily on the extent to which a government is bound to observe constraints imposed upon the use of the resources reported in governmental funds.

The PALRF, PCLRF, MRLRF and MMLRF report the following fund balance classification as of June 30, 2018:

Restricted - Amounts that are constrained for specific purposes, which are
externally imposed by providers, such as creditors, or amounts constrained
due to constitutional provisions or enabling legislation. The use of the Funds'
remaining fund balances are restricted for projects approved by LACMTA.

Information regarding the fund balance reporting policy adopted by the City is described in the City's Comprehensive Annual Financial Report.

#### NOTE 2 ANNUAL FINANCIAL STATEMENTS

The financial statements are intended to present only the financial position and results of operations of the PALRF, PCLRF, MRLRF and MMLRF, and do not purport to, and do not present the City's financial position as of June 30, 2018, and the changes in its financial position for the year then ended in accordance with accounting principles generally accepted in the United States of America.

# NOTE 3 PROPOSITION A AND PROPOSITION C LOCAL RETURN COMPLIANCE REQUIREMENTS

The Proposition A Ordinance requires that Local Return (LR) funds be used exclusively to benefit public transit. Expenditures related to fixed route and paratransit services, Transportation Demand Management, Transportation Systems Management and fare subsidy programs that exclusively benefit transit are all eligible uses of Proposition A LR funds. Proposition A LR funds may also be traded with other Jurisdictions in exchange for general or other funds.

The Proposition C Ordinance directs that LR funds also be used to benefit public transit, as described above, but provides an expanded list of eligible project expenditures including Congestion Management Programs, bikeways and bike lanes, street improvements supporting public transit service, and Pavement Management System projects. Proposition C LR funds cannot be traded.

Proposition A and Proposition C LR funds must be expended within three years of the last day of the fiscal year in which funds were originally allocated.

In accordance with *Proposition A and Proposition C Local Return Program Guidelines*, funds received pursuant to these guidelines may only be used for Proposition A and Proposition C Local Return approved programs. See accompanying Compliance Matrix.

#### NOTE 4 MEASURE R LOCAL RETURN COMPLIANCE REQUIREMENTS

The Measure R Ordinance specifies that LR funds be used exclusively for transportation purposes.

Measure R LR funds must be expended within five years of the first day of the fiscal year in which funds were originally allocated or received.

In accordance with *Measure R Local Return Program Guidelines*, funds received pursuant to these guidelines may only be used for Measure R Local Return approved programs. See accompanying Compliance Matrix.

#### NOTE 5 MEASURE M LOCAL RETURN COMPLIANCE REQUIREMENTS

Measure M was approved by the voters of Los Angeles County on November 8, 2016 to improve transportation and ease traffic congestion consistent with the Los Angeles County Traffic Improvement Plan Ordinance approved by the Metro Board of Directors on June 23, 2016. The Measure M Ordinance specifies that LR funds be used exclusively for transportation purposes.

Measure M LR funds must be expended within five years of the first day of the fiscal year in which funds were originally allocated or received.

In accordance with *Measure M Local Return Program Guidelines*, funds received pursuant to these guidelines may only be used for Measure M Local Return approved programs. See accompanying Compliance Matrix.

#### NOTE 6 PROPOSITION A DISCRETIONARY INCENTIVE PROGRAM GRANT

The City received Proposition A Discretionary Incentive Program Grant amounting to \$55,740 for the year ended June 30, 2018, which represents additional funds received from LACMTA for participating in the Voluntary NTD Program.

The Proposition A Discretionary Incentive Program Grant was recorded in PALRF.

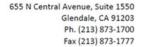
#### NOTE 7 PROJECT GENERATED REVENUES

Project generated revenues under PALRF for the year ended June 30, 2018 consisted of the following:

Passenger fares	\$ 44,379
Dial-A-Ride fares	1,985
	\$ 46,364

#### NOTE 8 SUBSEQUENT EVENTS

The City has evaluated subsequent events through January 24, 2019, the date the financial statements were available to be issued, and concluded no events have occurred that require disclosure or adjustments to the financial statements.





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OFFICE LOCATIONS: Los Angeles Sacramento San Diego Manila

# Report of Independent Auditors on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance With Government Auditing Standards

To the Honorable Members of the City Council of the City of Compton, California and the Los Angeles County Metropolitan Transportation Authority

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the Proposition A Local Return Fund, the Proposition C Local Return Fund, the Measure R Local Return Fund and the Measure M Local Return Fund (collectively, the Funds) of the City of Compton, California (the City) as of and for the year ended June 30, 2018, and the related notes to the financial statements, and have issued our report thereon dated January 24, 2019.

#### **Internal Control over Financial Reporting**

In planning and performing our audits of the Funds' financial statements, we considered the City's internal control over the Funds' financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the Funds' financial statements, but not for the purpose of expressing an opinion on the effectiveness of the City's internal control. Accordingly, we do not express an opinion on the effectiveness of the City's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Funds' financial statements will not be prevented, or detected and corrected on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. We identified a deficiency in internal control, described in the Schedule of Findings on Internal Control over Financial Reporting as Finding No. FS 2018-001, that we consider to be a material weakness.



#### The City's Response to the Finding

The City's response to the finding identified in our audit is described in the accompanying Schedule of Findings on Internal Control over financial Reporting. The City's response was not subjected to the auditing procedures applied in the audit of the financial statements, and accordingly, we express no opinion on the response.

#### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the City's Proposition A Local Return Fund, Proposition C Local Return Fund, Measure R Local Return Fund and Measure M Local Return financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audits, and accordingly, we do not express such an opinion. The results of our tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

#### **Purpose of this Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the City's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the City's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Glendale, California January 24, 2019

new 4 Company LLP

#### Finding No. FS 2018-001: Year-end Closing Process

#### Criteria

Proposition A and Proposition C Local Return Guidelines Section V, Measure R Local Return Guidelines Section VII and Measure M Local Return Guidelines Section XXV states that, "It is the jurisdictions' responsibility to maintain proper accounting records and documentation to facilitate the performance of the audit as prescribed in these Guidelines".

#### Condition and Context

This year's closing process was delayed because some important procedures were not performed on time. These include:

- Cut off procedures. Cut off procedures relating to year-end accruals were inadequate to ensure the recording of transactions in the proper period. This resulted in the City's adjustments which affected prior period's account balances.
- Beginning fund balances were not reconciled with the prior year audited reports
- Forms submitted to LACMTA were not reconciled with the City's General Ledger.

#### Cause and Effect

We learned that the City lost several key employees in the finance and accounting department during the fiscal year 2018. As such, there was delay in the closing of the City's books for the fiscal year 2018 and prior years. Currently, the accounting personnel and support do not have the institutional knowledge to ensure the books are updated and transactions are recorded correctly. These conditions resulted in delays in producing closing entries, trial balances, schedules, reconciliations, account analysis, and other financial reports needed by management and the auditors.

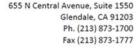
#### Recommendation

We recommend that the City establish and document proper closing and reconciliation procedures and assign responsibility for completing the procedures to specific City personnel. The closing procedures should be documented in a checklist that indicates who will perform each procedure and when completion of each procedure is due and is accomplished. The timing of specific procedures could be coordinated with the timing of management's or the auditor's need for the information. These reconciliations will provide assurance that financial statements are meaningful and accurate.

#### Views of Responsible Officials

The City is in the process of catching up on all accounting processes that have not been completed due to staff turnover and various other reasons. The new management team in the Controller's office are putting procedures in place to ensure monthly and annual year-end closing processes are well documented and occur on time.







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OFFICE LOCATIONS: Los Angeles Sacramento San Diego Manila

#### **Report of Independent Auditors on Compliance**

To the Honorable Members of the City Council of the City of Compton, California and the Los Angeles County Metropolitan Transportation Authority

#### **Report on Compliance**

We have audited the compliance of the City of Compton, California (the City) with the Proposition A and Proposition C Local Return Guidelines, Measure R Local Return Guidelines, and Measure M Local Return Guidelines (collectively, the Guidelines) for the year ended June 30, 2018.

#### Management's Responsibility

Management is responsible for the City's compliance with the Guidelines.

#### Auditors' Responsibility

Our responsibility is to express an opinion on the City's compliance with the Guidelines based on our audit. We conducted our audit of compliance in accordance with the auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States; and the Guidelines. Those standards and the Guidelines require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the compliance requirements referred to above that could have a direct and material effect on the Proposition A Local Return Program, Proposition C Local Return Program, Measure R Local Return Program and Measure M Local Return Program occurred. An audit includes examining, on a test basis, evidence about the City's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our qualified and unmodified opinion on compliance with the Guidelines. However, our audit does not provide a legal determination of the City's compliance with the Guidelines.

Basis for Qualified Opinions on Compliance of the Proposition A Local Return Fund (PALRF), Proposition C Local Return Fund (PCLRF) and Measure R Local Return Fund (MRLRF)

As described in the accompanying Schedule of Findings and Questioned Costs, we were unable to obtain sufficient appropriate audit evidence supporting the compliance of the City of Compton with the documentation requirements supporting allowability of certain costs charged to the local return funds.



#### Qualified Opinions on Compliance of the PALRF, PCLRF and MRLRF

In our opinion, except for the possible effects of the matter discussed in the Basis for Qualified Opinion paragraph, the City of Compton complied, in all material respects, with the compliance requirements of the Proposition A and Proposition C Local Return Guidelines and Measure R Local Return Guidelines for the year ended June 30, 2018.

#### Unmodified Opinion on Compliance of the Measure M Local Return Fund (MMLRF)

In our opinion, the City of Compton complied, in all material respects, with the compliance requirements of the Measure M Local Return Guidelines for the year ended June 30, 2018.

#### Other Matters

The results of our auditing procedures disclosed instances of noncompliance with the requirements, which are described in the accompanying Schedule of Findings and Questioned Costs as Findings CF #2018-001 through CF #2018-007.

The City's responses to the noncompliance findings identified in our audit are described in the accompanying Schedule of Findings and Questioned Costs. The City's responses were not subjected to the auditing procedures applied in the audit of compliance, and accordingly, we express no opinion on the responses.

#### **Report on Internal Control over Compliance**

Management of the City is responsible for establishing and maintaining effective internal control over compliance with the compliance requirements referred to above. In planning and performing our audit of compliance, we considered the City's internal control over compliance to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the City's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance under the Guidelines and Requirements on a timely basis. A material weakness in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance under the Guidelines and Requirements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance with the Guidelines and Requirements that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. We did identify certain deficiencies in internal control over compliance, as described in the accompanying Schedule of Findings and Questioned Costs as Findings CF #2018-001 through CF #2018-007, collectively, that we consider to be material weaknesses.



The City's responses to the findings identified in our audit are described in the accompanying Schedule of Findings and Questioned Costs. The City's responses were not subjected to the auditing procedures applied in the audit of compliance, and accordingly, we express no opinion on the responses.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Guidelines. Accordingly, this report is not suitable for any other purpose.

Glendale, California

Varguer & Company LLP

**January 24, 2019** 

Compliance Requirements		Compli		Questioned	If no, provide details and
	Yes	No	N/A	Costs	management response.
A. Proposition A and Proposition C Local Return Funds					
Uses the State Controller's					
Uniform System of Accounts					
and Records.	Х				
Timely use of funds.	X				
Funds expended were	+ ^-				
approved and have not been					See Finding CF #2018-
substituted for property tax.		Х			001
Expenditures that exceeded		,			
25% of approved project budget					
have approved amended					
Project Description Form (Form					
A)	X				
5. Administrative expenses are					
within the 20% cap of the total					
annual Local Return					
Expenditures.	X				
<ol><li>All on-going and carryover</li></ol>					
projects were reported in Form					
В.	X				
7. Annual Project Summary					
Report (Form B) was submitted					
timely.	X				
8. Annual Expenditure Report					
(Form C) was submitted timely.	Х				
<ol><li>Cash or cash equivalents are maintained.</li></ol>	X				
10. Accounting procedures, record				PALRF -	+
keeping and documentation are				\$25,010	
adequate.				PCLRF –	
adoquato.				\$212,021	
				and	
				PALRF -	See Finding CF #2018-
		Х		\$189,136	002 and CF #2018-003
11. Pavement Management System					
(PMS) in place and being used					
for Street Maintenance or					
Improvement Projects					
Expenditures.	Х				
12. Local Return Account is					
credited for reimbursable					
expenditures.			Х		
13. Self-Certification was completed					
and submitted for Intelligent					
Transportation Systems			V		
projects or elements.	1	<del>                                     </del>	Х		
14. Assurances and					
Understandings form was on					
file. 15. Recreational Transit Form was	X	-			
	X				
submitted timely.		l			L

	Compliance Requirements		ln (	Complia		Questioned	If no, provide details and
		•	Yes	No	N/A	Costs	management response.
B.		sure R Local Return Fund					
		Funds were expended for					See Finding CF #2018-
	1	transportation purposes.					004 and Finding #2018-
				Х		\$212,730	005
		Funds were used to augment,					
		not supplant, existing local					
		revenues being used for					
		transportation purposes unless					
		there is a funding shortfall.	Χ				
		Signed Assurances and					
		Understandings on file.	Χ				
		Separate Measure R Local					
		Return Account was					
		established.	Χ				
		Revenues received including					
		allocations, project generated					
		revenues and interest income					
		was properly credited to the					
		Measure R Local Return					
		Account.	Χ				
		Funds were expended with					See Finding CF#2018-
		LACMTA's approval.		Χ			006
		Expenditure Plan (Form One)					
		was submitted timely.	Χ				
		Expenditure Report (Form Two)					
		was submitted timely.	Χ				
		Timely use of funds.	Χ				
	10.	Administrative expenses are					See Finding CF #2018-
	,	within the 20% cap.		X		\$130,720*	007
	11.	Fund exchanges were approved					
		by LACMTA.			Χ		
	12.	A separate account was					
	(	established for Capital reserve					
		funds and Capital reserve was					
		approved by LACMTA.			Χ		
	13.	Recreational transit form was					
L	;	submitted timely.			X		

<sup>\*</sup>This amount is included in the \$212,730 questioned cost under compliance requirement No. 1.

	Compliance Requirements		omplia		Questioned	If no, provide details and
_			No	N/A	Costs	management response.
C.	Measure M Local Return Fund					
	Funds were expended for					There were no
	transportation purposes.			V		expenditures in FY
-	0 5			Х		2017/18.
	2. Funds were used to augment, not					
	supplant, existing local revenues					T
	being used for transportation					There were no
	purposes unless there is a fund			V		expenditures in FY
	shortfall.			Х		2017/18.
	3. Signed Assurances and	V				
-	Understandings on file.	Х				
	4. Separate Measure M Local Return	V				
	Account was established.	Χ				
	5. Revenues received including					
	allocations, project generated					
	revenues and interest income was					
	properly credited to the Measure M Local Return Account.	Х				
-	6. Funds were expended with					There were no
	LACMTA's approval.					expenditures in FY
	LACIVITA'S approvai.			Х		2017/18.
	7. Expenditure Plan (Form					There were no
	M-One) was submitted timely.					expenditures in FY
	W-One) was submitted timery.			Х		2017/18.
	8. Expenditure Report (Form					2017/10.
	M-Two) was submitted timely.	Χ				
	9. Timely use of funds.	X				
	10. Administrative expenses are within					There were no
	the 20% cap.					expenditures in FY
	шо 2070 бар.			Х		2017/18.
	11. Fund exchanges were approved by					
	LACMTA.			Х		
	12. A separate account was established					
	for Capital reserve funds and					
	Capital reserve was approved by					
	LACMTA.			Χ		
	13. Recreational transit form was					
	submitted timely.			Χ		



### PCLRF: Finding CF No. 2018-001

Compliance Reference	Section I(C) of the Proposition A and C Local Return Guidelines states that, "Jurisdictions shall submit for approval a Project Description Form (Form A) prior to the expenditure of funds for: 1) a new project; 2) a new route; 3) a 25 percent change (increase or decrease) in route or revenue vehicle miles for an established LR funded transit service; 4) a 0.75 miles or greater service change that duplicates/overlays an existing transit service; or 5) a 25 percent or greater change in an approved LR project budget or scope on all operating or capital LR projects."
Condition	The City claimed expenditures amounting to \$70,000 under PCLRF Project code 270-03, Gateway Cities Council of Governments, with no prior approval from LACMTA.  Although we found the expenditures to be eligible for Local Return funding, this project had no prior approval from LACMTA.
Cause	The City concurs with the finding that Project Form A should have been submitted for prior approval on our transit and capital project expenditures. The finding was caused by an oversight by City staff.
Effect	Proposition C funds were expended towards project expenditures without prior approval by the LACMTA. The City did not comply with the Guidelines.
Recommendation	We recommend for the City to establish procedures and controls to ensure that approval is obtained from LACMTA prior to spending on any Local Return-funded projects.
Management's Response	The City concurs with the finding. The City will establish procedures and controls to ensure that Form A is properly submitted for approval prior to expending funds toward the projects.
Finding Corrected During the Audit	The City subsequently submitted a Form A and LACMTA Program Manager granted a retroactive approval of the increase in the project's budget on December 6, 2018. No follow up is required.

#### PALRF and PCLRF: CF Finding #2018-002

#### **Compliance Reference**

Proposition A and Proposition C Local Return Guidelines Section II states that, "A proposed expenditure of funds shall be deemed to be for public transit purposes to the extent that it can reasonably be expected to sustain or improve the quality and safety of and/or access to public transit services by the general public or those requiring special public transit assistance". Also, Section V states that, "It is the jurisdictions' responsibility to maintain proper accounting records and documentation to facilitate the performance of the audit as prescribed in these Guidelines".

On April 29, 2014, the LACMTA Local Return Program Manager issued a memo addressed to all Jurisdictions to provide clarification for adequate salary and related costs documentations for the audit of the Local Return funds.

Below are recommendations to ensure that jurisdictions have adequate evidence to support its compliance with the Local Return Guidelines:

- 1. All hours are required to be documented. Develop and/or maintain a system that will keep track of actual hours worked by employees whose salaries and benefits were charged to the LACMTA project. Expenditures claimed based solely on amounts is not considered adequate budgeted documentation because it does not reflect actual expenditures incurred on the LACMTA project and do not provide adequate evidence that labor hours charged has transit/transportation purpose. The record of hours worked must: a) identify the LACMTA project, b) be authenticated by the employee and approved by his/her immediate supervisor, and c) tie to hours reported in the payroll records.
- 2. Provide adequate support for indirect costs. For indirect expenditures allocated to LACMTA projects, develop and/or maintain a system that distributes allowable expenditures to projects based on causal or beneficial relationships. Expenditures cannot be claimed on LACMTA project if the expenditures are not allowable (i.e., not transportation or transit related) or not allocable to the LACMTA project (i.e., LACMTA project did not cause the incurrence of the expenditure or LACMTA project did not benefit from the expenditure).

# PALRF and PCLRF: CF Finding #2018-002 (Continued)

Condition	The City claimed salaries and benefits expenditures under the following projects:	
	a) PALRF Project code 480-01, Memberships, Gateway Cities, I-710 Corridor (Formerly, 19-270), total amount of \$25,010; and	
	b) PCLRF Project code 480-01, Memberships, Gateway Cities, I-710 Corridor (Formerly, 19-270), total amount of \$212,021.	
	Salaries and benefits expenditures allocated to PALRF and PCLRF projects were not supported by actual time charges, documented time study, or overhead cost allocation plan. We were not able to verify the reasonableness and allowability of these expenditures under the Local Return Guidelines.	
	In addition, the project description used by the City to report the above administration expenses were not correct. The project description should be "Administration Costs" instead of "Memberships, Gateway Cities, I-710 Corridor (Formerly, 19-270)".	
Cause	Lack of oversight by City's management on the compliance with the requirements of the Guidelines. Moreover, there were turnover in the key positions in the finance and accounting department during the past fiscal years.	
Effect	The City failed to put in place a time reporting system that documents actual time spent on PALRF and PCLRF projects.	
	The salaries and benefits claimed under PALRF and PCLRF are not supported by actual time charges and documented time study and therefore, we question the total amount of expenditures reported under PALRF and PCLRF of \$25,010 and \$212,021, respectively.	
Recommendation	We recommend that the City reimburse its PALRF and PCLRF accounts the amount of \$25,010 and \$212,021, respectively. In addition, we recommend that the City establish controls to ensure that the salaries and benefits charged to the Local Return funds are adequately supported by timesheets, payroll registers, personnel action forms with job descriptions, or similar documentation as required by the Guidelines.	

### PALRF and PCLRF: CF Finding #2018-002 (Continued)

Management's Response	City staff provided actual time charges and documented activity sheets for the sample employees requested from the auditor. City staff will provide the e-mailed documents previously provided to substantiate some of the expenditures incurred during this audit period. Staff will however develop a cost allocation plan and/or actual costs for transportation funds pursuant to the recommendation provided by the audit team. The City will also establish controls to ensure that all salaries and benefits charged to the Local Return funds are adequately supported in the future.
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Compliance Reference	According to Proposition A and Proposition C Local Return Guidelines, Section II, "A proposed expenditure of funds shall be deemed to be for public transit purposes to the extent that it can reasonably be expected to sustain or improve the quality and safety of and/or access to public transit services by the general public or those requiring special public transit assistance" and Section V, "It is jurisdiction's responsibility to maintain proper accounting records and documentation."
Condition	The City charged general liability insurance and self insurance liability amounting to \$127,240 and \$61,896 to PALRF project code 480-01, Memberships, Gateway Cities, I-710 Corridor (Formerly, 19-270) and PALRF project code 500-07, Self Insured Compton Employer, respectively, based on budget. An analysis to true-up the amounts claimed was not performed at yearend to support and substantiate the reasonableness of the amount charged to these projects.
Cause	Lack of oversight by City's management on the compliance with the requirements of the Guidelines. Moreover, there were turnover in the key positions in the finance and accounting department during the past fiscal years.
Effect	The City did not perform a true-up analysis at year-end to ensure that general liability insurance costs charged to PALRF approximate the actual cost incurred.  The amount charged to PALRF may not reflect the most reasonable cost relating to PALRF had an analysis is performed by the City at yearend.
Recommendation	We recommend for the City to revisit its methodology for allocating the general liability and self insurance liability costs to all the funds and once it is established, the City does not necessarily have to update the methodology on an annual basis if the parameters did not change significantly from year to year. We recommend for the City to also reimburse its PALRF account the total amount of \$189,136.
Management's Response	The City will revisit its methodology for allocating the general liability and self insurance liability costs to all funds and provide the appropriate documentation to substantiate the Local Return guidelines. The City considers this allocation to be an eligible expense under the local return guidelines.

#### **Compliance Reference**

Measure R Local Return Guidelines Section (A) (I) states that, "The Measure R Ordinance specifies that LR funds are to be used for transportation purposes. No net revenues distributed to Jurisdictions may be used for purposes other than transportation purposes". Also, Section VII states that, "It is the jurisdictions' responsibility to maintain proper accounting records and documentation to facilitate the performance of the audit as prescribed in these Guidelines".

On April 29, 2014, the LACMTA Local Return Program Manager issued a memo addressed to all Jurisdictions to provide clarification for adequate salary and related costs documentations for the audit of the Local Return funds.

Below are recommendations to ensure that jurisdictions have adequate evidence to support its compliance with the Local Return Guidelines:

- 1. All hours are required to be documented. Develop and/or maintain a system that will keep track of actual hours worked by employees whose salaries and benefits were charged to the LACMTA project. Expenditures claimed based solely on budaeted amounts is not considered documentation because it does not reflect actual expenditures incurred on the LACMTA project and do not provide adequate evidence that labor hours charged has transit/transportation purpose. The record of hours worked must: a) identify the LACMTA project, b) be authenticated by the employee and approved by his/her immediate supervisor, and c) tie to hours reported in the payroll records.
- 2. Provide adequate support for indirect costs. For indirect expenditures allocated to LACMTA projects, develop and/or maintain a system that distributes allowable expenditures to projects based on causal or beneficial relationships. Expenditures cannot be claimed on LACMTA project if the expenditures are not allowable (i.e., not transportation or transit related) or not allocable to the LACMTA project (i.e., LACMTA project did not cause the incurrence of the expenditure or LACMTA project did not benefit from the expenditure).

### MRLRF: CF Finding #2018-004 (Continued)

Condition	The City claimed salaries and benefits expenditures under Project code 8.10, Fund Administration, totaling to \$92,210.
	Salaries and benefits expenditures allocated to MRLRF were not supported by actual time charges, documented time study, or overhead cost allocation plan. We were not able to verify the reasonableness and allowability of these expenditures under the Local Return Guidelines.
Cause	There was lack of oversight by the City's management on the compliance with the requirements of the Guidelines. Moreover, there were turnover in the key positions in the finance and accounting department during the past fiscal years.
Effect	The City failed to put in place a time reporting system that documents actual time spent on Measure R Local Return projects.
	The salaries and benefits claimed under MRLRF are not supported by actual time charges and documented time study and therefore, we question the total amount of expenditures reported under MRLRF of \$92,210.
Recommendation	We recommend that the City reimburse its MRLRF account the amount of \$92,210. In addition, we recommend that the City establish controls to ensure that the salaries and benefits charged to the Local Return funds are adequately supported by timesheets, payroll registers, personnel action forms with job descriptions, or similar documentation as required by the Guidelines.
Management's Response	City staff provided actual time charges and documented activity sheets for the sample employees requested from the auditor. City staff will provide the e-mailed documents previously provided to substantiate some of the expenditures incurred during this audit period. Staff will however develop a cost allocation plan and/or actual costs for transportation funds pursuant to the recommendation provided by the audit team. The City will also establish controls to ensure that all salaries and benefits charged to the Local Return funds are adequately supported in the future. The City considers this allocation to be an eligible expense under the local return guidelines.

Compliance Reference	Measure R Local Return Program Guidelines, Section B (VII. Audit Section) states that, "Jurisdictions are required to expend their Measure R Local Return funds for transportation purposes, as defined by the Guidelines" and "It is the Jurisdictions' responsibility to maintain proper accounting records and documentation."
Condition	The City charged general liability insurance costs amounting to \$120,520 to project code 8.10, Fund Administration, based on budget. An analysis to true-up the amount claimed was not performed at yearend to support and substantiate the reasonableness of the amount charged to this project.
Cause	Lack of oversight by City's management on the compliance with the requirements of the Guidelines. Moreover, there were turnover in the key positions in the finance and accounting department during the past fiscal years.
Effect	The City did not perform a true-up analysis at year-end to ensure that general liability insurance costs charged to MRLRF approximate the actual cost incurred.  The amount charged to MRLRF may not reflect the most
	reasonable cost relating to MRLRF.
Recommendation	We recommend for the City to revisit its methodology for allocating the general liability insurance costs to all the funds and once it is established, the City does not necessarily have to update the methodology on an annual basis if the parameters did not change significantly from year to year. We recommend for the City to also reimburse its MRLRF account the amount of \$120,520.
Management's Response	The City will revisit its methodology for allocating the general liability insurance costs to all the funds and if requested by Metro, would consider reimbursing its MRLRF account in the amount of \$120,520.

Compliance Reference	Section B (II) of Measure R Local Return Program Guideline states that, "To maintain legal eligibility and meet Measure R LR program compliance requirements, Jurisdiction shall submit to LACMTA an Expenditure Plan (Form One), annually, by August 1st of each year.  Expenditure Plan (Form One) provides a listing of projects funded with Measure R LR funds along with estimated expenditures for the year. For both operating and capital projects, Part I is to be filled out. For capital projects (projects over \$250,000), Part II is required. Pursuant to AB2321, LACMTA will provide LR funds to a capital project or program sponsor who submits the required expenditure plan.
Condition	The City claimed expenditures for the following MRLRF projects with no prior approval from LACMTA:
	<ul> <li>a. Project code 1.05, Central Ave Rehabilitation Project, totaling \$325,830;</li> <li>b. Project code 3.20, Compton Creek Walking Path – ADA Compliance, totaling \$2,210; and</li> <li>c. Project code 8.10, Fund Administration, totaling \$212,730.</li> </ul>
	The City submitted a revised Expenditure Plan (Form One) to the LACMTA Program Manager and obtained retroactive approvals of the said projects on December 4, 2018 and December 27, 2018.
Cause	The City concurs with the finding that an Expenditure Plan (Form One) should have been submitted by August 1 for the projects that will be funded with Measure R. The finding was caused by an oversight by City staff.
Effect	The City claimed expenditures totaling \$540,770 without prior approval from LACMTA. Lack of prior approval results in non-compliance which could impact future funding or result in questioned costs that require funding to be returned to LACMTA.
Recommendation	We recommend for the City to establish procedures and controls to ensure that approval is obtained from LACMTA prior to spending on Measure R-funded projects.

# MRLRF: CF Finding #2018-006 (Continued)

Management's Response	The City will establish procedures and controls to ensure that approval is obtained from LACMTA prior to spending Measure R funded projects. Specifically, in this instance, additional funding was needed from Measure R on a previously Metro approved Prop C project.
Finding Corrected During the Audit	LACMTA Program Manager granted retroactive approvals of the said projects on December 4, 2018 and December 27, 2018. No additional follow up is required.

Compliance Reference	Measure R Local Return Program Guidelines Section A(II)(8) states that, "Transportation Administration expenditures are those administrative costs associated with and incurred for the aforementioned eligible projects/program. Direct administration expenditures include those fully burdened costs that are directly associated with administering LR program or projects, and includes salaries and benefits, office supplies and equipment, and other overhead costs. All costs must be associated with developing, maintaining, monitoring, and coordinating, reporting and budgeting specific LR project(s). Expenditures must be reasonable and appropriate to the activities undertaken by the locality. The administrative expenditures for any year shall not exceed twenty percent (20%) of the total LR annual expenditures".
Condition	The City's administration expenditures exceeded more than 20 percent of its MRLRF total annual local return expenditures by \$130,720.
Cause	The City is aware of the 20% limit of actual expenditures on Direct Administration. However, budgeted project expenditures were lower than expected which reduced the threshold for allowable administrative costs.
Effect	Administrative expenses that exceeded 20% of the total annual local return expenditures are not allowable expenditures under the Measure R Local Return Program Guidelines.
Recommendation	We recommend for the City to establish procedures to ensure that administrative expenditures claimed under the local return funds be limited to 20 percent of the fund's total annual expenditures. The excess amount of \$130,720 was part of the questioned cost in CF Findings #2018-004 and #2018-005 which was recommended to be reimbursed to the MRLRF account.
Management's Response	The City will establish procedures that will ensure greater control of the administrative expenditures claimed under the Local Return funds to be limited to 20 percent of the fund's total annual expenditures.



An exit conference was held on January 16, 2019 with the City of Compton representatives. Those in attendance were:

Vasquez and Company LLP representatives:

Roger Martinez – Audit Partner

Marialyn Salvador – Audit Senior Manager

City of Compton representatives:

Rafaela King – Controller

Christopher Sutton – Deputy Controller

Maria David – Internal Auditor

Jocelyn Logan - Accountant

#### Matters discussed:

Results of the audit disclosed instances of noncompliance with the Guidelines.

A copy of this report was forwarded to the following City of Compton representatives for comments prior to the issuance of the final report:

Rafaela King – Controller Christopher Sutton – Deputy Controller Maria David – Internal Auditor Jocelyn Logan - Accountant Michelle Blue – Accountant John Strickland – Project Manager



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