



PETE CERVINKA  
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY  
**DEPARTMENT OF DEVELOPMENTAL SERVICES**

1215 O Street, Sacramento, CA 95814 • [www.dds.ca.gov](http://www.dds.ca.gov)



GAVIN NEWSOM  
GOVERNOR

April 8, 2026

Patricia Gonzales, Board President  
San Gabriel/Pomona Valleys Developmental Services, Inc.  
75 Rancho Camino Drive  
Pomona, CA 91766

Dear Patricia Gonzales:

The Department of Developmental Services' (Department) Audit Services Branch has completed the audit of the San Gabriel/Pomona Regional Center (SG/PRC). The period of review was from July 1, 2023, through June 30, 2025, with follow-up as needed into prior and subsequent periods. The enclosed report discusses the areas reviewed along with the findings and recommendations and includes the response submitted by SG/PRC in Appendix B.

If there is a disagreement with the audit findings, a written "Statement of Disputed Issues" may be filed with the Department's Audit Appeals Unit, pursuant to California Code of Regulations, Title 17, Section 50730, Request for Administrative Review (excerpt enclosed). The "Statement of Disputed Issues" must be filed and submitted within 30 days of receipt of this audit report to the address below:

Office of Legal Affairs  
Department of Developmental Services  
P.O. Box 944202  
Sacramento, CA 94299-9974

The cooperation of SG/PRC's staff in completing the audit is appreciated.

Patricia Gonzales, Board President  
April 8, 2026  
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If you have any questions regarding the audit report, please contact Edward Yan,  
Branch Chief, Audit Services Branch, at (916) 651-8207, or via email at  
[Ed.Yan@dds.ca.gov](mailto:Ed.Yan@dds.ca.gov).

Sincerely,

*Jim Knight*

JIM KNIGHT  
Deputy Director  
Administration Division

Attachment(s)

cc: See next page

Patricia Gonzales, Board President  
April 8, 2026  
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cc: Dr. Jesse Weller, San Gabriel/Pomona Regional Center  
Dara Mikesell, San Gabriel/Pomona Regional Center  
Carla Castañeda, Department of Developmental Services  
Dr. Michi A. Gates, Department of Developmental Services  
Hiren Patel, Department of Developmental Services  
Ernie Cruz, Department of Developmental Services  
Jacqueline Gaytan, Department of Developmental Services  
Edward Yan, Department of Developmental Services  
Luciah Ellen Nzima, Department of Developmental Services  
Dong Le, Department of Developmental Services

**California Code of Regulations**  
**Title 17, Division 2**  
**Chapter 1 - General Provisions**  
**Subchapter 7 - Fiscal Audit Appeals**  
**Article 2 - Administrative Review**

**§50730.** Request for Administrative Review.

a) An individual, entity, or organization which disagrees with any portion or aspect of an audit report issued by the Department or regional center may request an administrative review. The appellant's written request shall be submitted to the Department within 30 days after the receipt of the audit report. The request may be amended at any time during the 30-day period.

(b) If the appellant does not submit the written request within the 30-day period, the appeals review officer shall deny such request, and all audit exceptions or findings in the report shall be deemed final unless the appellant establishes good cause for late filing.

(c) The request shall be known as a "Statement of Disputed Issues." It shall be in writing, signed by the appellant or his/her authorized agent, and shall state the address of the appellant and of the agent, if any agent has been designated. An appellant shall specify the name and address of the individual authorized on behalf of the appellant to receive any and all documents, including the final decision of the Director, relating to proceedings conducted pursuant to this subchapter. The Statement of Disputed Issues need not be formal, but it shall be both complete and specific as to each audit exception or finding being protested. In addition, it shall set forth all of the appellant's contentions as to those exceptions or findings, and the estimated dollar amount of each exception or finding being appealed.

(d) If the appeals review officer determines that a Statement of Disputed Issues fails to state the grounds upon which objections to the audit report are based, with sufficient completeness and specificity for full resolution of the issues presented, he/she shall notify the appellant, in writing, that it does not comply with the requirements of this subchapter.

(e) The appellant has 15 days after the date of mailing of such notice within which to file an amended Statement of Disputed Issues. If the appellant does not amend his/her appeal to correct the stated deficiencies within the time permitted, all audit exceptions or findings affected shall be dismissed from the appeal, unless good cause is shown for the noncompliance.

(f) The appellant shall attach to the Statement of Disputed Issues all documents which he/she intends to introduce into evidence in support of stated contentions. An appellant that is unable to locate, prepare, or compile such documents within the appeal period specified in Subsection (a) above, shall include a statement to this effect in the Statement of Disputed Issues. The appellant shall have an additional 30 days after the expiration of the initial 30-day period in which to submit the documents. Documents that are not submitted within this period shall not be accepted into evidence at any stage of the appeal process unless good cause is shown for the failure to present the documents within the prescribed period.



PETE CERVINKA  
DIRECTOR

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**DEPARTMENT OF DEVELOPMENTAL SERVICES**  
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GAVIN NEWSOM  
GOVERNOR

# **AUDIT OF THE SAN GABRIEL/POMONA REGIONAL CENTER FOR FISCAL YEARS 2023-24 AND 2024-25**

**April 8, 2026**

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## **DEPARTMENT TEAM**

Jim Knight, Deputy Director, Administration  
Edward Yan, Branch Chief, Audit Services Branch  
Luciah Ellen Nzima, Section Chief, Regional Center Audit Services Section  
Dong Le, Supervisor, Regional Center Audit Services Section  
Audit Staff: Meera Ramakrishnan, Rajiv Raman, and Shoua Vue

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## **RESTRICTED USE**

This audit report is solely for the information and use of the Department of Developmental Services (Department), the Centers of Medicare and Medicaid Services, the Department of Health Care Services, and the Regional Center. This restriction does not limit distribution of this audit report, which is a matter of public record.

## **EXECUTIVE SUMMARY**

The Department conducted a fiscal compliance audit of San Gabriel/Pomona Regional Center (SG/PRC) to assess compliance with the requirements set forth in the Lanterman Developmental Disabilities Services Act and Related Laws/Welfare and Institutions Code (WIC); the Home and Community-based Services (HCBS) Waiver for the Developmentally Disabled; California Code of Regulations (CCR), Title 17; Federal Office of Management and Budget (OMB) Circulars A-122 and A-133; and the contract with the Department. Overall, the audit indicated that the Regional Center maintains accounting records and supporting documentation for transactions in an organized manner.

The audit period was July 1, 2023, through June 30, 2025, with follow-up, as needed, into prior and subsequent periods. This report identifies some areas where the Regional Center's administrative and operational controls could be strengthened, but none of the findings were of a nature that would indicate systemic issues or constitute major concerns regarding the Regional Center's operations.

A follow-up review was performed to determine whether the Regional Center has taken corrective action to resolve the finding identified in the prior Department audit report. The results of the follow-up can be found in the Conclusions section.

### **Findings that have been corrected:**

- Finding 1: Rate Reform Implementation Issues – SG/PRC needs to adjust the rates paid to four vendors. However, SG/PRC subsequently adjusted the rates for all four vendors after audit fieldwork.
- Finding 2: Overstated Claims – SG/PRC overpaid six vendors a total of \$5,520.78 due to duplicate payments or overlapping authorizations. SG/PRC has since recovered this full amount.

## **BACKGROUND**

The Department and San Gabriel/Pomona Valleys Developmental Services, Inc. entered into State Contract HD199018, effective July 1, 2019, through June 30, 2026. This contract specifies that San Gabriel/Pomona Valleys Developmental Services, Inc. will operate an agency known as SG/PRC to provide services to individuals with intellectual and developmental disabilities and their families. The contract is funded by State and federal funds that are dependent upon the Regional Center performing certain tasks, providing services to eligible individuals, and submitting billings to the Department.

This audit was conducted from August 4, 2025, through September 11, 2025, by the Audit Services Branch of the Department.

## **AUTHORITY**

The audit was conducted under the authority of the WIC, Section 4780.5 and the State Contract between the Department and the Regional Center.

## **CRITERIA**

The following criteria were used for this audit:

- WIC,
- Approved Application for the HCBS Waiver for the Developmentally Disabled,
- CCR, Title 17,
- OMB Circulars A-122 and A-133, and
- The State Contract between the Department and the Regional Center, effective July 1, 2019.

## **VIEWS OF RESPONSIBLE OFFICIALS**

The Department issued the draft audit report on February 12, 2026. The findings in the draft audit report were discussed at a formal exit conference on February 18, 2026. The views of responsible officials are included in this final audit report.

## **CONCLUSIONS**

Based upon the audit procedures performed, the Department has determined that except for the items identified in the Findings and Recommendations section, the Regional Center was in compliance with applicable audit criteria.

The costs claimed during the audit period were for program purposes and adequately supported.

From our review of the prior Department audit finding, it has been determined that the Regional Center has taken appropriate corrective action to resolve the finding.

# FINDINGS AND RECOMMENDATIONS

## Findings that have been corrected.

### Finding 1: Rate Reform Implementation Issues

Rates for four vendors of transportation, additional component (service code 880) were found to have been calculated assuming more than two trips per day for each individual. This was due in part because the rate reform workbooks and accompanying instructions issued by the Department did not identify the maximum number of trips per day. (See Attachment A)

The Department has since issued a revised directive on October 28, 2025, providing additional guidance to regional centers regarding the rate reform implementation for transportation services which states in part:

“Transportation – Additional Component (service code 880)

#### New Components

- Billing: Providers will bill services for each individual, per one-way trip associated with transporting the individual to or from the day service program, for a maximum of two one-way trips per day per individual.”

SG/PRC has subsequently adjusted the rates, assuming the maximum number of two one-way trips per day per individual for all four vendors after audit fieldwork.

### Recommendation:

SG/PRC must review all transportation, additional component, service code 880 vendors to verify that the rates are calculated based on the maximum of two trips per day per revised directive.

### Finding 2: Overstated Claims

The review of the Operational Indicator Reports revealed eight instances in which SG/PRC overpaid six vendors a total of \$5,520.78 due to duplicate payments or overlapping authorizations. SG/PRC indicated the Operational Indicator Reports are reviewed every two months but did not provide written procedures. SG/PRC indicated this occurred due to a lack of oversight on its part when its staff did not identify the erroneous payments during its review of the Operational Indicator Reports. SG/PRC has since recovered this full amount.

CCR, Title 17, Section 57300(c)(2) states:

“(c) Regional Centers shall not reimburse vendors:

(2) For services in an amount greater than the rate established pursuant to these regulations.”

**Recommendation:**

SG/PRC must review all Operational Indicator Reports and promptly correct all erroneous payments that may have occurred while conducting business with its vendors. In addition, SG/PRC should re-evaluate its current review process of the Operational Indicator Reports to identify whether additional procedures should be developed. Lastly, SG/PRC must develop written procedures so that its staff can monitor the Operational Indicator Reports for duplicate payments and overlapping authorizations.

## EVALUATION OF RESPONSE

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The Regional Center reviewed the draft audit report and agreed with all findings and recommendations (see Appendix B). The Department will confirm that the appropriate corrective actions have been taken during the next scheduled audit, unless otherwise described.

**San Gabriel/Pomona Regional Center  
Rate Reform Implementation  
Fiscal Years 2023-24 & 2024-25**

<b>List of Vendors With More than Two Trips</b>				
<b>No.</b>	<b>Vendor Number</b>	<b>Vendor Name</b>	<b>Service Code</b>	<b>Number of Trips</b>
1	HL0760	Partners For Potential	880	3
2	HP0050	Link DB	880	3
3	HP6412	Link Community	880	3
4	HP6632	Mainstream Centers Inc.	880	4

## **APPENDIX A**

### **SCOPE, OBJECTIVES, AND METHODOLOGY**

The Department is responsible, under the WIC, for ensuring that persons with intellectual and developmental disabilities receive the services and supports they need to lead more independent, productive, and integrated lives. To secure these services and supports, the Department contracts with 21 private, nonprofit community agencies/corporations that provide fixed points of contact in the community for serving eligible individuals and their families in California. These fixed points of contact are referred to as Regional Centers. The Regional Centers are responsible under State law to help ensure that such persons receive access to the programs and services that are best suited to them throughout their lifetime.

The Department also is responsible for providing assurance to the federal Department of Health and Human Services, Centers for Medicare, and Medicaid Services, that services billed under California's HCBS Waiver program are provided and that criteria set forth for receiving funds have been met. As part of providing this assurance, the Audit Services Section conducts fiscal compliance audits of each Regional Center no less than every two years and completes follow-up reviews in alternate years.

In addition to the fiscal compliance audit, each Regional Center is monitored by the Department's Federal Programs Branch to assess overall programmatic compliance with HCBS Waiver requirements. The HCBS Waiver compliance monitoring review has its own criteria and processes. These audits and program reviews are an essential part of an overall Department monitoring system that provides information on the Regional Centers' fiscal, administrative, and program operations.

This audit was conducted as part of the overall Department monitoring system that provides information on the Regional Centers' fiscal, administrative, and program operations. The objectives of this audit were:

- To determine compliance with the WIC,
- To determine compliance with the provisions of the HCBS Waiver Program for the Developmentally Disabled,
- To determine compliance with CCR, Title 17 regulations,
- To determine compliance with OMB Circulars A-122 and A-133, and
- To determine that costs claimed were in compliance with the provisions of the State Contract between the Department and the Regional Center.

The audit was conducted in accordance with the Generally Accepted Government Auditing Standards issued by the Comptroller General of the United States. However, the procedures do not constitute an audit of the Regional Center's financial statements. The Department limited the scope to planning and performing audit procedures necessary to obtain reasonable assurance that the Regional Center was in compliance with the objectives identified above.

The Department review of the Regional Center's internal control structure was conducted to gain an understanding of the transaction flow and the policies and procedures, as necessary, to develop appropriate auditing procedures.

The Department reviewed available annual audit report(s) that were conducted by an independent Certified Public Accounting firm. This review was performed to determine the impact, if any, upon the Department audit and, as necessary, develop appropriate audit procedures.

The audit procedures performed included the following:

**I. Purchase of Service**

The Department selected a sample of Purchase of Service (POS) claims billed to the Department. The sample included individual services and vendor rates. The sample also included individuals who were eligible for the HCBS Waiver Program. For POS claims, the following procedures were performed:

- The Department tested the sample items to determine if the payments made to service providers were properly claimed and could be supported by appropriate documentation.
- The Department selected a sample of invoices for service providers with daily and hourly rates, standard monthly rates, and mileage rates to determine if supporting attendance documentation was maintained by the Regional Center. The rates charged for the services provided to individuals were reviewed to ensure compliance with the provision of the WIC; the HCBS Waiver for the Developmentally Disabled; CCR, Title 17, OMB Circulars A-122 and A-133; and the State Contract between the Department and the Regional Center.
- If applicable to this audit, the Department selected a sample of Individual Trust Accounts to determine if there were any unusual activities and whether any account balances exceeded \$2,000, as prohibited by the Social Security Administration. In addition, the Department determined if any retroactive Social Security benefit payments received exceeded the \$2,000 resource limit for longer than nine months. The Department also reviewed these accounts to ensure that the interest earnings were distributed quarterly, personal and incidental funds were paid before the 10th of each month, and proper documentation for expenditures was maintained.
- The Department analyzed all bank accounts to determine whether the Department had signatory authority, as required by the State Contract with the Department.

- The Department selected a sample of bank reconciliations for Operations (OPS) accounts and Individual Trust bank accounts to determine if the reconciliations were properly completed on a monthly basis.

## **II. Regional Center Operations**

The Department selected a sample of OPS claims billed to the Department to determine compliance with the State Contract. The sample included various expenditures claimed for administration that were reviewed to assure that accounting staff properly input data, transactions were recorded on a timely basis, and expenditures charged to various operating areas were valid and reasonable. The following procedures were performed:

- A sample of the personnel files, timesheets, payroll ledgers, and other support documents were selected to determine if there were any overpayments or errors in the payroll or the payroll deductions.
- A sample of OPS expenses, including, but not limited to, purchases of office supplies, consultant contracts, insurance expenses, and lease agreements were tested to determine compliance with CCR, Title 17, and the State Contract.
- A sample of equipment was selected and physically inspected to determine compliance with requirements of the State Contract.
- The Department reviewed the Regional Center's policies and procedures for compliance with the Department Conflict of Interest regulations, and the Department selected a sample of personnel files to determine if the policies and procedures were followed.

## **III. Targeted Case Management (TCM) and Regional Center Rate Study**

The TCM Rate Study determines the Department rate of reimbursement from the federal government. The following procedures were performed upon the study:

- The Department examined the two TCM Rate Studies submitted to the Department during the audit period and traced the reported information to source documents.
- A review of the recent Case Management Time Study (required to be submitted every three years) is conducted if the study was not reviewed during the prior audit. The Department selected a sample of the Case Management Time Study Forms (DS 1916) for examination and reconciled them to the corresponding payroll timesheets to ensure that the forms were properly completed and supported.

#### **IV. Service Coordinator Caseload Survey**

Under the WIC, Section 4640.6(e), Regional Centers are required to provide service coordinator caseload data to the Department. The Department verified that the documentation was maintained to support the service coordinator caseload survey ratios.

#### **V. Early Intervention Program (EIP; Part C Funding)**

For the EIP, there are several sections contained in the Early Start Plan. However, only the Part C section was applicable for this review.

#### **VI. Parental Fee Program (PFP)**

The PFP was created for the purpose of prescribing financial responsibility to parents of children under the age of 18 years who are receiving 24-hour, out-of-home care services through a Regional Center or who are residents of a state hospital or on leave from a state hospital. Parents shall be required to pay a fee depending upon their ability to pay, but not to exceed (1) the cost of caring for a child without DD at home, as determined by the Director of the Department, or (2) the cost of services provided, whichever is less. To determine compliance with the WIC Section 4784, the Department requested a list of PFP assessments and verified the following:

- Identified all children with DD who are receiving the following services:
  - (a) All 24-hour, out-of-home community care received through a Regional Center for children under the age of 18 years;
  - (b) 24-hour care for such minor children in state hospitals;
  - (c) provided, however, that no ability to pay determination may be made for services required by state or federal law, or both, to be provided to children without charge to their parents.
- Provided the Department with a listing of new placements, terminated cases, and client deaths for those clients. Such listings must be provided not later than the 20th day of the month following the month of such occurrence.
- Informed parents of children who will be receiving services that the Department is required to determine parents' ability to pay and to assess, bill, and collect parental fees.

- Provided parents a package containing an informational letter, a Family Financial Statement, and a return envelope within 10 working days after placement of a minor child.
- Provided the Department a copy of each informational letter given or sent to parents, indicating the addressee and the date given or mailed.

## **VII. Procurement**

The Request for Proposal (RFP) process was implemented so that Regional Centers outline the vendor selection process when using the RFP process to address individual service needs. As of January 1, 2011, the Department requires Regional Centers to document their contracting practices, as well as how particular vendors are selected to provide individual services. By implementing a procurement process, Regional Centers will ensure that the most cost-effective service providers, amongst comparable service providers, are selected, as required by the Lanterman Act and the State Contract. To determine whether the Regional Center implemented the required RFP process, the Department performed the following procedures during the audit review:

- Reviewed the Regional Center's contracting process to ensure the existence of a Board-approved procurement policy and to verify that the RFP process ensures competitive bidding, as required by Article II of the State Contract, as amended.
- Reviewed the RFP contracting policy to determine whether the protocols in place included applicable dollar thresholds and comply with Article II of the State Contract, as amended.
- Reviewed the RFP notification process to verify that it is open to the public and clearly communicated to all vendors. All submitted proposals are evaluated by a team of individuals to determine whether proposals are properly documented, recorded, and authorized by appropriate officials at the Regional Center. The process was reviewed to ensure that the vendor selection process is transparent and impartial and avoids the appearance of favoritism. Additionally, the Department verified that supporting documentation is retained for the selection process and, in instances where a vendor with a higher bid is selected, written documentation is retained as justification for such a selection.

The Department performed the following procedures to determine compliance with the State Contract:

- Selected a sample of Operations, Community Placement Plan, and negotiated POS contracts subject to competitive bidding to ensure the

Regional Center notified the vendor community and the public of contracting opportunities available.

- Reviewed the contracts to ensure that the Regional Center has adequate and detailed documentation for the selection and evaluation process of vendor proposals and written justification for final vendor selection decisions and that those contracts were properly signed and executed by both parties to the contract.

In addition, the Department performed the following procedures:

- To determine compliance with the WIC, Section 4625.5: Reviewed to verify that the Regional Center has a written policy requiring the Board to review and approve any of its contracts of two hundred fifty thousand dollars (\$250,000) or more before entering into a contract with the vendor.
- Reviewed the Regional Center Board-approved Operations, Start-Up, and POS vendor contracts of \$250,000 or more, to verify that the inclusion of a provision for fair and equitable recoupment of funds for vendors that cease to provide services to individuals; verified that the funds provided were specifically used to establish new or additional services to individuals, the usage of funds is of direct benefit to individuals, and the contracts are supported with sufficiently detailed and measurable performance expectations and results.

The process above was conducted in order to assess the current RFP process and Board approval for contracts of \$250,000 or more, as well as to determine whether the process in place satisfies the WIC and State Contract requirements.

### **VIII. Statewide/Regional Center Median Rates**

The Statewide and Regional Center Median Rates were implemented on July 1, 2008, and amended on December 15, 2011, July 1, 2016, and April 1, 2022. Regional Centers may not negotiate rates higher than the set median rates for services. Despite the median rate requirement, rate increases can be obtained from the Department under health and safety exemptions where Regional Centers demonstrate the exemption is necessary for the health and safety of the individuals.

To determine compliance with the Lanterman Act, the Department performed the following procedures during the audit review:

- Reviewed sample vendor files to determine whether the Regional Center is using appropriately vendorized service providers and correct service codes and is paying authorized contract rates and complying with the median rate requirements of WIC Section 4691.9.

- Reviewed vendor contracts to verify that the Regional Center is reimbursing vendors using authorized contract median rates and verified that rates paid represented the lower of the statewide or Regional Center median rate set after June 30, 2008. Additionally, the Department verified that providers vendorized before June 30, 2008, did not receive any unauthorized rate increases, except in situations where required by regulation, or health and safety exemptions were granted by the Department.
- Reviewed vendor contracts to verify that the Regional Center did not negotiate rates with new service providers for services which are higher than the Regional Center's median rate for the same service code and unit of service, or the statewide median rate for the same service code and unit of service, whichever is lower. The Department also verified that units of service designations conformed with existing Regional Center designations or, if none exists, checked that units of service conformed to a designation used to calculate the statewide median rate for the same service code.

**IX. Other Sources of Funding from the Department**

Regional Centers may receive other sources of funding from the Department. The Department performed sample tests on identified sources of funds from the Department to ensure the Regional Center's accounting staff were inputting data properly, and that transactions were properly recorded and claimed. In addition, tests were performed to determine if the expenditures were reasonable and supported by documentation. The sources of funding from the Department identified in this audit may include:

- Community Placement Plan;
- Part C – Early Start Program;
- Family Resource Center;
- Foster Grandparent;
- Senior Companion;
- Mental Health Services Act;
- HCBS Compliance;
- Language Access and Cultural Competency Program; and
- Enhanced Community Integration for Children and Adolescents.

**X. Follow-up Review on Prior Department Audit Finding(s)**

As an essential part of the overall Department monitoring system, a follow-up review of prior Department audit finding(s) was conducted, if applicable. The Department identified prior audit finding(s) and reviewed supporting documentation to determine the degree of completeness of implementation of corrective actions.

**APPENDIX B**

**SAN GABRIEL/POMONA REGIONAL CENTER'S  
RESPONSE  
TO THE AUDIT FINDINGS**



San Gabriel / Pomona  
Regional Center

March 20, 2026

Mr. Edward Yan, Manager, Audit Branch  
Department of Development Services  
1215 O Street  
Sacramento, CA 95814

RE: **Response to Department of Development Services (DDS) audit of San Gabriel Pomona Regional Center for Fiscal Years 2023-24 and 2024-25**

Dear Mr. Yan,

San Gabriel/Pomona Regional Center wishes to thank the Department of Developmental Services (DDS) audit team for their professionalism and collaboration with SG/PRC's staff during this audit. Please accept this correspondence as our formal response to the draft audit report dated February 12, 2026. This report was discussed during our exit meeting on February 18, 2026, via Zoom. SG/PRC agrees with the auditors' findings. Our response is listed below:

**DDS Finding 1: Rate Reform Implementation Issues**

The rates for the identified transportation vendors have been changed to service code 880 subcodes ONO and OSO, in accordance with the description by DDS's Rate Reform Directive. As of the date of this letter, all transportation rates have been updated accordingly. Specifically, the rates for HP0050, HP6412 and HP6632 were updated effective 3/1/25 and 10/1/25 for HL0760.

**DDS Finding 2: Overstated Claims**

Upon receipt of the Operational Indicator Reports from DDS, SG/PRC reviewed and recovered the overstated claims. All supporting documentation was provided to the auditors prior to issuing the draft audit report. SG/PRC has since updated its internal controls and policies related to the Operational Indicator Reports. From this point forward, the Operational Indicator Reports will be reviewed monthly.

We are committed to ensuring that our internal controls and procedures remain compliant with regulations. We appreciate the opportunity to include our response in the final audit report.

If you have any questions or need additional information, please contact me.

Sincerely,

Dara Mikesell  
Chief Financial Officer

Cc: Dr. Jesse Weller, Executive Director