CITY OF WALTHAM, MASSACHUSETTS GAO AND UNIFORM GUIDANCE REPORTS YEAR ENDED JUNE 30, 2016

CITY OF WALTHAM, MASSACHUSETTS

GAO AND UNIFORM GUIDANCE REPORTS

YEAR ENDED JUNE 30, 2016

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INDEPENDENT AUDITORS' 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*

Honorable Mayor and City Council City of Waltham, Massachusetts

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 the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the City of Waltham Massachusetts, as of and for the year ended June 30, 2016, and the related notes to the financial statements, which collectively comprise the City's basic financial statements, and have issued our report thereon dated January 27, 2017.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the City of Waltham, Massachusetts' internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the City of Waltham, Massachusetts' internal control. Accordingly, we do not express an opinion on the effectiveness of the City of Waltham, Massachusetts' 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 entity'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. However, we identified a certain deficiency in internal control, described in the accompanying schedule of findings and questioned costs as finding 2016-001, that we consider to be a material weakness.



Compliance and Other Matters

As part of obtaining reasonable assurance about whether the City of Waltham, Massachusetts' 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 matters that are required to be reported under *Government Auditing Standards*.

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 result of that testing, and not to provide an opinion on the effectiveness of the entity'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 entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Clifton Larson Allen LLP

CliftonLarsonAllen LLP

Boston, Massachusetts January 27, 2017



INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM, REPORT ON INTERNAL CONTROL OVER COMPLIANCE, AND REPORT ON THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY THE UNIFORM GUIDANCE

Honorable Mayor and City Council City of Waltham, Massachusetts

Report on Compliance for Each Major Federal Program

We have audited the City of Waltham, Massachusetts' 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 City of Waltham, Massachusetts' major federal programs for the year ended June 30, 2016. The City of Waltham, Massachusetts' major federal programs are identified in the summary of auditors' 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.

Auditors' Responsibility

Our responsibility is to express an opinion on compliance for each of the City of Waltham, Massachusetts' 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; and 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 City of Waltham, Massachusetts' 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 the City of Waltham, Massachusetts' compliance.



Opinion on Each Major Federal Program

In our opinion, the City of Waltham, Massachusetts 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, 2016.

Other Matters

The results of our auditing procedures disclosed instances of noncompliance, which are required to be reported in accordance with the Uniform Guidance and which are described in the accompanying schedule of findings and questioned costs as items 2016-002, and 2016-003. Our opinion on each major federal program is not modified with respect to these matters.

The City of Waltham, Massachusetts's responses to the noncompliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs. The City of Waltham, Massachusetts's responses were not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on these responses.

Report on Internal Control Over Compliance

Management of the City of Waltham, Massachusetts is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the City of Waltham, Massachusetts'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 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 City of Waltham, Massachusetts'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 requirement of a federal program 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 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.

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 were not identified. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, we identified certain deficiencies in internal control over compliance, as described in the accompanying schedule of findings and questioned costs as items 2016-002, and 2016-003, that we consider to be significant deficiencies.

The City of Waltham, Massachusetts' responses to the internal control over compliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs. The City of Waltham, Massachusetts' responses were not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

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.

Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

We have audited the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the City of Waltham, Massachusetts, as of and for the year ended June 30, 2016 (except for the Waltham Contributory Retirement System which is as of and for the year ended December 31, 2015), and the related notes to the financial statements, which collectively comprise the basic financial statements of the City of Waltham, Massachusetts. We issued our report thereon dated January 27, 2017, which contained unmodified opinions on those financial statements.

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the basic 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 basic 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 basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

Clifton Larson Allen LLP

CliftonLarsonAllen LLP Boston, Massachusetts January 27, 2017

CITY OF WALTHAM, MASSACHUSETTS SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS YEAR ENDED JUNE 30, 2016

Federal Grantor/	Federal CFDA	Pass-Through	Federal	Amounts	
Pass-Through Grantor/ Program	Number	Entity Identifying Number	Expenditures	Provided to Subrecipient	
¥					
U.S. Department of Agriculture					
Passed Through the State Department of Elementary and					
Secondary Education:					
Child Nutrition Cluster	40.550	00.000	^	•	
School Breakfast Program - Cash Assistance	10.553	09-308	\$ 3,449	\$-	
National School Lunch Program - Cash Assistance	10.555	09-308	1,580,769	-	
National School Lunch Program - Non-Cash Assistance					
(Commodities)	10.555	09-308	275,172		
Subtotal - Child Nutrition Cluster			1,859,390		
Fresh Fruit and Vegetable Program	10.582	09-308	43,131	-	
Total U.S. Department of Agriculture			1,902,521	-	
U.S. Department of Housing and Urban Development					
Direct Program:					
Community Development Block Grant	14.218	Not Applicable	1,242,603	314,260	
U.S. Department of Justice					
Direct Programs:					
DEA Asset Forfeitures	16.unk	Not Applicable	327,638	-	
Passed Through the State Executive Office of Public Safety:					
Edward Byrne Memorial Justice Assistance Grant	16.738	Not Available	17,760	-	
Total U.S. Department of Justice			345,398	-	
U.S. Department of Transportation					
Passed through the State Department of Transportation:					
State and Community Highway Safety	20.600	Not Available	8,871	-	
National Priority Safety Programs	20.616	Not Available	20,214	-	
Passed Through the State Office of Emergency Management:					
Hazardous Materials Emergency Preparedness	20.703	FY14HMEP000000WALTH	4,000		
Total U.S Department of Transportation			33,085		
U.S. Department of Education					
Passed Through the State Department of Elementary and					
Secondary Education:					
Title I, Part A					
Title I Distribution (fiscal year 2014)	84.010	0305-024808-2014-0308	3,664	-	
Title I Distribution (fiscal year 2015)	84.010	0305-048111-2015-0308	210,170	-	
Title I Distribution (fiscal year 2016)	84.010	0305-048111-2016-0308	476,463	-	
Title I School Support (fiscal year 2015)	84.010	323-024-5-0308-O	27,276	-	
Title I School Support (fiscal year 2016)	84.010	323-024-6-0308-Q	7,961	-	
Subtotal - Title I, Part A			725,534	-	

See accompanying Notes to Schedule of Expenditures of Federal Awards

CITY OF WALTHAM, MASSACHUSETTS SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (CONTINUED) YEAR ENDED JUNE 30, 2016

Federal Grantor/	Federal	Pass-Through		Amounts
Pass-Through Grantor/	CFDA	Entity Identifying	Federal	Provided to
Program	Number	Number	Expenditures	Subrecipient
U.S. Department of Education (Continued)				
Passed Through the State Department of Elementary and				
Secondary Education:				
Special Education Cluster				
SPED 94-142 Allocation (fiscal year 2015)	84.027	240-246-5-0308	168,831	-
SPED 94-142 Allocation (fiscal year 2016)	84.027	240-245-6-0308	1,102,658	-
SPED Program Improvement (fiscal year 2015)	84.027	274-318-5-0308	12,941	-
SPED Program Improvement (fiscal year 2016)	84.027	274-074-6-0308	22,017	-
SPED Early Childhood Program Improvement (fiscal year 2015)	84.027	298-266-5-0308	8,550	-
SPED Early Childhood Program Improvement (fiscal year 2016)	84.027	298-266-6-0308	3,215	-
Passed Through the State Department of Early Education				
and Care:	84.173	26215WALTHAMPUBLIC	22 201	
SPED Early Childhood Allocation (fiscal year 2015) SPED Early Childhood Allocation (fiscal year 2016)	84.173 84.173	26216WALTHAMPUBLIC	23,301 30,976	-
	04.173	202 16WALTHAMPUBLIC		
Subtotal - Special Education Cluster			1,372,489	
Passed Through the State Department of Elementary and				
Secondary Education:				
Carl Perkins Occupational Education (fiscal year 2015)	84.048	400-035-5-0308	42,672	-
Carl Perkins Occupational Education (fiscal year 2016)	84.048	400-049-6-0308	11,585	-
Education for Homeless Children & Youth (fiscal year 2015)	84.196	310-023-5-0308	187	-
Education for Homeless Children & Youth (fiscal year 2016)	84.196	310-027-6-0308	19,847	-
Title III - English Language Acquisition (fiscal year 2015)	84.365	180-037-5-0308	76,036	-
Title III - English Language Acquisition (fiscal year 2016)	84.365	180-073-6-0308	77,946	-
Title IIA - Improving Teacher Quality (fiscal year 2015)	84.367	0140-031073-2015-0308	45,425	-
Title IIA - Improving Teacher Quality (fiscal year 2016)	84.367	0140-061749-2016-0308	168,225	-
Total U.S. Department of Education			2,539,946	
U.S. Department of Health and Human Services				
Passed Through the State Executive Office of Health and				
Human Services:				
School-Based Medicaid Reimbursement Program	93.778	110030884	292,274	
U.S. Department of Homeland Security				
Passed Through the State Office of Emergency Management:				
Public Assistance Grants	97.036	CTFEMA4214WALTH	85,609	-
Emergency Management Performance Grants	97.042	FY14EMPG120000WALTH	1,835	-
Emergency Management Performance Grants	97.042	FY15EMPG1314000WALTH	22,460	
Total U.S. Department of Homeland Security			109,904	-
Total			\$ 6,465,731	\$ 314,260

See accompanying Notes to Schedule of Expenditures of Federal Awards

CITY OF WALTHAM, MASSACHUSETTS NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS JUNE 30, 2016

NOTE 1 BASIS OF PRESENTATION

The accompanying schedule of expenditures of federal awards (the "Schedule") includes the federal award activity of the City of Waltham, Massachusetts under programs of the federal government for the year ended June 30, 2016. The information in this Schedule is presented in accordance with the requirements of 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance).* Because the Schedule presents only a selected portion of the operations of the City of Waltham, Massachusetts, it is not intended to and does not present the financial position, changes in net position, or cash flows of the City of Waltham, Massachusetts.

NOTE 2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Expenditures reported on the Schedule are reported on the modified cash basis of accounting. Such expenditures are recognized following the cost principles in OMB Circular A-87, Cost Principles for State, Local or Indian Tribal Governments, or the cost principles contained in Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

The City of Waltham, Massachusetts did not elect to use the 10-percent de minimis indirect cost rate identified in §200.414 of the Uniform Guidance.

NOTE 3 U.S. DEPARTMENT OF AGRICULTURE

The amount reported for the National School Lunch Program – Non-Cash Assistance (Commodities) represents non-monetary assistance and is reported in the Schedule at the fair market value of the commodities received. The amounts reported for the National School Lunch Program – Cash Assistance, School Breakfast Program – Cash Assistance and Fresh Fruit and Vegetable Program represent cash receipts from federal reimbursements.

NOTE 4 U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

The amount reported for the School-Based Medicaid Reimbursement Program represents federal reimbursements for Administrative Activity Claims.

NOTE 5 U.S. DEPARTMENT OF HOMELAND SECURITY

The amounts reported for the Emergency Management Performance and Public Assistance Grants represent federal reimbursements.

Section I – Summary of Auditors' Results	
Financial Statements	
1. Type of auditors' report issued:	Unmodified
2. Internal control over financial reporting:	
Material weakness(es) identified?	<u>x</u> yes no
 Significant deficiency(ies) identified that are not considered to be material weakness(es)? 	yesx none reported
3. Noncompliance material to financial statements noted?	yes <u>x</u> no
Federal Awards	
1. Internal control over major federal programs:	
Material weakness(es) identified?	yes <u>x</u> no
 Significant deficiency(ies) identified that are not considered to be material weakness(es)? Tune of ouditors' report issued on 	<u>x</u> yes none reported
Type of auditors' report issued on compliance for major federal programs:	Unmodified
3. Any audit findings disclosed that are required to be reported in accordance with Subpart F, Section 516(a) of the Uniform Guidance?	<u> </u>
Identification of Major Federal Programs	
14.218 84.027, 84.173	Community Development Block Grant Special Education Cluster

Section I – Summary of Auditors' Results (Continued)					
Dollar threshold used to distinguish between Type A and Type B programs:	\$	750,000			
Auditee qualified as low-risk auditee pursuant to Uniform Guidance?		yes	X	no	

Section II – Financial Statement Findings

<u>2016 – 001</u> Capital Assets

Type of Finding: Material Weakness in Internal Control over Financial Reporting

Condition and Context: During 2016, management identified certain capital expenditures that were not properly capitalized in governmental activities. Proper internal controls require such transactions to be capitalized in the period the transaction occurs.

Criteria or specific requirement: Management is responsible for establishing and maintaining internal controls over GAAP financial reporting.

Effect: The 2016 audited financial statements included a prior period restatement that increased capital assets and net position in governmental activities by \$1,432,000 to properly reflect these prior years transactions.

Cause: Procedures were not in place to ensure that capital assets were properly reflected in the governmental activities.

Recommendation: We recommend management evaluate the current financial reporting processes and controls to ensure that controls are in place to properly record all transactions.

Views of responsible officials and planned corrective actions:

Explanation of disagreement with audit finding: None

Actions planned in response to finding: The funding source for the questioned capital asset item of \$1,432,000 was provided from a seldom used fund (Housing Trust Fund). The expenditures for the item were incurred over multiple fiscal years and the original funding source was replenished with General Fund revenues. Notwithstanding the previous statements, the audit finding is valid and management will annually review all funds for the source of capital asset acquisitions/expenditures to ensure all capital assets are correctly valued and timely recorded.

Responsible party: Paul Centofanti, City Auditor

Planned completion date for corrective action: Immediate

Plan to monitor completion of corrective action plan: During the year end annual update of the capital assets file, management will review all funds for the source of capital asset acquisitions/expenditures to ensure all capital assets are correctly valued and timely recorded.

Section III – Findings and Questioned Costs – Major Federal Programs

2016-002

Federal agency: U.S. Department of Education

Federal program: Special Education Cluster

CFDA Number: 84.027, 84.173

Pass-Through Agency: Massachusets State Department of Elementary and Secondary Education

Pass-Through Number(s): 274-318-5-0308, 298-266-5-0308

Award Period: July 1, 2015 – June 30, 2016

Type of Finding:

- Significant Deficiency in Internal Control over Compliance
- Other Matters

Criteria or specific requirement: 2 CFR Part 200 *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award* requires compliance with the provisions of reporting. The City of Waltham, Massachusetts should have internal controls designed to ensure compliance with those provisions.

Final Financial Reports must be submitted within 60 days of the grant period end date. The revenues and expenditures reported on the reports must be based on actual amounts received and expended and the report must be prepared in accordance with the Massachusetts Department of Elementary and Secondary Education's requirements.

Condition: Internal controls were not in place to file the reports timely.

Questioned costs: None

Context: The two reports selected for testing were submitted more than 60 days subsequent to the grant completion date.

Cause: Procedures were not in place to submit the financial reports in accordance with the Uniform Guidance.

Effect: Reports submitted outside the required timeframe resulted in noncompliance.

Recommendation: Procedures must be implemented to ensure that all financial reports are submitted within the required timeframe.

Views of responsible officials: There is no disagreement with the audit finding.

<u>2016-003</u>

Federal agency: U.S. Department of Education
Federal program: Special Education Cluster
CFDA Number: 84.027, 84.173
Pass-Through Agency: Massachusets State Department of Elementary and Secondary Education
Pass-Through Number(s): 240-246-5-0308, 240-245-6-0308
Award Period: July 1, 2015 – June 30, 2016
Type of Finding:

- Significant Deficiency in Internal Control over Compliance
- Other Matters

Compliance Requirement: Reporting

Criteria or specific requirement: 2 CFR Part 200 *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award* requires compliance with the provisions of reporting. The City of Waltham, Massachusetts should have internal controls designed to ensure compliance with those provisions.

Special Reporting – The City of Waltham, Massachusetts is required to report an unduplicated count of children with disabilities receiving special education and related services.

Condition: Internal controls were not in place to ensure the accurary of the special reporting requirements.

Questioned costs: None

Context: 1 of the 60 students included in the October 2015 SIMS report was not eligble to receive benefits until subsequent to the effective date of the report. In addition, 1 additional student out of the 60 students tested did not have proper documentation of approval for inclusion in the reports.

Cause: Procedures were not in place to ensure the documentation maintained was sufficient to support the inclusion of the students in the SIMS report.

Effect: Over reporting of students in the SIMS report.

Recommendation: Procedures must be implemented to ensure that only students meeting the requirements for SPED inclusion in the SIMS report are included.

Views of responsible officials: There is no disagreement with the audit finding.

Section IV – Prior Year Major Federal Program Findings

2015-001 – Procurement and Suspension and Debarment- Child Nutrition Cluster

Last year's testing of procurement and suspension and debarment identified that the City did not obtain a debarment certification or check the *System for Award Management* website for vendors contracted with in excess of \$25,000. During this year's testing, no instances of noncompliance were noted. Resolved.

2015-002 – Meal Counts on Reimbursement Requests- Child Nutrition CLuster

Last year's testing of claims for reimbursements identified that procedures were not in place to reconcile the meal counts reported with the supporting daily records maintained by the schools for the month in question. During this year's testing, no instances of noncompliance were noted. Resolved.

2015-003 – Time and Effort– Community Development Block Grant

Last year's testing of identified salaries and wages charged to the grant for one employee were not supported by the required time and effort reports. During this year's testing, no instances of noncompliance were noted. Resolved.