### HUDSON HOUSING AUTHORITY Hudson, Massachusetts

#### INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

As of and For the Year Ended September 30, 2022

# **HUDSON HOUSING AUTHORITY**

#### INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

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#### INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To The Board of Commissioners Hudson Housing Authority Hudson, Massachusetts

We have performed the procedures enumerated in the attached Schedule of Agreed-Upon Procedures on compliance and other matters prescribed by the Massachusetts Department of Housing and Community Development (DHCD) pursuant to Massachusetts General Law Chapter 235 Section 10 as of and for the year ended September 30, 2022. The Hudson Housing Authority is responsible for compliance and other matters prescribed by the Massachusetts Department of Housing and Community Development (DHCD) pursuant to Massachusetts General Law Chapter 235 Section 10 as development (DHCD) pursuant to Massachusetts Department of Housing and Community Development (DHCD) pursuant to Massachusetts General Law Chapter 235 Section 10.

The engaging party, the Hudson Housing Authority has agreed to and acknowledged that the procedures performed are appropriate to meet the requirements of DHCD for the year ended September 30, 2022. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of this report and may not meet the needs of all users of this report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes.

The procedures and associated findings are presented in the Schedule of Agreed-Upon Procedures included with this report.

We were engaged by Hudson Housing Authority to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the AICPA. We were not engaged to and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on compliance and other matters prescribed by DHCD, for the year ended September 30, 2022. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Hudson Housing Authority and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement

This report is intended solely for the information and use of the DHCD and the Hudson Housing Authority, and is not intended to be and should not be used by anyone other than these specified parties.

Marcune LLP

Providence, Rhode Island May 22, 2023

| Housing Authority Name:  |                        |          | HUDSON HOUSING     | AUTHORITY             |                          |  |  |
|--|------------------------|----------|--------------------|-----------------------|--------------------------|--|--|
| Fiscal Year End (FYE):   |                        |          | Sep 2022           |                       |                          |  |  |
| Date of  | Date of AUP Conducted: |          |                    | 3/23/2023 12:00:00 AM |                          |  |  |
| E  | xecutive Dire          | ector:   | Jaclyn A. Beaulieu |                       |                          |  |  |
|  |                        | CPA:     | Marcum LLP         |                       |                          |  |  |
|  | CPA PI                 | hone:    | 401-600-4725       |                       |                          |  |  |
|  |                        | HMS:     | Robert Pelletier   |                       |                          |  |  |
| Total  | AUP Except             | tions:   | 0                  |                       |                          |  |  |
|  | A. G                   | eneral / | Accounting         |                       |                          |  |  |
| Total # of exceptions: 0   |                        |          |                    | Rating: No Findings   |                          |  |  |
|  | Exceptions             | Exc      | eption Explanation | CPA Recommendations   | LHA Response             |  |  |
| A. Reconciling financial statements to general ledger.   |                        |          |                    |                       |                          |  |  |
| 1. The amounts reported on the Operating Statement and<br>Balance Sheet (DHCD Forms 51-1 and 51-2, respectively)<br>reconcile to the LHA's general ledger. (Tolerable error of +/-<br>\$100). For all cases that don't match, please detail specifics<br>including at a minimum account and variance amount in column<br>to right. | NE                     |          |                    |                       |                          |  |  |
| <ul> <li>B. The following general ledger accounts reconcile to support match, please detail specifics including at a minimum account</li> <li>1. Cash accounts (#1111 to #1114.1 and #1162) are in agreement with bank statements and reconciliations</li> </ul>   |                        |          |                    |                       | For all cases that don't |  |  |
| 2. Tenant Accounts Receivable and Prepaid Tenant Rent accounts (#1122, #1124 and #2240) are in agreement with agings of Tenants Accounts Receivable (TAR)  | NE                     |          |                    |                       |                          |  |  |
| 3. Capital Assets and Accumulated Depreciation (all fixed assets except 1400.2) are in agreement with the depreciation schedule/fixed asset listing).  | NE                     |          |                    |                       |                          |  |  |
| 4. Accounts Payables accounts (#2111, #2111.1, #2120 and #2139) are in agreement with supporting documentation for Accounts Payables and accruals.   | NE                     |          |                    |                       |                          |  |  |
| 5. Accrued Compensated Absences accounts (#2135 and #2335.01) are in agreement with the compensated absences schedule.   | NE                     |          |                    |                       |                          |  |  |
| 6. DHCD approved budget exemptions for direct reimbursement<br>as found in the (ANUEL & Subsidy Worksheet - Section 8 in the<br>Operating Statement) are in agreement with LHA record of<br>actual expenses in the General Ledger.   | NE                     |          |                    |                       |                          |  |  |

| 7. Salaries and Gross Wages (4110, 4410, 4120) (tolerable error of +/- 3.0%) are in agreement with the MA form WR-1 (state filings).   | NE            |                                  |                                 |                           |  |  |  |
|--|---------------|----------------------------------|---------------------------------|---------------------------|--|--|--|
| 8. Balance Sheet Accounts (#2140, #2339.1, and #2339.2) are in agreement with OPEB/pension reporting.  | NE            |                                  |                                 |                           |  |  |  |
| C. DHCD Public Housing Notice #2018-4, Direct Cost Exemption for Operating Reserve Augmentation in FY2018 Budget & New Operating Reserve Thresholds.   |               |                                  |                                 |                           |  |  |  |
| 1. The amounts reported on the Operating Statement and<br>Balance Sheet (DHCD Forms 51-1 and 51-2, respectively)<br>reconcile to the LHA's general ledger. (Tolerable error of +/-<br>\$100). For all cases that don't match, please detail specifics<br>including at a minimum account and variance amount in column<br>to right. | NE            |                                  |                                 |                           |  |  |  |
|  | <b>B.</b> 1   | Fenant Accounting                |                                 |                           |  |  |  |
| Total # of exceptions: 0   |               |                                  | Rating: No Findings             |                           |  |  |  |
|  | Exceptions    | Exception Explanation            | CPA Recommendations             | LHA Response              |  |  |  |
| A. Select a random sample of rent transactions (Small - 5, Med<br>and 20% are lease enforcements (if have).  | d - 10, Large | - 15, Very Large - 20) of rent t | ransactions. Include at least 2 | 0% are credit adjustments |  |  |  |
| <ol> <li>The Authority retained supporting documentation for rent receipts.</li> </ol>   | NE            |                                  |                                 |                           |  |  |  |
| <ol><li>The Authority posted rent receipts to the correct tenant accounts.</li></ol>   | NE            |                                  |                                 |                           |  |  |  |
| <ol> <li>The Authority retained documentation supporting credit<br/>adjustments.</li> </ol>  | NE            |                                  |                                 |                           |  |  |  |
| 4. The Authority followed its rent collection policy for non-<br>payment of rent (i.e., issued a notice to quit, followed eviction<br>protocol.)   | NE            |                                  |                                 |                           |  |  |  |
| B. Account Write-Offs  |               |                                  |                                 |                           |  |  |  |
| 1. Documentation of Board approval to write-off account (board approval of write-off required per budget guidelines for Acct #4570 - Collection Loss).   | NE            |                                  |                                 |                           |  |  |  |
| C. Vacancies Being Reported in Vacancy System  |               |                                  |                                 |                           |  |  |  |
| 1. Verify that the number of vacant units accounted for in the LHA's operating software is the same number of vacancies reported by the LHA in the DHCD On Line Vacancy System for the fiscal year   | NE            |                                  |                                 |                           |  |  |  |
|  |               | C. Payroll                       |                                 |                           |  |  |  |
| Total # of exceptions: 0   |               |                                  | Rating: No Findings             |                           |  |  |  |
|  | Exceptions    | Exception Explanation            | CPA Recommendations             | LHA Response              |  |  |  |
| A. Wage Reporting  |               |                                  |                                 |                           |  |  |  |

|   | 1. Actual wages for the Top 5 highest paid employees was<br>consistent with the DHCD-approved budget (Schedule of All                      |                |                       |                     |              |
|---|--|----------------|-----------------------|---------------------|--------------|
|   | Salaries and Positions Report), excluding over-time and  | NE             |                       |                     |              |
|   | longevity payments. (Tolerable error of +/- 3.0% of budgeted salary)   |                |                       |                     |              |
|   | 2. Verify the amount reported on the Top 5 Compensation Form   |                |                       |                     |              |
|   | matches exactly the amount reported on reconciled to the WR-   | NE             |                       |                     |              |
|   | 1.   |                |                       |                     |              |
|   | <ol><li>LHA is in possession of DHCD-approved executive contract<br/>signed by the LHA, Executive Director and DHCD. If LHA can</li></ol>  |                |                       |                     |              |
|   | show that currently being processed by DHCD and was not  |                |                       |                     |              |
|   | returned to the LHA for failing to meet DCHD's requirements,   | NE             |                       |                     |              |
|   | LHA can produce the last DHCD-approved executive contract or   |                |                       |                     |              |
|   | at-will agreement signed by the LHA, Executive Director and DHCD.  |                |                       |                     |              |
| E | 3. Payroll Testing for all employees from all funding sources  | - Select a sin | gle payroll period:   |                     |              |
|   | 1. The payroll register accurately accounts for time worked as   | NE             |                       |                     |              |
|   | logged on employee timesheets/time cards.  |                |                       |                     |              |
|   | <ol><li>Timesheets/time cards are maintained by all employees<br/>(including Executive Director) and were approved by supervisor</li></ol> |                |                       |                     |              |
|   | (except Executive Director) and were approved by supervisor  | NE             |                       |                     |              |
|   | 3. Annual leave time (i.e., sick, vacation, personal) used is  |                |                       |                     |              |
|   | identified on timesheets/time cards and accurately accounted   | NE             |                       |                     |              |
| - | for in a compensated absences register.  |                |                       |                     |              |
| ( | C. Compensated Absences Policy   |                |                       |                     |              |
|   | 1. 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                  | NE             |                       |                     |              |
|   | to year, and; (3) a cap on the payout for accrued and unused   |                |                       |                     |              |
|   | sick leave at the end of employment per PHN 2017-14.   |                |                       |                     |              |
|   | 2. The Authority is accounting for annual leave time earned in   | NE             |                       |                     |              |
| - | accordance with the Authority's personnel policy.  |                |                       |                     |              |
|   |  | D. /           | Accounts Payable      |                     |              |
| Ļ | Total # of exceptions: 0   |                |                       | Rating: No Findings |              |
| Ļ |  | Exceptions     | Exception Explanation | CPA Recommendations | LHA Response |
|   | A. Select a random sample of (Small - 15, Med - 20, Large - 25,  |                |                       |                     |              |
|   | arge or unusual items identified in a review of the cash disbu<br>employee expense reimbursement transaction, at least one ca              |                |                       |                     |              |
|   | For all discrepancies, to the right detail the type of payable, th   |                |                       |                     |              |
|   | 1. Cash disbursements were authorized in accordance with the Authority's policies.   | NE             |                       |                     |              |
|   | 2. Cash disbursements are in agreement with supporting documentation.  | NE             |                       |                     |              |
|   | 3. Supporting documentation is sufficiently detailed.  | NE             |                       |                     |              |
|   |  |                |                       |                     |              |

| 4. Costs are allowable (i.e. sales tax, alcohol, lottery tickets)   | NE         |                       |                     |              |  |
|---|------------|-----------------------|---------------------|--------------|--|
| 5. Costs are properly allocated to the correct program(s). Cost of current year additions are allocated to programs in a manner consistent with the use of the asset.   | NE         |                       |                     |              |  |
| 6. Costs are properly classified.   | NE         |                       |                     |              |  |
|   | <u>.</u>   | E. Inventory          |                     |              |  |
| Total # of exceptions: 0  |            |                       | Rating: No Findings |              |  |
|   | Exceptions | Exception Explanation | CPA Recommendations | LHA Response |  |
| A. Capital and Non-Capital Asset Inventory  |            |                       |                     |              |  |
| 1. The Authority performed a physical count of its capital asset<br>and non-capital asset inventory at least annually (non-capital<br>assets are refrigerators and stoves and other furniture<br>equipment over the Authority's non-capital inventory threshold,<br>which may not exceed \$1,000).  | NE         |                       |                     |              |  |
| 2. Capital and Non-Capital Asset inventory includes all<br>necessary information to identify the asset. For non-capital<br>assets that includes a tag with an LHA-assigned number for all<br>assets of \$1,000 or more (and all refrigerators and stoves of<br>any value). For relevant assets of \$5,000 or more that includes<br>the make/model/year for vehicles and the FISH number.  | NE         |                       |                     |              |  |
| 3. The Authority identified additions and disposals of capital and non-capital assets for the accounting period.  | NE         |                       |                     |              |  |
| 4. Select a random sample of non-capital assets by tag number (Small - 3, Med - 6, Large - 9, Very Large - 12) and verify existence.  | NE         |                       |                     |              |  |
|   |            | F. Procurement        |                     |              |  |
| Total # of exceptions: 0  |            |                       | Rating: No Findings |              |  |
|   | Exceptions | Exception Explanation | CPA Recommendations | LHA Response |  |
| 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 \$50,000 and one procurement valuing more than \$50,000 (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. |            |                       |                     |              |  |
| A. Procurement Policy   |            |                       |                     |              |  |
| 1. The Authority's procurement policy is consistent with the requirements of MGL c. 30b (or more conservative federal regulations).   | NE         |                       |                     |              |  |
| 2. The Authority maintains a contract register which includes<br>the following information: contractor, description, active/inactive,<br>start date, end date, extensions available, contract award<br>amount, change orders amount, contract expenditures to date<br>and remaining value.  | NE         |                       |                     |              |  |

LHA can follow more conservative federal regulations when applicable. [- If N/A selected for any one below, then default all drop downs

| IA can follow more conservative federal regulations when ap  | plicable. [ - | II N/A Selected for any | one below, then delault | an drop downs to N/A in this section  |
|--|---------------|-------------------------|-------------------------|---------------------------------------|
| . Proper procurement method used.  | NE            |                         |                         |                                       |
| 2. Proper selection based on MGL c.30B s.5 solicitation of<br>Juotes requirements.   | NE            |                         |                         |                                       |
| B. Documentation of a written purchase description with olicitation of written quotes from at least three persons.   | NE            |                         |                         |                                       |
| •. Contract was for not more than 3 years unless majority board ote allowed it to be longer.   | NE            |                         |                         |                                       |
| 5. Board vote is documented approving individual contract, or a<br>board vote to delegate authority over certain contracts (by dollar<br>hreshold or other criteria) to an LHA staff member, usually<br>Executive Director.  | NE            |                         |                         |                                       |
| 6. Contract did not go through automatic renewals unless enewals were part of the original procurement.  | NE            |                         |                         |                                       |
| 7. The contracts are included on the Authority's contract register.  | NE            |                         |                         |                                       |
| Known and possible procurements valuing (more than \$50,0<br>A can follow more conservative federal regulations when ap  |               |                         |                         | all drop downs to N/A in this section |
| . Proper procurement method used.  | NE            |                         |                         |                                       |
| 2. Proper selection based on MGL c.30B s.5 IFB requirements<br>or MGL c.30B s.6 RFP requirements. If using MGL C.30B s.6<br>RFP requirements, LHA must have a Chief Procurement Officer<br>CPO) conduct the procurement under c.30B s.6.   | NE            |                         |                         |                                       |
| B. Documentation of Newspaper advertisement, LHA's Office<br>and COMMBUYS two weeks prior to bidding process. If<br>contract was for over \$100K, it was advertised in the Goods &<br>Services Bulletin.   | NE            |                         |                         |                                       |
| I. If IFB, contract award went to lowest bidder. If RFP, contract vent to lowest bidder or letter explaining why went with another bidder.   | NE            |                         |                         |                                       |
|  |               |                         |                         |                                       |
| 5. Board vote is documented approving individual contract, or a<br>board vote to delegate authority over certain contracts (by dollar<br>hreshold or other criteria) to an LHA staff member, usually   | NE            |                         |                         |                                       |
| <ul> <li>Board vote is documented approving individual contract, or a board vote to delegate authority over certain contracts (by dollar nreshold or other criteria) to an LHA staff member, usually Executive Director.</li> <li>Contract did not go through automatic renewals unless</li> </ul>   | NE<br>NE      |                         |                         |                                       |
| <ul> <li>Board vote is documented approving individual contract, or a board vote to delegate authority over certain contracts (by dollar hreshold or other criteria) to an LHA staff member, usually Executive Director.</li> <li>Contract did not go through automatic renewals unless enewals were part of the original procurement.</li> <li>The contracts are included on the Authority's contract</li> </ul>                      |               |                         |                         |                                       |
| <ul> <li>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.</li> <li>6. Contract did not go through automatic renewals unless renewals were part of the original procurement.</li> <li>7. The contracts are included on the Authority's contract register.</li> </ul> | NE<br>NE      | gibility Compliance     |                         |                                       |
| <ul> <li>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.</li> <li>6. Contract did not go through automatic renewals unless renewals were part of the original procurement.</li> <li>7. The contracts are included on the Authority's contract</li> </ul>           | NE<br>NE      | gibility Compliance     | Rating: N               | o Findings                            |

A. Public Housing - 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.  |             |                              |                                   |                               |  |
|--|-------------|------------------------------|-----------------------------------|-------------------------------|--|
| 1. The Authority performed timely annual rent determinations (or bi-annual if the Authority has a waiver from DHCD to do so).                          | NE          |                              |                                   |                               |  |
| 2. The Authority properly calculated rent.   | NE          |                              |                                   |                               |  |
| 3. The Authority verified family composition.  | NE          |                              |                                   |                               |  |
| 4. The Authority verified income, exclusions from income and deductions.   | NE          |                              |                                   |                               |  |
| 5. The Authority properly sent notifications of rent redetermination at least 60 days prior to the effective date.                                     | NE          |                              |                                   |                               |  |
| 6. The Authority properly sent notifications of rent change at least 14 days prior to the effective date.  | NE          |                              |                                   |                               |  |
| 7. The Authority was timely in the execution of lease addendums.   | NE          |                              |                                   |                               |  |
| B. MRVP - Select a sample of annual rent determinations (sam drop downs to N/A in this section]  | ple 10% (mi | n:1 max:15) of leased MRVP u | nits). [ - If N/A selected for ar | y one below, then default all |  |
| 1. The Authority performed timely annual rent determinations.  | NE          |                              |                                   |                               |  |
| 2. The Authority properly calculated rent.   | NE          |                              |                                   |                               |  |
| 3. The Authority verified family composition.  | NE          |                              |                                   |                               |  |
| 4. The Authority verified income, exclusions from income and deductions.   | NE          |                              |                                   |                               |  |
| 5. The Authority obtained Certificates of Fitness (COF).   | NE          |                              |                                   |                               |  |
| 6. The Authority obtained Letters of Compliance for Lead Paint if child <6 years old and building built prior to 1978 with no new construction permit. | NE          |                              |                                   |                               |  |
| 7. The Authority obtained Proofs of Ownership  | NE          |                              |                                   |                               |  |
| 8. The Authority obtained W9s for landlords.   | NE          |                              |                                   |                               |  |