

**Los Angeles Unified School District
Office of the Inspector General**

**Assessment of District
Compliance with Review
and Approval Policies for
Contract Professional
Timesheets and Invoices –
Cumming Management
Group, Inc., Contract No.
4400007486**

**OA 24-1442
March 14, 2025**

**Sue Stengel
Inspector General**





Los Angeles Unified School District Office of the Inspector General

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March 14, 2025

Ms. Krisztina Tokes, Chief Facilities Executive
Facilities Services Division
Los Angeles Unified School District
333 S. Beaudry Avenue, 19th Floor Los Angeles, CA 90017

RE: Assessment of District's Compliance with Review and Approval Policies for Contract
Professional Timesheets and Invoices - Cumming Management Group, Inc.,
Contract No. 4400007486

Dear Ms. Tokes:

This is the final report on our assessment of the District's review and approval of timesheets and invoices submitted by Cumming Management Group, Inc. under Contract No. 4400007486.

Please contact our office if you have any questions.

Sincerely,

Mark H. Pearson

Digitally signed by Mark H. Pearson
DN: cn=Mark H. Pearson, o, ou,
email=mark.pearson1@lausd.net, c=US
Date: 2025.03.14 13:39:43 -07'00'

Mark H. Pearson, CPA, CFE, CIGA
Assistant Inspector General

Sue Stengel

Digitally signed by Sue Stengel
DN: cn=Sue Stengel, o=OIG, ou=OIG,
email=susan.stengel1@lausd.net, c=US
Date: 2025.03.14 13:55:17 -07'00'

Sue Stengel, Esq., CIG
Inspector General

c: Andrea Reyes
Chris Alejo
Rachel Charlsie Chua
Socorro Leano

333 South Beaudry Avenue, 12th Floor, Los Angeles, California 90017
Telephone: (213) 241-7700 Fax: (213) 241-6826
Inspector.general@lausd.net

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**Assessment of District Compliance with Review and Approval Policies for Contract
Professional Timesheets and Invoices
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EXECUTIVE SUMMARY

This audit evaluates whether the invoices submitted by Cumming Management Group, Inc. (CMG) under Contract No. 4400007486¹ (Contract) with the Los Angeles Unified School District (District) were reviewed and approved in compliance with the District's established policies and procedures, CT-005 Standard Protocol for Validating Contract Professional Hours.² The purpose of the audit was to improve contractor oversight and accountability of the District's capital improvement program.

Conclusion

The audit found that CMG invoices and timesheets were reviewed and approved by FSD management according to the District's policies and procedures.

INTRODUCTION

Cumming Management Group, Inc. (CMG), established in 1996, is a consulting firm providing project and cost management services. On November 18, 2019, the Los Angeles Unified School District (District) awarded CMG Contract No. 4400007486 to provide professional construction and project management services in support of the District's capital improvement program.

The Contract's original period spanned from December 1, 2019, to November 30, 2021, with an initial not-to-exceed (NTE) amount of \$5,000,000 and three one-year extension options. The Contract was subsequently extended through November 30, 2024 and the NTE amount increased to \$43,300,000. As of April 30, 2024, the cumulative expenditures under the contract total \$37,750,552.

CMG provided the services of a total of 36 contract professionals (CPs) under the Contract for the duration of the audit period, which covered December 1, 2019 through April 30, 2024. The staffing categories of CPs appointed to the District included the following:

- AutoCAD Drafter
- Community Relations/Small Business Specialist
- Senior Design Manager – Architecture/Engineering
- Design Manager
- Design Associate
- Field Supervisor - Electrical
- Field Supervisor - Plumbing
- Junior Scheduler
- Program Lead

¹ Microsoft Word - 1990015-4400007486 Cumming Management Group, Inc. CM - Agreement.docx

² Microsoft Word - CT-005 Consultant Staff Work Hours Protocol - Revised1

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- Project Manager – Planning & Development
- Project Development Manager
- Project Cost Estimator
- Owner Authorized Representative I
- Owner Authorized Representative II
- Structural Engineer

These CPs operated on a staff-augmentation basis, with their daily work supervised and managed by the Facilities Services Division (FSD) personnel. The CPs' hours were recorded in the District's Consolidated On-line Information Nexus (COLIN). CMG submitted monthly invoices to FSD based on these records and the contractual hourly billing rates. The CPs' assigned supervisors were responsible for validating and approving the CPs' timesheets, following the established policies and procedures.

SCOPE AND OBJECTIVE

The objective of our examination was to ensure that the invoices and timesheets submitted by CMG were reviewed and approved according to the District's policies and procedures. The scope of the audit covered invoices submitted for services provided from December 2019 to April 2024.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS), issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions.

METHODOLOGY

We performed the following audit procedures to achieve the audit objectives:

1. Policy and Procedure Analysis:

- We reviewed FSD policies and procedures governing the validation and approval of CP timesheets.

2. Interviews:

- We conducted interviews with CMG personnel to gain insights into their process for submitting invoices.
- We conducted interviews with FSD personnel to gain insights into the process for supervising CPs and validating their hours.

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3. Sample Selection:

- We selected a statistical sample of 35 invoices and the corresponding 105 timesheets submitted under Contract No. 4400007486 for testing.

4. Invoice Review:

- **Invoice Approval:** We reviewed the approved invoices to determine they were approved by District employees.
- **Billing for Overtime/Weekend/Holiday Work:** We reviewed invoices to ensure that CPs did not bill for overtime work or for work performed on District holidays, weekends, or shutdown days, unless prior written approval from the Branch Director was obtained.

5. Timesheet Review:

- **CP's Signature Date:** We reviewed CP's signature date to make sure the timesheet was signed after the last workday of the billing month.
- **Timesheet Approval Signature:** We reviewed timesheet approval signature to determine that the approver was not from the same firm or sub-consultants.
- **FSD Supervisor Approval:** We examined whether the timesheets were approved by the designated FSD supervisors, as required by the established protocols.

RESULTS OF AUDIT

Audit found that CMG invoices and timesheets were properly documented and approved by FSD management.

1. Invoice Review:

- All invoices were properly approved by District employees.
- No instances of billing for overtime, holiday, weekend, or shutdown day work were found without prior written approval from the Branch Director.

Conclusion: Full compliance was observed with no exceptions.

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2. Timesheet Review:

- CP timesheets were signed after the last workday of the billing month, as required.
- Approval signatures were from individuals independent of the CP's firm or sub-consultants, in line with established procedures.
- All timesheets were reviewed and approved by the designated FSD supervisors, adhering to established protocols.

Conclusion: Full compliance was observed with no exceptions.

AUDIT TEAM

Stella Lai, Audit Manager
Valerie Logan, Principal Auditor
Lurline Garrett, Senior Auditor