

---

## West Ascension Parish Audit Action Plan:

### 1. Financial Reporting & Deadlines (Findings 1 & 4)

- **The Issue:** Lack of internal controls over financial reporting; missing statutory LLA filing deadlines.
- **Louisiana Law Context: La. R.S. 24:513** requires local public entities to submit completed financial statements to the LLA within six months of the close of the fiscal year.

#### Action Plan

- **Policy (Financial Oversight):** Establish a board-approved policy mandating that all balance sheet accounts be reconciled monthly and reviewed by a secondary supervisor. The policy must explicitly state a target completion date for the annual audit draft at least **45 days prior** to the LLA statutory deadline.
- **Protocol (Month-End & Audit Prep):**
  1. Implement a standardized **Month-End Closing Checklist** that requires physical or digital sign-offs from both the outside accounting firm and the internal accounting supervisor.
  2. Create a permanent **Audit PBC (Provided by Client) List** workflow. As soon as the FY2026 engagement letter is signed, data requests must be centralized in a shared tracking sheet with strict internal deadlines assigned to the contracted CPA.
- **Control:** The Board of Commissioners must add a standing agenda item to the monthly meeting: *"Review of Monthly Financial Checklist and External Audit Progress Report."*

### 2. Public Procurement & Bid Law (Finding 2)

- **The Issue:** Awarding a renovation contract without following proper public bidding procedures.
- **Louisiana Law Context: La. R.S. 38:2211 et seq. (Louisiana Public Bid Law)** sets strict monetary thresholds for public works (renovations/construction) and materials/supplies. These thresholds change periodically.

## Action Plan

- **Policy (Procurement Realignment):** Adopt a revised Purchasing and Procurement Policy that strips out any static internal dollar thresholds and explicitly pegs the District's limits directly to **La. R.S. 38:2212** (for Public Works) and **La. R.S. 38:2212.1** (for Materials and Supplies). Add a clause stating that the policy automatically adjusts whenever the state legislature updates the statutory limits.
- **Protocol (Bidding Workflow):** Before any project is greenlit, the requesting department must fill out a *Procurement Threshold Worksheet* calculating the estimated cost. If it crosses the statutory line, a formal advertisement for bids must be managed through a designated compliance officer.
- **Control:** Require Legal Counsel sign-off on all contracts exceeding the lowest statutory threshold *before* execution to verify Bid Law compliance.

## 3. Compensation, Bonuses, & Severance (Findings 3 & 6)

- **The Issue:** Overpayment of accrued vacation to a former CEO; payment of unapproved/retroactive employee bonuses.
- **Louisiana Law Context: Article VII, Section 14(A) of the Louisiana Constitution** strictly prohibits the funds, credit, property, or things of value of the state or any political subdivision from being loaned, pledged, or donated to any person. Retroactive bonuses or payments outside of strict policy are considered unconstitutional donations of public funds.

## Action Plan

- **Policy (Compensation & HR):**
  1. Adopt a strict **Anti-Gratuity Policy** that explicitly bans any retroactive performance bonuses, retention payments after-the-fact, or discretionary separation payouts.
  2. Implement a **Prospective Retention Policy** allowing only clearly defined, forward-looking incentive/retention structures approved by the Board *before* the work is performed.

- **Protocol (Separation & Payouts):** Create an HR offboarding protocol requiring a dual-calculation method for final leave payouts (accrued vs. used).
- **Control (The CEO Finding Fix):** For Finding #3, formally transmit a public records request or official letter to the District Attorney requesting the final written "no violation/matter closed" closure letter. Scan and attach this letter directly to the audit resolution file. For future executive payouts, require the outside accounting firm to audit the calculation against the contract *before* cutting the final check.

#### **4. Public Funds & Community Contributions (Finding 5)**

- **The Issue:** Spending nearly \$150,000 on community events without documented, equivalent value coming back to the District.
- **Louisiana Law Context:** Under Article VII, Section 14, and the Louisiana Supreme Court *Coviello* test, public expenditures for community support must meet three criteria: (1) public purpose, (2) the expenditure doesn't appear to be a donation, and (3) a reasonable expectation of receiving equal value.

#### **Action Plan**

- **Policy (Public Expenditures):** Ban all direct donations, sponsorships, and handouts to individuals or generic events.
- **Protocol (Cooperative Endeavor Agreements):** Every dollar spent on community outreach must be funneled through a formal **Cooperative Endeavor Agreement (CEA)**. The CEA template must include a mandatory section titled "*Commensurate Public Benefit Valuation*."

*Example:* If the District provides \$10,000 to a non-profit, the CEA must legally bind that non-profit to deliver a specific number of medical screenings or healthcare services to District residents, valued at \$10,000 or more.

- **Control:** The Chief Financial Officer must review and sign an economic justification form for every CEA proving the "commensurate value" exchange before funds are disbursed.

#### **5. Governance & Public Access (Findings 7, 8, 9, & 10)**

- **The Issue:** Failures in Public Records Law compliance, Open Meetings Law documentation (Executive Sessions), and Dual Employment rules.
- **Louisiana Law Context:** **La. R.S. 44:1 et seq.** (Public Records), **La. R.S. 42:11 et seq.** (Open Meetings), and **La. R.S. 42:61 et seq.** (Dual Employment).

## Action Plan

### GOVERNANCE COMPLIANCE

| Public Records | • Appoint an official Public Records Custodian. Mr. Quincy Richard, Compliance Officer

| (La. R.S. 44) | • Protocol: Log all requests upon receipt. If data |  
| | isn't ready, issue a formal 3-day statutory written notice certifying  
availability date.

| Open Meetings | • Protocol: If entering a closed Executive Session |  
| (La. R.S. 42) | for litigation, the public notice and minutes |  
| | MUST list the formal lawsuit title, case number, and court jurisdiction.

| Dual Employment | • Policy: Require all employees to sign an annual  
| (La. R.S. 42:61) disclosure form identifying any other government or public sector  
employment.