

Housing Authority: Groveland

Fiscal Year End (FYE): 6/30/17
 Date AUP Conducted: 2/15/19
 Executive Director: Joseph Hart
 CPA: Gary L. DePace, CPA PC
 CPA Phone: (413) 267-5223

A. Rent Collection / Tenant Accounts Receivable / Account Write-Offs
 Number of Category Exceptions: 1 Category Rating: Operational Guidance

A. Rent Collection – Walk-through of sample (Small - 3, Med - 5, Large - 7, Very Large - 9) of individual rent receipts to ensure all the following steps are being executed.	No Exception Found
1. Log of rent collected is complete, accurate and includes all necessary information.	NE
2. Post-dated checks for current amount due is not accepted payment by LHA.	NE
3. Trace amounts from receipt log to deposit slip for bank. Cash is deposited daily per DHCD guidelines (per Accounting Manual Sec. 8, p. 3). Except IF: LHA has only one administrative employee who deposits cash at least weekly.	NE
4. Reconcile tenant ledger with receipt log, bank deposit and General Ledger.	NE
5. What is on General Ledger matches bank statement (bank reconciliation) and Operating Statement and Balance Sheet (51-1 and 51-2 respectively).	NE
B. Rent Collection – Segregation of Duties	Exception Found
1. Document and evaluate internal controls and segregation of duties for steps 1 to 5 above. For LHAs with only one administrative employee: if sufficient internal controls and segregation of duties are not in place, there are mitigating controls in place, such as reporting the frequency/amount of credit adjustments to the board or fee accountant.	E
C. Rent Collection – Tenant Accounts Receivables (TAR)	No Exception Found
1. Aging of Tenant Accounts Receivable is matched to the General Ledger and to the Balance Sheet TAR (51-2).	NE
2. Draw a sample of uncollected TAR accounts (Small - 3, Med - 5, Large - 7, Very Large - 9). Rent Collection is in compliance with LHA rent collection policy (per Contract for Financial Assistance (CFA) and Management Plan IIIC).	NE
3. Allowance for Doubtful Accounts is determined in accordance with GAAP and LHA has evaluated estimate on annual basis. Reasonable allowance based on historical data. Repayment Agreements reconcile to the Balance Sheet/Operating Statements and are in accordance with DHCD policy.	NE
D. Account Write-Offs – Walk-through uncollected rent that was written-off.	Not Applicable
If no write-offs can be found, please select N/A option from drop down for both steps 1 and 2.	
1. Obtain detail of write-offs and verify that write-offs are in accordance with DHCD policy.	N/A
2. Documentation of Board approval to write-off account (board approval of write-off required per budget guidelines for Acct #4570 - Collection Loss).	N/A

Exceptions Noted:	B.) The Firm notes that internal controls over rent collections can be strengthened. Currently, all steps except for the bank reconciliation are being done by the administrative assistant.
Internal Control Recommendation:	B.) The Firm recommends that the Authority assign some of the steps of the rent collection process to a different staff member.
Authority's Response:	B.) There is only one 20-hour per week administrative employee. However, we will institute procedural changes so that the same employee does not collect, post and deposit the rent checks. There are no cash payments. 21 of 61 monthly rent payments are by direct deposit.

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B. Payroll/Fringe Benefits	
Number of Category Exceptions: 2	Category Rating: Operational Guidance
A. Wage Reconciliation	Exception Found
1. Verify analytically (not to exact amount) that FYE-end wages gross payroll reported on the LHA's General Ledger for all programs and all employees matches actual wage amounts reported on Forms 941 and WR-1 (state and federal filings).	NE
2. Look at DHCD-approved budget <i>Schedule of All Salaries and Positions "Report"</i> in HAFIS and identify five highest paid salaries from all funding sources. Verify analytically (within % ANUEL increase for that year - exclude overtime in calculation for maintenance employees) that it matches the amount reported at FYE on the LHA's Top 5 Compensation Form (LHA should have a copy on file). Verify the amount reported on the Top 5 Compensation Form matches <u>exactly</u> the amount reported on reconciled Form 941 and the corresponding state online submission (mass.gov/lwd/unemployment-insur/employers/).	E
3. LHA is in possession of DHCD-approved executive contract signed by the LHA, Executive Director and DHCD. If LHA can show that currently being processed by DHCD and was not returned to the LHA for failing to meet DCHD's requirements, LHA can produce the last DHCD-approved executive contract signed by the LHA, Executive Director and DHCD.	NE
B. Select a Single Pay Period:	No Exception Found
1. Trace timesheets/timcards to the payroll register.	NE
2. Test for completeness and accuracy.	NE
3. Proper controls and approvals are in place, i.e. employees sign timesheets, the Executive Director signs off on employee timesheets, and the Executive Director maintains a timesheet.	NE
C. Obtain a compensated absences liability schedule:	Exception Found
1. Test for consistency with personnel policy (personnel policy required per Contract for Financial Assistance (CFA) and Management Plan IIa2) and reconcile to Balance Sheet (51-2) and General Ledger. If AUP conducted after 9/30/17, personnel policy includes (1) the limits on the amount of vacation and sick leave that will be accrued each year, and when and how such leave will be accrued; (2) a limit on the amount of accrued vacation that may be carried over from year to year, and; (3) a cap on the payout for accrued and unused sick leave at the end of employment per PHN 2017-14. Verify analytically future liabilities for employee benefits (particularly GASB 45 and GASB 68) are properly reflected on Operating Statement (51-1) and Balance Sheet (51-2). If GASB 68 actuarial reports were not received by the LHA in time for year-end financial statements, it is OK for LHA to report last year's GASB 68 numbers.	E
2. Proper controls and approvals are in place, i.e. Executive Director approves employee compensated absences.	NE
3. Compensated absences should be tracked apart from the timesheets, and verification with timesheets should be performed.	NE
4. Accrued and Accumulated leave time matches. Time is accruing as it should.	E
Exceptions Noted:	A.2.) <i>The Firm notes that the Authority's 2017 Top 5 Compensation Form did not reconcile to the gross wages reported on the quarterly tax forms for the fiscal year. C.1.) The Firm notes that the personnel policy is unclear as to whether the sick accrual granted to employees is 5 days per year or 7 days per year. The Authority was unable to provide clarification on this issue. C.4.) The Firm notes that sick time for the Administrative Assistant is not being accrued properly. For employees that work less than 5 days per week, the number of hours in a work day should be calculated by dividing the scheduled work week by 5. Therefore, if the policy prescribes 7 sick days earned per year, the Assistant should be accruing 28 hours of sick time per year based on her 20-hour work week, not 35 hours. (20 hrs per week / 5 = 4 hrs per day. 4 hrs per day * 7 sick days per year = 28 sick hours per year).</i>
Internal Control Recommendation:	A.2.) <i>The Firm recommends that the Authority examine the gross wages reported on its 2017 Top 5 form and amend the form as necessary. If done correctly, the gross amount listed for each employee should match the gross amounts reported to MassQuest for the year. C.4.) The Firm recommends that the Authority recalculate the Administrative Assistant's sick accrual based on the formula above.</i>
Authority's Response:	A.2.) <i>The GHA filed the Top 5 form using its best estimate of earnings. Any amount that does not match exactly does not differ substantially from the actual number. During the course of FY17, the GHA switched from a desktop-based QuickBooks application to a payroll service. On May 17, 2017, a ransomware virus encrypted the QuickBooks data making it inaccessible. In the future, we will make sure these numbers agree. The goal of transparency was not compromised. C.1&4.) The Personnel Policy clearly states that employees receive five sick days per year. We were informed by the administrative assistant that the former executive director had put forth a motion to change this to seven days at the board meeting on June 17, 2014 without incorporating this into the personnel policy document. We will recalculate the sick time accrual for the administrative assistant. However, this employee is close to retirement which will negate any compensation liability. We intend to update the sick leave policy to be consistent with current law and necessary prorations.</i>

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C. Accounts Payable/Disbursements

Number of Category Exceptions: 3 Category Rating: Corrective Action

A. Select a sample (Small - 3, Med - 5, Large - 7, Very Large - 9) of operating and capital expenditures (at least 1 of each type if have).		Exception Found
1. Approval and Segregation of Duties		E
2. Accuracy		NE
3. Supporting Documentation		NE
4. Allowability		NE
5. Allocation		NE
6. Classification		NE
C. Select a sample (Small - 6, Med - 10, Large - 14, Very Large - 18) of credit card/debit card statements. If no credit/debit expenditures can be found, please select N/A option from drop down for all steps 1 to 8.		Exception Found
1. Approval and Segregation of Duties		E
2. Accuracy		NE
3. Supporting Documentation (CPAs: include date, description of charge and amount of transaction for each purchase missing documentation below)		E
4. Allowability		NE
5. Allocation		NE
6. Classification		NE
7. No Sales Tax Paid		NE
8. Card is in Housing Authority name; not Executive Director (or any other staff member) name.		NE
D. Select a sample (Small - 3, Med - 5, Large - 7, Very Large - 9) of employee reimbursements (include at least one travel reimbursement).		Exception Found
1. Approval and Segregation of Duties		E
2. Accuracy		NE
3. Supporting Documentation		NE
4. Allowability		NE
5. Allocation		NE
6. Classification		NE
Exceptions Noted:	A,C,D.1.) The Firm notes that approval could not be tested on disbursements because the related documentation could not be provided. C.3.) The Firm notes that purchases made on the Authority's Staples Credit Plan card did not include supporting documentation. The purchases included office supplies for \$154.96 on 12/13/2016, \$59.16 on 12/29/2016, and \$42.28 on 1/4/2017.	
Internal Control Recommendation:	A,C,D.1.) The Firm recommends that the Authority maintain documentation of approval for disbursements. C.3.) The Firm recommends that the Authority retain supporting documentation for online purchases made with Staples, such as print outs of the order confirmations, and attach the documentation to the corresponding monthly billing statements.	
Authority's Response:	A,C,D.1.) A work order system and related procurement policy language will be implemented to approve purchases prior to incurring any cost. C3.) We will make sure in the future that Staples order conformations are placed with the invoices in the future. The invoices do list all products billed.	

D. Inventory (Fixed Assets)	
Number of Category Exceptions: 2	Category Rating: Operational Guidance
A. Obtain a copy of the depreciation schedules/ fixed asset listing:	Exception Found
1. Inventory listing includes both capitalized and non-capitalized items (such as refrigerators, stoves, community room equipment, office equipment, etc.) of \$1,000 or more. It also includes all necessary information, including a tag with an LHA-assigned number for all assets of \$1,000 or more (and all refrigerators and stoves of any value).	E
2. Depreciation schedule/ fixed asset listing includes all relevant assets of \$5,000 or more. It also includes all necessary information to sufficiently identify an asset. For vehicles, that includes the make/model/year and for modernization jobs the Fish number.	E
3. Items on depreciation schedule/ fixed asset listing are being accurately depreciated.	NE
4. Reconcile depreciation schedule/ fixed asset listing to Form 51-1 (Operating Statement) and General Ledger and evaluate for completeness and sufficiency of detail.	NE
5. Verify analytically that items listed still exist and are in possession of LHA.	NE
6. Assets are appropriately allocated between Federal and State on General Ledger, Operating Statement (51-1), and depreciated according to which funds were used for purchase.	NE
B. Capitalization Policy	Exception Found
1. Verify capitalization policy is within state established limits (per Accounting Manual, Sec. 16, p.3).	E
C. Vehicles	No Exception Found
1. Confirm vehicles are listed on fixed asset listing, and trace vehicles listing to insurance policies.	NE
Exceptions Noted:	A.1.) The Firm notes that the Authority does not maintain an inventory listing for its 400-1 program. A.2.) The Firm notes that the closed modernization project on the Authority's 400-1 depreciation schedule does not include the project's FISH number in its description. B.) The Firm notes that the capitalization policy that was in effect during the audit fiscal year could not be located.
Internal Control Recommendation:	A.1.) The Firm recommends that the Authority create an inventory listing to keep track of the Authority-owned stoves that are located in the three 705 units. A.2.) The Firm recommends that the Authority add the FISH number of the closed modernization project to the project's description on the depreciation schedule. B.) The Firm notes that a new capitalization policy has been approved since the end of the audited fiscal year.
Authority's Response:	A.1.) The inventory for the 400-1 program consists of three stoves. We will add these to the inventory. A.2.) The project FISH number may have been omitted but the GHA receives about \$4,000 to \$5,000 per year in its capital grant. This results in one project per fiscal year. We will consult with the fee accountant to insure that project data is clearly labeled. B.) There is a capitalization policy from this period which sets the threshold at \$5,000. This has a 2006 date on the file but no date of board adoption. This policy was updated on September 27, 2018.

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E. Procurement/Public Bidding for Goods and Services	
Number of Category Exceptions: 1	Category Rating: Operational Guidance
<p>For A to C below, examine the cash disbursements journal (or check register) as well as the contract register and identify purchases of goods and services during the year that should have been competitively procured. From these purchases that should have been competitively procured, select a sample (Small - 3, Med - 5, Large - 7, Very Large - 9) of known or possible procurements valuing \$10,000 or more; if possible when selecting the sample, include at least one procurement valuing \$10,000 to \$35,000 and one procurement valuing \$35,000 or more (for goods and services for MGL c. 30B only). If any in the sample were not competitively procured, enter as an exception in A. For sampled purchases that went through procurement, follow procedures under B or C below depending on the size of the procurement.</p>	
A. Competitive Procurement When Required	No Exception Found
1. Verify that sampled purchases for goods and services that should have been competitively procured as defined per MGL c. 30B were competitively procured.	NE
B. Known procurements valuing (pre 11/7/16 - \$10,000 up to \$35,000 OR post 11/7/16 \$10,000 up to and including \$50,000) (for goods and services for MGL c. 30B only). If no procurement can be found valuing \$10,000 up to \$35,000, please select N/A option from drop down for each step 1 - 7 below.	Not Applicable
1. (pre 11/7/16) Proper selection based on MGL c.30B s.5 IFB requirements/(post 11/7/16) Proper selection based on MGL c.30B s.5 solicitation of quotes requirements.	N/A
2. (pre 11/7/16) Documentation of solicitation of at least three oral or written quotes/(post 11/7/16) Documentation of a written purchase description with solicitation of <u>written</u> quotes from at least three persons.	N/A
3. Contract is DHCD-approved template or developed by LHA (not a vendor contract).	N/A
4. Contract was for not more than 3 years unless majority board vote allowed it to be longer.	N/A
5. Board vote is documented approving individual contract, or a board vote to delegate authority over certain contracts (by dollar threshold or other criteria) to an LHA staff member, usually Executive Director.	N/A
6. Contract did not go through automatic renewals unless renewals were part of the original procurement.	N/A
7. LHA Procurement Policy exists (per Accounting Manual Sec. 16, p.2) and is compliant with MGL c. 30B elements mentioned in 1 to 6 above.	N/A
C. Known procurements valuing (pre 11/7/16 - \$35,000 or more OR post 11/7/16 more than \$50,000) (for goods and services for MGL c. 30B only). If no procurement can be found in this value range, please select N/A option from drop down for each step 1 - 8 below.	Not Applicable
1. Proper selection based on MGL c.30B s.5 IFB requirements or MGL c.30B s.6 RFP requirements. (post 11/7/16 only: If using MGL C.30B s.6 RFP requirements, LHA must have a Chief Procurement Officer (CPO) conduct the procurement under c.30B s.6.)	N/A
2. (pre 11/7/16) Documentation of Newspaper advertisement two week prior to bidding process/(post 11/7/16) Documentation of Newspaper advertisement, LHA's Office and COMMBUYS two weeks prior to bidding process.	N/A
3. If contract was for over \$100K, it was advertised in the Goods & Services Bulletin.	N/A
4. If IFB, contract award went to lowest bidder. If RFP, contract went to lowest bidder or letter explaining why went with another bidder.	N/A
5. Contract is DHCD-approved template or developed by LHA (not a vendor contract).	N/A
6. Board vote is documented approving individual contract, or a board vote to delegate authority over certain contracts (by dollar threshold or other criteria) to an LHA staff member, usually Executive Director.	N/A
7. Contract did not go through automatic renewals unless renewals were part of the original procurement.	N/A
8. LHA Procurement Policy exists (Accounting Manual Sec. 16, p.2) and is compliant with MGL c. 30B elements mentioned in 1 to 7 above.	N/A
D. Obtain a copy of the contract register and verify:	Exception Found
1. Contract register exists and includes all modernization as well as goods and services contracts (per Accounting Manual, Sec. 6, p.12)/PHN 2017-14.	E
2. For each contract, it includes the following information: contractor, description, active/inactive, start date, end date, extensions available, contract award amount, change orders amount, contract expenditures to date and remaining value.	E
3. Evaluate for completeness by analyzing the cash disbursements journal against the contract register.	NE
Exceptions Noted:	D.1.&2.) The Firm notes that the Authority does not maintain a contract register, but acknowledges that the Authority does not have any modernization or service contracts directly related to its 400-1 program at this time.
Internal Control Recommendation:	D.1.&2.) The Firm recommends that the Authority create a contract register to have for future use in the event of the Authority awarding a modernization or service contract in relation to its 400-1 program. The contract register should include columns for each of the following items: contractor name, description of the goods or services provided, whether the contract is active or inactive, start date, end date, extensions available, the dollar value the contract was awarded for, amount added for change orders, contract expenditures to date, and the remaining value of the contract.
Authority's Response:	D.1.&2.) In the future, the GHA will compile contract registers for the 400-1 and federal programs for service contracts and construction contracts. Although we acknowledge this is required, the volume of contracts is very low and contract activity is simple to track.

F. Cash Management and Investment Practices

Number of Category Exceptions: 0 Category Rating: No Findings

A. Pull a mid-year and year-end bank statements:		No Exception Found
1. Test the monthly bank reconciliation to ensure that the following two match: General Ledger and bank statements (exclude deposits of rent collected as this was covered earlier).		NE
2. Checks that have been issued and marked on General Ledger but have not been cashed (not on bank statement), known as checks in transit are identified as a part of the reconciliation process.		NE
B. Bank and Investment Accounts		No Exception Found
1. Verify that banking and investment accounts are properly insured or collateralized (per Accounting Manual Sec. 16, p.7)		NE
Exceptions Noted:	None	
Internal Control Recommendation:	None	
Authority's Response:	N/A	

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G. Operating Subsidy Number of Category Exceptions: 0 Category Rating: No Findings	
A. Obtain copy of DHCD-approved budget exemptions. If no DHCD-approved exemptions, please select N/A option from drop down for step 1 below. 1. Compare DHCD-approved budget exemptions for direct reimbursement (as found in the ANUEL & Subsidy Worksheet - Section 8) to LHA record of actual expenses to the General Ledger.	No Exception Found NE
B. Revenue Reconciliation 1. Reconcile revenue to the General Ledger. Compare revenue reported in Accounts #3110, #3190, #3610 and #3690 in the Operating Statement (51-1) to the General Ledger to the amounts reported in the ANUEL & Subsidy Worksheet.	No Exception Found NE
C. Utility Reconciliation 1. Reconcile utilities to the General Ledger. Compare utilities reported in Account #4300 on the Operating Statement (51-1) to the General Ledger to the amounts reported in the ANUEL & Subsidy Worksheet.	No Exception Found NE
Exceptions Noted:	<i>None</i>
Internal Control Recommendation:	<i>None</i>
Authority's Response:	<i>N/A</i>

Housing Authority: Groveland	
H. Annual Rent Calculation and Compliance	
Number of Category Exceptions: 1	Category Rating: Operational Guidance
To conduct A through D below, select a sample (Small LHA - 5, Medium LHA - 10, Large or Very Large LHA - 15) of tenant files (from programs 200, 667, 705); if the LHA has multiple property managers, at least one file should be selected per manager. Conduct A to C and E, if have MRVP, sample 10% (min:1 max:15) of leased MRVP units.	
A. Obtain the rent roll and HAP roll:	No Exception Found
1. Verify analytically the completeness of the resident population. (Rent roll and HAP roll support what is reported on Operating Statement Form 51-1).	NE
B. Timeliness of Annual Rent Calculation	Exception Found
1. Verify timeliness of annual rent redetermination (occurs one year from move-in date or last annual recertification). Except IF: LHA can produce DHCD waiver for Chapter 667 annual rent redetermination requirement and has done rent redetermination once within 2 years of move-in date or last annual recertification).	E
C. Accuracy of Rent Calculation	No Exception Found
1. Test rent calculation for proper verification of income, expenses and deductions.	NE
2. Verify family composition for allowance purposes.	NE
3. Documentation of income, exclusions from income, and deductions.	NE
D. Timeliness of Notifications Regarding Rent Changes	No Exception Found
1. Verify notification of rent redetermination sent at least 60 days prior to effective date (see 760 CMR 6.04 (4)(b)).	NE
2. Verify Notice of Rent Change sent no less than 14 days prior to effective date (see 760 CMR 6.04 (4)(e)).	NE
3. Verify timeliness and proper execution of Lease Addendum (see 760 CMR 6.06 (5)(q)).	NE
E. MRVP Documentation (starting with AUPs conducted after 7/31/17)	Not Applicable
1. MRVP file has Certificate of Fitness (COF).	N/A
2. MRVP file has Letter of Compliance for Lead Paint if child <6 years old and building built prior to 1978 with no new construction permit.	N/A
3. MRVP file has Proof of Ownership which is either 1. Deed/Online Printout from Registry of Deeds or 2. Proof of Insurance or 3. Tax Documents.	N/A
4. MRVP file has W9.	N/A
Exceptions Noted:	B.) The Firm notes that not all of the annual rent redeterminations were completed in a timely manner.
Internal Control Recommendation:	B.) The Firm recommends that the Authority begin the rent redetermination process early enough to allot time for the effective date of the latest lease to be no more than 12 months after the effective date of the prior lease.
Authority's Response:	B.) Recertifications were delayed due to nonresponse on the part of one resident. The administrative assistant has since been instructed to keep the recertification schedule and informed how to proceed if financial information is not forthcoming. There was also some confusion about whether to recertify if there were active legal actions against a resident by the housing authority. This has been cleared up.