



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

OFFICE OF COUNTY INVESTIGATIONS
KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 514
LOS ANGELES, CALIFORNIA 90012-3557

OSCAR VALDEZ
AUDITOR-CONTROLLER

CONNIE YEE
CHIEF DEPUTY AUDITOR-CONTROLLER

ASSISTANT AUDITOR-CONTROLLERS:

MAJIDA ADNAN
ROBERT G. CAMPBELL

May 16, 2024

TO: Norma E. García-González, Director
Department of Parks and Recreation

FROM: Greg Hellmold, Chief *Greg Hellmold*
Office of County Investigations

SUBJECT: **DEPARTMENT OF PARKS AND RECREATION – IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED REVIEW (REPORT #IOR-2017-13594) - SECOND AND FINAL FOLLOW-UP REVIEW**

We completed a second and final follow-up review of the Department of Parks and Recreation (Parks or Department) Improvement Opportunities Noted During Limited Review dated February 22, 2021 (Report #IOR-2017-13594). We reviewed the status of one Priority 2 recommendation, regarding conflict of interest reporting obligations, that had not been fully implemented in our first follow-up report issued September 13, 2023. As summarized in Table 1, Parks partially implemented the one outstanding recommendation.

Table 1 - Results of Second and Final Follow-up Review

RECOMMENDATION IMPLEMENTATION STATUS					
PRIORITY RANKINGS	TOTAL RECOS OUTSTANDIN	EXEMPT FROM REVIEW	FINAL OUTSTANDING RECOMMENDATIONS		
			FULLY IMPLEMENTED	PARTIALLY IMPLEMENTED	NOT IMPLEMENTED
PRIORITY 1	0	0	0	0	0
PRIORITY 2	1	0	0	1	0
PRIORITY 3	0	0	0	0	0
TOTAL	1	0	0	0	0
				1	

For details of our review and the applicable corrective actions, see Attachment.

We thank Parks management and staff for their cooperation and assistance during our review. If you have any questions, please contact me at (213) 893-0243 or ghellmold@auditor.lacounty.gov, or contact Supervising Investigator Graciela Soto at (213) 893-0552 or gsoto@auditor.lacounty.gov.

GH:TW:GLS:jh
F2-2017-13594

Attachment

c: Oscar Valdez, Auditor-Controller
Audit Committee
Audit Division

LOS ANGELES COUNTY AUDITOR-CONTROLLER

Robert G. Campbell
ASSISTANT AUDITOR-CONTROLLER

Greg Hellmold
DIVISION CHIEF

OFFICE OF COUNTY INVESTIGATIONS

Report #F2-2017-13594

DEPARTMENT OF PARKS AND RECREATION IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED REVIEW (REPORT #IOR-2017-13594) – SECOND AND FINAL FOLLOW-UP REVIEW

RECOMMENDATION	A-C COMMENTS
<p>3 Priority 2 – Department of Parks and Recreation (Parks or Department) management update the Department’s Conflict of Interest (COI) Code to include all employees who make or participate in making procurement and/or contracting decisions, and train impacted employees on their Statement of Economic Interests (Form 700) reporting obligations.</p> <p>Original Issue/Impact: We noted that some Parks employees who make and/or participate in making procurement and/or contracting decisions are not included in the Department’s Board-approved COI Code, and therefore are not required to file an annual Form 700. For example, the position of Regional Parks Superintendent III at Bonelli Park is responsible for approving purchases and providing decision makers with information related to the performance of concessionaires and service contractors at Bonelli Park, but the position classification is not listed as a required Form 700 filer in Parks’ COI Code, and the incumbent in that position did not file a Form 700 between 2005 and 2008, and between 2011 and 2014.</p> <p>Pursuant to Government Code (GC) Section (§) 87301 and 87302, local government agencies are required to adopt conflict of interest codes tailoring the disclosure requirements to the types of governmental decisions a person holding a position makes. In creating the- conflict of interest code, GC § 87302(a) instructs local government agencies to enumerate positions within the agency “which involve the making or participation in the making of decisions which may foreseeably make a material effect on any financial interest for each such enumerated position” (i.e., the focus is on the types of decisions that person makes, and the potential to affect that person’s financial interests).</p> <p>These conditions increase the risk that employees could personally benefit from a decision made in their capacity as a government employee.</p>	<p>Recommendation Status: Partially Implemented</p> <p>Parks met with the Executive Office of the Board of Supervisors (Board) on February 28, 2024, to present Parks’ proposed revisions to their COI Code. The proposed revisions designate positions that have procurement and/or contracting responsibilities.</p> <p>To fully implement this recommendation, Parks should obtain formal approval of the updated COI Code by the Board, develop formal training, and train affected staff. Parks indicated they plan to fully implement this recommendation by August 30, 2024.</p>

We conducted our review in conformance with the International Standards for the Professional Practice of Internal Auditing. For more information on our auditing process, including recommendation priority rankings, the follow-up process, and management’s responsibility for internal controls, visit auditor.lacounty.gov/audit-process-information.

Priority Ranking: Recommendations are ranked from Priority 1 to 3 based on the potential seriousness and likelihood of negative impact on the Agency’s operations if corrective action is not taken.