# COUNTY OF ONONDAGA, NEW YORK REPORT REQUIRED BY THE SINGLE AUDIT ACT DECEMBER 31, 2011

# COUNTY OF ONONDAGA, NEW YORK

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# INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE WITH REQUIREMENTS THAT COULD HAVE A DIRECT AND MATERIAL EFFECT ON EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE IN ACCORDANCE WITH OMB CIRCULAR A-133

To the Honorable County Executive, Joanne M. Mahoney and Honorable Members of the County Legislature County of Onondaga, New York

#### **COMPLIANCE**

We have audited the compliance of the County of Onondaga, New York (the "County") with the types of compliance requirements described in the *U.S. Office of Management and Budget ("OMB") Circular A-133 Compliance Supplement* that could have a direct and material effect on each of the County's major federal programs for the year ended December 31, 2011. The County's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts and grants applicable to each of its major federal programs is the responsibility of the County's management. Our responsibility is to express an opinion on the County's compliance based on our audit.

The County's basic financial statements include the operations of Onondaga Community College, Onondaga County Convention Center/War Memorial Complex Management Corporation, Onondaga County Industrial Development Agency, Friends of the Rosamond Gifford Zoo and the Onondaga Tobacco Asset Securitization Corporation whose federal awards are not included in the schedule of expenditures of federal awards for the year ended December 31, 2011. Our audit, described below, did not include the federal awards of the above entities as these entities conducted audits in accordance with OMB Circular A-133, if required.

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 OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 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. Our audit does not provide a legal determination on the County's compliance with those requirements.

As described in item 11-04 in the accompanying schedule of findings and questioned costs, the County did not comply with requirements regarding allowable costs/cost principles and eligibility that are applicable to the major program, Low-Income Home Energy Assistance Program (93.568). Compliance with such requirements is necessary, in our opinion, for the County to comply with the requirements applicable to that program.

In our opinion, except for the noncompliance described in the preceding paragraph, the County complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on its major federal program for the year ended December 31, 2011. The results of our auditing procedures also disclosed other instances of noncompliance with those requirements, which are required to be reported in accordance with OMB Circular A-133 and which are described in the accompanying schedule of findings and questioned costs as items 11-07 and 11-09.

#### INTERNAL CONTROL OVER COMPLIANCE

Management of the County is responsible for establishing and maintaining effective internal control over compliance with requirements of laws, regulations, contracts and grants applicable to federal programs. In planning and performing our audit, we considered the County's internal control over compliance with requirements that could have a direct and material effect on a major federal program in order to determine our auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with OMB Circular A-133, 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.

Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over compliance that might be significant deficiencies or material weaknesses and therefore, there can be no assurance that all deficiencies, significant deficiencies, or material weaknesses have been identified. However, as discussed below, we identified certain deficiencies in internal control over compliance that we consider to be material weaknesses and other deficiencies that we consider to be significant deficiencies.

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. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 11-04 through 11-07 to be material weaknesses.

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. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as item 11-08 to be a significant deficiency.

The County's responses to the findings identified in our audit are described in the accompanying schedule of findings and questioned costs. We did not audit the County's responses and, accordingly, we express no opinion on the responses.

# SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

Testone, Mountall + Ducaya, LLP

We have audited the financial statements of the County of Onondaga, New York as of and for the year ended December 31, 2011 and have issued our report thereon dated September 25, 2012. Our audit was performed for the purpose of forming an opinion on the financial statements taken as a whole. The accompanying schedule of expenditures of federal awards is presented for the purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the financial statements and, in our opinion, is fairly stated, in all material respects, in relation to the financial statements taken as a whole.

#### **OTHER MATTERS**

In accordance with *Government Auditing Standards*, we have also issued a report dated May 16, 2012 on our consideration of the County's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of our audit.

This report is intended solely for the information of the County Legislature, management and federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

September 25, 2012

Syracuse, New York

Federal Grantor/Program Title	CFDA#	Pass-Through Grantor ID#	Federal Expenditures
U.S. Department of Agriculture:			
Pass-Through New York State Education Department: Child Nutrition Cluster:			
School Breakfast Program National School Lunch Program	10.553 10.555		\$ 8,195 14,263
Total Child Nutrition Cluster	10.555		22,458
Pass-Through NYS Department of Health:			
Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	10.557	C025777	1,775,266
	10.557	C25815	271,702
Total WIC	10.557		6,983,081
10th 112			9,030,049
Pass-Through New York State (NYS) Department of Family Assistance:			
State Administrative Matching Grants for Supplemental Nutrition Assistance Program	10.561		4,022,313
			-,,-
Pass-Through NYS Department of Health:			
State Administrative Matching Grants for Supplemental Nutrition Assistance Program	10.561	C026674	14,378
Total State Administrative Matching Grants for Supplemental Nutrition Assistance Program			4,036,691
Total U.S. Department of Agriculture			\$ 13,089,198
			4 13,003,170
U.S. Department of Defense:			
Direct Program:			
Protection of Essential Highways, Highway Bridge Approaches, and Public Works	12.105		\$ 356,794
Total II S. Danadurant of D. S.			n 256 <b>5</b> 04
Total U.S. Department of Defense			\$ 356,794
U.S. Department of Housing and Urban Development: Direct Programs:			
Community Development Block Grants/Entitlement Grants	14.218		\$ 2,842,686
ARRA - Community Development Block Grants/Entitlement Grants	14.218		8,153
Total Community Development Block Grants/Entitlement Grants			2,850,839
Emergency Shelter Grants Program	14 22 1		
Sinci gency directed Grants Flogram	14.231		100,140
Home Investment Partnerships Program	14.239		704,839
Lead-Based Paint Hazard Control in Privately- Owned Housing	14,900		2,228,790
Pass-Through City of Syracuse:			
Lead-Based Paint Hazard Control in Privately- Owned Housing	14.900	NYLHD0199-09	30,000
Total Lead-Based Paint Hazard Control in Privately Owned Housing	14,900		22,187
			2,260,977
Pass-Through NYS Department of Family Assistance:			
ARRA - Homeless Prevention and Rapid Re-Housing	14.257		860,113
Total U.S. Department of Housing and Urban Development			\$ 6,796,908
J.S. Department of Justice:			
Direct Program:			
Public Safety Partnership and Community Policing Grants  Pass-Through NYS Department of Family Policing Grants:	16.710		\$ 702,380
	16.710		52 502
Public Safety Parmership and Community Policing Grants	10.710		53,582 755,962
Public Safety Partnership and Community Policing Grants  Total Public Safety Partnership and Community Policing Grants			
Total Public Safety Partnership and Community Policing Grants  Total Public Safety Partnership and Community Policing Grants			
· · · · · · · · · · · · · · · · · · ·			
Total Public Safety Partnership and Community Policing Grants  Direct Program:  Edward Byrne Memorial Justice Assistance Grant Program	16.738		95,852
Total Public Safety Partnership and Community Policing Grants  Direct Program:  Edward Byrne Memorial Justice Assistance Grant Program  ass-Through NYS Division of Criminal Justice Services:	16.738		95,852
Total Public Safety Partnership and Community Policing Grants  Direct Program:  Edward Byrne Memorial Justice Assistance Grant Program	16.738	T632320	26,260
Total Public Safety Partnership and Community Policing Grants  Direct Program:  Edward Byrne Memorial Justice Assistance Grant Program  ass-Through NYS Division of Criminal Justice Services:		T632320 C632351	

Federal Grantor/Program Title	CFDA#	Pass-Through Grantor ID#	Federal Expenditures
U.S. Department of Justice (Continued):			
Direct Programs:			
Crime Laboratory Improvement	16.564	DN-BX-K047	66,855
	16.564	DN-BX-K120	144,060
	16.564	DN-BX-K091	20,618
Total Crime Laboratory Improvement			231,533
Pass-Through NYS Division of Criminal Justice Services:			
Paul Coverdell Forensic Sciences Improvement Grant Program	16.742	2009-CD-BX-0083	16,671
1		2010-CD-BX-0104	174,693
		C118154	60,235
		C104146	53,719
Total Paul Coverdell Forensic Sciences Improvement Grant Program			305,318
Pass-Through Rosamond Gifford Foundation: Project Safe Neighborhoods	16.609		20 20°
Project Sale Weighborhoods	10,009		39,202
Total U.S. Department of Justice			\$ 1,465,936
U.S. Danaytmant of Labour			
U.S. Department of Labor: Pass-Through NYS Office for the Aging:			
• •			
Senior Community Service Employment Program ARRA - Senior Community Service Employment Program	17.235		\$ 185,588
ARRA - Senior Community Service Employment Program	17.235		29,445
Total U.S. Department of Labor			\$ 215,033
J.S. Department of Transportation:			
Pass-Through NYS Department of Transportation:			
Highway Planning and Construction	20.205		\$ 3,847,027
ARRA - Highway Planning and Construction	20,205		735,958
			4,582,985
Metropolitan Transportation Planning	20.505		240,172
Pass-Through NYS Governor's Traffic Safety Committee:			
State and Community Highway Safety	20.600		118,783
Total U.S. Department of Transportation			\$ 4,941,940
nstitute of Museum and Library Services:			
Pass-Through NYS Department of Education:			
Museums for America	45.301		\$ 59,823
Total Institute of Museum and Library Services			\$ 59,823
U.S. Environmental Protection Agency:			
Pass-Through NYS Environmental Facilities Corporation:			
Congressionally Mandated Projects	66.202		\$ 3,540,447
ARRA - Capitalization Grants for Clean Water State Revolving Funds	66.458		133,060
D. The LAWOR of the Control of the C			
ass-Through NYS Department of Health: State Indoor Radon Grants	66.032	T027073	1,273
Total U.S. Environmental Destruction Access			
Total U.S. Environmental Protection Agency			\$ 3,674,780
J.S. Department of Energy:			
Direct Program: ARRA - Energy Efficiency and Conservation Block Grant Program	81.128		\$ 1.675.265
Zhiolog Zhiolonog and Consolvation Diox Otalit Flogram	61.128		\$ 1,675,268
Total U.S. Department of Energy			\$ 1,675,268
(Continued)			

Federal Grantor/Program Title	CFDA#	Grantor ID#	Federal Expenditures
J.S. Department of Education:			
Pass-Through NYS Office of Alcohol and Substance Abuse Services:			
Safe and Drug Free Schools and Communities State Grants	84.186		\$ 120,139
Pass-Through Syracuse City School District:			
Special Education Grants to the States (IDEA, Part B)	84.027		55,563
Pass-Through Department of Health:			
Early Intervention Cluster			
Special Education - Grants for Infants and Families	84.181	C21808	353,98
ARRA - Special Education - Grants for Infants and Families - Recovery Act	84.393	C025231	79,38
Total Early Intervention Cluster			433,36
Total U.S. Department of Education			\$ 609,06
J.S. Department of Health and Human Services: Direct Programs:			
Comprehensive Community Mental Health Services for Children with Serious	00.104		
Emotional Disturbances	93.104		\$ 893,690
Healthy Start Initiative	93.926		1,015,32
Pass-Through National Association of County and City Health Officials:			
Medical Reserve Corps Small Grant Program	93.008		5,09
ass-Through NYS Office for the Aging:			
Special Programs for the Aging, Title III, Part D, Disease Prevention and Health Promotion Services	93.043		20,54
Aging Cluster:			
Special Programs for the Aging, Title III, Part B, Grants for Supportive Services and Senior Centers	93.044		510,65
Special Programs for the Aging, Title III, Part C, Nutrition Services	93.045		899,20
Nutrition Services Incentive Program	93.053		245,87
Total Aging Cluster			1,655,73
National Family Caregiver Support, Title III, Part E	93.052		229,182
Medicare Enrollment Assistance Program	93.071		21,09
Centers for Medicare and Medicaid Services (CMS) Research, Demonstrations and Evaluations	93.779		13,29
Low-Income Home Energy Assistance ass-Through NYS Department of Family Assistance:	93.568		91,243
Low-Income Home Energy Assistance	93.568		15 450 70
Total Low-Income Home Energy Assistance	95.506		15,459,79
•			
Child Support Enforcement	93.563		2,052,07
ARRA - Child Support Enforcement	93.563		133,03
Total Child Support Enforcement			2,185,10
Child Care and Development Fund Cluster:			
Child Care and Development Block Grant	93.575		11,155,93
ARRA - Child Care and Development Block Grant	93.713		189,56
Total Child Care and Development Fund Cluster			11,345,50
Refugee and Entrant Assistance - Voluntary Agency Programs	93.567		1,312,162
Stephanie Tubbs Jones Child Welfare Services Program	93.645		405,722
Foster Care - Title IV-E	93,658		5 225 011
			5,335,015 187,163
ARRA - Foster Care - Title IV-E	93.658		

Federal Grantor/Program Title	CFDA#	Pass-Through Grantor ID#	Federal Expenditures
U.S. Department of Health and Human Services (Continued): Pass-Through NYS Department of Family Assistance:			
Adoption Assistance	93.659		3,235,662
ARRA - Adoption Assistance	93.659		262,682
Total Adoption Assistance			3,498,344
Social Services Block Grant	93.667		3,236,974
Chafee Foster Care Independence Program	93.674		212,108
Temporary Assistance for Needy Families Pass-Through NYS Department of Health:	93,558		38,931,470
Temporary Assistance for Needy Families	93,558	C021715	299,334
Total Temporary Assistance for Needy Families	30,000	0021713	39,230,804
Immunization Cluster:			
Immunization Grants	93,268	C023258	75 923
minutation organs	93.268	C023238 C023001	75,821 3,993
ARRA - Immunization	93.712	C025290	30,723
Total Immunization Cluster			110,537
State Children's Insurance Program	93.767	C021715	131,813
Preventive Health Services - Sexually Transmitted Diseases Control Grants	93.977	C021838	165,613
Preventive Health and Health Services Block Grant	93.991	C026674	37,471
Total Preventive Health and Health Services Block Grant	93.991	C0230001	<u>22,506</u> 59,977
Maternal and Child Health Services Block Grant to the States	93.994	C023001	9,801
	93.994	C0265	19,643
	93.994	C020238	44
	93.994 93.994	C021148 C026523	5,863
	93.994	C020323 C021565	130,513 29,731
Total Maternal and Child Health Services Block Grant to the States			195,595
Pass-Through Health Research, Inc.:			
Centers for Disease Control and Prevention - Investigations and Technical Assistance	93,283	C-3489-02, 03	3,195
	93.283	C-3487-02	2,256
	93.283	C-3487-03	110,447
Total Centers for Disease Control and Prevention - Investigations and Technical Assistance			115,898
Public Health Emergency Preparedness	93.069	1578-09	74,191
·	93.069	1578-08	163,474
Total Public Health Emergency Preparedness			237,665
Pass-Through NYS Office of Mental Health:			
Projects for Assistance in Transition from Homelessness	93.150		468,936
Pass-Through NYS Office of Alcohol and Substance Abuse Services:			
Block Grant for Prevention and Treatment of Substance Abuse	93.959		2,315,526

Federal Grantor/Program Title	CFDA#	Pass-Through Grantor ID#	Federal Expenditures
U.S. Department of Health and Human Services (Continued):			
Medical Assistance Program	93.778		18,625
Pass-Through NYS Office for People With Development Disabilities:			,
Medical Assistance Program	93.778		22,637
Pass-Through NYS Office of Mental Health:			,
Medical Assistance Program	93.778		410,332
Pass-Through NYS Department of Health:			·
ARRA - Medical Assistance Program	93.778		11,362,651
Medical Assistance Program	93.778	C021374	102,485
	93.778	C021715	109,690
	93.778		374,969,887
Total - Medical Assistance Program			386,996,307
Total U.S. Department of Health and Human Services			\$ 477,151,765
U.S. Department of Homeland Security:			
Pass-Through NYS Homeland Security:			
Hazardous Material Assistance Program	97.021		\$ 1,019
Emergency Management Performance Grants	97.042		190,372
Interoperable Emergency Communications	97.055		212,873
Pass-Through NYS Department of Health:			
Homeland Security Grant Program	97.067		1,034,018
Homeland Security Grant Program	97.067	C834594	ć 470
Total Homeland Security Grant Program	97.007	C034374	6,478 1,040,496
Tomorana bootany Grant Hogian			1,040,490
Total U.S. Department of Homeland Security			\$ 1,444,760
Total Expenditures of Federal Awards			\$ 511,481,271

# 1. BASIS OF PRESENTATION

#### **Pass-Through Programs**

Where the County receives funds from a government entity other than the federal government (pass-through), the funds are accumulated based upon the Catalog of Federal Domestic Assistance (CFDA) number when advised by the pass through grantor. Identifying numbers, other than CFDA numbers, which may be assigned by pass-through grantors, are not maintained in the County's financial management system. County management has identified certain pass-through identifying numbers and included them in the schedule of expenditures of federal awards.

# **Non-Monetary Federal Programs**

The County is awarded four financial assistance programs that do not result in cash receipts or disbursements, termed "non-monetary programs." During the fiscal year ended December 31, 2011, the County distributed \$6,965,098 of Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) food instruments to eligible persons participating in the WIC Program (CFDA 10.557), \$14,094,008 of energy assistance to eligible persons under the Low-Income Home Energy Assistance program (CFDA 93.568) and \$361,606,503 of medical goods and services were received by eligible persons participating in the Medical Assistance Program (CFDA 93.778), as listed in the accompanying schedule.

#### 2. BASIS OF ACCOUNTING

The schedule of expenditures of federal awards is presented on the modified accrual basis of accounting and the amounts presented are derived from the County's general ledger. Federal expenditures are recorded when an allowable cost is incurred under the applicable program and is due and payable. For programs with funding ceilings and caps, federal expenditures are only recorded and presented in the schedule of expenditures of federal awards up to such amounts.

#### 3. INDIRECT COSTS

Indirect costs are included in the reported expenditures to the extent such costs are included in the federal financial reports used as the source for the data presented.

### 4. MATCHING COSTS

Matching costs (i.e., the County's share of certain program costs) are not included in the schedule of expenditures of federal awards.

# 5. SUBRECIPIENTS

A summary of the federal programs that pass-through federal monies to a subrecipient entity is provided below.

Federal Programs with Subrecipients	CFDA#	Amount
Edward Byrne Memorial Justice Assistance Grant Program	16.738	\$ 72,807
Highway Planning and Construction	20.205	1,532,883
Metropolitan Transportation Planning	20.505	240,172
Special Programs for the Aging - Title III, Part D – Disease		ŕ
Prevention and Health Promotion Services	93.043	16,412
Special Programs for the Aging - Title III, Part B - Grants		·
for Supportive Services and Senior Centers	93.044	322,814
Special Programs for the Aging - Title III,		
Part C - Nutrition Services	93.045	662,240
National Family Caregiver Support, Title III, Part E	93.052	230,243
Nutrition Services Incentive Program	93.053	245,872
Low-Income Home Energy Assistance	93.568	87,702
Block Grant for Prevention and Treatment of Substance		•
Abuse	93.959	2,192,099

#### Part I - Summary of Auditor's Results

- The Independent Auditor's Report on the Basic Financial Statements expressed an unqualified opinion.
  - Material weaknesses in internal control were disclosed during the audit of the financial statements as required to be reported in accordance with Government Auditing Standards.
  - No instances of noncompliance material to the basic financial statements were disclosed during the audit.
- The Independent Auditor's Report on Compliance with Requirements Applicable to Major Federal Award Programs expressed a qualified opinion and the audit disclosed findings which are required to be reported under Section 510(a) of OMB Circular A-133.
  - Material noncompliance with requirements applicable to the major federal program was identified as required to be reported in accordance with OMB Circular A-133.
  - Other instances of noncompliance with requirements applicable to major federal programs were identified as required to be reported in accordance with OMB Circular A-133.
  - Material weaknesses in internal control over compliance with requirements applicable to major federal award programs were identified as required to be reported in accordance with OMB Circular A-133.
  - A significant deficiency in internal control over compliance with requirements applicable to major federal award programs was identified as required to be reported in accordance with OMB Circular A-133.

# Part I - Summary of Auditor's Results (cont'd)

• The dollar threshold to determine Type A programs was \$3,000,000. The major federal programs of the County for the year ended December 31, 2011 were as follows:

#### U.S. Department of Agriculture

- State Administrative Matching Grants for SNAP Program (10.561)
- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) (10.557)

# **Environmental Protection Agency (EPA)**

• Congressionally Mandated Projects (66.202)

# U.S. Department of Health and Human Services

- Medical Assistance Program (93.778)
- Temporary Assistance for Needy Families (93.558)
- Low-Income Home Energy Assistance Program (93.568)
- Child Care and Development Fund Cluster (93.575, 93.713)
- Foster Care Title IV-E (93.658)
- Social Services Block Grant (93.667)
- Adoption Assistance (93.659)

#### U.S. Department of Transportation

- Highway Planning and Construction (20.205)
- The County is not considered a low-risk auditee for the year ended December 31, 2011

#### Part II - Findings and Questioned Costs Relating to Federal Awards

Reference: 11-04

U.S. Department of Health and Human Services

Pass-through entities: NYS Department of Family Assistance and NYS Department of Health

Low-Income Home Energy Assistance Program (93.568)

**Onondaga County Department of Social Services** 

Program Year: 2011

#### Criteria:

Low-Income Home Energy Assistance Program ("LIHEAP") funds may be used to assist eligible households to meet the allowable cost of home energy, i.e. heating or cooling their residences (42 USC 8621(a) and 8624(b)(1)). Grantees may provide assistance to eligible individuals with household income less than 150 percent of the State's established poverty level, or 60 percent of the State median income. Grantees may give priority to those households with the highest home energy costs or needs in relation to income (42 USC 8624 (b)(2)). According to New York State guidelines add-on benefits may be issued if a household's income is in the Tier 1 income range.

#### Cause/Condition:

The County has policies and procedures to ensure federal awards are expended in an allowable manner on behalf of eligible individuals. In three cases an add-on benefit was erroneously awarded and in two cases distributed to eligible individuals. In one case a federal award was distributed based upon the incorrect source of heat (i.e. coal vs. oil) resulting in an overpayment.

#### **Questioned Costs:**

None noted.

#### **Effect:**

As a result of the County not following policies and procedures, instances of noncompliance with federal guidelines occurred.

#### Recommendation:

It is recommended that the County emphasize the importance of following stated policies and procedures to prevent noncompliance with allowability and eligibility federal program guidelines.

# Part II - Findings and Questioned Costs Relating to Federal Awards (Cont'd)

# Reference 11-04 (Cont'd)

# **Response:**

The supervisor e-mailed each worker who was cited with an error. At the time of the initial findings a memo was sent out to staff reiterating the kinds of errors that were found in the audit and outlining how the error could have been corrected. An e-mail was sent to our contract agency's (OFA) supervisor reiterating the errors found. One was found to be his worker's error.

Reference: 11-05

U.S. Department of Agriculture

Pass-through entity: NYS Department of Health

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) (10.557)

**Onondaga County Health Department** 

Program Year: 2011

#### Criteria:

Internal controls should provide reasonable assurance that only eligible individuals receive assistance under Federal award programs and that amounts provided to or on behalf of eligible recipients are calculated in accordance with program requirements and supported by proper documentation.

#### Cause/Condition:

The County has policies and procedures in place to ensure proper completion and accuracy of documentation as well as evidence of review during the eligibility process. The participant and caseworker sign off and date applications as an indication that the form is accurate and complete. In six of sixty cases tested, the Authorization form was missing a sign off and/or date.

#### **Questioned Costs:**

None noted.

# Part II - Findings and Questioned Costs Relating to Federal Awards (Cont'd)

Reference: 11-05 (Cont'd)

#### **Effect:**

Although no improper payments occurred in the above cases, by not following established internal controls, a potential for noncompliance with eligibility federal guidelines exists.

#### **Recommendation:**

It is recommended that the County emphasize the importance of following stated policies and procedures to prevent noncompliance with eligibility federal program guidelines.

# **Response:**

During FY2011, the OCHD WIC Program operated using a chartless system for clinic operations. The chartless system included the development of the Signature Authorization binders which included copies of Signature Authorization forms. As per NYSDOH WIC Program, the original Signature Authorization form needs to be initialed and dated at each certification appointment. The initialing and dating of the form took place on the copy of the original form (as approved by NYSDOH WIC Program). If a change to the Signature Authorization form was made, a designated staff member was assigned to place the original Signature Authorization form in the participant chart and make a copy of the new Signature Authorization form and place it in the Signature Authorization binder.

In June 2012, a change in this procedure was necessitated by 1) reduction in clinic staffing and 2) results from Quality Assurance monitors. The change in procedure did away with the chartless system and Signature Authorization binders. The procedure presently in place requires the participant chart containing the original Signature Authorization form to be "pulled" for each participant appointment. This change in procedure ensures that the original form can be completed by the WIC staff at the time of the appointment, therefore reducing the incidence of error by eliminating a step in the process.

This process was reviewed with WIC staff on June 26, 2012. Compliance to this process is monitored weekly through the weekly Income Q.A. Monitor and is scheduled quarterly on the Monthly Quality Assurance Monitors. Results of the Quality Assurance Monitors are reviewed with all staff during monthly staff meetings.

# Part II - Findings and Questioned Costs Relating to Federal Awards (Cont'd)

Reference: 11-06

U.S. Department of Health and Human Services

Pass-through entities: NYS Department of Family Assistance and NYS Department of Health

Adoption Assistance 93.659

**Onondaga County Department of Social Services** 

Program Year: 2011

#### Criteria:

Internal controls should provide reasonable assurance that only eligible individuals receive assistance under Federal award programs and that amounts provided to or on behalf of eligible recipients are calculated in accordance with program requirements and supported by proper documentation.

#### Cause/Condition:

The County has policies and procedures in place to ensure proper completion and accuracy of documentation as it relates to federal requirements including eligibility and allowability as it relates to Adoption Assistance. Policies and procedures were not followed in the instances noted below:

- In one instance the adoption subsidy agreement was missing the signature of the New York State Adoption Subsidy Official,
- In one instance the Form LDSS-4623 supporting the eligibility determination made by New York State was not retained,
- In one instance verification of enrollment in a secondary school or trade school was not done until a previously scheduled recertification date rather than as of the recipient's 18<sup>th</sup> birthday,
- In one instance an error in the retroactive calculation resulted in the County not utilizing Title IV-E funds the recipient was eligible for.

#### **Questioned Costs:**

None noted.

#### **Effect:**

Of the cases referenced above, no unallowable payments or payments to ineligible individuals were noted. However, a deviation from prescribed controls results in a risk of noncompliance with federal program guidelines.

# Part II - Findings and Questioned Costs Relating to Federal Awards (Cont'd)

Reference: 11-06 (Cont'd)

#### Recommendation:

It is recommended that the County emphasize the importance of following stated policies and procedures to prevent noncompliance with federal program guidelines.

# **Response:**

This individual is IV-E eligible past 18 years old because he is enrolled as a student in college. New (last Fall) regulations allow IV-E continuation for hard-to-place youths if they are attending secondary, vocational, or training school.

This individual continued IV-E adoption subsidy, an annual certification letter that stated the child's enrollment in college that was dated for the current year but after his 18th birthday. He turned 18 in July and the certification letter was for the September college enrollment session.

# Part II - Findings and Questioned Costs Relating to Federal Awards (Cont'd)

Reference: 11-07

U.S. Department of Health and Human Services

Pass-through entities: NYS Department of Family Assistance and NYS Department of Health

Adoption Assistance 93.659

**Onondaga County Department of Social Services** 

Program Year: 2011

#### Criteria:

In accordance with Adoption Assistance eligibility requirements per OMB Circular A-133, once a child is determined eligible to receive title IV-E adoption assistance, he or she remains eligible and the subsidy continues until either the age of 18 (or 21 if the IV-E agency determines that the child has a mental or physical disability which warrants the continuation of assistance) (42 USC 673(a)(4)(A) and (B)).

#### Cause/Condition:

The recipient is over the age of 18 and has not been classified as disabled or handicapped and therefore not eligible for the adoption assistance subsidy.

#### **Questioned Costs:**

\$7,390

#### Effect:

During the fiscal year ending December 31, 2011, there was an overpayment of federal funds that resulted in questioned costs.

# Part II - Findings and Questioned Costs Relating to Federal Awards (Cont'd)

Reference: 11-07 (Cont'd)

#### Recommendation:

The County should establish policies and procedures to ensure federal funds are expended in accordance with OMB Circular A-133.

#### **Response:**

The individual has been changed from IV-E to Non IV-E and the amount is \$17,354.97. Case was changed to Non-IV-E through the child turning 21, which ended the subsidy.

This review of a child not receiving continued IV-E benefits past age 18 is just a case in error. We apparently did not capture all of the 18 year olds for continued IV-E adoption benefits when legislation changed in October 2011.

# Part II - Findings and Questioned Costs Relating to Federal Awards (Cont'd)

Reference: 11-08

U.S. Department of Health and Human Services

Pass-through entities: NYS Department of Family Assistance and NYS Department of Health

Low-Income Home Energy Assistance Program (93.568) Child Care and Development Fund Cluster (93.575, 93.713)

Social Services Block Grant (93.667)

**Onondaga County Department of Social Services** 

Program Year: 2011

#### Criteria:

Internal controls should provide reasonable assurance that only eligible individuals receive assistance under Federal award programs and that amounts provided to or on behalf of eligible recipients are calculated in accordance with program requirements and supported by proper documentation.

#### Cause/Condition:

The County has policies and procedures in place to ensure proper completion and accuracy of documentation as it relates to federal requirements including eligibility and allowability. Policies and procedures were not followed in the instances noted below:

- Low-Income Home Energy Assistance Program In two of forty cases selected for testing, the case file did not include a WMS inquiry print screen that would serve as evidence that duplicate payments across Counties did not occur.
- Child Care and Development Fund Cluster In two instances there were no payment agreements for the daycare vendors to allow verification of the rate paid in the Kinder Track system.
- Social Services Block Grant Although no instances were found where payments were made to a vendor that was suspended or debarred, currently the County does not have a policy in place to verify non-contracted vendors have not been suspended or debarred. In addition, in one instance, services were recorded to an individual with a similar name, rather than the individual that received the benefit.

#### **Questioned Costs:**

None noted.

# Part II - Findings and Questioned Costs Relating to Federal Awards (Cont'd)

Reference: 11-08 (Cont'd)

#### **Effect:**

Of the cases referenced above, no unallowable payments or payments to ineligible individuals were noted. However, a deviation from prescribed controls results in a risk of noncompliance with federal program guidelines.

#### **Recommendation:**

It is recommended that the County emphasize the importance of following stated policies and procedures to prevent noncompliance with federal program guidelines.

#### **Response:**

A staff meeting was conducted on 9/1/12 to remind staff to make sure they review the case record for proper WMS documentation, narrate, and expectation to be more careful. Payment agreements appear to have been misplaced. We will emphasize the importance of maintaining the vendor files. The Department of Social Services will work with the Comptroller's Office on a process to verify non-contracted vendors have not been suspended or debarred and to reiterate the importance of verifying names that are similar in nature.

# Part II - Findings and Questioned Costs Relating to Federal Awards (Cont'd)

Reference: 11-09

U.S. Department of Agriculture

Pass-through entity: NYS Department of Health

Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) (10.557)

**Onondaga County Health Department** 

Program Year: 2011

#### Criteria:

Per OMB Circular A-133, in determining eligibility for individuals, a competent professional authority must perform or document a hematological test for anemia if the applicant has no nutritional risk factor prescribed by the State agency other than anemia (7 CFR section 246.7(e)).

### Condition/Cause:

Evidence could not be provided to support that a hemoglobin test was conducted in accordance with federal eligibility guidelines.

#### **Questioned Costs:**

None noted.

#### **Effect:**

The County was not in compliance with federal eligibility guidelines.

#### Recommendation:

We recommend the County ensure they are in compliance with all federal eligibility guidelines as outlined in OMB Circular A-133. We recommend the County follow policies and procedures to ensure the required hematological test is conducted in all future eligibility determinations.

# Part II - Findings and Questioned Costs Relating to Federal Awards (Cont'd)

Reference: 11-09 (Cont'd)

#### Response:

The WIC single audit completed on FY2011 noted that one of sixty charts reviewed did not have evidenced documentation to support that a hemoglobin test was conducted as indicated.

All WIC staff has been in-serviced on the policy and procedure for completing hemoglobin testing and documenting its occurrence in the corresponding child's chart. The OCHD WIC program has recently implemented new policy originating from the NYSDOH-WIC in 2011 regarding certifications for children ages 1-5 years. In August 2011, the certification period for children changed from 6 months to 1 year. In August 2011, a new hematological testing policy was issued to correspond with the 1 year child certification. This policy changed the intervals that hematological testing is required.

Ongoing monitoring that all indicated child hemoglobin testing is completed and documented in the child's corresponding chart is monitored via weekly QI/QA activities completed by the senior nutritionist on randomly selected nutrition staff. Individual staff noted to be noncompliant with policy and/or procedure are counseled and educated on policy/procedure compliance. Audit results are noted and shared with staff. Any staff compliance concerns are further discussed with the WIC Program Coordinator.

# Part III - Status of Prior Year Federal Award Findings and Questioned Costs

Reference: 10-1

**Status:** Management has taken corrective action.

Reference: 10-2

**Status:** See current year finding 11-08.

Reference: 10-3

**Status:** See current year finding 11-05.

Reference: 10-4

**Status:** Management has taken corrective action.

Reference: 10-5

**Status:** Management has taken corrective action.