MID-CUMBERLAND COMMUNITY

ACTION AGENCY, INC.

AUDITED FINANCIAL STATEMENTS

AND OTHER INFORMATION

JUNE 30, 2018 AND 2017

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MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. DIRECTORY OF BOARD MEMBERS AND MANAGEMENT (UNAUDITED) JUNE 30, 2018

BOARD MEMBERS

Ms. Linda Hardymon, Chairman

Ms. Katie Wilson, Vice-Chairman

Mr. Daryl Eubanks, Treasurer

Ms. Christie Sprinkles, Secretary

Mr. Jeff Bennett

Mr. Sam Bancroft

Ms. Marilyn Bryant

Ms. Julie Brockman

Mr. Jeff Coker

Mr. Ben Dean

Ms. Elizabeth Dickerson

Ms. Carla Frizzle

Mr. James Hubbard

Ms. Misty Keenan

Mr. Cleon McLeod

Mr. Bill Munson

Mr. Chris Orndorff

Mr. Steve Paxton

Ms. Joannie Summers

Mr. Robert Springer

Mr. Mike Weber

MANAGEMENT

Ms. Debra Holmes, Executive Director

Ms. Michelle Burroughs, Finance Director

Ms. Janet Ogles, Head Start Director

Ms. Andrea Stanley, Low Income Home Energy Assistance Program Director

Ms. Joyce Caldwell, Community Services Block Grant Director

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INDEPENDENT AUDITOR'S REPORT

Board of Directors Mid-Cumberland Community Action Agency, Inc. Lebanon, Tennessee

Report on the Financial Statements

We have audited the accompanying financial statements of Mid-Cumberland Community Action Agency, Inc. (the Agency) (a nonprofit organization), which comprise the statements of financial position as of June 30, 2018 and 2017, and the related statements of activities, functional expenses, and cash flows for the years then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to on the previous page present fairly, in all material respects, the financial position of the Agency as of June 30, 2018 and 2017, and the changes in its net assets and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Other Matters

Other Information

Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards and state financial assistance, as required by Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, is presented for purposes of additional analysis and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated, in all material respects, in relation to the financial statements as a whole.

The introductory section listed in the table of contents is presented for purposes of additional analysis and is not a required part of the financial statements. The directory of board members and management has not been subjected to the auditing procedures applied in the audit of the basic financial statements and, accordingly, we do not express an opinion or provide any assurance on it.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated December 28, 2018, on our consideration of the Agency's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to solely describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Agency's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Agency's internal control over financial reporting and compliance.

Stone Rudolph & Henry, PLC

Clarksville, Tennessee December 28, 2018

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. STATEMENTS OF FINANCIAL POSITION JUNE 30, 2018 AND 2017

ASSETS

	2018	2017
CURRENT ASSETS		
Cash and cash equivalents		
Restricted	\$ 19,382	\$ 96,991
Unrestricted	93,836	15,255
Federal grants receivable	954,016	1,272,109
Prepaid expenses	34,584	22,579
Inventory	40,823	54,312
Investments	21,208	18,954
Current portion of prepaid rent	67,753	67,753
Total current assets	1,231,602	1,547,953
PROPERTY AND EQUIPMENT		
Building	1,093,199	1,093,199
Furniture and equipment	531,167	531,167
Vehicles	1,657,400	1,540,197
Total property and equipment	3,281,766	3,164,563
Less: Accumulated depreciation	2,535,904	2,398,516
Net property and equipment	745,862	766,047
OTHER ASSETS		
Prepaid rent, less current portion	142,484	210,237
Total assets	\$ 2,119,948	\$ 2,524,237
LIABILITIES AND NET ASSETS		
CURRENT LIABILITIES		
Accounts payable	\$ 321,449	\$ 592,335
Accrued expenses	267,928	226,177
Unearned revenue - federal grants	47,145	58,923
Advances from grantors	48,679	45,245
Total current liabilities	685,201	922,680
NET ASSETS		
Temporarily restricted	918,397	1,319,244
Unrestricted	516,350	282,313
Total net assets	1,434,747	1,601,557
Total liabilities and net assets	\$ 2,119,948	\$ 2,524,237

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. STATEMENTS OF ACTIVITIES YEARS ENDED JUNE 30, 2018 AND 2017

	2018	2017
UNRESTRICTED NET ASSETS		
Revenue:		
Gifts in-kind	\$ 278,549	\$ 275,953
Investment income	217	111
Total unrestricted support	278,766	276,064
Net assets released from restrictions:		
Restrictions satisfied by grant compliance	15,754,889	14,669,800
Total unrestricted support and reclassifications	16,033,655	14,945,864
Expenses:		
Program services	15,073,936	14,600,517
Supporting services	722,213	569,983
Total expenses	15,796,149	15,170,500
Change in unrestricted net assets	237,506	(224,636)
TEMPORARILY RESTRICTED NET ASSETS		
Federal and state grants	15,282,133	14,775,853
Local grants, contributions and other revenue	71,909	242,490
Net assets released from restrictions:		
Restrictions satisfied by grant compliance	(15,754,889)	(14,669,800)
Change in temporarily restricted net assets	(400,847)	348,543
OTHER INCOME (EXPENSE)		
Gain on sale of investments	40	-
Gain (loss) on disposal of property and equipment	(3,509)	8,515
Total other income (expense)	(3,469)	8,515
Change in net assets	(166,810)	132,422
NET ASSETS - BEGINNING OF YEAR	1,601,557	1,469,135
NET ASSETS - END OF YEAR	\$ 1,434,747	\$ 1,601,557

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. STATEMENT OF FUNCTIONAL EXPENSES YEAR ENDED JUNE 30, 2018

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					Pro	Program Services				Ė	
	Community	Low-	Low-Income	;	•	Emergency	1		; ;	tar Ctort	tarly Head
	Services	Home	Home Energy	Weath	Weatherization	Food	Неад		Early	Start	Start child care
	Block Grant	Assi	Assistance	Assi	Assistance	Assistance	Start	포 	Head Start	Part	Partnership
									4	٠,	000
Salaries/wages	\$ 487,046	·s	248,802	ᡐ	66,326	\$ 21,383	\$ 4,519,899	99 \$	513,093	小	604,299
Employee benefits	203,422		80,456		24,284	8,384	1,589,066	99	177,439		261,154
Total personnel	690,468		329,258		90,610	29,767	6,108,965	65	690,532		865,453
Client assistance	777,777		1,942,776		179,352	347,009		F	1		•
Communications	40,901		5,238		1,115	1,949	99,810	10	5,022		2,173
Contracted services	13,001		2,764		1,198	36,975	382,233	33	4,484		177,002
In-kind	I		4		1	,	278,549	49	•		
Insurance	3,395		9,978		1,791	353	71,294	94	6,122		4,258
Maintenance	4,842		2,737		302	ı	319,978	78	15,303		6,632
Occupancy	81,846		40,349		9,864	9,362	276,680	80	20,956		ı
Other	3,501		9,902		1	ı	25,996	96	1,264		83
Professional services	3,436		6,396		1,029	280	19,716	16	2,160		3,621
Supplies	73,342		48,455		2,249	6,465	585,331	31	38,064		44,338
Training and seminars	11,217		684		1,624	1	94,775	75	14,182		60,677
Travel	27,182		7,205		5,711	4,086	49,166	99	3,046		7,545
	1,230,908		2,405,742		294,845	436,246	8,312,493	93	801,135	ਜ	1,171,782
Denreciation	1		1		ı	t		1	t		1
Total functional expenses \$ 1,230,908	\$ 1,230,908	\$	2,405,742	\$	294,845	\$ 436,246	\$ 8,312,493	93 \$	801,135	\$ 1	1,171,782

(Continued) The accompanying notes are an integral part of the financial statements.

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MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. STATEMENT OF FUNCTIONAL EXPENSES (CONT'D) YEAR ENDED JUNE 30, 2018

				Program Services				
	Child	-		Special	Private	Total		
	and Adult	Juft	Emergency	State	and Local	Program	Supporting	Total
	Care Food	poc	Food and Shelter	Grant	Assistance	Services	Services	Expenses
Saparios (mores	\$ 9	68.533	÷	· ·	\$ 42,301	\$ 6,571,682	\$ 324,942	\$ 6,896,624
Salatics/ wages	·	10 946	, ,	916	59,015	2,415,082	95,267	2,510,349
Eniployee benefits Total personnel	7	79,479	1	916	101,316	8,986,764	420,209	9,406,973
0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	17	174 017	2 948	,	29,941	2,953,820	ı	2,953,820
Client assistance	7	, 10,t	2: 2/2	6.015	330	162,553	3,934	166,487
Communications		7000	E		53	620,994	21,572	642,566
Contracted services		2,204		•	1	278,549	1	278,549
In-kind		1 601	ı	3.383	33	102,191	1,071	103,262
insurance		F, C 64	,	5,700	1	355,574	4,033	359,607
Waintenance		3	•	•	94	439,151	35,442	474,593
Occupancy			1	1	1	40,746	7,002	47,748
Other		1 066	ı	65	372	38,141	1,400	39,541
Proressional services		1,000	•	7.071	961	807,365	25,687	833,052
Supplies		T,000,1	,	•	1	184,109	17,146	201,255
Fraining and seminars		930	1	•	38	103,979	15,744	119,723
Iravei	76	261,549	2,948	23,150	133,138	15,073,936	553,240	15,627,176
		ı	•	,	•	,	168,973	168,973
חפטופרומווסיי								
Total functional expenses \$		261,549	\$ 2,948	\$ 23,150	\$ 133,138	\$ 15,073,936	\$ 722,213	\$ 15,796,149

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. STATEMENT OF FUNCTIONAL EXPENSES YEAR ENDED JUNE 30, 2017

				Pro	Program Services				Ĺ	1000
	Community	Low-Income		Weatherization	Emergency Food	Head		Early	Ea Start	Early Head Start Child Care
	Block Grant	Assistance		Assistance	Assistance	Start	He	Head Start	Pai	Partnership
							•	,	4	0
Salaries/Wages	\$ 439,987	\$ 172,972	372 \$	81,505	\$ 47,730	\$ 4,103,795	ᡐ	516,014	v>	616,589
Employee benefits	147,376	61,531	531	30,048	14,605	1,500,503		197,751		239,356
Total personnel	587,363	234,503	03	111,553	62,335	5,604,298		713,765		855,945
Officer actions	213.250	2.004.279	279	241,103	402,385	1		1		ŧ
Cilent assistance	202,613	14.036	386	713	1,972	92,334		4,788		415
Committee	10.314	7,4	4.019	655	30,461	362,547		1,300		182,776
COINTACTED SELVICES	- ! ;) ;		<u>'</u>	1	1	275,953		ı		Ē
In-Kind	A 176	16.398	398	1,253	364	69,302		10,324		4,410
Insurance	4,120) I	322	,	•	167,618		7,500		26,090
Maillenance	73.878	30.317	317	5,278	7,383	276,567		22,093		1
Occupancy	7747		5.103	1	30	35,436		3,721		680′9
Other Daffactional continue	2,7.47	7	4.981	618	275	17,139		2,043		3,703
Professional services	33 083	113	13.326	1,977	1,455	240,243		41,819		436,388
Supplies	3 803		, , !	3,621	17	98,850		14,328		47,175
Trayol	19,677	10,	10,457	5,746	2,545	86,413		1,711		5,481
מאַ	989,586	2,437,741	741	372,517	509,222	7,326,700		823,392		1,568,472
Denreciation	1		1	•	-			1		•
Total functional expenses	\$ 989,586	\$ 2,437,741] 	\$ 372,517	\$ 509,222	\$ 7,326,700	\$	823,392	٠	1,568,472

(Continued)

The accompanying notes are an integral part of the financial statements.

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. STATEMENT OF FUNCTIONAL EXPENSES (CONT'D) YEAR ENDED JUNE 30, 2017

	Pild	Emergency	Rural Spe	Special	Private	Total		
	and Adult	Food and	Housing	State	and Locai	Program	Supporting	Total
	Care Food	Shelter	Preservation Grant	Grant	Assistance	Services	Services	Expenses
2020///2017/20	\$ 80.806	·	\$ 1,094	- ج	\$ 19,314	\$ 6,079,806	\$ 276,200	\$ 6,356,006
Salaries/ wages		·		1,553	7,646	2,237,473	14,168	2,251,641
Ciliployee Delicitis Total personnel	117,529		1,475	1,553	26,960	8,317,279	290,368	8,607,647
	996 766	1 1	30.222	183	620'69	3,197,789	1	3,197,789
Client assistance	007'/67	. !		1.390	999	151,308	4,838	156,146
Communications	, ,,	t I	F	11.586	1	621,379	17,195	638,574
Contracted services	17,17	1	•		,	275,953	1	275,953
In-kind	, 07.7	1	1	119	827	108,801	839	109,640
Insurance	Τ'Ω'Τ		1	ŀ	357	206,029	3,103	209,132
Maintenance	I	· •	·	71	4,153	419,740	32,838	452,578
Occupancy	ı	o o	•	723	3,663	57,605	608'6	67,414
Other	, 66		10	16	215	32,249	23,145	55,394
Professional services	1,040 24,040	1 1	166	6.984	2,540	909,182	24,677	933,859
Supplies	31,201	,	•	500	1,275	169,569	8,867	178,436
Training and seminars	1		5	1,529	75	133,634	15,304	148,938
ravel	406,457	93	31,873	24,654	109,810	14,600,517	430,983	15,031,500
Donrociation	1	1	•	4	1	1	139,000	139,000
Total functional expenses	\$ 406,457	\$ 93	\$ 31,873	\$ 24,654	\$ 109,810	\$14,600,517	\$ 569,983	\$ 15,170,500
	••							

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. STATEMENTS OF CASH FLOWS YEARS ENDED JUNE 30, 2018 AND 2017

	 2018		2017
CASH FLOWS FROM OPERATING ACTIVITIES	 		
Change in net assets	\$ (166,810)	\$	132,422
Adjustments to reconcile change in net assets to net			
cash provided by operating activities:			
Depreciation expense	168,973		139,000
Unrealized gain on investments	(2,254)		(3,027)
Loss (Gain) on disposal of property and equipment	3,509		(8,515)
Changes in:			
Federal grants receivable	318,093		(359,079)
Prepaid expenses	(12,005)		(17,211)
Inventory	13,489		3,761
Prepaid rent	67,753		67,753
Accounts payable	(270,886)		230, 9 48
Accrued expenses	41,751		(51,400)
Deferred revenue - federal grants	(11,778)		(3,761)
Advances from grantors	3,434		15,147
Net cash provided by operating activities	 153,269		146,038
CASH FLOWS FROM INVESTING ACTIVITIES			
Proceeds from sale of property and equipment	-		16,824
Purchases of property and equipment	(152,297)		(228,592)
Net cash used in investing activities	 (152,297)		(211,768)
Met cash asea in investing determes	 		
NET CHANGE IN CASH AND CASH EQUIVALENTS	972		(65,730)
CASH AND CASH EQUIVALENTS - BEGINNING	 112,246	سند ينهو	177,976
CASH AND CASH EQUIVALENTS - ENDING	\$ 113,218	\$	112,246

During the years ended June 30, 2018 and 2017, the Agency received non-cash assistance recorded as gifts in-kind and program services totaling \$278,949 and \$275,953, respectively.

1. Summary of Significant Accounting Policies

Organization and Nature of Activities

Mid-Cumberland Community Action Agency, Inc. (the Agency) is a private, not-for-profit corporation located in Lebanon, Tennessee. The Agency was chartered in 1971 and is a quasi-governmental entity that provides health and educational assistance to low-income households. A board of directors (the Board) governs the Agency and its programs are carried out by staff members under the supervision of the Executive Director, who is appointed by the Board. The Agency operates community action and other human resource programs primarily aimed at the lower income population of selected counties in the middle Tennessee area. The main source of funding is federal government grants received either directly or through a similar department of the State of Tennessee.

The Agency is qualified as a tax-exempt organization under Section 501(c)(3) of the Internal Revenue Code. It has not been determined to be a private foundation and is considered by the Internal Revenue Service (IRS) to be a public charity. Accordingly, no provision for income taxes has been made. However, the Agency does file informational returns required by the IRS. The Agency is no longer subject to federal or state income tax examinations by tax authorities for fiscal years ended before June 30, 2015.

Use of Estimates

The Agency's financial statements are presented in accordance with accounting principles generally accepted in the United States of America which require the use of management's estimates and assumptions. Those estimates and assumptions affect the reported amounts of assets and liabilities, the disclosure of contingent liabilities, and the reported amounts of revenues and expenses. Actual results could differ from these estimates in the near term and these variances could have a material effect on these financial statements.

Basis of Accounting

Basis of accounting refers to when revenues and expenses are recognized in the accounts and reported in the financial statements. The Agency utilizes the accrual basis of accounting which recognizes revenues when earned and expenses when incurred. Operating revenues and expenses include those items that increase or decrease unrestricted net assets.

The Financial Accounting Standards Board (FASB) has established standards concerning contributions and financial statement presentation applicable to non-governmental not-for-profit organizations such as the Agency. These standards require that unconditional promises to give (pledges) be recorded as receivables and revenues and require the Agency to distinguish among contributions received for each net asset category in accordance with donor-imposed restrictions. A description of the three net asset categories follows:

1. Summary of Significant Accounting Policies (Cont'd)

Basis of Accounting (Cont'd)

Unrestricted

Unrestricted net assets are free of grant-imposed or donor-imposed restrictions. All revenues, gains and losses that are not temporarily or permanently restricted by grants or donors are included in this classification. All expenditures are reported in the unrestricted class of net assets since the use of restricted contributions in accordance with the grants' or donors' stipulations results in the release of the restriction.

Temporarily Restricted

Temporarily restricted net assets are limited as to use by grant-imposed or donor-imposed restrictions that expire with the passage of time or that can be satisfied by use for the specific purpose. The Agency's temporarily restricted net assets consisted of funds received or due from grantor agencies in excess of actual expenditures at June 30, 2018 and 2017.

Permanently Restricted

Permanently restricted net assets are amounts required by donors to be held in perpetuity, including gifts requiring that the principal be invested and the income or specific portions thereof be used for operations. The Agency had no permanently restricted net assets at June 30, 2018 and 2017.

Concentrations of Credit Risk/Funding

Financial instruments that potentially subject the Agency to significant concentrations of credit risk consist principally of cash and receivables. The Agency is exposed to credit risk by placing its cash in financial institutions. The Agency has mitigated this risk by placing its cash with federally-insured financial institutions. The Agency receives grants from both the federal and state government and local assistance from the City of Murfreesboro. Funding from these sources constituted 98.2% and 98.2% of revenues for the years ended June 30, 2018 and 2017, respectively. The Agency would have to greatly reduce services provided if assistance was significantly reduced. All outstanding grants receivable are from governmental agencies. The Agency does not obtain collateral for receivables.

Cash and Cash Equivalents

The Agency considers all highly-liquid debt instruments purchased with maturities of 90 days or less to be cash equivalents.

Investments

The Agency's investments consist of one mutual fund investment recorded at market value. At June 30, 2018 and 2017, the market value of the mutual fund was \$21,208 and \$18,954, respectively, with a cost basis of \$13,452.

1. Summary of Significant Accounting Policies (Cont'd)

Federal Grants Receivable

Grants receivable are stated at unpaid balances and consist of balances due from federal and state agencies as summarized in Note 3. Management has elected to use the direct write-off method which is not materially different from the allowance for uncollectible accounts method. It is the Agency's policy to charge off uncollectible receivables when management determines the receivable will not be collected. All receivable balances are considered by management to be fully collectible.

Inventory

Inventory consists of food for the Temporary Emergency Food Assistance Program. Inventory is valued at the per-unit value as determined by the State of Tennessee Department of Agriculture using the first-in, first-out method for financial statement reporting purposes and is included in temporarily restricted net assets.

Property and Equipment

Property and equipment, including leasehold improvements, are recorded at historical cost or, if contributed, at estimated fair values at the date of receipt. Property and equipment acquired with a unit cost greater than \$5,000 and a useful life of more than one year are capitalized. Expenditures for additions, major renovations and improvements are capitalized while those for maintenance and repairs are charged to expense as incurred. Capitalized assets are depreciated over their estimated useful lives using the straight-line method. Included in net property and equipment at June 30, 2018 and 2017 is \$672,102 and \$672,341, respectively, of assets purchased with restricted resources. If the Agency does not continue to use such assets in its Head Start operations, either the title to the assets or the proceeds from the sale of the assets will revert to the federal government.

Revenue Recognition

Grants and contributions received are recorded as unrestricted, temporarily restricted, or permanently restricted support, depending on the existence and/or nature of any restriction. Grant revenues are recognized as the related expenditures are incurred.

Functional Expenses

The costs of providing various programs and other activities have been summarized on a functional basis in the statements of functional expenses. Accordingly, certain costs have been allocated among the programs based on the revenue allotted to each of those programs.

Advertising Costs

The Agency expenses advertising costs as incurred.

Date of Management's Review

Subsequent events have been evaluated through December 28, 2018, which is the date the financial statements were available to be issued.

2. Cash and Cash Equivalents

Cash and cash equivalents were represented by deposits in financial institutions totaling \$352,507 and \$236,295, at June 30, 2018 and 2017, respectively, of which \$263,060 and \$236,295, respectively, was insured by the Federal Deposit Insurance Corporation (FDIC), and \$89,447 and \$-0-, respectively, was uninsured. Restricted cash represents unearned grant revenue and funds restricted for use in the Head Start program.

3. Federal Grants Receivable

Grants receivable consisted of the following amounts:

	2018	2017
Rural Housing Preservation Grant	\$ -	\$ 22,813
Child and Adult Care Food	7,595	7,940
Temporary Emergency Food Assistance	17,129	50,840
Federal Emergency Management Agency	93	93
Weatherization Assistance	155,739	210,277
Head Start Program	110,298	239,907
Low Income Home Energy Assistance	332,911	491,614
Community Services Block Grant	330,251	248,625
Total federal grants receivable	\$ 954,016	\$ 1,272,109

4. Unearned Revenue - Grants

Unearned grant revenue consisted of the following amounts:

		2018		2017
Temporary Emergency Food Assistance	\$	40,823	\$	54,312
Special State Grant	***************************************	6,322	******	4,611
Total unearned grant revenue	<u>\$</u>	47,145	\$	58,923

5. Advances

The Agency received the following advances from federal and state agencies:

		2018		2017
Low-Income Home Energy Assistance	\$	21,117	\$	30,803
Retired Senior Volunteer Program (RSVP)	***********	27,562	****	14,442
Total advances from grantors	<u>\$</u>	<u>48,679</u>	<u>\$</u>	45,245

These advances may be increased or decreased periodically as additional advances are received and partial payments are made. The balances are payable on demand.

6. Profit-Sharing Plan

The Agency has a defined contribution profit-sharing plan that covers full-time employees of the Agency over age 21 and having at least one year of service. Contributions to the plan are discretionary and are determined annually by the board of directors. The Board elected to contribute 5% of eligible compensation to the plan for the years ended June 30, 2018 and 2017. The amount of this contribution was \$299,940 and \$282,724, respectively.

7. Compensated Absences

The Agency advances vacation leave to employees at the beginning of each fiscal year on July 1. Unused vacation leave cannot be carried forward past the Agency's fiscal year-end except for the Head Start program. At June 30, 2018 and 2017, the estimated leave liability was \$23,605 and \$15,510, respectively.

8. In-Kind Support

The fair value of in-kind support is reflected in revenues and included in expenses in the following functional categories:

	 2018	 2017
Rent	\$ 278,549	\$ 275,953

A substantial number of unpaid volunteers have made significant contributions of their time to support the Agency's programs. No amounts have been recognized in the statement of activities because the criteria for recognition under FASB ASC Codification 958-605-50-1 have not been satisfied. However, the Agency does have various grant contracts with the U.S. Department of Health and Human Services that allow these types of in-kind contributions to be used for grant matching purposes. The Agency conducts a Head Start Program and Retired Senior Volunteer Program which require matching contributions of twenty percent for each program. Also, the Agency conducts an Emergency Shelter Program which requires matching contributions of fifty percent. The in-kind match support has been valued by the Agency at approximate minimum wage rate for salaries and at fair value for rent and supplies. The in-kind support used for matching purposes during the year ended June 30, 2018 consisted of the following:

	Head Start
Labor	\$ 2,309,737
Rent	1,030,334
Supplies	186,901
• •	<u>\$ 3,526,972</u>

The in-kind support used for matching purposes during the year ended June 30, 2017 consisted of the following:

	Head Start
Labor	\$ 1,876,113
Rent	1,108,190
Supplies	<u>159,192</u>
	\$ 3,143,495

9. Operating Leases

The Agency leases office space, classrooms, and equipment under operating leases. The total paid for these leases was \$376,958 and \$410,816 for the years ended June 30, 2018 and 2017, respectively. The Agency also leases storage facilities on a month-to-month basis as needed.

The Agency is a party to 20-year lease agreements for three of its Head Start facilities. The Agency made prepayments at the inception of these leases which are being amortized over the lives of the related leases and are recorded as an offset to the monthly lease payments. The remaining prepayment balance of \$210,237 and \$277,990 at June 30, 2018 and 2017, respectively, is classified as prepaid rent on the statements of financial position.

Future minimum lease payments are as follows:

Year Ending	
<u>June 30,</u>	Amount
2019	\$ 129,844
2020	93,420
2021	80,043
2022	49,089
2023	14,448

10. Contingencies

Funding for the Agency's programs is provided by federal, state, and local government agencies. These funds are to be used for designated purposes only. If, based on the grantor's review, the funds are considered not to have been used for the intended purpose, the grantors may request a refund of monies advanced or refuse to reimburse the Agency for its disbursements. The amount of such future refunds and unreimbursed disbursements, if any, is not expected to be significant. Continuation of the Agency's programs is predicated upon the grantor's satisfaction that the funds are being spent as intended and the grantor's intent to continue its programs.

11. Budget

The Agency prepares annual budgets for each program fund. Prior to the beginning of each budget year, the Agency's annual budget is approved by the Agency's governing body and is submitted to federal and state grantors for approval. Budgetary amendments require approval by the governing body and by federal and state grantors. All budgetary appropriations lapse at the end of each fiscal year.

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS AND STATE FINANCIAL ASSISTANCE MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. YEAR ENDED JUNE 30, 2018

Grant Number		Accrued			Accrued
Or Pass-Through	Federal	Receivable			Receivable
Grantor's	CFDA	(Payable)			(Payable)
Contract Number	Number	July 1, 2017	Receipts	Expenditures	June 30, 2018

	Or Pass-Through	Federal	Receivable			Receivable
Federal Grantor/Program Title	Grantor's Contract Number	C+DA Number	(Payable) July 1, 2017	Receipts	Expenditures	(Payable) June 30, 2018
U.S. Department of Agriculture Rural Housing Preservation Grant		10.433	\$ 22,813	\$ 22,813	\$	\$
Total Rural Housing Preservation Grant			22,813	22,813	**	
Passed through State of TN Department of Agriculture Child and Adult Care Food (16-17) Child and Adult Care Food (17-18)	55994 55994	10.558 10.558	7,940	34,322	26,382 389,853	- 7,595
Total Child and Adult Care Food			7,940	416,580	416,235	7,595
Temporary Emergency Food Assistance (16-17) Temporary Emergency Food Assistance (17-18)	45910 45910	10.568 10.568	50,840	67,085 54,499	16,245	17,129
Total Temporary Emergency Food Assistance			50,840	121,584	87,873	17,129
Non-Cash Assistance Temporary Emergency Food Assistance		10.569	(54,312)	333,520	347,009	(40,823)
Total U.S. Department of Agriculture			27,281	894,497	851,117	(16,099)
Federal Emergency Management Agency						
Federal Emergency Management Agency		97.024	93	÷		63
Total Federal Emergency Management Agency			93	1	1	93
U.S. Department of Energy Passed through Tennessee Housing Development Agency Weatherization Assistance (16-17) Weatherization Assistance (17-18)	WAP-15-09 31620-00339	81.042	210,277	210,277	300,333	155,739
Total U.S. Department of Energy			210,277	354,871	300,333	155,739

(Continued)

See accompanying notes to schedule of expenditures of federal awards and state financial assistance.

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS AND STATE FINANCIAL ASSISTANCE (CONT'D) YEAR ENDED JUNE 30, 2018

Federal Grantor/Program Title	Grant Number Or Pass-Through Grantor's Contract Number	Federal CFDA Number	Accrued Receivable (Payable) July 1, 2017	Receipts	Expenditures	Accrued Receivable (Payable) June 30, 2018
U.S. Department of Health and Human Services Head Start (16-17)	04CH4771/02	93.600	183,176		3,353,256	1
Head Start (17-18) Early Head Start Child Care Partnership (16-17)	04CH4771/03-03 04HP0024/01-02	93.600 93.600	56,731	ν, ·	5,926,146 301,902	74,841
Early Head Start Child Care Partnership (17-18)	04HP0024/02-01	93.600			933,631	35,457
Total Head Start		1	239,907	7 10,644,544	10,514,935	110,298
Passed Through State of TN Department of Human Services Community Services Block Grant (16-17) Community Services Block Grant (17-18)	Z-16-49111 Z-17-49111	93.569 93.569	248,625	5 248,625 - 938,890	1,269,141	330,251
Total Community Services Block Grant		•	248,625	5 1,187,515	1,269,141	330,251
Passed Through State of TN Housing Development Agency	000	0	7	n 2000		
Low Income Home Energy Assistance (16-17) I ow Income Home Energy Assistance (16-09)	48928 LWx-16-09	93.568 93.568	306,113 185,499		34,841	1 1
Low Income Home Energy Assistance (17-18)	LWx-17-10	93.568		- 153,992	265,648	111,656
Low Income Home Energy Assistance (17-18)	LIHEAP-17-11	93.568		1,801,527	2,022,782	221,255
Total Low Income Home Energy Assistance			491,614	4 2,481,974	2,323,271	332,911
Total U.S. Department of Health and Human Services		'	980,146	6 14,314,033	14,107,347	773,460
Total Federal Awards			1,217,797	7 15,563,401	15,258,797	913,193
<u>State Awards</u>	×	V/14	(7 611)	,	,	(4 611)
Special State Grant (10-11) Special State Grant (17-18)	N/A	N/A	10(1)	- 25,050	23,339	(1,711)
Total State Awards		'	(4,611)	1) 25,050	23,339	(6,322)
Total Federal and State Awards		II	\$ 1,213,186	6 \$ 15,588,451	\$ 15,282,136	\$ 906,871

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS AND STATE FINANCIAL ASSISTANCE JUNE 30, 2018

NOTE A - Basis of Presentation

The accompanying schedule of expenditures of federal awards and state financial assistance (the schedule) includes the federal and state grant activity of the Agency and is presented on the accrual basis of accounting. The information in the schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). Therefore, some amounts presented in the schedule may differ from amounts presented in, or used in the preparation of, the basic financial statements.

NOTE B - Summary of Significant Accounting Policies

Expenditures reported on the schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. The Agency has elected not to use the ten percent de minimis indirect cost rate allowed under the Uniform Guidance.

NOTE C - Food Distribution

Nonmonetary assistance is reported in the schedule at the per-unit values as determined by the State of Tennessee Department of Agriculture. At June 30, 2018, the Agency had food commodities in inventory totaling \$40,823.

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INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

Board of Directors Mid-Cumberland Community Action Agency, Inc. Lebanon, Tennessee

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of Mid-Cumberland Community Action Agency, Inc. (the Agency) (a nonprofit organization), which comprise the statement of financial position as of June 30, 2018, and the related statements of activities, functional expenses and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated December 28, 2018.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Agency's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Agency's internal control. Accordingly, we do not express an opinion on the effectiveness of the Agency's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the Agency's financial statements will not be prevented, or detected and corrected on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Agency's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matter that are required to be reported under *Government Auditing Standards*.

The Agency resolved prior-year finding numbers 2017-001, 2017-002, and 2017-003 related to compliance by performing the specific tasks outlined in our report dated March 29, 2018.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Agency's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Agency's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Stone Rudolph & Henry, PLC

Clarksville, Tennessee December 28, 2018

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INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE REQUIRED BY THE UNIFORM GUIDANCE

Board of Directors Mid-Cumberland Community Action Agency, Inc. Lebanon, Tennessee

Report on Compliance for Each Major Federal Program

We have audited Mid-Cumberland Community Action Agency, Inc.'s (the Agency) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of the Agency's major federal programs for the year ended June 30, 2018. The Agency's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the Agency's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Agency's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of the Agency's compliance.

Opinion on Each Major Federal Program

In our opinion, the Agency complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2018.

The Agency resolved prior-year finding number 2017-005 related to compliance by performing the specific tasks outlined in our report dated March 29, 2018.

Report on Internal Control over Compliance

Management of the Agency is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to on the previous page. In planning and performing our audit of compliance, we considered the Agency's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Agency's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that have not been identified. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The Agency resolved prior-year finding number 2017-004 related to internal control over compliance by performing the specific tasks in our report dated March 29, 2018.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Stone Rudolph & Henry, PLC

Clarksville, Tennessee December 28, 2018

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. SCHEDULE OF FINDINGS AND QUESTIONED COSTS YEAR ENDED JUNE 30, 2018

SECTION I - SUMMARY OF AUDITOR'S RESULTS

- The auditor's report dated December 28, 2018, expressed an unmodified opinion on the financial statements of the Agency.
- No material weaknesses relating to the audit of the financial statements was reported in the Independent Auditor's Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards dated December 28, 2018.
- No instances related to compliance were reported in the Independent Auditor's Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards dated December 28, 2018.
- 4. No instances relating to the audit of the major federal award programs were reported in the Independent Auditor's Report on Compliance for Each Major Program and on Internal Control Over Compliance Required by the Uniform Guidance dated December 28, 2018.
- The Independent Auditor's Report on Compliance with Requirements for Each Major Program and on Internal Control over Compliance Required by the Uniform Guidance dated December 28, 2018, for the major federal award programs of the Agency expressed an unmodified opinion on all major federal programs.
- 6. No audit findings relating to major programs were required to be reported in accordance under 2 CFR section 200.516(a) of the Uniform Guidance.
- 7. The programs tested as major programs were:

Program	CFDA No.
Child and Adult Care Food Program	10.558
Head Start Program	93.600

- 8. The threshold used for distinguishing between Type A and Type B programs was \$750,000.
- 9. The Agency did not qualify as a low-risk auditee.

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONT'D) YEAR ENDED JUNE 30, 2018

SECTION II - FINANCIAL STATEMENT FINDINGS

RELATED TO INTERNAL CONTROL

None

RELATED TO COMPLIANCE

None

SECTION III – FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

None

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. SUMMARY SCHEDULE OF PRIOR FEDERAL AWARD FINDINGS YEAR ENDED JUNE 30, 2017

SECTION II - FINANCIAL STATEMENT FINDINGS

RELATED TO INTERNAL CONTROL

None

RELATED TO COMPLIANCE

2017-001 Audit Filing Deadline

<u>Condition:</u> The Agency's annual audit was not completed by December 31, 2017, as required by the State of Tennessee.

<u>Criteria:</u> All governmental audits should be completed and submitted to the State of Tennessee within six months of the fiscal year end.

Cause: The Agency did not select an auditor until December 2017.

Effect: The Agency did not meet the state audit deadline.

Recommendation: We recommend that the Agency's year-end closing procedures be reviewed and revised as necessary to ensure a timely start and completion of the audit by the required date.

Response: Monthly and year-end procedures have been implemented with deadlines to ensure the state audit deadline of December 31 is met each year including closing the year-end books by August 31.

2017-002 Closing of Accounting Records

<u>Condition:</u> The Agency's accounting records were not closed and available for audit by August 31, 2017, as required by the State of Tennessee.

<u>Criteria:</u> Per Section 9-2-102, *Tennessee Code Annotated*, all local governments are required to have accounting records closed and available for audit no later than two months after the close of their fiscal year end.

<u>Cause:</u> The Agency was not aware of this requirement.

Effect: The Agency did not meet the deadline for closing their accounting records.

<u>Recommendation:</u> We recommend that the Agency's year-end closing procedures be reviewed and revised as necessary to ensure a timely start and completion of the audit by the required date.

Response: Monthly and year-end procedures have been implemented with deadlines to ensure the State year-end closing deadline of August 31 is met each year.

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. SUMMARY SCHEDULE OF PRIOR FEDERAL AWARD FINDINGS YEAR ENDED JUNE 30, 2017

2017-003 <u>Internal Control Manual</u>

<u>Condition:</u> The internal control policies and procedures of the Agency are not documented in writing in the manner prescribed by the Green Book.

<u>Criteria:</u> Per Section 9-18-102(a), *Tennessee Code Annotated*, all local governments are required to document their internal controls in writing.

<u>Cause:</u> The Agency experienced turnover in a key position and was unable to complete the manual by the end of the audit.

<u>Effect:</u> By not having written internal control policies and procedures, the Agency cannot demonstrate compliance with the Green Book requirements.

Recommendation: We recommend that the Agency prepare a written manual of internal control policies and procedures as prescribed by the Green Book.

Response: The Agency is currently preparing a written manual of internal control policies and procedures in accordance with the Green Book using the Agency's current financial policies and procedures. This is to be completed by the end of the current fiscal year.

SECTION III - FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

RELATED TO INTERNAL CONTROL

2017-004 <u>Control Operating Effectiveness Deficiency – Weatherization (CFDA #81.042, program year 2016-2017)</u>

<u>Condition:</u> For one of 51 applicants tested, income was not re-certified after twelve months had lapsed since the initial verification of income eligibility.

<u>Criteria:</u> If weatherization service is not provided within twelve months of verifying the applicant's income eligibility, the verification process must be repeated prior to service.

Cause: The Agency inadvertently overlooked this file for income re-certification.

Effect: Disbursements could be made to ineligible applicants.

<u>Recommendation:</u> We recommend that management implement procedures to ensure that an applicant's income is re-certified if weatherization services are not provided within twelve months.

<u>Response</u>: The Agency implemented procedures for the Weatherization program during the prior program year to ensure weekly review of application dates which would prompt re-certification of clients for eligibility.

MID-CUMBERLAND COMMUNITY ACTION AGENCY, INC. SUMMARY SCHEDULE OF PRIOR FEDERAL AWARD FINDINGS YEAR ENDED JUNE 30, 2017

RELATED TO COMPLIANCE

2017-005 <u>Control Operating Effectiveness Deficiency – Weatherization (CFDA #81.042, program year 2016-2017)</u>

<u>Condition</u>: For one of 51 applicants tested, income was not re-certified after twelve months had lapsed since the initial verification of income eligibility.

<u>Criteria:</u> If weatherization service is not provided within twelve months of verifying the applicant's income eligibility, the verification process must be repeated prior to service.

Cause: The Agency inadvertently overlooked this file for income re-certification.

Effect: Disbursements could be made to ineligible applicants.

<u>Recommendation:</u> We recommend that management implement procedures to ensure that an applicant's income is re-certified if weatherization services are not provided within twelve months.

<u>Response</u>: The Agency implemented procedures for the Weatherization program during the prior program year to ensure weekly review of application dates which would prompt re-certification of clients for eligibility.