Single Audit Report (Uniform Guidance)

For the Fiscal Year Ended June 30, 2017

#### SINGLE AUDIT REPORT

### FOR THE FISCAL YEAR ENDED JUNE 30, 2017

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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

To the Honorable Board of Supervisors County of San Bernardino, California

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, the discretely presented component unit, each major fund, and the aggregate remaining fund information of the County of San Bernardino, California (County), as of and for the year ended June 30, 2017, and the related notes to the financial statements, which collectively comprise the County's basic financial statements and have issued our report thereon dated December 22, 2017. Our report includes an emphasis of matter paragraph regarding the County's adoption of Governmental Accounting Standards Board (GASB) Statement No. 82, *Pension Issues – An Amendment of GASB Statements No. 67, No. 68 and No. 73.* Our report also includes a reference to other auditors who audited the financial statements of the County of San Bernardino Consolidated Fire Districts, the County of San Bernardino Redevelopment Successor Agency Private-Purpose Trust Fund, and the Housing Authority of the County of San Bernardino as described in our report on the County's financial statements. This report does not include the results of the other auditors' testing of internal control over financial reporting or compliance and other matters that are reported on separately by those auditors.

#### **Internal Control over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the County'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 opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the County's internal control. Accordingly, we do not express an opinion on the effectiveness of the County'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 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. 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 County'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 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 results 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.

Varrinik, Trine, Day & Co. LLP Rancho Cucamonga, California

December 22, 2017



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INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE; REPORT ON SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY THE UNIFORM GUIDANCE; AND THE SUPPLEMENTAL SCHEDULE OF OFFICE OF CALIFORNIA STATE DEPARTMENT OF AGING GRANTS

To the Honorable Board of Supervisors County of San Bernardino, California

#### Report on Compliance for Each Major Federal Program

We have audited the County of San Bernardino, California's (County) 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 County's major federal programs for the year ended June 30, 2017. The County's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

The County's basic financial statements include the operations of the Housing Authority of the County of San Bernardino (Housing Authority), which received \$92,141,292 in federal awards which is not included in the schedule during the year ended June 30, 2017. Our audit, described below, did not include the operations of the Housing Authority because the Housing Authority engaged other auditors to perform an audit in accordance with the Uniform Guidance.

#### 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 County'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; 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 County'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 County's compliance.

#### Opinion on Each Major Federal Program

In our opinion, the County 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, 2017.

#### **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 2017-002, 2017-003, and 2017-005 through 2017-007. Our opinion on each major federal program is not modified with respect to these matters.

The County's responses to the noncompliance findings identified in our audit are described in the County's separate corrective action plan. The County's responses were not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the responses.

#### **Report on Internal Control over Compliance**

Management of the County 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 County'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 County'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 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 2017-001, 2017-003, and 2017-005 through 2017-007 that we consider to be significant deficiencies.

The County's responses to the internal control over compliance findings identified in our audit are described in the County's separate corrective action plan. The County's responses were not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the responses.

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 and Supplemental Schedule of Office of California State Department of Aging Grants

We have audited the financial statements of the governmental activities, the business-type activities, the discretely presented component unit, each major fund, and the aggregate remaining fund information of the County as of and for the year ended June 30, 2017, and the related notes to the financial statements, which collectively comprise the County's financial statements. We have issued our report thereon dated December 22, 2017, which contained unmodified opinions on those financial statements. Our report included an emphasis of matter paragraph regarding the County's adoption of Governmental Accounting Standards Board (GASB) Statement No. 82, Pension Issues - An Amendment of GASB Statements No. 67, No. 68 and No. 73. Our report also included a reference to other auditors who audited the financial statements of the County of San Bernardino Consolidated Fire Districts, the County of San Bernardino Redevelopment Successor Agency Private-Purpose Trust Fund, and the Housing Authority of the County of San Bernardino as described in our report on the County's 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. The supplemental schedule of Office of California State Department of Aging Grants is presented for purposes of additional analysis 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 and supplemental schedule of Office of California State Department of Aging Grants are fairly stated in all material respects in relation to the financial statements as a whole.

Varrinik, Trine, Day & Co. LLP Rancho Cucamonga, California

March 26, 2018

### SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

Federal Grantor/Pass-Through Grantor/Program or Cluster Title	Federal CFDA Number	Grant Identification/ Pass-Through Entity Identification Number	Federal Award Expenditures	Pass-Through Awards to Subrecipients
U.S. DEPARTMENT OF AGRICULTURE		Entry Identification Number	Lispenditures	Биотестрино
Pass-Through Programs: Child Nutrition Cluster: California Department of Education: School Breakfast Program National School Lunch Program Total Child Nutrition Cluster	10.553 10.555	36-10363-6037469-01 36-10363-6037469-01	\$ 157,690 298,466 456,156	\$ - - -
Supplemental Nutrition Assistance Program (SNAP) Cluster: <u>California Department of Social Services:</u> State Administrative Matching Grants for the Supplemental Nutrition Assistance Program <u>California Department of Public Health:</u> State Administrative Matching Grants for the Supplemental Nutrition Assistance Program Education  Total SNAP Cluster	10.561 10.561	1946001347-A7 16-10145	44,792,880 2,921,194 47,714,074	1,472,306 1,472,306
California Department of Education: Child and Adult Care Food Program	10.558	223600	1,994,443	
California Department of Food and Agriculture:  Plant and Animal Disease, Pest Control, and Animal Care - Pierce's Disease Control  Plant and Animal Disease, Pest Control, and Animal Care - Pest Surveillance Canine Inspection Team  Plant and Animal Disease, Pest Control, and Animal Care  Subtotal	10.025 10.025 10.025	16-0424-SF 16-0209-SF 16-0522-SF	27,512 158,535 26,724 212,771	- - -
California Department of Public Health:  Special Supplemental Nutrition Program for Women, Infants & Children	10.557	15-15109	11,028,506	
Forest Service Schools and Roads Cluster:  State Controller's Office: Schools and Roads - Grants to States TOTAL - U. S. DEPARTMENT OF AGRICULTURE	10.665	99003012	220,118 61,626,068	1,472,306
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  Pass-Through Programs: Community Development Block Grant (CDBG) - Entitlement Grants Cluster: City of Chino Hills:				
Community Development Block Grants/Entitlement Grants Direct Programs:	14.218	0711008883190	10,000	-
Community Development Block Grants/Entitlement Grants Community Development Block Grants/Entitlement Grants - Neighborhood Stabilization Program Grant #1 Total CDBG Entitlement Grants Cluster	14.218 14.218		6,661,386 99,403 6,770,789	1,631,303 - 1,631,303
Emergency Solutions Grant Program	14.231		423,706	407,895
Home Investment Partnerships Program Home Investment Partnerships Program Home Investment Partnerships Program Subtotal	14.239 14.239 14.239	Loans Program Income	2,332,682 42,518,435 64,251 44,915,368	
Continuum of Care Program - Homeless Assistance Planning Project Continuum of Care Program - Homeless Management Information System (HMIS) Continuum of Care Program - Homeless Management Information System (FY16) Subtotal	14.267 14.267 14.267		194,048 177,324 67,834 439,206	
TOTAL - U.S. DEPT. OF HOUSING AND URBAN DEVELOPMENT			52,549,069	2,039,198

## SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

Federal Grantor/Pass-Through Grantor/Program or Cluster Title	Federal CFDA Number	Grant Identification/ Pass-Through Entity Identification Number	Federal Award Expenditures	Pass-Through Awards to Subrecipients
U.S. DEPARTMENT OF JUSTICE				,
Pass-Through Programs:				
California Governor's Office of Emergency Services:  Crime Victim Assistance - Human Trafficking Advocacy Program	16.575	071-00000	\$ 15,962	\$ -
Crime Victim Assistance - Unserved/Underserved Victim Advocacy and Outreach Program	16.575	071-00000	167,068	-
Crime Victim Assistance - Victim Witness Assistance Program	16.575	071-00000	1,307,773	-
Subtotal			1,490,803	-
Paul Coverdell Forensic Sciences Improvement Grant Program FY 16	16.742	CQ15 09 0360	16,336	-
Paul Coverdell Forensic Sciences Improvement Grant Program	16.742	CQ16 10 0360	11,001	
Subtotal			27,337	
State of California Board of State and Community Corrections:				
Edward Byrne Memorial Justice Assistance Grant Program (SHR)	16.738	BSCC 789-15	250,000 414,500	-
Edward Byrne Memorial Justice Assistance Grant Program (SHR) Subtotal	16.738	BSCC 789-16	664,500	
Direct Programs:				
Edward Byrne Memorial Justice Assistance Grant Program - 2013	16.738		47,498	47,038
Edward Byrne Memorial Justice Assistance Grant Program - 2014	16.738		121,812	120,545
Edward Byrne Memorial Justice Assistance Grant Program - 2015	16.738		198,655	166,165
Edward Byrne Memorial Justice Assistance Grant Program - 2016	16.738		214,747	159,048
Subtotal			582,712	492,796
DNA Backlog Reduction Program - FY 2015	16.741		177,976	-
TO DESCRIPTION OF THE PROPERTY	7 15004			
Law Enforcement Assistance Narcotics and Dangerous Drugs Training - Riverside Task Force (RTF) Agreement FY 16-1	7 16.004		41,911	
2016 Domestic Cannabis Eradication/Suppression Program	16.2016-45		38,652	-
2017 Domestic Cannabis Eradication/Suppression Program	16.2017-40		84,825	-
San Bernardino Gang Impact Team (GIT) Safe Streets Task Force (FY15-16)	16.281D-LA-223769		32,409	-
San Bernardino Gang Impact Team (GIT) Safe Streets Task Force (FY16-17)	16.281D-LA-223769		124,551	-
Subtotal			280,437	
Southwest Border Prosecution Initiative Program	16.755		303,043	-
Equitable Sharing Program - IRNET	16.922		2,585,821	-
Equitable Sharing Program - NARCOTIC	16.922		3,509,452	
Subtotal			6,095,273	
TOTAL - U.S. DEPARTMENT OF JUSTICE			9,663,992	492,796
U.S. DEPARTMENT OF LABOR				
<u> </u>				
Pass-Through Programs: California Employment Development Department:				
WIOA National Dislocated Worker Grants/WIA National Emergency Grants	17.277	07154900	1,078,535	
	17.277	07151500	1,070,000	
WIA/WIOA Cluster: <u>California Employment Development Department:</u>				
WIA/WIOA Adult Program	17.258	07154900	7,209,904	_
WIA/WIOA Youth Activities	17.259	07154900	4,676,767	3,435,342
WIA/WIOA Dislocated Worker Formula Grants	17.278	07154900	4,667,865	
Total WIA/WIOA Cluster			16,554,536	3,435,342
California Department of Aging:				
Senior Community Service Employment Program - Title V (SCSEP)	17.235	TV-1617-20	295,186	-
County of Riverside:				
Workforce Innovation Fund	17.283	09A0B	19,914	10,399
TOTAL - U.S. DEPARTMENT OF LABOR			17,948,171	3,445,741
U.S. DEPARTMENT OF TRANSPORTATION				
Pass-Through Programs:				
Highway Planning and Construction Cluster:				
California Department of Transportation:	20.205	85954	7,509,410	
Highway Planning and Construction  Total Highway Planning and Construction Cluster	20.203	83934	7,509,410	
			7,507,110	
Highway Safety Cluster:  California Office of Traffic Safety:				
State and Community Highway Safety	20.600	PT1698	65,287	_
State and Community Highway Safety	20.600	PT17107	68,776	-
National Priority Safety Programs	20.616	N/A	189,567	-
Total Highway Safety Cluster			323,630	-
Minimum Penalties for Repeat Offenders for Driving While Intoxicated	20.608	20.308	451,803	-
Minimum Penalties for Repeat Offenders for Driving While Intoxicated	20.608	PT17107	91,075	-
Minimum Penalties for Repeat Offenders for Driving While Intoxicated	20.608	PT1698	94,020	
Subtotal			636,898	
Direct Programs:	****			
Airport Improvement Program (FY14-15)	20.106		203,365	
TOTAL - U.S. DEPARTMENT OF TRANSPORTATION			8,673,303	

### SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

Federal Grantor/Pass-Through Grantor/Program or Cluster Title	Federal CFDA Number	Grant Identification/ Pass-Through Entity Identification Number	Federal Award Expenditures	Pass-Through Awards to Subrecipients
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES	rumber	Entity Identification Fumber	2.Apenditures	Dubi ecipiento
Pass-Through Programs:				
Medicaid Cluster:				
California Department of Health Care Services:				
Medical Assistance Program - Medi-Cal Assistance Program CFS Portion Only	93.778	MSO1809-17	\$ 4,712,168	\$ -
Medical Assistance Program - Medi-Cal Assistance Program TAD Portion Only Medical Assistance Program - Medical Assistance Program (California Children Services (2300))	93.778 93.778	MSO1809-17 4260-111-0001	47,845,264 4,084,941	-
Medical Assistance Program - Medical Assistance Program (Camorma Children Services (2500))  Medical Assistance Program - Child Health and Disability Prevention Case Management	93.778	4260-111-0001	901,580	
Medical Assistance Program - Early Periodic Screening, Diagnosis and Treatment	93.778	4260-111-0001	674.844	-
Medical Assistance Program - Program 3201 Family Support Services - HCPCFC	93.778	4260-111-0001	906,948	-
Medical Assistance Program - Mental Health Administrative Cost	93.778	N/A	7,043,255	-
Medical Assistance Program - Medi-Cal Assistance Program (Alcohol)	93.778	N/A	6,447,762	5,514,100
California Department of Aging:				
Medical Assistance Program (Title XIX, MSSP)  California Department of Social Services:	93.778	MS-1617-17	568,923	-
Medical Assistance Program (Title XIX, IHSS)	93.778	MS01809-17	14,919,115	
Medical Assistance Program - In-Home Supportive Services-Public Authority-IHSS-PA	93.778	N/A	3,181,257	-
Total Medicaid Cluster			91,286,057	5,514,100
Aging Cluster:				
California Department of Aging:				
Special Programs for the Aging-Title VII, Chapter 3-Programs for Prevention of Elder Abuse, Neglect, and Exploitation	93.041	AP-1617-20	11,463	-
Special Programs for the Aging-Title VII, Chapter 2-Long Term Care Ombudsman Services for Older Individuals	93.042	AP-1617-20	48,603	-
Special Programs for the Aging-Title III, Part D-Disease Prevention and Health Promotion Services	93.043	AP-1617-20	96,559	
Special Programs for the Aging-Title III, Part B Grants for Supportive Services and Senior Centers Special Programs for the Aging-Title III, Part C Nutrition Services	93.044	AP-1617-20	1,478,363	370,716
Special Programs for the Aging-11tle III, Part C Nutrition Services  National Family Caregiver Support, Title III, Part E	93.045 93.052	AP-1617-20 AP-1617-20	3,096,146 811,592	2,999,609 440,000
Nutrition Services Incentive Program	93.053	AP-1617-20 AP-1617-20	471,010	471,010
Total Aging Cluster			6,013,736	4,281,335
Association of Food and Drug Officials:				
Food and Drug Administration Research	93.103	GSP - 1611-04507	230	_
Food and Drug Administration Research	93.103	GMP - 1611-04510	2,250	-
Food and Drug Administration Research	93.103	GT - 1611-04511	2,800	-
Subtotal			5,280	
California Department of Public Health:				
Immunization Cooperative Agreements	93.268	63-0317191	534,695	
Epidemiology and Laboratory Capacity for Infectious Diseases (ELC)	93.323	0187.3090	40,488	
Subtotal			575,183	
TANF Cluster:				
California Department of Social Services:				
Temporary Assistance for Needy Families	93.558	1946001347-A7	157,270,316	2,101,494
Total TANF Cluster			157,270,316	2,101,494
California Department of Health Care Services:				
Substance Abuse Prevention and Treatment Block Grant (SAPT)	93.959	N/A	9,450,649	6,181,853
California Department of Public Health:				
Project Grants and Cooperative Agreements for Tuberculosis Control Programs	93.116	NU52PS004656	204,051	-
Childhood Lead Poisoning Prevention Projects-State and Local Childhood Lead Poisoning Prevention and Surveillance				
of Blood Lead Levels in Children	93.197	14-10030	49,161	-
State and Local Public Health Actions to Prevent Obesity, Diabetes, Heart Disease and Stroke (PPHF)	93.757	16-10553	4,778	
				501.557
HIV Care Formula Grants	93.917	15-692 A-1	932,252	691,667
HIV Prevention Activities-Health Department Based	93.940	15-10946	633,475	-
Prevention Health Services - Sexually Transmitted Diseases Control Grants	93.977	15-10263	68,848	-
Maternal and Child Health Services Block Grant to the States (BIH portion)	93.994	20136	536,539	
Maternal and Child Health Services Block Grant to the States (MCAH)	93.994	20136	380,749	-
Subtotal			917,288	-
Public Health Emergency Preparedness	93.069	14-10534	1,779,818	
Public Health Emergency Preparedness - Supplemental Ebola Funding	93.069	15-10379	78,740	-
Public Health Emergency Preparedness - Zika Response Resources - Epidemiology and Surveillance	93.069	16-10933	26,213	
Subtotal			1,884,771	
Hospital Preparedness Program (HPP) and Public Health Emergency Preparedness (PHEP) Aligned Cooperative	93.074	14-10505	140,068	-
Hospital Preparedness Program (HPP) and Public Health Emergency Preparedness (PHEP) Aligned Cooperative				
Agreements - LEMSAC	93.074	14-10506	56,127	
Subtotal			196,195	

### SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

Federal Grantor/Pass-Through Grantor/Program or Cluster Title U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES (Continued)	Federal CFDA Number	Grant Identification/ Pass-Through Entity Identification Number	Federal Award Expenditures	Pass-Through Awards to Subrecipients
California Department of Health Care Services:				
Children's Health Insurance Program	93.767	4260-111-0001	\$ 801,598	s -
Projects for Assistance in Transition from Homelessness (PATH)	93.150	N/A	506,792	-
Block Grants for Community Mental Health Services	93.958	N/A	4,000,972	1,132,257
California Department of Social Services:				
Guardianship Assistance	93.090	1946001347-A7	5,240,030	-
Promoting Safe and Stable Families	93.556	1946001347-A7	1,914,711	1,914,711
Refugee and Entrant Assistance - State Administered Programs-Admin. Refugee and Entrant Assistance - State Administered Programs Subtotal	93.566 93.566	1946001347-A7 1946001347-A7	3,779 95,023 98,802	
Stephanie Tubbs Jones Child Welfare Services Program - Child Welfare Services - State Grants	93.645	1946001347-A7	1,589,301	-
Foster Care - Title IV-E - Probation	93.658	TAD 006852425 DCS 136498818	2,128,276	_
Foster Care - Title IV-E - CFS	93.658	1946001347-A7	34,124,606	-
Foster Care - Title IV-E - TAD	93.658	1946001347-A7	39,816,420	
Subtotal			76,069,302	
Adoption Assistance - Administration Adoption Assistance	93.659 93.659	1946001347-A7 1946001347-A7	3,162,457 30,602,688	-
Subtotal	93.039	1940001347-A7	33,765,145	
Social Services Block Grant - Title XX	93.667	1946001347-A7	3,765,514	-
Social Services Block Grant	93.667	1946001347-A7	25,443,326	-
Subtotal			29,208,840	
Chafee Foster Care Independence Program	93.674	1946001347-A7	878,893	383,208
California Department of Child Support Services: Child Support Enforcement	93.563	1604CACSES	26,361,129	-
Child Care Development Fund (CCDF) Cluster:				
California Department of Education: Child Care and Development Block Grant	93.575	36-2236	145.929	
Child Care Mandatory and Matching Funds of the Child Care and Development Fund	93.596	36-2236	317,699	-
Total CCDF Cluster			463,628	-
California Department of Aging:				
Medicare Enrollment Assistance Program -MIPPA	93.071	MI-1617-20	23,373	21,656
State Health Insurance Assistance Program	93.324	HI-1617-20	183,602	170,263
Affordable Care Act State Health Insurance Assistance Program (SHIP) and Aging and Disability Resource Center (ADRC) Options Counseling for Medicare-Medicaid Individuals in States with Approved Financial Alignment Models	93.626	FA-1617-20	32,620	29,358
California Family Health Council: Family Planning-Services	93.217	454-5320-71209-17-18	347,076	-
Direct Programs:				
Health Center Program Cluster:				
Consolidated Health Centers (Community Health Centers, Migrant Health Centers, Health Care for the Homeless, and				
Public Housing Primary Care)	93.224		253,207	-
Affordable Care Act (ACA) Grants for New and Expanded Services under The Health Center Program  Total Health Center Program Cluster	93.527		997,873	
Head Start - Early Head Start Program - Child Care Partnership	93.600		3,275,528	
Head Start	93.600		43,426,050	3,612,269
Subtotal			46,701,578	3,612,269
HIV Emergency Relief Project Grants	93.914		6,543,866	5,598,142
Grants to Provide Outpatient Early Intervention Services with Respect to HIV Disease- Part C	93.918		452,330	-
TOTAL - U.S. DEPT, HEALTH AND HUMAN SERVICES				

### SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

### FOR THE FISCAL YEAR ENDED JUNE 30, 2017

Federal Grantor/Pass-Through Grantor/Program or Cluster Title	Federal CFDA Number	Grant Identification/ Pass-Through Entity Identification Number	Federal Award Expenditures	Pass-Through Awards to Subrecipients
U.S. EXECUTIVE OFFICE OF THE PRESIDENT				
Pass-Through Programs: California Office of National Drug Policy:				
High Intensity Drug Trafficking Areas Program - High Intensity Drug Trafficking Area (IRNET & RMTF)	95.001	G16LA0001A	\$ 346,776	\$ -
High Intensity Drug Trafficking Areas Program - High Intensity Drug Trafficking Area (IRNET & RMTF)	95.001	G17LA0001A	620,444	-
High Intensity Drug Trafficking Areas Program - High Intensity Drug Trafficking Area (IRNET & RMTF)	95.001	G15LA0001A	2,701	-
Direct Programs:				
High Intensity Drug Trafficking Areas Program - DEA - Southern California Drug Task Force (SCDTF) FY16	95.001		14,964	-
High Intensity Drug Trafficking Areas Program - Southern California Drug Task Force (SCDTF) FY16/17	95.001		69,071	
Subtotal			1,053,956	
TOTAL - U.S. EXECUTIVE OFFICE OF THE PRESIDENT			1,053,956	
U.S. DEPARTMENT OF HOMELAND SECURITY				
Pass-Through Programs: California Governor's Office of Emergency Services:				
Emergency Management Performance Grant FY15 (EMPG)	97.042	071-0000	200,430	
Emergency Management Performance Grant FY16 (EMPG)	97.042	071-0000	560,632	287,578
Subtotal			761,062	287,578
Pre-Disaster Mitigation Grant	97.047	07-91092	93,120	93,120
Homeland Security Grant Program - FY15	97.067	FIPS # 071-00000	915,365	546,320
Homeland Security Grant Program - FY16	97.067	FIPS # 071-00000	311,639	283,060
Homeland Security Grant Program - Riverside Urban Areas Security Initiative (UASI) - FY15	97.067	FIPS # 065-62000	147,842	
Subtotal			1,374,846	829,380
California Department of Parks & Recreation:				
Boating Safety Financial Assistance	97.012	CONTRACT # C1570602	12,244	
TOTAL - U.S. DEPARTMENT OF HOMELAND SECURITY			2,241,272	1,210,078
TOTAL EXPENDITURES OF FEDERAL AWARDS			\$ 659,682,539	\$ 40,292,432

See accompanying notes to schedule of expenditures of federal awards.

#### NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

#### FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### **NOTE 1 – BASIS OF PRESENTATION**

The accompanying schedule of expenditures of federal awards (Schedule) includes the federal award activity of the County of San Bernardino, California (County) under programs of the federal government for the year ended June 30, 2017. The information in this Schedule is presented in accordance with the 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). Because the Schedule presents only a selected portion of the operations of the County, it is not intended to and does not present the financial position, changes in net position, or cash flows of the County. The County's reporting entity is defined in Note 1 to the County's basic financial statements.

The County's basic financial statements include the operations of the Housing Authority of the County of San Bernardino (Housing Authority), which received \$92,141,292 in federal awards which is not included in the schedule during the year ended June 30, 2017. Our audit did not include the operations of the Housing Authority because the Housing Authority engaged other auditors to perform an audit in accordance with the Uniform Guidance.

#### NOTE 2 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Expenditures reported on the Schedule are reported on the modified 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. Negative amounts shown on the Schedule represent adjustments or credits made in the normal course of business to amounts reported as expenditures in prior years.

#### NOTE 3 – PASS-THROUGH ENTITIES' IDENTIFYING NUMBER

When federal awards were received from a pass-through entity, the Schedule shows, if available, the identifying number assigned by the pass-through entity. When no identifying number is shown, the County has determined that no identifying number is assigned for the program or the County was unable to obtain an identifying number from the pass-through entity.

#### NOTE 4 – CATALOG OF FEDERAL DOMESTIC ASSISTANCE (CFDA) NUMBERS

The CFDA numbers included in this report were determined based on the program name, review of grant contract information, and the Office of Management and Budget's Catalog of Federal Domestic Assistance.

#### NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

#### FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### **NOTE 5 – AGING CLUSTER**

The California Department of Aging considers other closely-related pass through programs by the State to be included with the Aging Cluster, in accordance with 2 CFR 200.12.

#### NOTE 6 – MEDICAID CLUSTER

Except for Medi-Cal administrative expenditures, Medicaid (Medi-Cal) and Medicare program expenditures are excluded from the Schedule. These expenditures represent fees for services; therefore, neither is considered a federal award program of the County for purposes of the Schedule or in determining major programs. The County assists the State of California (the State) in determining eligibility and provides Medi-Cal and Medicare services through County-owned health facilities.

Medi-Cal administrative expenditures are included in the Schedule as they do not represent fees for services.

#### **NOTE 7 – INDIRECT COST RATE**

The County has not elected to use the 10-percent de minimis indirect cost rate allowed under the Uniform Guidance.

#### NOTE 8 – LOAN PROGRAM WITH CONTINUING COMPLIANCE REQUIREMENTS

The County administers loans that are made from funds provided by the Home Investment Partnerships Program (CFDA No. 14.239), and balances and transactions relating to the program are included in the County's basic financial statements. Loans outstanding at the beginning of the year and loans made during the year are included in the federal expenditures presented in the Schedule. As of June 30, 2017, the outstanding loan receivables balance is as follows:

		Outstanding
<b>CFDA</b>		at June 30,
No.	Federal Program	2017
14.239	Home Investment Partnerships Program	\$ 42,162,947

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS FOR THE FISCAL YEAR ENDED JUNE 30, 2017

### I. SUMMARY OF AUDITORS' RESULTS

Type of report the auditor issued on y		
Type of report the auditor issued on v	whether the financial statements audited	
were prepared in accordance with C	SAAP:	Unmodified
Internal control over financial reporti	ng:	
Material weakness(es) identified?		No
Significant deficiency(ies) identifi	ied?	None reported
Noncompliance material to financial	statements noted?	No
EDERAL AWARDS		
Internal control over major federal pr	ograms:	
Material weakness(es) identified?		No
Significant deficiency(ies) identifi	ied?	Yes
Type of auditors' report issued on cor		Unmodified
Any audit findings disclosed that are	required to be reported in accordance with 2 CFR 200.516(a)?	Yes
		•
Identification of major federal progra	ms:	
Identification of major federal progra	ms:  Name of Federal Program or Cluster	
CFDA Number(s)	Name of Federal Program or Cluster	
CFDA Number(s) 20.205	Name of Federal Program or Cluster  Highway Planning and Construction Cluster	
<u>CFDA Number(s)</u> 20.205  93.958	Name of Federal Program or Cluster  Highway Planning and Construction Cluster  Block Grants for Community Mental Health Services	- - -
20.205 93.958 93.090	Name of Federal Program or Cluster  Highway Planning and Construction Cluster  Block Grants for Community Mental Health Services  Guardianship Assistance	
20.205 93.958 93.090 93.658	Name of Federal Program or Cluster  Highway Planning and Construction Cluster  Block Grants for Community Mental Health Services  Guardianship Assistance  Foster Care - Title IV-E	- - - -
20.205 93.958 93.090 93.658 93.659	Name of Federal Program or Cluster  Highway Planning and Construction Cluster Block Grants for Community Mental Health Services Guardianship Assistance Foster Care - Title IV-E Adoption Assistance	- - - -
20.205 93.958 93.090 93.658 93.659 93.563	Name of Federal Program or Cluster  Highway Planning and Construction Cluster Block Grants for Community Mental Health Services  Guardianship Assistance Foster Care - Title IV-E Adoption Assistance Child Support Enforcement	- - - -
20.205 93.958 93.090 93.658 93.659 93.563 93.914	Name of Federal Program or Cluster  Highway Planning and Construction Cluster Block Grants for Community Mental Health Services Guardianship Assistance Foster Care - Title IV-E Adoption Assistance Child Support Enforcement HIV Emergency Relief Project Grants etween Type A and Type B programs:	\$ 3,000,000 Yes

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS, CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2017

### II. FINANCIAL STATEMENT FINDINGS

None reported.

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS, CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### III. FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

#### **Finding 2017-001**

**Program:** Highway Planning and Construction Cluster

**CFDA No.:** 20.205

Federal Grantor: U.S. Department of Transportation

Passed-through: State of California Department of Transportation

Award Year: FY 2016-17

**Compliance Requirements:** Reporting

#### Criteria:

Title 2 CFR Section 200.302(b)(1) and (2) of the Uniform Guidance require that grantees have internal control procedures in place to provide reasonable assurance that reliable, accurate, and complete disclosure of the expenditures of federal awards of grants are presented in the Schedule of Expenditures of Federal Awards (SEFA).

#### **Condition:**

Significant Deficiency – The County (Department of Public Works) in the preparation of SEFA amounts applicable to the Highway Planning and Construction Cluster, omitted indirect costs of \$480,390 applicable to the program.

#### **Context:**

The condition noted above was identified when reconciling the SEFA for the Highway Planning and Construction program to the underlying accounting records.

#### **Effect:**

The SEFA did not report all expenditures of federal awards attributable to the Highway Planning and Construction Cluster in accordance with the Uniform Guidance.

#### Cause:

The County's (Department of Public Works) procedures did not provide for a process that verified all costs, both direct and indirect, attributable to the Highway Planning and Construction Cluster were reported in the SEFA.

#### **Recommendation:**

We recommend the County (Department of Public Works) update and review its procedures related to the preparation of the SEFA to ensure that all costs both direct and indirect are included in accordance with 2 CFR Section 200.302(b)(1) and (2) of the Uniform Guidance.

#### Views of Responsible Officials and Planned Corrective Actions:

See separate corrective action plan.

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS, CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### III. FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

#### **Finding 2017-002**

**Program:** Highway Planning and Construction Cluster

**CFDA No.:** 20.205

Federal Grantor: U.S. Department of Transportation

Passed-through: State of California Department of Transportation

Award Year: FY 2016-17

Compliance Requirements: Allowable Costs/Cost Principles, Cash Management

#### Criteria:

Title 2 CFR Section 200.302(b)(6) and (7) of the Uniform Guidance requires all non-Federal entities to establish written procedures to implement the requirements of 2 CFR section 200.305 (Payment) and for determining the allowability of costs in accordance with Subpart E – Cost Principles and the terms and conditions of the Federal award.

#### **Condition:**

*Instance of Non-Compliance* – The County (Department of Public Works) has not established written procedures to implement the cash management requirements of 2 CFR Section 200.305 or requirements for determining allowability of costs in accordance with Subpart E – Cost Principles or the terms and conditions of the Federal award.

#### **Questioned Costs:**

No questioned costs were identified as a result of our procedures.

#### **Context:**

The condition noted above was identified during our procedures related to cash management and allowable costs for the Highway Planning and Construction program.

#### **Effect:**

The County (Department of Public Works) has not complied with the specific requirements for written procedures over cash management and allowable costs as described in the Uniform Guidance.

#### Cause:

The County's (Department of Public Works) procedures did not ensure the required written procedures were developed and implemented in accordance with the Uniform Guidance.

#### **Recommendation:**

We recommend the County (Department of Public Works) review its policies and formalize written procedures related to cash management requirements within 2 CFR Section 200.305 and allowable costs in accordance with Subpart E – Cost Principles.

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS, CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### III. FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

#### Views of Responsible Officials and Planned Corrective Actions:

See separate corrective action plan.

#### **Finding 2017-003**

**Programs:** Foster Care-Title IV-E

**CFDA No.:** 93.658

Federal Grantor: U.S. Department of Health and Human Services

Passed-through: California Department of Social Services

Award Year: FY 2016-17

**Compliance Requirements:** Allowable Costs/Cost Principles

#### Criteria:

Title 45 CFR Section 75.430 Compensation – Personal Services outlines and requires standards for documentation of personnel expenses, and requires that charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed and must be supported by a system of internal controls which provide reasonable assurance that the charges are accurate, allowable, and properly allocated.

#### **Condition:**

Significant Deficiency, Instance of Non-Compliance – We noted that 2 out of the 40 payroll transactions selected for testing had a total of 17 hours of direct costs charged to the program supported by the timesheet that was classified as unallocable time on the time study resulting in a total of 17 hours of allocable time not being charged to the program. Time that is not directly charged to the program is instead allocated, indirectly to other programs.

#### **Questioned Costs:**

No questioned costs were identified as a result of our procedures.

#### **Context:**

The condition noted above was identified during our procedures related to the activities allowed or unallowed, allowable costs/cost principles for the Foster Care-Title IV-E program, including the review of the time study, payroll, and time card process.

#### **Effect:**

17 hours of direct allocable time was not charged to the program. Hours were instead indirectly allocated to other programs. As such, there is an increased risk of non-compliance with activities allowed and unallowed requirements and the allowable costs/cost principles requirements.

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS, CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### III. FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

#### Cause:

The appropriate level of monitoring was not administered by the County (Child and Family Services Department) that was sufficient to prevent, detect and correct discrepancies between allocable and unallocable time reported on the time study and on the time sheet.

#### **Recommendation:**

We recommend the County (Child and Family Services Department) strengthen procedures to ensure hours documented on the time studies are correctly classified as allocable or unallocable and agree with the classification of hours on the timesheets.

#### **Views of Responsible Officials and Planned Corrective Actions:**

See separate corrective action plan.

#### **Finding 2017-004**

**Program:** HIV Emergency Relief Project Grant

**CFDA No.:** 93.914

Federal Grantor: U.S. Department Health and Human Services

Award Year: FY 2016-17

Compliance Requirements: Allowable Costs/Cost Principles, Cash Management

#### Criteria:

Title 2 CFR Section 200.302(b)(6) and (7) of the Uniform Guidance requires all non-Federal entities to establish written procedures to implement the requirements of 2 CFR section 200.305 (Payment) and for determining the allowability of costs in accordance with Subpart E – Cost Principles and the terms and conditions of the Federal award.

#### **Condition:**

*Instance of Non-Compliance* – The County (Department of Public Health) has not established written procedures to implement the cash management requirements of 2 CFR Section 200.305 or for determining allowability of costs in accordance with Subpart E – Cost Principles or the terms and conditions of the Federal award.

#### **Questioned Costs:**

No questioned costs were identified as a result of our procedures.

#### **Context:**

The condition noted above was identified during our procedures related to cash management and allowable costs for the HIV Emergency Relief Project Grant-Title I program.

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS, CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### III. FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

#### **Effect:**

The County (Department of Public Health) has not complied with the specific requirements for written procedures over cash management and allowable costs as described in the Uniform Guidance.

#### Cause:

The County's (Department of Public Health) procedures did not ensure the required written procedures were developed and implemented in accordance with the Uniform Guidance.

#### **Recommendation:**

We recommend the County (Department of Public Health) review its policies and formalize written procedures related to cash management requirements within 2 CFR Section 200.305 and allowable costs in accordance with Subpart E – Cost Principles.

#### Views of Responsible Officials and Planned Corrective Actions:

See separate corrective action plan.

#### **Finding 2017-005**

Programs: HIV Emergency Relief Project Grant

**CFDA No.:** 93.914

Federal Grantor: U.S. Department Health and Human Services

Award Year: FY 2016-17

Compliance Requirements: Subrecipient Monitoring

#### Criteria:

Per the 2017 OMB Compliance Supplement and Title 2 CFR Section 200.331(a) of the Uniform Guidance states that the pass-through entity must identify the award and applicable requirements to the subrecipient with certain information as well as all the requirements imposed by the pass-through entity on the subrecipient so that the Federal award is used in accordance with Federal statutes, regulations, and the terms and conditions of the award.

#### **Condition:**

Significant Deficiency, Instance of Non-Compliance – We noted 2 instances out of 2 subrecipients selected for testwork where the County (Department of Public Health) did not identify all of the required elements of the subaward in accordance with 2 CFR 200.331(a) of the Uniform Grant Guidance.

#### **Questioned Costs:**

No questioned costs were identified as a result of our procedures.

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS, CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### III. FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

#### **Context:**

The condition noted above was identified in 2 of the 2 subrecipients selected during our testing procedures over subrecipient monitoring compliance requirements.

#### Effect:

The County (Department of Public Health) did not identify the required elements of the subaward to the subrecipient, increasing the likelihood of noncompliance in relation to the program.

#### Cause:

The County (Department of Public Health) does not have procedures in place to ensure that the subawards contain the required elements pursuant to 2 CFR 200.331(a).

#### **Recommendation:**

It is recommended that the County (Department of Public Health) prepare subaward agreements that contain all of the required elements as specified in 2 CFR 200.331(a).

#### **Views of Responsible Officials and Planned Corrective Actions:**

See separate corrective action plan.

#### **Finding 2017-006**

**Programs:** Block Grants for Community Mental Health Services

**CFDA No.:** 93.958

**Federal Grantor:** U.S. Department of Health and Human Services **Passed-through:** California Department of Health Care Services

Award Year: FY 2016-17

**Compliance Requirements:** Subrecipient Monitoring

#### Criteria:

Per the 2017 OMB Compliance Supplement and Title 2 CFR Section 200.331(a) of the Uniform Guidance states that the pass-through entity must identify the award and applicable requirements to the subrecipient with certain information as well as all the requirements imposed by the pass-through entity on the subrecipient so that the Federal award is used in accordance with Federal statutes, regulations, and the terms and conditions of the award.

#### **Condition:**

Significant Deficiency, Instance of Non-Compliance – We noted 1 instance out of 1 subrecipient selected for testwork where the County (Department of Behavioral Health) did not identify all of the required elements of the subaward in accordance with 2 CFR 200.331(a) of the Uniform Grant Guidance.

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS, CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### III. FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

#### **Questioned Costs:**

No questioned costs were identified as a result of our procedures.

#### **Context:**

The condition noted above was identified in 1 of the 1 subrecipient selected during our testing procedures over subrecipient monitoring compliance requirements.

#### **Effect:**

The County (Department of Behavioral Health) did not identify the required elements of the subaward to the subrecipient, increasing the likelihood of noncompliance in relation to the program.

#### Cause:

The County (Department of Behavioral Health) does not have procedures in place to ensure that the subawards contain the required elements pursuant to 2 CFR 200.331(a).

#### **Recommendation:**

It is recommended that the County (Department of Behavioral Health) prepare subaward agreements that contain all of the required elements as specified in 2 CFR 200.331(a)(1).

#### **Views of Responsible Officials and Planned Corrective Actions:**

See separate corrective action plan.

#### **Finding 2017-007**

**Program:** Block Grants for Community Mental Health Services

**CFDA No.:** 93.958

**Federal Grantor:** U.S. Department of Health and Human Services **Passed-through:** California Department of Health Care Services

Award Year: FY 2016-17

Compliance Requirement: Procurement, Suspension, and Debarment

#### Criteria:

Title 2 CFR Section 200.213 of the Uniform Guidance states that the County must comply with 2 CFR part 180, which implements Executive Orders 12549 and 12689, "Debarment and Suspension;" Federal awarding agency regulations in Title 2 of the CFR adopting/implementing the OMB guidance in 2 CFR part 180; program legislation; and the terms and conditions of the award. The 2017 Compliance Supplement states:

 Non-Federal entities are prohibited from contracting with or making subawards under covered transactions to parties that are suspended or debarred. "Covered transactions" include contracts

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS, CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### III. FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

for goods and services awarded under a non-procurement transaction (e.g., grant or cooperative agreement) that are expected to equal or exceed \$25,000 or meet certain other criteria as specified in 2 CFR section 180.220. All non-procurement transactions entered into by a pass-through entity (i.e., subawards to subrecipients), irrespective of award amount, are considered covered transactions, unless they are exempt as provided in 2 CFR section 180.215.

- When a non-Federal entity enters into a covered transaction with an entity at a lower tier, the non-Federal entity must verify that the entity, as defined in 2 CFR section 180.995 and agency adopting regulations, is not suspended or debarred or otherwise excluded from participating in the transaction. This verification may be accomplished by (1) checking the *Excluded Parties List System (EPLS)* maintained by the General Services Administration (GSA) and available at https://www.sam.gov/portal/public/SAM/, (2) collecting a certification from the entity, or (3) adding a clause or condition to the covered transaction with that entity (2 CFR section 180.300).
- Non-Federal entities receiving contracts from the Federal Government are required to comply
  with the contract clause at FAR 52.209-6 before entering into a subcontract that will exceed
  \$30,000, other than a subcontract for a commercially available off-the-shelf item.

#### **Condition:**

Significant Deficiency, Instance of Non-Compliance: As a result of the testwork performed, the County (Department of Behavioral Health) did not have proper procedures in place for verifying that vendors were not debarred, suspended or otherwise excluded, nor for ensuring there is a clause or condition stated in the contract, prior to entering into covered transactions.

#### **Questioned Costs:**

No questioned costs were identified as a result of our procedures.

#### **Context:**

Two of the two contracts selected for testing did not include the EPLS clause or condition. In addition, the Department of Behavioral Health Compliance also reviewed its records and did not have support of their review of the contract. However, of the 2 transactions selected for testing, we noted none of the vendors selected were identified as a suspended or debarred vendor on Sam.gov as of the date of our fieldwork.

#### **Effect:**

As a result of the condition noted, there is an increased risk of non-compliance with procurement, suspension and debarment requirements.

#### Cause:

The County (Department of Behavioral Health) does not have proper procedures in place for verifying that vendors are not suspended, debarred or otherwise excluded prior to entering into covered transactions.

## SCHEDULE OF FINDINGS AND QUESTIONED COSTS, CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2017

#### III. FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

#### **Recommendation:**

We recommend the County (Department of Behavioral Health) implement policies and procedures to verify all vendors who are providing services to federally funded programs in excess of \$25,000 to ensure that the entity is not suspended, debarred, or otherwise excluded. This verification should be checked on the System for Awards Management (SAM) website, and evidence of the verification should be maintained.

#### **Views of Responsible Officials and Planned Corrective Actions:**

See separate corrective action plan.

## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS FOR THE FISCAL YEAR ENDED JUNE 30, 2017

Summarized below is the status of all audit findings reported in the prior year audit's schedule of audit findings and questioned costs.

Finding No.	Program Name/ Description	CFDA No.	Compliance Requirement	Status of Corrective Action
2016-001	Employer Payroll Transmission Reports	Not Applicable	Not Applicable	Implemented
2016-002	Substance Abuse Prevention and Treatment Block Grant	93.959	Procurement Suspension and Debarment	Partially Implemented -  The Department of Behavioral Health (DBH) drafted policies and procedures to verify all entities who are providing services to federally funded programs through a subaward in excess of \$25,000 are not suspended, debarred, or otherwise excluded. However, the procedures were not finalized until after June 30, 2017. Although the recommendation suggests that DBH should verify each vendor by using the System for Awards Management (SAM), DBH has elected to include a clause or condition in their contracts which is an acceptable method to comply with 2 CFR section 180.300. However, upon review of DBH's subawards it was noted that DBH did not have clause/conditions for 2 out of 26 subawards tested. In response to the follow-up audit, DBH further updated their policy and procedures as well as their subaward contract templates.  See County's Separate Summary Schedule of Prior Audit Findings for Status of Corrective Action (Finding 2016-002).
2016-003	Medical Assistance Program (Medicaid Cluster)	93.778	Allowable Costs/Cost Principles, Cash Management	Partially Implemented -  Human Services (HS) has formalized adequate written procedures for determining the allowability of costs as described in accordance with Subpart E – Cost Principles. Procedures for cash management related to the requirements of 2 CFR Section 200.305 have been written, however, the procedures did not directly relate to HS's Medicaid Cluster grants. Subsequent to June 30, 2017, the cash management procedures were updated to include the Department of Health Care Services, which provides funding for Title XIX programs to County Welfare Departments.

Finding No.	Program Name/ Description	CFDA No.	Compliance Requirement	Status of Corrective Action  See County's Separate Summary Schedule of Prior Audit Findings for Status of Corrective Action (Finding 2016 -003).
2016-004	Medical Assistance Program (Medicaid Cluster)	93.778	Eligibility	Not Implemented -  The Transitional Assistance Department (TAD) issued a flyer in July 2017 reminding Eligibility Workers to upload Medi-Cal Eligibility Database System (MEDS) screens used to verify eligibility into case files in C-IV to meet the eligibility documentation requirements. Two out of ten cases reviewed did not have the required documentation supporting the client's citizenship status uploaded to the C-IV database. TAD was able to verify citizenship status through MEDS, but the screen was not imaged into the C-IV database.  See County's Separate Summary Schedule of Prior Audit Findings for Status of Corrective Action (Finding 2016-004).
2016-005	Social Services Block Grant	93.667	Allowable Costs/Cost Principles, Cash Management	Implemented
2016-006	Community Development Block Grant (CDBG) - Entitlement Grants Cluster	14.218	Allowable Costs/Cost Principles, Cash Management	Implemented
2016-007	Community Development Block Grant (CDBG) - Entitlement Grants Cluster	14.218	Allowable Costs/Cost Principles, Cash Management	Implemented

F: 1:	Program	CED A	G. II	
Finding	Name/	CFDA No	Compliance	Status of Connective Action
No.	Description	No.	Requirement	Status of Corrective Action
2016-008	Community Development Block Grant (CDBG) - Entitlement Grants Cluster	14.218	Allowable Costs/Cost Principles	Partially Implemented  The Department (CDH) added guidance in their manual stating they will claim costs using the 10% de minimis rate so long as there is no negotiated indirect cost rate with a federal cognizant agency, and began calculating their indirect costs using the de minimis rate prior to June 30, 2017. CDH also identified that the 10% de minimis rate will be used in their next grant agreements, which were dated after June 30, 2017.
				See County's Separate Summary Schedule of Prior Audit Findings for Status of Corrective Action (Finding 2016-010).
2016-009	Home Investment Partnerships Program (HOME)	14.239	Allowable Costs/Cost Principles, Cash Management	Implemented
2016-010	Home Investment Partnerships Program (HOME)	14.239	Activities Allowed or Unallowed, Allowable Costs/Cost Principles	Implemented
2016-011	Home Investment Partnerships Program (HOME)	14.239	Allowable Costs/Cost Principles	Partially Implemented -  The Department (CDH) added guidance in their manual stating they will claim costs using the 10% de minimis rate so long as there is no negotiated indirect cost rate with a federal cognizant agency, and began calculating their indirect costs using the de minimis rate prior to June 30, 2017. CDH also identified that the 10% de minimis rate will be used in their next grant agreements, which were dated after June 30, 2017.  See County's Separate Summary Schedule of Prior
				Audit Findings for Status of Corrective Action (Finding 2016-010).

Finding No.	Program Name/ Description	CFDA No.	Compliance Requirement	Status of Corrective Action
2016-012	Home Investment Partnerships Program (HOME)	14.239	Program Income	In January 2017, HUD revised the regulations governing the HOME program components of the action plans for local governments (§ 91.220) and States (§ 91.320). Specifically, this rule revises sections § 91.220(1)(2)(i) and § 91.320(k)(2)(i) to require the participating jurisdiction to include uncommitted program income, repayments, and recaptured funds that it has received during the previous year in the resources it describes in its annual action plan. The rule gives participating jurisdictions the option to include program income, repayments, or recaptures expected to be received during the program year in the summary of anticipated Federal resources described in their annual action plan instead of requiring program income to be used before drawing down any new HOME funds. However, the department did not become aware of this change in regulation until August 2017. From the prior audit report until June 30, 2017 the department did not draw down any program income or entitlement funds. The first entitlement draw was made in August 2017, after the department was notified of the change in regulation.  See County's Separate Summary Schedule of Prior Audit Findings for Status of Corrective Action (Finding 2016-012).
2016-013	Home Investment Partnerships Program (HOME)	14.239	Special Tests and Provisions - Housing Quality Standards and Qualification as Affordable Housing	Implemented
2016-014	Home Investment Partnerships Program (HOME)	14.239	Special Tests and Provisions - Wage Rate Requirements	Partially Implemented -  The Department (CDH) put procedures in place to help ensure construction contractors/sub-contractors submit their certified payroll within the timeframe required by the U.S. Department of Labor prior to June 30, 2017, but they were not formalized until after June 30, 2017.

Finding No.	Program Name/ Description	CFDA No.	Compliance Requirement	Status of Corrective Action  See County's Separate Summary Schedule of Prior Audit Findings for Status of Corrective Action (Finding 2016-014).
2016-015	Aging Cluster	93.041, 93.042, 93.043, 93.044, 93.045, 93.052, 93.053	Allowable Costs/Cost Principles, Cash Management	Partially Implemented -  The Department of Aging and Adult Services (DAAS) had formalized adequate written procedures for determining the allowability of costs as described in accordance with Subpart E – Cost Principles.  Procedures for cash management related to the requirements of 2 CR Section 200.305 were also written, however, the procedures did not directly relate to the Aging Cluster grants. Subsequent to June 30, 2017, DAAS updated the procedures and corrected the deficiency.  See County's Separate Summary Schedule of Prior Audit Findings for Status of Corrective Action (Finding 2016-015).

# SUPPLEMENTAL SCHEDULE OF OFFICE OF CALIFORNIA STATE DEPARTMENT OF AGING GRANTS FOR THE FISCAL YEAR ENDED JUNE 30, 2017

Federal Grantor/Program Title	Federal CFDA Number	Contract Number	Federal Award Expenditures	State Expenditures
Senior Community Service Employment Program - Title V (SCSEP)	17.235	TV-1617-20	\$ 295,186	\$ -
Special Programs for the Aging - Chapter 3, Prevention of Elder Abuse	93.041	AP-1617-20	11,463	-
Special Programs for the Aging - Chapter 2, Long Term Care Ombudsman	93.042	AP-1617-20	48,603	-
Special Programs for the Aging - Title III, Part D, Disease Prevention	93.043	AP-1617-20	96,559	-
Special Programs for the Aging - Title III, Part B, Supportive Services	93.044	AP-1617-20	1,478,363	44,672
Special Programs for the Aging - Title III, Parts C1 and C2, Nutrition Services	93.045	AP-1617-20	3,096,146	454,185
National Family Caregiver Support - Title III, Part E	93.052	AP-1617-20	811,592	-
Nutrition Services Incentive Program	93.053	AP-1617-20	471,010	-
Medicare Enrollment Assistance Program- MIPPA	93.071	MI-1617-20	23,373	-
ACA Financial Alignment	93.626	FA-1617-20	32,620	-
Medi-Cal Assistance Program (Title XIX, MSSP)	93.778	MS-1617-17	568,923	568,923
State Health Insurance Assistance Program (HICAP)	93.324	HI-1617-20	183,602	243,460
Ombudsman Special Deposit Fund (SDF)	N/A	AP-1617-20	-	80,473
Ombudsman Skilled Nursing Facility Quality & Accountability Fund (SNFQAF)	N/A	AP-1617-20	-	84,877
Ombudsman Public Health L & C Program Fund	N/A	AP-1617-20	-	17,869
Totals	\$ 7,117,440	\$ 1,494,459		