



The State Bar of California

OPEN SESSION AGENDA ITEM 4.5 NOVEMBER 2023 LEGAL SERVICES TRUST FUND COMMISSION

DATE: November 9, 2023

TO: Members, Legal Services Trust Fund Commission

FROM: Members, Legal Services Trust Fund Commission Homelessness Prevention Funds Committee

SUBJECT: Approve Recommendations on Coalition of California Welfare Rights Organizations' 2021–2024 Homelessness Prevention (HP 3) Formula Grant

EXECUTIVE SUMMARY

State Bar staff (staff) discovered problems related to Coalition of California Welfare Rights Organizations' (CCWRO's) HP 2 and HP 3 formula grants expenditure and services reports. Staff discovered these problems during the review of all HP 2 grant deliverables, the desk review of CCWRO's HP 3 formula grant, and the 2023 monitoring visit to CCWRO. HP 2 are state funds and HP 3 are federal, each with its own specific requirements. CCWRO failed to segregate activities and expenditures for its HP 2 and HP 3 awards and did not track actual expenditures by grant. CCWRO also reported—potentially double counting—the same work for both grants including some work that is nonqualifying for both HP 2 and HP 3 funding.

Staff provided extensive technical assistance to CCWRO and explained what actions it must perform to satisfy concerns about CCWRO's HP 2 and HP 3 formula expenditures and services. Additionally, the Eligibility and Budget Review Committee (EBR) held an Eligibility Review Conference (ERC) with CCWRO on July 25, 2023, to discuss internal control concerns, including these HP 2 and HP 3 issues. This memo describes the Homelessness Prevention Funds Committee's (Committee's) recommendations regarding CCWRO's HP 3 formula grant for the Legal Services Trust Fund Commission (LSTFC) meeting on November 9, 2023.

BACKGROUND

Through CCWRO's May 19, 2023, monitoring visit, the review of HP 2 services data, and the desk review of CCWRO's HP 3 formula grant, staff found that CCWRO was billing work to its HP 2 and 3 formula grants as if they were the same award, without segregating time or activities by grant. Also, CCWRO billed both its HP 2 and 3 formula awards for nonqualifying activities. Additionally, CCWRO did not keep time-by-fund records of its work for these grants and was unable to demonstrate why it billed a certain amount of employee time to each of its grants. CCWRO initially declined to revise its HP 2 and 3 formula expenditure reports, attesting that the expenditure reports were accurate. However, the reports comingled and potentially supplanted HP 2 and 3 funds, and included nonqualifying activities.

On May 31, 2023, staff issued its findings for CCWRO's HP 3 formula grant desk review, notifying CCWRO that it did not maintain functional timekeeping records, and that CCWRO's cost allocation methodology improperly relied on estimates.¹ Staff requested CCWRO respond with a Corrective Action Plan (CAP) by June 30, 2023. On June 30, 2023, CCWRO submitted its CAP via email (Attachment A). The CAP CCWRO submitted stated that CCWRO would submit documentation separating HP 2 and HP 3 expenditures by July 31, 2023, and retroactive timesheets by August 15, 2023.

DISCUSSION

HP 2 and HP 3 grants are separate funding opportunities. HP 2 grants are state funds from the National Mortgage Special Deposit Fund, as detailed in Government Code section 12531.² Specifically, HP 2 awards must fund:

[E]viction defense or other tenant defense assistance in landlord-tenant disputes, including preeviction and eviction legal services, counseling, advice, and consultation, mediation, training, renter education, and representation, and legal services to improve habitability, increase affordable housing, ensure receipt of eligible income or benefits to improve housing stability, and prevent homelessness.

Government Code section 12531(e)(1)(B).

HP 3 grants are federal Coronavirus State Fiscal Recovery Funds, as detailed in the Budget Acts of 2021, 2022, and 2023.³ HP 3 awards must fund:

¹ Functional timekeeping refers to the process of maintaining records of an employee's time spent on each project, in order to track how much funding to allocate to that employee's paycheck. More than tracking an employee's time spent at work each day, functional timekeeping tracks how much time an employee spends on each project during a pay period.

² See Government Code section 12531, available at https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=12531&lawCode=GOV.

³ See the Budget Act of 2021, available at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB129. See also the Budget Act of

[E]viction defense, other tenant defense assistance in landlord-tenant rental disputes, or services to prevent foreclosure for homeowners, including pre-eviction and eviction legal services, counseling, advice and consultation, mediation, training, renter education, and representation, and legal services to improve habitability, increasing affordable housing, ensuring receipt of eligible income or benefits to improve housing stability, legal help for persons displaced because of domestic violence, and homelessness prevention.

The Budget Acts of 2021, 2022, and 2023.

Furthermore, the HP 2 and HP 3 grants have different start and end dates, applications, budgets, and reporting requirements. Whereas HP 2 formula grants began on January 1, 2021, and will end on December 31, 2023, HP 3 formula grants began on December 1, 2021, and will end on December 31, 2024. While HP 2 grants only require annual services and expenditures reports, HP 3 grants require both quarterly and annual reports.

Between May and October 2023, staff met with CCWRO multiple times to clarify grant requirements and provide extensive technical assistance. This included working with CCWRO to ensure CCWRO understood how to complete its CAP successfully, ensuring CCWRO understood the different reporting requirements for its HP 2 and HP 3 formula grants, clarifying qualifying versus nonqualifying activities, and helping CCWRO understand how to retroactively deduct nonqualifying work it billed to its HP 2 and 3 formula grants.⁴ CCWRO's deliverables were consistently late, incomplete, and/or inaccurate, and required multiple rounds of revisions. For example, CCWRO has submitted revised timesheets for its staff working on its HP 3 formula grant at least three times, and it continued to provide grant allocation worksheets that combine—rather than segregate—its HP 2 and 3 grants. These continued revisions demonstrate that CCWRO continues to struggle to understand the reporting requirements for its HP 2 and 3 formula grants. For these reasons, the Committee continues to have concerns about whether CCWRO has sufficient internal controls to oversee the administration of federal and state homelessness prevention funding.

2022, available at https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220AB1624, and the Budget Act of 2023, available at https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240SB101.

⁴ Staff identified three nonqualifying activities:

- A CARE Court guide about defending respondents' procedural rights (submitted as part of CCWRO's HP 3 quarter four services report);
- The same CARE Court guide about defending respondents' procedural rights (submitted as part of CCWRO's HP 2 annual evaluation); and
- A CARE Court amicus letter related to another grantee's CARE Court litigation (submitted as part of CCWRO's HP 2 annual evaluation).

CCWRO's internal controls were also a concern for EBR. EBR conducted an ERC with CCWRO on July 25, 2023, where staff and commissioners met with CCWRO to discuss its internal controls, including those implicating its HP 2 and HP 3 formula awards, and CCWRO was reminded of the importance of its compliance with its CAP. One of the ERC's recommendations to EBR was that CCWRO must submit "complete, accurate, and timely documentation of successful implementation of its HP 3 Corrective Action Plan."⁵ However, CCWRO continued to miss deadlines and submit inaccurate deliverables.

On August 10, 2023, the LSTFC found CCWRO eligible for 2024 Interest on Lawyers' Trust Accounts (IOLTA) and Equal Access Funds (EAF) with contingencies as described in the ERC's memo to EBR.⁶ The LSTFC also passed the following resolution:

FURTHER RESOLVED, that the **Legal Services Trust Fund Commission** provides a formal warning to Coalition of California Welfare Rights Organizations that if it fails to comply with its Corrective Action Plan, the LSTFC may pursue any of the remedies available to it under the General Grant Provisions.

On August 31, 2023, at the HP funds Committee meeting, the Committee reviewed CCWRO's HP 2 and 3 formula grants. At the time, CCWRO still had not submitted all overdue deliverables, and continued to revise submitted materials. Staff provided the Committee with an interim update on CCWRO's progress, as well as its plans to continue to work with CCWRO to resolve these outstanding issues. To ensure staff could finalize its analysis, the Committee passed the following resolution:

RESOLVED, that the Legal Services Trust Fund Commission (LSTFC) Homelessness Prevention Funds Committee (Committee) approves requiring Coalition of California Welfare Rights Organizations (CCWRO) to submit a spend down plan for its 2021–2023 homelessness prevention (HP 2) formula funding from August 1, 2023–December 31, 2023, to staff by October 1, 2023; and it is

⁵ The complete list of the ERC's recommendations to EBR, in its memo dated August 10, 2023, reads:

If CCWRO is found eligible for 2024 IOLTA and EAF funding, the working group recommends the following:

- Require participation in a follow up fiscal and program monitoring visit in 2024.
- Require submission of complete, accurate, and timely reports for all Trust Fund Program grants.
- Require submission of complete, accurate, and timely documentation of successful implementation of its HP 3 Corrective Action Plan.
- Require submission of a complete, timely, and satisfactory response to the fundings in the 2023 Monitoring Visit report.
- Require submission of a complete and accurate 2025 IOLTA and EAF application, including an audit, by the May 1, 2024, deadline.
- Recommend staff informs CCWRO's Board of Directors about the ERC and keeps the Board of Directors more informed generally.
- Recommend recruiting Board member(s) with a financial background.
- Recommend hiring a part-time or full-time accountant or bookkeeper.

⁶ See footnote 5, *supra*, for a complete list of the contingencies CCWRO must meet in order to qualify for 2024 IOLTA and EAF funding.

FURTHER RESOLVED, that the Committee approves requiring CCWRO to submit a spend down plan for its 2021–2024 homelessness prevention (HP 3) formula funding from August 1, 2023–December 31, 2024, to staff by October 1, 2023.

Additionally, after the August 31, 2023, Committee meeting, staff reminded CCWRO it needed to revise its HP 3 allocation worksheet.

On October 1, 2023, CCWRO submitted its HP 2 formula and HP 3 formula spend down plans of unspent funds. The plan provided details of the unspent amount of CCWRO's HP2 formula and HP3 formula grant funds for 2022 and 2023 (through August). Based on staff's review, comparing unspent amounts per CCWRO's previously provided accounting reports for 2022 and 2023 (through August), staff noted that the unspent amounts in the October 1 spend down plan deviated significantly from CCWRO's accounting reports. CCWRO's spend down plans underreported approximately \$20,000 in HP 2 formula funds and also underreported approximately \$40,000 in HP 3 formula funds. The discrepancies between the unspent amounts in the spend down plan and accounting reports suggests that CCWRO's documents remain inaccurate.

Additionally, CCWRO submitted its updated HP 3 expense allocation worksheet; however, the worksheet again combined CCWRO's HP 2 and 3 formula grants, rather than segregating HP 2 and 3 funds. CCWRO submitted an updated expense allocation worksheet that segregated its HP 3 formula grant on October 6, 2023.

CCWRO's HP 3 timesheets and cost allocation worksheet submitted as of October 1 still did not align with its HP 3 general ledger. Staff advised the Committee on October 20, 2023, that one or more of these documents required revision to remain in compliance with the requirements for federal awards. The Code of Federal Regulations (CFR) states:

Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must: (i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated... (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity... Support the distribution of the employee's salary or wages among specific activities or cost objectives...

Title 2 of the CFR, Part 200, Subpart E § 200.430 (i).

The CFR also requires grantees to reconcile projected expenditures and actual expenditures at least annually before the end of a grantee's fiscal year. The CFR explains:

Budget estimates... do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, provided that: (A) The system for establishing the estimates produces reasonable approximations of the activity actually performed; (B)

Significant changes in the corresponding work activity (as defined by the non-Federal entity's written policies) are identified and entered into the records in a timely manner. Short term (such as one or two months) fluctuation between workload categories need not be considered as long as the distribution of salaries and wages is reasonable over the longer term; and (C) The non-Federal entity's system of internal controls includes processes to review after-the-fact interim charges made to a Federal award based on budget estimates. All necessary adjustment must be made such that the final amount charged to the Federal award is accurate, allowable, and properly allocated.

Title 2 of the CFR, Part 200, Subpart E § 200.430 (i) 1 (viii).

Additionally, Title 2 of the CFR, Part 200, Subpart E § 200.430 (e)-(g) requires grantees to adequately document costs, and only bill allowable costs. Title 2 of the CFR, Part 200, Subpart A § 200.1 defines disallowed costs as “those charges to a Federal award that the Federal awarding agency or pass-through entity determines to be unallowable, in accordance with the applicable Federal statutes, regulations, or the terms and conditions of the Federal award.”

Finally, the CFR mandates the collection of unallowable costs:

Payments made for costs determined to be unallowable by either the Federal awarding agency, cognizant agency for indirect costs, or pass-through entity, either as direct or indirect costs, must be refunded (including interest) to the Federal Government in accordance with instructions from the Federal agency that determined the costs are unallowable under Federal statute or regulation directs otherwise.

Title 2 of the CFR, Part 200, Subpart E § 200.410.

Grantees may not correct quarterly HP 3 expenditure reports once that data has been reported to the federal government. Grantees who need to make corrections must do so in subsequent quarters. Per the CFR above, CCWRO should have corrected its expenditures at least annually by the end of its fiscal year in June. Accordingly, CCWRO should have corrected its expenditures in June 2023. However, because CCWRO missed correcting its expenditures in June 2023, it must make these corrections for the next quarterly report. HP 3 quarter 7 expenditure reports are due on October 31, 2023, for all grantees.

On October 20, 2023, the Committee passed the following resolution:

RESOLVED, that the Legal Services Trust Fund Commission (LSTFC) Homelessness Prevention Funds Committee (Committee) approves requiring Coalition of California Welfare Rights Organizations (CCWRO) to revise its 2021–2024 homelessness prevention (HP 3) formula grant on the quarter seven expenditure report due October 31, 2023, to reflect its actual expenditures; and it is

FURTHER RESOLVED, that if CCWRO fails to revise its HP 3 formula grant completely, accurately, and on time by the October 31, 2023, deadline, that the Committee recommends that the LSTFC require CCWRO to return any disallowed costs from its HP 3 formula grant award, as defined in staff's memo dated October 20, 2023.

Following the October 20, 2023, Committee meeting, staff communicated with CCWRO to ensure it understood what documentation to submit by October 31, 2023, and to offer to provide additional technical assistance. On November 1, 2023, staff emailed CCWRO requesting missing information and to clarify discrepancies in the materials CCWRO submitted on October 31, 2023. In order to post this memo on time, staff will provide a verbal update on November 9, 2023, regarding CCWRO's quarter seven expenditures report and related HP 3 formula grant revisions.

CONCLUSION

Staff provided CCWRO with significant technical assistance as well as reminders to ensure CCWRO could comply with all HP 2 and 3 formula grant requirements. CCWRO continues to miss deadlines and provide incomplete and inaccurate documents for its HP 3 formula grant. Additionally, major discrepancies between CCWRO's HP 2 and 3 formula spend down plans and its expenditure reports demonstrate that it lacks sufficient internal controls required of grantees, especially those awarded federal funds. As a result, the Committee is concerned that CCWRO remains noncompliant with all federal requirements for its HP 3 formula grant. Due to the ongoing concerns discussed above, the Committee gave CCWRO a final deadline to correct its expenditures; revise its cost allocation worksheet, and/or general ledger so that these documents are consistent; and reconcile its spend down plans with its expenditure reports and general ledger. If this deadline is not met, due to its failure to comply with applicable federal requirements, CCWRO will be required to immediately return to the State Bar all disallowed costs from its HP 3 formula grant award.

RECOMMENDATIONS

Should the LSTFC concur with the Committee's proposal, passage of the following resolution is recommended:

RESOLVED, that the Legal Services Trust Fund Commission requires Coalition of California Welfare Rights Organizations to return any disallowed costs from its HP 3 formula grant award, as defined in staff's memo and presentation dated November 9, 2023.

ATTACHMENTS LIST

- A. CCWRO's HP 3 Corrective Action Plan Submission on June 30, 2023
- B. CCWRO's HP 3 Corrective Action Plan Update on August 2, 2023



Coalition of California Welfare Rights Organizations

"The work goes on. The cause endures. The hope is still alive and the dream never dies." T.M. Kennedy

Kevin M. Aslanian, Ex. Director
Grace A. Galligher, Dir. Attorney
Carlos Holquin-Flores, Staff Attorney
Andrew Chen, Staff Attorney
Daphne Macklin, Researcher
1111 Howe Avenue, Suite 635
Sacramento, CA 95825-8551
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
www.ccwro.org

6/30/23

To: Esteban Cano-Gutierrez, Senior Financial Analyst

cc: Melanie Snider, Supervising Attorney,
Judicial Council of California

From: Kevin Aslanian, Executive Director
Coalition of California Welfare Rights Organizations

Re: **CCWRO CORRECTIVE ACTION PLAN**

Dear Mr. Cano-Gutierrez,

In response to the HP3 Desk Review Report on May 31, 2023. We have attached our Corrective Action Plan for your review.

The Office of Access and Inclusion of the State Bar of California conducted a desk review of Coalition of California Welfare Rights Organizations' (CCWRO) Homelessness Prevention (HP) 3 formula grant for the 2022 grant year.

The review resulted in two findings:

Finding 1 – Functional Timekeeping

Time and effort records were not maintained for the staff working on the grant.

Finding 2 – Insufficient Cost Allocation

A review of the cost allocation methods used by CCWRO revealed that the personnel expenses, both direct and indirect, charged to the grant are based on estimated percentages of time worked for each staff member. There was no documentation to support either the actual time worked on the grant, or the services provided to clients. As such, we are not able to determine if the expenses are allowable.

The findings were based on The Code of Federal Regulations (CFR) Title 2 Part 200 Subpart E § 200.430 (i) states "Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must: (i) Be supported by

a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated; (iii) Reasonably reflect the total activity for which the employee is compensated by the non- Federal entity, not exceeding 100% of compensated activities; ...Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity.”

Office of Access and Inclusion of the State Bar of California Recommendation

The recommendation was that “CCWRO must develop and use an allocation basis that accurately reflects the work performed on the grant. This allocation method must meet the standards detailed in § 200.430 (i) above. As an example, timesheets would satisfy this requirement. CCWRO must review the expenditures that have been reported based on estimates and make the necessary adjustments to the expenditure reports to reflect the accurate amount based upon actual work performed.

We appreciate the assistance that the Office of Access and Inclusion of the State Bar of California has provided us. Our intention is to facilitate the recommendations stated above to the best of our ability.

The metrics of the corrective action plan are set forth below as Attachment # 1. Sample timekeeping documents as Attachment #2.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Aslanian', written in a cursive style.

Kevin Aslanian, Executive Director/Advocate

Attachment #1 - METRICS OF CCWRO CORRECTIVE ACTION PLAN

| ISSUE | ACTION | MEASUREMENT |
|---|--|--|
| <p>Finding 1 –Functional Timekeeping</p> <p>Time and effort records were not maintained for the staff working on the grant.</p> | <p>CCWRO adopted the time sheet provided by Michael Cheng which demonstrates both time spent and allocation to programs.</p> <p>CCWRO will complete the timesheets retroactive from January 1, 2022 to December 2022 for employees covered by the HP.</p> <ul style="list-style-type: none"> Andrew Chen, as primary, Kevin Aslanian and Grace Galligher, as supervisors, will complete the recommended timesheets. <p>CCWRO will complete the timesheets retroactive from January 1, 2023 to June 2023 for employees covered by the HP.</p> <ul style="list-style-type: none"> Andrew Chen as primary, Kevin Aslanian and Grace Galligher, as supervisors will complete the recommended timesheets. <p>CCWRO will procure Rocket Matter timekeeping and case management program. This program will maintain and track real time activities for HP3, IOLTA and EAF programs.</p> | <p>The sample timesheet is attached hereto.</p> <p>Andrew. Chen, Kevin Aslanian and Grace Galligher will submit the timesheets no later than August 15, 2023.</p> <p>Andrew Chen, Kevin Aslanian and Grace Galligher will complete and submit the timesheets no later than August 30, 2023.</p> <p>CCWRO will complete the purchase of Rocket Matter by July 30, 2023.</p> |
| <p>Finding 2 – Insufficient Cost Allocation</p> <p>No documentation to support the allocation methods used by CCWRO for the personnel expenses, both direct and indirect, charged to the grant are based on estimated percentages of time worked for each staff member. There was no documentation to support either the actual time worked on the</p> | <p>CCWRO adopted the time sheet provided by Michael Cheng which demonstrates both time spent and allocation to programs. CCWRO will adopt separate timesheets and cost allocation for the HP2 and HP3 programs.</p> <p>CCWRO will complete the timesheets retroactive from January 1, 2022 to December 2022 for employees covered by the HP.</p> <ul style="list-style-type: none"> Andrew Chen, as primary, Kevin Aslanian and Grace Galligher, as supervisors, will complete the recommended timesheets. <p>CCWRO will complete the timesheets retroactive from January 1, 2023 to June 2023 for employees covered by the HP.</p> | <p>The sample timesheets are attached hereto.</p> <p>Andrew. Chen, Kevin Aslanian and Grace Galligher will complete and submit the timesheets no later than August 15, 2023.</p> <p>Andrew. Chen, Kevin Aslanian and Grace Galligher will complete and submit the</p> |

| | | |
|---|---|--|
| grant, or the services provided to clients. | <ul style="list-style-type: none"> • Andrew Chen as primary, Kevin Aslanian and Grace Galligher, as supervisors will complete the recommended timesheets. <p>CCWRO will procure Rocket Matter timekeeping and case management program. This program will maintain and track real time activities for HP3, IOLTA and EAF programs.</p> | <p>timesheets no later than August 30, 2023.</p> <p>CCWRO will complete the purchase of Rocket Matter by July 30, 2023.</p> |
| | <div data-bbox="505 474 1037 506" style="background-color: #fff9c4; text-align: center;">HP3</div> <p>Create a separate HP3 ledger to track HP expenditures including expenses and payroll:</p> <ul style="list-style-type: none"> • Confer with accountant to perform work. • Create a new Quickbook ledger using the existing one to build the new ledger. • Develop a procedure to collect and process HP3 transactions including payroll. • Separate HP3 income and expenditures ledger which will then be the dedicated HP3 account. • Develop new instructions to funding source and payroll processing to use the dedicated HP3 ledger. • Identify all HP3 employees. • Provide HP3 budget on payroll. <div data-bbox="505 1205 1037 1236" style="background-color: #fff9c4; text-align: center;">HP2</div> <p>Create a separate HP2 ledger to track HP expenditures including expenses and payroll</p> <ul style="list-style-type: none"> • Incorporate the new HP2 ledger into the new Quickbook account • Develop a procedure to collect and process transactions including payroll. • Identify all HP2 employees • Provide HP2 budget on payroll. | <p>To be completed by 6/30/23</p> <p>To be completed by 7/5/23</p> <p>To be completed by 7/5/23</p> <p>To be completed by 7/31/23</p> <p>To be completed by 7/31/23</p> <p>To be completed by 7/31/23</p> <p>To be completed by 7/5/23</p> <p>To be completed by 7/5/23</p> <p>To be completed by 7/5/23</p> <p>To be completed by 7/31/23</p> <p>To be completed by 7/31/23</p> |

Attachment #2 – Sample timekeeping documents

| | | | | | | | | | | |
|------------------|--------------------------|-----|--------------------|----|----------|----|------------|--|--------------|-------------------------|
| Andrew | | | | | | | | | | |
| June Pay cycle | HP3 | | Non - Program time | | Time Off | | Total Time | | Program Time | Time off (Benefit Time) |
| Week 1 | | 24 | | 16 | | | 40 | | 60% | 0% |
| Week 2 | | 20 | | 12 | | 8 | 40 | | 50% | 20% |
| Week 3 | | 16 | | 16 | | 8 | 40 | | 40% | 20% |
| Week 4 | | 28 | | 12 | | | 40 | | 70% | 0% |
| Week 5 | | 16 | | 24 | | | 40 | | 40% | 0% |
| | | 104 | | 80 | | 16 | 200 | | 52% | 0.08 |
| Salary -\$83,248 | Monthly Rate = \$6937.34 | | | | | | | | | |

| | | | | | | | | | | |
|------------------|--------------------------|----|--------------------|-----|----------|----|------------|--|--------------|-------------------------|
| Andrew Chen | | | | | | | | | | |
| June Pay cycle | HP2 | | Non - Program time | | Time Off | | Total Time | | Program Time | Time off (Benefit Time) |
| Week 1 | | 16 | | 24 | | | 40 | | 40% | 0% |
| Week 2 | | 12 | | 20 | | 8 | 40 | | 30% | 20% |
| Week 3 | | 16 | | 16 | | 8 | 40 | | 40% | 20% |
| Week 4 | | 12 | | 28 | | | 40 | | 30% | 0% |
| Week 5 | | 24 | | 16 | | | 40 | | 60% | 0% |
| | | 80 | | 104 | | 16 | 200 | | 40% | 0.08 |
| Salary -\$83,248 | Monthly Rate = \$6937.34 | | | | | | | | | |



Coalition of California Welfare Rights Organizations

"The work goes on. The cause endures. The hope is still alive and the dream never dies." T.M. Kennedy

July 31, 2023

TO: CCWRO BOARD OF DIRECTORS

FROM: Kevin Aslanian

SUBJECT: HP III Desk Review Corrective Action Plan Update

Kevin M. Aslanian, Ex. Director
 Grace A. Galligher, Dir. Attorney
 Carlos Holquin-Flores, Staff Attorney
 Andrew Chen, Staff Attorney
 Daphne Macklin, Researcher
 1111 Howe Avenue, Suite 635
 Sacramento, CA 95825-8551
 Tel. (916) 736-0616
 Fax (916) 736-2645
 Cell (916) 712-0071
www.ccwro.org

In response to the State Bar 5-31-23 HP II Desk Review CCWRO developed a Corrective Action Plan.

| Finding | Corrective Action Plan | Tasks | Board Update |
|---|---|--|---------------------------|
| Finding 1 –Functional Timekeeping Time and effort records were not maintained for the staff working on the grant. | CCWRO adopted the time sheet provided by Michael Cheng which demonstrates both time spent and allocation to programs. CCWRO will complete the timesheets retroactive from January 1, 2022 to December 2022 for employees covered by the HP. <ul style="list-style-type: none"> Andrew Chen, as primary, Kevin Aslanian and Grace Galligher, as | The sample timesheet is attached hereto. Andrew. Chen, Kevin Aslanian and Grace Galligher will submit the timesheets no later than August 15, 2023. | Done. In progress. |

| | | | |
|---|---|---|--|
| | <p>supervisors, will complete the recommended timesheets.</p> <p>CCWRO will complete the timesheets retroactive from January 1, 2023 to June 2023 for employees covered by the HP.</p> <ul style="list-style-type: none"> Andrew Chen as primary, Kevin Aslanian and Grace Galligher, as supervisors will complete the recommended timesheets. <p>CCWRO will procure Clockify timekeeping and case management program. This program will maintain and track real time activities for HP3, IOLTA and EAF programs.</p> | <p>Andrew Chen, Kevin Aslanian and Grace Galligher will complete and submit the timesheets no later than August 30, 2023.</p> <p>CCWRO will complete the purchase of Clockify July 30, 2023.</p> | <p>In. progress</p> <p>CCWRO has signed up for Clockify and staff has been trained. It is in use now</p> |
| <p>Finding 2 – Insufficient Cost Allocation</p> <p>No documentation to support the allocation methods used by CCWRO for the personnel expenses, both direct and indirect, charged to the grant are based on estimated percentages of time worked for each staff member. There was no documentation to support either the actual time worked on the grant, or the services provided to clients.</p> | <p>CCWRO adopted the time sheet provided by Michael Cheng which demonstrates both time spent and allocation to programs. CCWRO will adopt separate timesheets and cost allocation for the HP2 and HP3 programs.</p> <p>CCWRO will complete the timesheets retroactive from January 1, 2022 to December 2022 for employees covered by the HP.</p> <ul style="list-style-type: none"> Andrew Chen, as primary, Kevin Aslanian and Grace Galligher, as supervisors, will complete the recommended timesheets. <p>CCWRO will complete the timesheets retroactive from January 1, 2023 to June 2023 for employees covered by the HP.</p> <ul style="list-style-type: none"> Andrew Chen as primary, Kevin Aslanian and Grace Galligher, as supervisors will complete the recommended timesheets. | <p>The sample timesheets are attached hereto.</p> <p>Andrew. Chen, Kevin Aslanian and Grace Galligher will complete and submit the timesheets no later than August 15, 2023.</p> <p>Andrew. Chen, Kevin Aslanian and Grace Galligher will complete and submit the timesheets no later than August 30, 2023.</p> | <p>Done.</p> <p>In progress.</p> <p>In. progress</p> |

| | | | |
|--|--|---|---|
| | CCWRO will procure Rocket Matter timekeeping and case management program. This program will maintain and track real time activities for HP3, IOLTA and EAF programs. | CCWRO will complete the purchase of Rocket Matter by July 30, 2023. | CCWRO has signed up for Clockify and staff has been trained. It is in use now. |
| | <p style="text-align: center;">HP3</p> <p>Create a separate HP3 ledger to track HP expenditures including expenses and payroll:</p> <ul style="list-style-type: none"> • Confer with accountant to perform work. • Create a new Quickbook ledger using the existing one to build the new ledger. • Develop a procedure to collect and process HP3 transactions including payroll. • Separate HP3 income and expenditures ledger which will then be the dedicated HP3 account. • Develop new instructions to funding source and payroll processing to use the dedicated HP3 ledger. • Identify all HP3 employees. • Provide HP3 budget on payroll. <p style="text-align: center;">HP2</p> <p>Create a separate HP2 ledger to track HP expenditures including expenses and payroll.</p> <ul style="list-style-type: none"> • Incorporate the new HP2 ledger into the new Quickbook account | <p>To be completed by 6/30/23</p> <p>To be completed by 7/5/23</p> <p>To be completed by 7/5/23</p> <p>To be completed by 7/31/23</p> <p>To be completed by 7/31/23</p> <p>To be completed by 7/31/23</p> <p>To be completed by 7/31/23</p> <p>To be completed by 7/5/23</p> <p>To be completed by 7/5/23</p> | <p>Completed</p> <p>Completed</p> <p>Completed</p> <p>All HP III payroll is based up a revised time sheets that segregate HP III payroll numbers.</p> <p>Completed</p> <p>Completed</p> <p>Completed. Kevin Aslanian, Grace Galligher and Andrew Chen.</p> <p>Completed</p> <p>Completed</p> <p>Completed</p> |

| | | | |
|--|---|----------------------------|-----------|
| | •Develop a procedure to collect and process transactions including payroll. | To be completed by 7/31/23 | Completed |
| | •Identify all HP2 employees | To be completed by 7/31/23 | Completed |
| | •Provide HP2 budget on payroll. | To be completed by 7/31/23 | Completed |