Schedules of Expenditures of Federal Awards and Reports Required by the Uniform Guidance Year Ended September 30, 2019



Schedules of Expenditures of Federal Awards and Reports Required by the Uniform Guidance Year Ended September 30, 2019

#### Contents

Independent Auditor's Reports Required by the Uniform Guidance	
Independent Auditor's Report on Schedules of Expenditures of Federal Awards	3-4
Independent Auditor's Report on Compliance For Each Major Federal Program and Report on Internal Control Over Compliance Required by the Uniform Guidance	5-13
Schedule I - Schedule of Expenditures of Federal Awards, By Federal Grantor	14-27
Schedule II - Schedule of Expenditures of Federal Awards, By District Agency	28-35
Notes to Schedules of Expenditures of Federal Awards	36-38
Schedule of Findings and Questioned Costs	39-100
Management's Section	
Appendix A - Summary Schedule of Prior Audit Findings	
Appendix B - Management's Corrective Action Plan	



Tel: 202-644-5400 Fax: 202-644-5401 www.bdo.com

#### **Independent Auditor's Report**

To the Mayor and the Council of the Government of the District of Columbia

#### Report on Schedules of Expenditures of Federal Awards

We have audited the accompanying schedules of expenditures of federal awards of the Government of the District of Columbia by federal grantor and by District agency for the year ended September 30, 2019, and the related notes (the financial statements).

#### Management's Responsibility

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the financial statements that are free from material misstatement, whether due to fraud or error.

#### Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit 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 the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.



#### Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the expenditures of federal awards of the Government of the District of Columbia for the year ended September 30, 2019, in accordance with accounting principles generally accepted in the United States of America.

BDO USA, LLP

October 30, 2020



Tel: 202-644-5400 Fax: 202-644-5401 www.bdo.com

Independent Auditor's Report on Compliance For Each Major Federal Program and Report on Internal Control Over Compliance Required by the Uniform Guidance

To the Mayor and the Council of the Government of the District of Columbia

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

We have audited the Government of the District of Columbia's (the District) compliance with the types of compliance requirements described in the U.S. Office of Management and Budget (OMB) Compliance Supplement that could have a direct and material effect on each of the District's major federal programs for the year ended September 30, 2019. The District's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

The accompanying Schedules of Expenditures of Federal Awards and our audit described below do not include the federal expenditures of the District of Columbia Housing Finance Agency (HFA). Our audit, described below, did not include the operations of HFA because the component unit engaged other auditors to have an audit performed in accordance with Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (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.

#### Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the District'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 the 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 District'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 unmodified and modified opinions on compliance for each major federal program. However, our audit does not provide a legal determination of the District's compliance.

BDO USA, LLP, a Delaware limited liability partnership, is the U.S. member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms.



#### Basis for Adverse Opinion on the Major Federal Program Identified in Table I

As described in the accompanying schedule of findings and questioned costs, and as identified in Table I below, the District did not comply with requirements regarding the following:

Table	I - Material No	ncompliance Resulting	g In Adverse Opinion				
Federal Awarding Agency	CDFA Number (s)	Number (s) Program		Finding Number			
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Assistance for Needy Families				
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Special Tests and Provisions - Child Support Non-Cooperation	2019-011			
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Reporting; Special Tests and Provisions - Penalty for Failure to Comply with Work Verification Plan	2019-014			

Compliance with such requirements is necessary, in our opinion, for the District to comply with the requirements applicable to that program.

#### Adverse Opinion on the One Major Federal Program Identified in Table I

In our opinion, because of the significance of the matters discussed in the Basis for Adverse Opinion paragraph, the District did not comply in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on the major federal program identified in Table I for the year ended September 30, 2019.

#### Basis for Qualified Opinions on the Seven Major Federal Programs Identified in Table II

As described in the accompanying schedule of findings and questioned costs, and as identified in Table II below, the District did not comply with requirements regarding the following:

Table II - Material Noncompliance Resulting In Qualified Opinions							
Federal Awarding Agency	CDFA Number (s)	Major Program	Compliance Requirement	Finding Number			
Agriculture	10.551, 10.561	Supplemental Nutrition Assistance Program Cluster	Special Tests and Provisions - ADP System for SNAP	2019-001			



Table	II - Material Noi	ncompliance Resulting	In Qualified Opinions			
Federal Awarding Agency	CDFA Number (s)	Major Program	Compliance Requirement	Finding Number		
Agriculture	10.551, 10.561	Supplemental Nutrition Assistance Program Cluster	Special Tests and Provisions - EBT Card Security	2019-002		
Housing and Urban Development	14.239	HOME Investment Partnerships Program	Eligibility	2019-005		
Health and Human Services	93.600	Head Start	ead Start Special Test and Provisions - Monitoring of Income Eligibility Requirement			
Health and Human Services	93.600	Head Start	Special Test and Provisions - Program Governance	2019-017		
Health and Human Services	93.658	Foster Care - Title IV-E	Eligibility	2019-018		
Health and Human Services	93.658	Foster Care - Title IV-E	Reporting	2019-019		
Health and Human Services	93.659	Adoption Assistance - Title IV-E	Eligibility	2019-020		
Health and Human Services	93.914	HIV Emergency Relief Project Grants	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	2019-024		
Health and Human Services	93.917	HIV Care Formula Grants	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	2019-025		

Compliance with such requirements is necessary, in our opinion, for the District to comply with the requirements applicable to those programs.

#### Qualified Opinions on the Seven Major Federal Programs Identified in Table II

In our opinion, except for the noncompliance described in the Basis for Qualified Opinions paragraph above, the District complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on the major federal programs identified in Table II for the year ended September 30, 2019.



#### Unmodified Opinions on Each of the Other Major Federal Programs

In our opinion, the District 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 other major federal programs identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs for the year ended September 30, 2019.

#### Other Matters

The results of our auditing procedures disclosed other 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, and as identified in Tables III and IV below. Our opinion on each major federal program is not modified with respect to these matters.

Table III - Other Instances of Noncompliance Noted in Program with an Adverse Opinion								
Federal Awarding Agency	CDFA Number (s)	Major Program	Compliance Requirement	Finding Number				
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Reporting	2019-010				
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Special Tests and Provisions - Income Eligibility and Verification System	2019-012				
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Special Tests and Provisions - Penalty for Refusal to Work	2019-013				

Table IV - Other Instances of Noncompliance							
Federal Awarding Agency	CDFA Number (s)	Major Program	Compliance Requirement	Finding Number			
Agriculture	10.553, 10.555, 10.556, 10.559	Child Nutrition Cluster	Eligibility	2019-003			
Agriculture	10.553, 10.555, 10.556, 10.559	Child Nutrition Cluster	Special Tests and Provisions - Verification of Free and Reduced-Price Applications (NSLP)	2019-004			



	Table IV - 0	Other Instances of Non	compliance	
Federal Awarding Agency	CDFA Number (s)	Major Program	Compliance Requirement	Finding Number
Housing and Urban Development	14.239	HOME Investment Partnerships Program	Special Tests and Provisions - Housing Quality Standards	2019-006
Housing and Urban Development	14.241	Housing Opportunities for Persons with AIDS	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	2019-007
Education	Student Financial 84.007, 84.033, 84.063, 84.268, 93.925			2019-008
Health and Human Services	93.569	Community Services Block Grant	Principles Subrecipient Monitoring	2019-015
Health and Human Services	93.659	Adoption Assistance - Title IV-E	Reporting	2019-021
Health and Human Services	93.775, 93.777, 93.778	Medicaid Cluster	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	2019-022
Health and Human Services	93.775, 93.777, 93.778	Medicaid Cluster	Eligibility	2019-023



The District's responses to the noncompliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs. The District'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 District 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 District'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 District'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 material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that have not been identified. However, as discussed below, we identified certain deficiencies in internal control over compliance that we consider to be material weaknesses and 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, and as identified in Table V below, to be material weaknesses.

Table V	- Material Wea	knesses in Internal Co	ntrol Over Compliance	e	
Federal Awarding	CDFA	Major	Compliance	Finding	
Agency	Number (s)	Program	Requirement	Number	
Agriculture	10.551, 10.561	Supplemental Nutrition Assistance Program Cluster	Special Tests and Provisions - ADP System for SNAP	2019-001	
Agriculture	10.551, 10.561	Supplemental Nutrition Assistance Program Cluster	Special Tests and Provisions - EBT Card Security	2019-002	
Housing and Urban Development	14.239	HOME Investment Partnerships Program	Eligibility	2019-005	



Table V	Table V - Material Weaknesses in Internal Control Over Compliance								
Federal Awarding Agency	CDFA Number (s)	Major Program	Compliance Requirement	Finding Number					
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Eligibility	2019-009					
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Special Tests and Provisions - Child Support Non-Cooperation	2019-011					
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Reporting; Special Tests and Provisions - Penalty for Failure to Comply with Work Verification Plan	2019-014					
Health and Human Services	93.600	Head Start	Special Test and Provisions - Monitoring of Income Eligibility Requirement	2019-016					
Health and Human Services	93.600	Head Start	Special Test and Provisions - Program Governance	2019-017					
Health and Human Services	93.658	Foster Care - Title IV-E	Eligibility	2019-018					
Health and Human Services	93.658	Foster Care - Title IV-E	Reporting	2019-019					
Health and Human Services	93.659	Adoption Assistance - Title IV-E	Eligibility	2019-020					
Health and Human Services	93.914	HIV Emergency Relief Project Grants	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	2019-024					
Health and Human Services	93.917	HIV Care Formula Grants	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	2019-025					



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, and as identified in Table VI below, to be significant deficiencies.

Table VI -	· Significant De	ficiencies in Internal (	Control Over Complia	nce		
Federal Awarding Agency	CDFA Number (s)	Major Program	Compliance Requirement	Finding Number		
Agriculture	10.553, 10.555, 10.556, 10.559	Child Nutrition Cluster	Eligibility	2019-003		
Agriculture	10.553, 10.555, 10.556, 10.559	Child Nutrition Cluster	Special Tests 2019- and Provisions - Verification of Free and Reduced-Price Applications (NSLP)			
Housing and Urban Development	14.239	HOME Investment Partnerships Program	Special Tests and Provisions - Housing Quality Standards	2019-006		
Housing and Urban Development	14.241	Housing Opportunities for Persons with AIDS	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	2019-007		
Education	84.007, 84.033, 84.063, 84.268, 93.925	Student Financial Assistance Cluster	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	2019-008		
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Reporting	2019-010		
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Special Tests and Provisions - Income Eligibility and Verification System	2019-012		



Table VI -	Significant De	ficiencies in Internal (	Control Over Complian	ice
Federal Awarding Agency	CDFA Number (s)	Major Program	Compliance Requirement	Finding Number
Health and Human Services	93.558	Temporary Assistance for Needy Families Cluster	Special Tests and Provisions - Penalty for Refusal to Work	2019-013
Health and Human Services	93.569	Community Services Block Grant	Subrecipient Monitoring	2019-015
Health and Human Services	93.659	Adoption Assistance - Title IV-E	Reporting	2019-021
Health and Human Services	93.775, 93.777, 93.778	Medicaid Cluster	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	2019-022
Health and Human Services	93.775, 93.777, 93.778	Medicaid Cluster	Eligibility	2019-023

The District's responses to the internal control over compliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs and corrective action plan. The District'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.

BDO USA, LLP

October 30, 2020

# Schedule I - Schedule of Expenditures of Federal Awards by Federal Grantor

### Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September 30, 2019

		Pass Through			Student					
	Federal	Entity	Res	earch and	Financial				Total Fodovol	Passed
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	CFDA Number	Identifying Number		elopment Cluster	Assistance Cluster		Other	Cluster Total	Total Federal Expenditures	Through to Subrecipients
U.S. Department of Agriculture										
AGRICULTURAL RESEARCH_BASIC AND APPLIED RESEARCH	10.001		\$	20,552	\$	- \$	-		\$ 20,552	\$ -
PESTICIDE APPLICATOR TRAINING	10.025			-		-	11,634		11,634	-
SPECIALTY CROP BLOCK GRANT PROGRAM - FARM BILL	10.170			82,908		-	86,307		169,215	-
PAYMENTS TO AGRICULTURAL EXPERIMENT STATIONS UNDER THE HATCH ACT	10.203			889,632		-	-		889,632	-
COOPERATIVE EXTENSION SERVICE	10.500			1,118,286		-	60,468		1,178,754	-
SNAP FRAUD FRAMEWORK IMPLEMENTATION GRANT	10.535			-		-	112,910		112,910	-
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) CLUSTER										
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) - FOOD STAMPS	10.551			-		-	173,109,637		173,109,637	-
STATE ADMINISTRATIVE MATCHING GRANTS FOR THE SUPPLEMENTAL NUTRITION										
ASSISTANCE PROGRAM	10.561			-			28,918,068		28,918,068	199,600
SUBTOTAL - SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) CLUSTER								\$ 202,027,705		
CHILD NUTRITION CLUSTER										
SCHOOL BREAKFAST PROGRAM	10.553			-		-	11,012,881		11,012,881	11,012,881
NATIONAL SCHOOL LUNCH PROGRAM	10.555			-		-	26,349,375		26,349,375	26,349,375
SPECIAL MILK PROGRAM FOR CHILDREN	10.556			-		-	1,528,150		1,528,150	1,774
SUMMER FOOD SERVICE PROGRAM FOR CHILDREN	10.559			-		-	2,949,112		2,949,112	2,906,262
SUBTOTAL - CHILD NUTRITION CLUSTER								41,839,518		
SPECIAL SUPPLEMENTAL NUTRITION PROGRAM FOR WOMEN, INFANTS, AND										
CHILDREN (WIC)	10.557			-		-	11,731,677		11,731,677	3,012,205
CHILD AND ADULT CARE FOOD PROGRAM	10.558			-		-	10,891,246		10,891,246	10,688,273
FOOD DISTRIBUTION CLUSTER										
COMMODITY SUPPLEMENTAL FOOD PROGRAM	10.565			-		-	393,852		393,852	393,852
EMERGENCY FOOD ASSISTANCE PROGRAM (ADMINISTRATIVE COST)	10.568			-		-	440,952		440,952	392,065
SUBTOTAL - FOOD DISTRIBUTION CLUSTER								834,804		
WIC FARMERS' MARKET NUTRITION PROGRAM (FMNP)	10.572			-		-	146,374		146,374	-
FARM TO SCHOOL GRANT PROGRAM	10.575			-		-	99,476		99,476	-
SENIOR FARMERS MARKET NUTRITION PROGRAM	10.576			-		-	134,879		134,879	-
CHILD NUTRITION DISCRETIONARY GRANTS LIMITED AVAILABILITY	10.579			-		-	121,578		121,578	121,578
CHILD NUTRITION DISCRETIONARY GRANTS LIMITED AVAILABILITY, NON-CASH AWARD	10.579			-		-	3,409,492		3,409,492	-
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) PROCESS AND										
TECHNOLOGY IMPROVEMENT GRANTS	10.580			-		-	56,831		56,831	-

# Schedule of Expenditures of Federal Awards by Federal Grantor

Pedral Grantor / Possa-Through Grantor / Program or Cluster Title	Year Ended September 30, 2019								
FRESH FRUIT AND VEGETABLE PROGRAM   10.582   2.083,486   2.083,4	Federal Grantor / Pass-Through Grantor / Program or Cluster Title	CFDA	Entity Identifying	Research and Development	Financial Assistance	Other	Cluster Total		Through to
PARTIMERSHIP AGREEMENTS   10.699	U.S. Department of Agriculture (continued)								
	FRESH FRUIT AND VEGETABLE PROGRAM			-	-			·	1,989,338
U.S. Department of Commerce	PARTNERSHIP AGREEMENTS	10.699			-	1,738		1,738	-
ATLANTIC COASTAL FISHERIES COOPERATIVE MANAGEMENT ACT 11.474 - 12.935 12.935 - 12.935	Total U.S. Department of Agriculture			2,111,378	•	273,650,585	244,702,027	275,761,963	57,067,203
SCIENCE, TECHNOLOGY, BUSINESS AND/OR EDUCATION OUTREACH   11.620   52,115   - 12,935   - 63,050	U.S. Department of Commerce								
Total U.S. Department of Commerce   52,115   12,935   65,050   0	ATLANTIC COASTAL FISHERIES COOPERATIVE MANAGEMENT ACT	11.474		-	-	12,935		12,935	-
U.S. Department of Defense	SCIENCE, TECHNOLOGY, BUSINESS AND/OR EDUCATION OUTREACH	11.620		52,115	-	-		52,115	-
PROCUREMENT TECHNICAL ASSISTANCE FOR BUSINESS FIRMS 12.002 - 418,992 - 418,992 - 518 MEMORANDUM OF AGREEMENT PROGRAM FOR THE REIMBURSEMENT OF TECHNICAL SERVICES 12.113 - 241,022 - 241,02	Total U.S. Department of Commerce			52,115	-	12,935	-	65,050	-
PROCUREMENT TECHNICAL ASSISTANCE FOR BUSINESS FIRMS 12.002 - 418,992 - 418,992 - 518 MEMORANDUM OF AGREEMENT PROGRAM FOR THE REIMBURSEMENT OF TECHNICAL SERVICES 12.113 - 241,022 - 241,02	U.S. Department of Defense								
TECHNICAL SERVICES	•	12.002		-	-	418,992		418,992	-
TECHNICAL SERVICES	STATE MEMORANDUM OF AGREEMENT PROGRAM FOR THE REIMBURSEMENT OF								
NATIONAL GUARD CHALLENGE PROGRAM   12.404   - 2,168,189   2,168,189   - 2,168,189		12.113		-	-	241,022		241,022	-
COMMUNITY ECONOMIC ADJUSTMENT ASSISTANCE FOR ESTABLISHMENT,   EXPANSION, REALIGNMENT, OR CLOSURE OF A MILITARY INSTALLATION   12.607   - 0.000000000000000000000000000000000	NATIONAL GUARD MILITARY OPERATIONS AND MAINTENANCE (O&M) PROJECTS	12.401		-	-	6,255,057		6,255,057	-
EXPANSION, REALIGNMENT, OR CLOSURE OF A MILITARY INSTALLATION   12.607   - (27.274)   (27.274)   - (27.274)	NATIONAL GUARD CHALLENGE PROGRAM	12.404		-	-	2,168,189		2,168,189	-
BASIC, APPLIED, AND ADVANCED RESEARCH IN SCIENCE AND ENGINEERING   12.630   240,070   -   -   -   240,070   -     LANGUAGE GRANT PROGRAM   12.900   -   157,364   157,364   -     157,364	COMMUNITY ECONOMIC ADJUSTMENT ASSISTANCE FOR ESTABLISHMENT,								
LANGUAGE GRANT PROGRAM   12.900   -   157,364   157,364   -   157,364	EXPANSION, REALIGNMENT, OR CLOSURE OF A MILITARY INSTALLATION	12.607		-	-	(27,274)		(27,274)	-
Total U.S. Department of Defense  U.S. Department of Housing and Urban Development  COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS CLUSTER  COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG) 14.218 - 29,973,208 29,973,208 11,563,499  COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG), OUTSTANDING LOAN BEGINNING BALANCE 14.218 - 284,586,590 284,586,590 5  SUBTOTAL - COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS  14.218 - 284,586,590 284,586,590 5  SUBTOTAL - COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS	BASIC, APPLIED, AND ADVANCED RESEARCH IN SCIENCE AND ENGINEERING	12.630		240,070	-	-		240,070	-
U.S. Department of Housing and Urban Development  COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG)  COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG)  COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG),  OUTSTANDING LOAN BEGINNING BALANCE  SUBTOTAL - COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS  14.218  - 284,586,590  284,586,590  - 284,586,590	LANGUAGE GRANT PROGRAM	12.900			-	157,364		157,364	-
COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG) 14.218 - 29,973,208 29,973,208 11,563,499 COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG), OUTSTANDING LOAN BEGINNING BALANCE 14.218 - 284,586,590 284,586,590 - 2000 14.218 - 2000	Total U.S. Department of Defense			240,070	•	9,213,350		9,453,420	-
COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS CLUSTER  COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG) 14.218 - 29,973,208 29,973,208 11,563,499  COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG),  OUTSTANDING LOAN BEGINNING BALANCE 14.218 - 284,586,590 - 284,586,590 - 5  SUBTOTAL - COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS	U.S. Department of Housing and Urban Development								
COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG), OUTSTANDING LOAN BEGINNING BALANCE 14.218 - 284,586,590 - 284,586,590 - SUBTOTAL - COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS	· · · · · · · · · · · · · · · · · · ·								
OUTSTANDING LOAN BEGINNING BALANCE 14.218 284,586,590 284,586,590 - SUBTOTAL - COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS	COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG)	14.218		-	-	29,973,208		29,973,208	11,563,499
SUBTOTAL - COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS	COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG),								
	OUTSTANDING LOAN BEGINNING BALANCE	14.218		-	-	284,586,590		284,586,590	-
CLUSTER 314,559,798	SUBTOTAL - COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS				_				
	CLUSTER						314,559,798		

# Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September	30,	2019	
----------------------	-----	------	--

· · · · · · · · · · · · · · · · · · ·		Pass Through		Student				
	Federal	Entity	Research and	Financial				Passed
	CFDA	Identifying	Development	Assistance			Total Federal	Through to
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number		Cluster	Cluster	Other	Cluster Total	Expenditures	Subrecipients
U.S. Department of Housing and Urban Development (continued)								
EMERGENCY SOLUTIONS GRANT PROGRAM	14.231		-	-	2,464,985		2,464,985	-
HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)	14.239		-	-	3,991,548		3,991,548	1,350,000
HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME), OUTSTANDING LOAN								
BEGINNING BALANCE	14.239		-	-	118,093,902		118,093,902	-
HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS	14.241		-	-	11,144,742		11,144,742	5,625,522
CONTINUUM OF CARE PROGRAM	14.267		-	-	5,415,738		5,415,738	-
HOUSING TRUST FUND	14.275		-	-	290,283		290,283	-
FAIR HOUSING ASSISTANCE PROGRAM - STATE AND LOCAL	14.401		-	-	42,054		42,054	-
LEAD HAZARD REDUCTION DEMONSTRATION GRANT PROGRAM	14.905			-	(569,403)		(569,403)	(424,073)
Total U.S. Department of Housing and Urban Development			-	-	455,433,647	314,559,798	455,433,647	18,114,948
U.S. Department of the Interior								
FISH AND WILDLIFE CLUSTER								
SPORT FISH RESTORATION PROGRAM	15.605		-	-	1,835,017		1,835,017	57,216
SUBTOTAL - FISH AND WILDLIFE CLUSTER				<del>-</del>		1,835,017	, ,	•
SPORTFISHING AND BOATING SAFETY ACT	15.622		-	-	116,800		116,800	89,526
STATE WILDLIFE GRANTS	15.634		-	-	92,380		92,380	-
ASSISTANCE TO WATER RESOURCES RESEARCH INSTITUTES	15.805		84,398	-	-		84,398	-
HISTORIC PRESERVATION FUND GRANTS-IN-AID	15.904		-	-	566,237		566,237	55,000
NATIONAL MARITIME HERITAGE GRANTS	15.925		-	-	24,352		24,352	24,352
Total U.S. Department of the Interior			84,398	•	2,634,786	1,835,017	2,719,184	226,094
U.S. Department of Justice								
SEXUAL ASSAULT SERVICES FORMULA PROGRAM	16.017		_	_	439,212		439,212	437,386
JUVENILE JUSTICE AND DELINQUENCY PREVENTION - ALLOCATION TO STATES	16.540		-	-	323,274		323,274	309,124
STATE JUSTICE STATISTICS PROGRAM FOR STATISTICAL ANALYSIS CENTERS	16.550		_	_	158,700		158,700	-
NATIONAL CRIMINAL HISTORY IMPROVEMENT PROGRAM (NCHIP)	16.554		-	-	304,266		304,266	19,400
CRIME VICTIM ASSISTANCE PROGRAM	16.575		-	-	6,535,258		6,535,258	6,398,585
CRIME VICTIM ASSISTANCE/DISCRETIONARY GRANTS	16.582		-	-	395,425		395,425	355,389
VIOLENCE AGAINST WOMEN FORMULA GRANTS	16.588		-	-	759,887		759,887	736,080
RESIDENTIAL SUBSTANCE ABUSE TREATMENT FOR STATE PRISONERS	16.593		-	-	80,528		80,528	80,528

# Schedule of Expenditures of Federal Awards by Federal Grantor

Year	Ended	September	30.	. 2019
			,	,

		Pass Through		Student				
	Federal CFDA	Entity Identifying	Research and Development	Financial Assistance			Total Federal	Passed Through to
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number	Number	Cluster	Cluster	Other	Cluster Total	Expenditures	Subrecipients
U.S. Department of Justice (continued)								
PUBLIC SAFETY PARTNERSHIP & COMMUNITY POLICING GRANTS	16.710		-	-	449,771		449,771	201,417
EDWARD BYRNE MEMORIAL JUSTICE ASSISTANCE GRANT PROGRAM	16.738		-	-	440,815		440,815	340,594
FORENSIC DNA BACKLOG REDUCTION PROGRAM	16.741		-	-	468,178		468,178	-
PAUL COVERDELL FORENSIC SCIENCES IMPROVEMENT GRANT PROGRAM	16.742		-	-	222,974		222,974	222,974
CRIMINAL AND JUVENILE JUSTICE AND MENTAL HEALTH COLLABORATION PROGRAM	16.745		-	-	100,415		100,415	-
EDWARD BYRNE MEMORIAL COMPETITIVE GRANT PROGRAM	16.751		-	-	377,215		377,215	19,046
SECOND CHANCE ACT PRISONER REENTRY INITIATIVE	16.812		-	-	222,997		222,997	-
BYRNE CRIMINAL JUSTICE INNOVATION PROGRAM	16.817		-	-	17,719		17,719	17,719
SMART PROSECUTION INITIATIVE	16.825		-	-	138,897		138,897	-
VISION 21	16.826		-	-	194,868		194,868	189,760
Total U.S. Department of Justice			-	-	11,630,399		11,630,399	9,328,002
U.S. Department of Labor								
LABOR FORCE STATISTICS	17.002		_	_	639,330		639,330	_
COMPENSATION AND WORKING CONDITIONS	17.005		_	_	89,500		89,500	_
EMPLOYMENT SERVICE CLUSTER	17.000				00,000		00,000	
EMPLOYMENT SERVICE/WAGNER-PEYSER FUNDED ACTIVITIES	17.207		_	_	2,087,968		2,087,968	_
DISABLED VETERANS OUTREACH PROGRAM	17.801		_	_	318,749		318,749	_
LOCAL VETERANS EMPLOYMENT REPRESENTATIVE	17.804		_	_	237,804		237,804	-
SUBTOTAL - EMPLOYMENT SERVICE CLUSTER				-		2,644,521	_0:,00:	
UNEMPLOYMENT INSURANCE	17.225		_	_	130,179,594	, , , , ,	130,179,594	-
ARRA - UNEMPLOYMENT INSURANCE	17.225		_	_	56,309		56,309	-
SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM	17.235		-	-	462,916		462,916	-
WIOA CLUSTER					,		,	
WIOA ADULT PROGRAM	17.258		-	-	2,435,786		2,435,786	-
WIOA YOUTH ACTIVITIES	17.259		-	-	3,284,203		3,284,203	-
WIOA DISLOCATED WORKER FORMULA GRANTS	17.278		-	-	6,094,973		6,094,973	-
SUBTOTAL - WIOA CLUSTER				-	· ·	11,814,962	, ,	
WORK OPPORTUNITY TAX CREDIT PROGRAM (WOTC)	17.271		-	-	66,000	· · ·	66,000	-
TEMPORARY LABOR CERTIFICATION FOR FOREIGN WORKERS	17.273		-	-	10,131		10,131	-
CONSULTATION AGREEMENTS	17.504		-	-	502,600		502,600	-
Total U.S. Department of Labor				-	146,465,863	14,459,483	146,465,863	-

### Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September 30, 2019

		Pass Through		Student				
	Federal	Entity	Research and	Financial				Passed
	CFDA	Identifying	Development	Assistance			Total Federal	Through to
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number	Number	Cluster	Cluster	Other	Cluster Total	Expenditures	Subrecipients
U.S. Department of Transportation								
HIGHWAY RESEARCH AND DEVELOPMENT PROGRAM	20.200		2,986,787	-	-		2,986,787	-
HIGHWAY PLANNING AND CONSTRUCTION CLUSTER								
HIGHWAY PLANNING AND CONSTRUCTION	20.205		-	-	211,431,766		211,431,766	,
RECREATIONAL TRAILS PROGRAM	20.219		-	-	145,007		145,007	,
SUBTOTAL - HIGHWAY PLANNING AND CONSTRUCTION CLUSTER				_		211,576,773		
HIGHWAY TRAINING AND EDUCATION	20.215		-	-	416,198		416,198	
NATIONAL MOTOR CARRIER SAFETY	20.218		-	-	843,023		843,023	
SAFETY DATA IMPROVEMENT PROGRAM	20.234		-	-	4,992		4,992	
MOTOR CARRIER SAFETY ASSISTANCE HIGH PRIORITY ACTIVITIES GRANTS AND								
COOPERATIVE AGREEMENTS	20.237		-	-	81,386		81,386	-
METROPOLITAN TRANSPORTATION PLANNING	20.505		-	-	320,771		320,771	
TRANSIT SERVICES PROGRAMS CLUSTER								
ENHANCED MOBILITY OF SENIORS AND INDIVIDUALS WITH DISABLITIES	20.513		-	-	(4,665)		(4,665)	-
SUBTOTAL - TRANSIT SERVICES PROGRAMS CLUSTER				_	<u> </u>	(4,665)		
RAIL FIXED GUIDEWAY PUBLIC TRANSPORTATION SYSTEM STATE SAFETY								
OVERSIGHT FORMULA GRANT PROGRAM	20.528		-	-	140,581		140,581	
HIGHWAY SAFETY CLUSTER								
STATE AND COMMUNITY HIGHWAY SAFETY	20.600		-	-	3,711,275		3,711,275	
SUBTOTAL - HIGHWAY SAFETY CLUSTER				_		3,711,275		
PIPELINE SAFETY PROGRAM STATE BASE GRANT	20.700		-	-	485,327		485,327	-
NATIONAL INFRASTRUCTURE INVESTMENTS	20.933		-	-	854,832		854,832	-
Total U.S. Department of Transportation			2,986,787	-	218,430,493	215,283,383	221,417,280	
Equal Employment Opportunity Commission								
EMPLOYMENT DISCRIMINATION - TITLE VII OF THE CIVIL RIGHTS ACT OF 1964	30.001		_	_	200,553		200,553	_
	30.001			-	200,553		200,553	
Total Equal Employment Opportunity Commission					200,000		200,000	
National Aeronautics and Space Administration	40.000						<b>-0.00</b>	
EDUCATION - OFFICE OF STEM ENGAGEMENT, NASA	43.008		56,628	-	<u>-</u>		56,628	
Total National Aeronautics and Space Administration			56,628		-		56,628	<u> </u>

### Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended S	eptember	30,	2019
--------------	----------	-----	------

		Pass Through		Student				
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Federal CFDA Number	Entity Identifying Number	Research and Development Cluster	Financial Assistance Cluster	Other	Cluster Total	Total Federal Expenditures	Passed Through to Subrecipients
National Endowment for the Humanities					_			·
PROMOTION OF THE ARTS - PARTNERSHIP AGREEMENTS	45.025		_	_	706,990		706,990	
GRANTS TO STATES	45.310		_	_	943,402		943,402	
NATIONAL LEADERSHIP GRANTS	45.312		_	_	86,473		86,473	
Total National Endowment for the Humanities	101012		-	-	1,736,865		1,736,865	
National Science Foundation								
EDUCATION AND HUMAN RESOURCES	47.076		840,676	-	115,398		956,074	
Total National Science Foundation			840,676	-	115,398		956,074	
U.S. Department of Veterans Affairs								
VETERANS AFFAIRS MEDICAL CENTER	64.009		-	-	1,020,182		1,020,182	
Total U.S. Department of Veterans Affairs			-	-	1,020,182		1,020,182	
Environmental Protection Agency								
AIR POLLUTION CONTROL PROGRAM SUPPORT	66.001		-	-	1,386,069		1,386,069	
STATE INDOOR RADON GRANTS	66.032		-	-	101,019		101,019	
SURVEYS, STUDIES, INVESTIGATIONS ACTIVITIES RELATING TO THE CLEAN AIR ACT	66.034		-	-	273,215		273,215	
MULTIPURPOSE GRANTS TO STATES AND TRIBES	66.204		-	-	138,216		138,216	
CONSTRUCTION GRANTS FOR WASTEWATER TREATMENT WORKS	66.418		-	-	3,618,469		3,618,469	533,734
WATER POLLUTION CONTROL STATE, INTERSTATE, TRIBAL PROGRAM SUPPORT	66.419		-	-	1,285,822		1,285,822	
WATER QUALITY MANAGEMENT PLANNING	66.454		-	-	100,000		100,000	60,000
NONPOINT SOURCE IMPLEMENTATION GRANTS	66.460		-	-	949,681		949,681	277,566
CHESAPEAKE BAY PROGRAM	66.466		-	-	1,763,195		1,763,195	607,459
DRINKING WATER STATE REVOLVING FUND CLUSTER								
CAPITALIZATION GRANTS FOR DRINKING WATER STATE REVOLVING FUNDS	66.468		-	-	5,458		5,458	
SUBTOTAL - DRINKING WATER STATE REVOLVING FUND CLUSTER				_		5,458		
PERFORMANCE PARTNERSHIP GRANTS	66.605		-	-	193,001		193,001	
POLLUTION PREVENTION GRANTS PROGRAM	66.708		-	-	524,475		524,475	
SOURCE REDUCTION ASSISTANCE	66.717		-	-	70,235		70,235	48,198
HAZARDOUS WASTE MANAGEMENT STATE PROGRAM SUPPORT	66.801		-	-	354,235		354,235	

## Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September	30,	2019	
----------------------	-----	------	--

Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Federal CFDA Number	Pass Through Entity Identifying Number	Research and Development Cluster	Student Financial Assistance Cluster	Other	Cluster Total	Total Federal Expenditures	Passed Through to Subrecipients
Environmental Protection Agency (continued)					_			
UNDERGROUND STORAGE TANK PREVENTION, DETECTION & COMPLIANCE PROGRAM	66.804		_	-	759,572		759,572	-
STATE AND TRIBAL RESPONSE PROGRAM GRANTS	66.817		-	-	282,611		282,611	-
Total Environmental Protection Agency			-	-	11,805,273	5,458	11,805,273	1,526,957
U.S. Department of Energy								
STATE ENERGY PROGRAM	81.041		-	-	250,727		250,727	50,000
WEATHERIZATION ASSISTANCE FOR LOW-INCOME PERSONS	81.042		-	-	745,743		745,743	489,838
STATE ENERGY PROGRAM SPECIAL PROJECTS	81.119		-	-	156		156	156
NATIONAL NUCLEAR SECURITY ADMINISTRATION (NNSA) MINORITY SERVING								
INSTITUTION (MSI) PROGRAM	81.123		-	-	1,930		1,930	-
STATE HEATING OIL AND PROPANE PROGRAM	81.138			-	7,097		7,097	-
Total U.S. Department of Energy				•	1,005,653		1,005,653	539,994
U.S. Department of Education								
ADULT EDUCATION - BASIC GRANTS TO STATES	84.002		-	-	681,980		681,980	668,802
TITLE I GRANTS TO LOCAL EDUCATIONAL AGENCIES (LEA)	84.010		-	-	50,856,587		50,856,587	50,174,381
TITLE I STATE AGENCY PROGRAM FOR NEGLECTED & DELINQUENT CHILDREN	84.013		-	-	95,175		95,175	94,350
FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANTS (SEOG)	84.007		-	575,274	-		575,274	-
FEDERAL WORK-STUDY PROGRAM	84.033		-	228,578	-		228,578	-
FEDERAL PELL GRANT PROGRAM	84.063		-	7,840,124	-		7,840,124	-
FEDERAL DIRECT STUDENT LOANS	84.268		-	20,757,656	-		20,757,656	-
SPECIAL EDUCATION CLUSTER								
SPECIAL EDUCATION - GRANT TO STATES	84.027		-	-	19,290,919		19,290,919	16,637,097
SPECIAL EDUCATION - PRESCHOOL GRANTS	84.173		-	- <u> </u>	172,211		172,211	129,120
SUBTOTAL - SPECIAL EDUCATION CLUSTER						19,463,130		
HIGHER EDUCATION - INSTITUTIONAL AID	84.031		-	-	6,877,174		6,877,174	-
TRIO CLUSTER								
TRIO - TALENT SEARCH	84.044		-	-	462,439		462,439	-
TRIO - UPWARD BOUND	84.047		-		305,758		305,758	-
SUBTOTAL - TRIO CLUSTER						768,197		
CAREER & TECHNICAL EDUCATION - BASIC GRANTS TO STATES	84.048		-	-	5,097,310		5,097,310	4,490,566

# Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September 30, 20
-----------------------------

		Pass Through		Student				
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Federal CFDA Number	Entity Identifying Number	Research and Development Cluster	Financial Assistance Cluster	Other	Cluster Total	Total Federal Expenditures	Passed Through to Subrecipients
U.S. Department of Education (continued)								
REHABILITATION SERVICES - VOCATIONAL REHABILITATION GRANTS TO STATES REHABILITATION SERVICES - INDEPENDENT LIVING SERVICES - OLDER INDIVIDUALS	84.126		-	-	15,297,186		15,297,186	-
WHO ARE BLIND	84.177		-	-	165,113		165,113	-
SPECIAL EDUCATION - GRANTS FOR INFANTS - FAMILIES	84.181		-	-	2,341,185		2,341,185	261,480
SUPPORTED EMPLOYMENT SERVICES FOR INDIVIDUALS WITH THE MOST					, ,			·
SIGNIFICANT DISABILITIES	84.187		-	-	204,509		204,509	-
EDUCATION FOR HOMELESS CHILDREN AND YOUTH	84.196		-	-	239,943		239,943	189,753
INNOVATIVE APPROACHES TO LITERACY, FULL-SERVICE COMMUNITY SCHOOLS;								
AND PROMISE NEIGHBORHOODS	84.215		-	-	325,649		325,649	-
CHARTER SCHOOLS	84.282		-	-	1,743,430		1,743,430	1,562,146
21ST CENTURY COMMUNITY LEARNING CENTERS - AFTER SCHOOL	84.287		-	-	1,855,463		1,855,463	1,768,981
ENGLISH LANGUAGE ACQUISITION	84.365		-	-	1,079,263		1,079,263	1,049,082
MATHEMATICS & SCIENCE PARTNERSHIP	84.366		-	-	(832,049)		(832,049)	(832,049)
IMPROVING TEACHER QUALITY STATE GRANTS	84.367		-	-	9,182,652		9,182,652	8,853,232
GRANTS FOR STATE ASSESSMENTS & RELATED ACTIVITIES	84.369		-	-	4,470,774		4,470,774	-
DC SCHOOL CHOICE INCENTIVE PROGRAM	84.370		-	-	18,284,981		18,284,981	(117,799)
STATEWIDE LONGTITUDINAL DATA SYSTEMS	84.372		-	-	(16,167)		(16,167)	(16,167)
SCHOOL IMPROVEMENT GRANTS	84.377		-	-	1,666,177		1,666,177	1,561,480
COLLEGE ACCESS CHALLENGE GRANT PROGRAM	84.378		-	-	(15)		(15)	(15)
STUDENT SUPPORT AND ACADEMIC ENRICHMENT GRANTS	84.424			-	5,149,953		5,149,953	5,002,201
Total U.S. Department of Education			-	29,401,632	144,997,600	20,231,327	174,399,232	91,476,641
Consumer Product Safety Commission								
VIRGINIA GRAEME BAKER POOL AND SPA SAFETY	87.002		-	-	68,352		68,352	-
Total Consumer Product Safety Commission				-	68,352		68,352	-
U.S. Election Assistance Commission								
HELP AMERICA VOTE ACT REQUIREMENTS PAYMENTS	90.401		-	-	515,298		515,298	-
2018 HELP AMERICA VOTE ACT ELECTION SECURITY GRANTS	90.404		_	_	207,421		207,421	_
Total U.S. Election Assistance Commission	33			-	722,719		722,719	-

## Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September 30, 2019

		Pass Through		Student				
	Federal CFDA	Entity Identifying	Research and Development	Financial Assistance			Total Federal	Passed Through to
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number	Number	Cluster	Cluster	Other	Cluster Total	Expenditures	Subrecipients
U.S. Department of Health and Human Services								
STATE & TERRITORIAL & TECHNICAL ASSISTANCE CAPACITY DEVELOPMENT								
MINORITY HIV/AIDS DEMONSTRATION PROGRAM	93.006		-	-	530,605		530,605	-
SPECIAL PROGRAMS FOR THE AGING - TITLE VII, CHAPTER 3 - PROGRAMS FOR								
PREVENTION OF ELDER ABUSE, NEGLECT, AND EXPLOITATION	93.041		-	-	23,544		23,544	23,544
SPECIAL PROGRAMS FOR THE AGING - TITLE VII, CHAPTER 2 - LONG TERM CARE								
OMBUDSMAN SERVICES FOR OLDER INDIVIDUALS	93.042		-	-	215,260		215,260	215,260
TITLE III AGING CLUSTER								
SPECIAL PROGRAMS FOR THE AGING - TITLE III, PART B - GRANTS FOR								
SUPPORTIVE SERVICES AND SENIOR CENTERS	93.044		-	-	1,778,520		1,778,520	1,380,366
SPECIAL PROGRAMS FOR THE AGING - TITLE III, PART C - NUTRITION SERVICES	93.045		-	-	3,565,907		3,565,907	-
NUTRITION SERVICES INCENTIVE PROGRAM	93.053		-		662,281		662,281	-
SUBTOTAL - TITLE III AGING CLUSTER				_	_	6,006,708		
SPECIAL PROGRAMS FOR THE AGING - TITLE IV & TITLE II - DISCRETIONARY PROJECTS	93.048		-	-	258,504		258,504	-
ALZHEIMER'S DISEASE DEMONSTRATION GRANTS TO STATES	93.051		-	-	107,913		107,913	-
NATIONAL FAMILY CAREGIVERS SUPPORT TITLE III PART E	93.052		-	-	1,014,925		1,014,925	1,014,925
PUBLIC HEALTH EMERGENCY PREPAREDNESS	93.069		-	-	966,255		966,255	-
HOSPITAL PREPAREDNESS PROGRAM (HPP) AND PUBLIC HEALTH EMERGENCY								
PREPAREDNESS (PHEP) ALIGNED COOPERATIVE AGREEMENTS	93.074		-	-	5,559,126		5,559,126	64,990
COOPERATIVE AGREEMENTS TO PROMOTE ADOLESCENT HEALTH THROUGH								
SCHOOL-BASED HIV/STD PREVENTION AND SCHOOL-BASED SURVEILLANCE	93.079		-	-	449,393		449,393	-
GUARDIANSHIP ASSISTANCE	93.090		-	-	2,540,438		2,540,438	-
AFFORDABLE CARE ACT PERSONAL RESPONSIBILITY EDUCATION PROGRAM	93.092		-	-	309,919		309,919	66,203
FOOD AND DRUG ADMINISTRATION RESEARCH	93.103		-	-	17,284		17,284	-
COMPREHENSIVE COMMUNITY MENTAL HEALTH SERVICES FOR CHILDREN WITH								
SERIOUS EMOTIONAL DISTURBANCES (SED)	93.104		-	-	1,225,957		1,225,957	-
PROJECT GRANTS & COOP AGREEMENTS FOR TUBERCOLOSIS CONTROL								
PROGRAMS	93.116		-	-	328,655		328,655	-
COOPERATIVE AGREEMENTS TO STATES/TERRITORIES FOR THE COORDINATION								
AND DEVELOPMENT OF PRIMARY CARE OFFICES	93.130		-	-	150,203		150,203	-
INJURY PREVENTION & CONTROL RESEARCH & STATE COMMUNITY BASED								
PROGRAM	93.136		-	-	1,401,065		1,401,065	102,544

### Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September 30, 2019

		Pass Through		Student				
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Federal CFDA Number	Entity Identifying Number	Research and Development Cluster	Financial Assistance Cluster	Other	Cluster Total	Total Federal Expenditures	Passed Through to Subrecipients
U.S. Department of Health and Human Services (continued)								
PROJECTS FOR ASSISTANCE IN TRANSITION FROM HOMELESSNESS (PATH)	93.150		-	-	227,677		227,677	-
GRANTS TO STATES FOR LOAN REPAYMENT PROGRAM	93.165		-	-	333,155		333,155	-
CHILD LEAD POISONING PREVENTION PROGRAM	93.197		-	-	304,656		304,656	55,625
GRANTS TO STATES TO SUPPORT ORAL HEALTH WORKFORCE ACTIVITIES	93.236		-	-	185,729		185,729	-
SUBSTANCE ABUSE MENTAL HEALTH SERVICES (SAMHS) - PROJECTS OF REGIONAL								
AND NATIONAL SIGNIFICANCE	93.243		-	-	5,702,698		5,702,698	1,033,097
UNIVERSAL NEWBORN HEARING SCREENING	93.251		-	-	171,780		171,780	-
IMMUNIZATION COOPERATIVE AGREEMENTS	93.268		-	-	1,897,702		1,897,702	72,221
ADULT VIRAL HEPATITIS PREVENTION AND CONTROL	93.270		-	-	156,826		156,826	51,093
NATIONAL STATE BASED TOBACCO CONTROL PROGRAMS	93.305		-	-	652,729		652,729	-
EPIDEMIOLOGY AND LABORATORY CAPACITY FOR INFECTIOUS DISEASES (ELC)	93.323		-	-	2,165,279		2,165,279	-
NATIONAL CENTER FOR ADVANCING TRANSLATIONAL SCIENCES	93.350		-	-	44,652		44,652	-
ACTIVITIES TO SUPPORT STATE, TRIBAL, LOCAL AND TERRITORIAL (STLT) HEALTH								
DEPARTMENT RESPONSE TO PUBLIC HEALTH OR HEALTHCARE CRISES	93.354		-	-	3,069,042		3,069,042	40,000
ACL INDEPENDENT LIVING STATE GRANTS	93.369		-	-	398,829		398,829	-
IMPROVING THE HEALTH OF AMERICANS THROUGH PREVENTION AND								
MANAGEMENT OF DIABETES AND HEART DISEASE AND STROKE	93.426		-	-	1,943,532		1,943,532	644,100
EVERY STUDENT SUCCEEDS ACTS (ESSA)/PRESCHOOL DEVELOPMENT GRANTS	93.434		-	-	3,515,840		3,515,840	-
ACL ASSISTIVE TECHNOLOGY	93.464		-	-	345,846		345,846	-
TANF POLICY ACADEMY FOR INNOVATIVE EMPLOYMENT STRATEGIES (PAIES)	93.475		-	-	20,470		20,470	-
AFFORDABLE CARE ACT - MEDICARE IMPROVEMENTS FOR PATIENTS AND PROVIDERS	93.518		-	-	7,521		7,521	7,521
THE AFFORDABLE CARE ACT: BUILDING EPIDEMIOLOGY, LABORATORY, AND								
HEALTH INFORMATION SYSTEMS CAPACITY IN THE EPIDEMIOLOGY AND								
LABORATORY CAPACITY FOR INFECTIOUS DISEASE (ELC) AND EMERGING								
INFECTIONS PROGRAMS (EIP) COOPERATIVE AGREEMENTS; PPHF	93.521		-	-	13,389		13,389	-
PROMOTING SAFE AND STABLE FAMILIES	93.556		-	-	888,553		888,553	-
TEMPORARY ASSISTANCE FOR NEEDY FAMILIES CLUSTER								
TEMPORARY ASSISTANCE FOR NEEDY FAMILIES	93.558		-	- <u>-</u>	115,013,012		115,013,012	-
SUBTOTAL - TEMPORARY ASSISTANCE FOR NEEDY FAMILIES CLUSTER						115,013,012		
CHILD SUPPORT ENFORCEMENT PROGRAM	93.563		-	-	18,960,677		18,960,677	-
CHILD SUPPORT ENFORCEMENT RESEARCH	93.564		-	-	49,324		49,324	-

## Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September 30, 2019

Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Federal CFDA Number	Pass Through Entity Identifying Number	Research and Development Cluster	Student Financial Assistance Cluster	Other	Cluster Total	Total Federal Expenditures	Passed Through to Subrecipients
U.S. Department of Health and Human Services (continued)								·
REFUGEE & ENTRANT ASSISTANCE - STATE ADMINISTERED	93.566		_	_	1,602,378		1,602,378	_
LOW INCOME HOME ENERGY ASSISTANCE	93.568		_	_	11,706,700		11,706,700	9,394,902
COMMUNITY SERVICES BLOCK GRANT	93.569		_	_	12,079,600		12,079,600	10,738,256
COMMUNITY SERVICES BLOCK GRANT_DISCRETIONARY AWARDS	93.570		_	_	(13,993)		(13,993)	-
CHILD CARE AND DEVELOPMENT FUND (CCDF) CLUSTER					(12,000)		(10,000)	
CHILD CARE & DEVELOPMENT BLOCK GRANT	93.575		_	_	20,231,706		20,231,706	17,443,894
SUBTOTAL - CHILD CARE AND DEVELOPMENT FUND (CCDF) CLUSTER				_		20,231,706	,,,,,,,,,,	,,
COMMUNITY-BASED CHILD ABUSE PREVENTION GRANTS	93.590		_	_	216,629		216,629	-
GRANTS TO STATES FOR ACCESS AND VISITATION PROGRAM	93.597		_	_	96,556		96,556	-
CHAFEE EDUCATION AND TRAINING VOUCHERS PROGRAM (ETV)	93.599		-	_	53,729		53,729	-
HEAD START	93.600		-	_	14,392,538		14,392,538	619,500
ADOPTION AND LEGAL GUARDIANSHIP PROGRAM	93.603		-	_	56,691		56,691	-
DEVELOPMENTAL DISABILITIES BASIC SUPPORT AND ADVOCACY GRANTS	93.630		-	_	613,531		613,531	-
DEVELOPMENTAL DISABILITIES PROJECTS OF NATIONAL SIGNIFICANCE	93.631		-	_	332,275		332,275	-
CHILDREN'S JUSTICE GRANTS TO STATES	93.643		-	_	66,171		66,171	-
CHILD WELFARE - SERVICES - STATE GRANTS	93.645		-	_	389,069		389,069	-
FOSTER CARE - TITLE IV-E	93.658		-	_	35,600,140		35,600,140	-
ADOPTION ASSISTANCE - TITLE IV-E	93.659		-	-	9,584,793		9,584,793	-
SOCIAL SERVICES BLOCK GRANT	93.667		-	_	10,053,874		10,053,874	-
CHILD ABUSE AND NEGLECT STATE GRANTS	93.669		-	_	61,787		61,787	-
FAMILY VIOLENCE PREVENTION & SERVICES/GRANT FOR BATTERED WOMEN'S								
SHELTERS - GRANTS TO STATES & INDIAN TRIBES	93.671		-	-	748,814		748,814	-
CHAFEE FOSTER CARE INDEPENDENCE PROGRAM	93.674		-	-	824,250		824,250	-
STATE PUBLIC HEALTH APPROACHES FOR ENSURING OUTLINE CAPACITY -								
FUNDED IN PART BY 2012 PREVENTION & PUBLIC HEALTH FUNDS (PPHF-2012)	93.735		-	-	48,289		48,289	48,289
PPHF: HEALTH CARE SURVEILLANCE/HEALTH STATISTICS - SURVEILLANCE								
PROGRAM ANNOUNCEMENT: BEHAVIORAL RISK FACTOR SURVEILLANCE SYSTEM								
FINANCED IN PART BY 2012 PREVENTION & PUBLIC HEALTH FUND (PPHF-2012)	93.745		-	-	300,848		300,848	-
CHILD LEAD POISONING PREVENTION SURVEILLANCE FINANCED IN PART BY								
PREVENTION AND PUBLIC HEALTH (PPHF) PROGRAM	93.753		-	-	(695)		(695)	-
STATE AND LOCAL PUBLIC HEALTH ACTIONS TO PREVENT OBESITY, DIABETES,								
HEART DISEASE AND STROKE (PPHF)	93.757		-	-	146,646		146,646	-

### Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September 30, 2019

		Pass Through		Student				
	Federal	Entity	Research and	Financial				Passed
	CFDA	Identifying	Development	Assistance			Total Federal	Through to
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number	Number	Cluster	Cluster	Other	Cluster Total	Expenditures	Subrecipients
U.S. Department of Health and Human Services (continued)								
PREVENTIVE HEALTH AND HEALTH SERVICES BLOCK GRANT FUNDED SOLELY WITH								
PREVENTION AND PUBLIC HEALTH FUNDS (PPHF)	93.758		-	-	66,916		66,916	20,424
CHILDREN'S HEALTH INSURANCE PROGRAM	93.767		-	-	56,965,645		56,965,645	-
MEDICARE - HOSPITAL INSURANCE	93.773		-	-	2,780,521		2,780,521	-
MEDICAID CLUSTER								
STATE MEDICAID FRAUD CONTROL UNITS	93.775		-	-	2,174,955		2,174,955	-
STATE SURVEY AND CERTIFICATION OF HEALTH CARE PROVIDERS & SUPPLIERS								
TITLE (XVIII) MEDICARE	93.777		-	-	3,585,426		3,585,426	-
MEDICAL ASSISTANCE PROGRAM	93.778		-	-	2,273,977,467		2,273,977,467	-
ARRA - MEDICAL ASSISTANCE PROGRAM	93.778		-	-	6,113,780		6,113,780	2,249,999
SUBTOTAL - MEDICAID CLUSTER						2,285,851,628	, ,	,
CENTERS FOR MEDICARE & MEDICAID SERVICES (CMS) RESEARCH,								
DEMONSTRATIONS AND EVALUATIONS	93.779		-	-	128,796		128,796	-
OPIOD STR	93.788		-	-	10,645,353		10,645,353	-
MONEY FOLLOWS THE PERSON REBALANCING DEMONSTRATION	93.791		-	-	1,190,712		1,190,712	
STATE SURVEY AND CERTIFICATION OF HEALTH CARE PROVIDERS & SUPPLIERS								
TITLE (XIX) MEDICAID	93.796		-	-	183,209		183,209	-
ORGANIZED APPROACHES TO INCREASE COLORECTAL SCREENING	93.800		-	-	381,697		381,697	253,910
INSURANCE MARKET REFORM GRANT	93.811		-	-	452,433		452,433	-
HOSPITAL PREPAREDNESS PROGRAM (HPP) EBOLA PREPAREDNESS AND								
RESPONSE ACTIVITIES	93.817		-	-	754,885		754,885	456,064
MATERNAL, INFANT, AND EARLY CHILDHOOD HOME VISITING GRANT PROGRAM	93.870		-	-	1,952,010		1,952,010	1,563,286
NATIONAL BIOTERROISM HOSPITAL PREPAREDNESS PROGRAM	93.889		-	-	123,875		123,875	22,379
CANCER PREVENTION AND CONTROL PROGRAMS FOR STATE, TERRITORIAL AND								
TRIBAL ORGANIZATIONS	93.898		-	-	1,172,860		1,172,860	-
HIV EMERGENCY RELIEF PROJECT GRANTS	93.914		_	-	30,383,694		30,383,694	20,427,878
HIV CARE FORMULA GRANTS	93.917		-	-	14,592,023		14,592,023	4,288,674
SCHOLARSHIPS FOR HEALTH PROFESSIONS STUDENTS FROM DISADVANTAGED								
BACKGROUNDS	93.925		-	382,598	-		382,598	-
HEALTHY START INITIATIVE	93.926		-	-	966,890		966,890	576,707

## Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September 30, 20
-----------------------------

		Pass Through		Student				
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Federal CFDA Number	Entity Identifying Number	Research and Development Cluster	Financial Assistance Cluster	Other	Cluster Total	Total Federal Expenditures	Passed Through to Subrecipients
· · · · · · · · · · · · · · · · · · ·							<u> </u>	·
U.S. Department of Health and Human Services (continued) HIV PREVENTION ACTIVITIES - HEALTH DEPARTMENT BASED	93.940			_	7,202,439		7,202,439	735,366
HUMAN IMMUNODEFICIENCY VIRUS (HIV)/ACQUIRED IMMUNODEFICIENCY	33.340		_	_	7,202,433		7,202,403	7 33,30
SYNDROME (AIDS) SURVEILLANCE	93.944		_	_	494,275		494,275	
ASSISTANCE PROGRAMS FOR CHRONIC DISEASE PREVENTION & CONTROL	93.945		_	-	85,695		85,695	
COOPERATIVE AGREEMENTS TO SUPPORT STATE BASED SAFE MOTHERHOOD	00.0.10				33,333		00,000	
AND INFANT HEALTH INITIATIVE PROGRAMS	93.946		-	-	102,364		102,364	
BLOCK GRANTS FOR COMMUNITY MENTAL HEALTH SERVICES	93.958		-	-	2,170,948		2,170,948	
BLOCK GRANTS FOR PREVENTION AND TREATMENT OF SUBSTANCE ABUSE	93.959		-	-	6,701,122		6,701,122	
PREVENTIVE HEALTH SERVICES - SEXUALLY TRANSMITTED DISEASES CONTROL GRANTS	93.977		-	-	807,251		807,251	
PREVENTIVE HEALTH & HEALTH SERVICES BLOCK GRANT	93.991		-	-	1,266,285		1,266,285	354,83
MATERNAL AND CHILD HEALTH SERVICES BLOCK GRANT TO THE STATES	93.994		-	-	6,671,667		6,671,667	2,153,770
Total U.S. Department of Health and Human Services				382,598	2,730,462,191	2,427,103,054	2,730,844,789	76,119,618
Corporation for National and Community Service								
RETIRED AND SENIOR VOLUNTEER PROGRAM	94.002		-	-	130,837		130,837	13,37
STATE COMMISSIONS	94.003		-	-	254,493		254,493	116,250
AMERICORPS	94.006		-	-	3,075,437		3,075,437	3,075,43
TRAINING AND TECHNICAL ASSISTANCE	94.009		-	-	205,354		205,354	29,000
FOSTER GRANDPARENT/SENIOR COMPANION CLUSTER								
SENIOR COMPANION PROGRAM	94.016		-		311,437		311,437	
SUBTOTAL - FOSTER GRANDPARENT/SENIOR COMPANION CLUSTER						311,437		
Total Corporation for National and Community Service				-	3,977,558	311,437	3,977,558	3,234,066
Social Security Administration								
SOCIAL SECURITY DISABILITY INSURANCE CLUSTER								
SOCIAL SECURITY DISABILITY INSURANCE	96.001		-	-	12,512,101		12,512,101	
SUBTOTAL - SOCIAL SECURITY DISABILITY INSURANCE CLUSTER				-	_	12,512,101		
Total Social Security Administration			-	-	12,512,101	12,512,101	12,512,101	

# Schedule of Expenditures of Federal Awards by Federal Grantor

Year Ended September 30, 20
-----------------------------

		Pass Through		Student				
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Federal CFDA Number	Entity Identifying Number	Research and Development Cluster	Financial Assistance Cluster	Other	Cluster Total	Total Federal Expenditures	Passed Through to Subrecipients
U.S. Department of Homeland Security								
NON-PROFIT SECURITY PROGRAM	97.008		_	_	1,121,385		1,121,385	1,121,385
PUBLIC ASSISTANCE - PRESIDENTIAL DECLARED DISASTER	97.036		-	_	(586,337)		(586,337)	
BOATING SAFETY FINANCIAL ASSISTANCE	97.012		-	-	756,159		756,159	-
COMMUNITY ASSISTANCE PROGRAM STATE SUPPORT SERVICES ELEMENT (CAP-SSSE)	97.023		-	_	66,309		66,309	13,332
HAZARD MITIGATION GRANT	97.039		-	_	947,268		947,268	801,479
EMERGENCY MANAGEMENT PERFORMANCE GRANTS	97.042		-	-	3,363,295		3,363,295	-
ASSISTANCE TO FIREFIGHTERS GRANT	97.044		-	-	(42)		(42)	-
COOPERATING TECHNICAL PARTNERS	97.045		-	-	62,979		62,979	58,750
PRE-DISASTER MITIGATION	97.047		-	-	695,229		695,229	499,375
PORT SECURITY GRANT PROGRAM	97.056		-	-	145,016		145,016	-
HOMELAND SECURITY GRANT PROGRAM	97.067		-	-	51,606,824		51,606,824	40,060,086
HOMELAND SECURITY-RELATED SCIENCE, TECHNOLOGY, ENGINEERING AND MATHEMATIC	S							
(HS STEM) CAREER DEVELOPMENT PROGRAM	97.104		77,414	-	-		77,414	-
SECURING THE CITIES PROGRAM	97.106			-	1,257,920		1,257,920	339,866
Total U.S. Department of Homeland Security			77,414	-	59,436,005		59,513,419	42,307,936

# Schedule II - Schedule of Expenditures of Federal Awards by District Agency

#### Schedule of Expenditures of Federal Awards by District Agency

Year Ended September 30, 2019				
		Pass		
	Federal	Through Entity	Total	Passed
	CFDA	Identifying	Federal	Through to
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number	Number	Expenditures	Subrecipients
HUMAN SUPPORT SERVICES CLUSTER:				
Department of Health				
SPECIAL SUPPLEMENTAL NUTRITION PROGRAM FOR WOMEN, INFANTS, AND CHILDREN (WIC)	10.557		\$ 11,731,677	\$ 3,012,205
STATE ADMINISTRATIVE MATCHING GRANTS FOR THE SUPPLEMENTAL NUTRITION ASSISTANCE			,	<b>v</b> 0,012,200
PROGRAM	10.561		1,568,923	199,600
COMMODITY SUPPLEMENTAL FOOD PROGRAM	10.565		393,852	393,852
WIC FARMERS' MARKET NUTRITION PROGRAM (FMNP)	10.572		146,374	· -
SENIOR FARMERS MARKET NUTRITION PROGRAM	10.576		134,879	-
HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS	14.241		11,144,742	5,625,522
COMPENSATION AND WORKING CONDITIONS	17.005		89,500	-
VIRGINIA GRAEME BAKER POOL AND SPA SAFETY	87.002		68,352	-
STATE & TERRITORIAL & TECHNICAL ASSISTANCE CAPACITY DEVELOPMENT MINORITY HIV/AIDS				
DEMONSTRATION PROGRAM	93.006		530,605	-
PUBLIC HEALTH EMERGENCY PREPAREDNESS	93.069		966,255	-
HOSPITAL PREPAREDNESS PROGRAM (HPP) AND PUBLIC HEALTH EMERGENCY PREPAREDNESS	00.074		F FF0 400	04.000
(PHEP) ALIGNED COOPERATIVE AGREEMENTS	93.074		5,559,126	64,990
AFFORDABLE CARE ACT PERSONAL RESPONSIBILITY EDUCATION PROGRAM	93.092		95,298	18,517
FOOD AND DRUG ADMINISTRATION RESEARCH PROJECT GRANTS & COOP AGREEMENTS FOR TUBERCOLOSIS CONTROL PROGRAMS	93.103 93.116		17,284 328,655	-
COOPERATIVE AGREEMENTS TO STATES/TERRITORIES FOR THE COORDINATION AND DEVELOPMENT	33.110		320,033	-
OF PRIMARY CARE OFFICES	93.130		150,203	_
INJURY PREVENTION & CONTROL RESEARCH & STATE COMMUNITY BASED PROGRAM	93.136		1,401,065	102,544
GRANTS TO STATES FOR LOAN REPAYMENT PROGRAM	93.165		333,155	102,544
GRANTS TO STATES TO SUPPORT ORAL HEALTH WORKFORCE ACTIVITIES	93.236		185,729	-
UNIVERSAL NEWBORN HEARING SCREENING	93.251		171,780	-
IMMUNIZATION COOPERATIVE AGREEMENTS	93.268		1,897,702	72,221
ADULT VIRAL HEPATITIS PREVENTION AND CONTROL	93.270		156,826	51,093
NATIONAL STATE BASED TOBACCO CONTROL PROGRAMS	93.305		652,729	-
EPIDEMIOLOGY AND LABORATORY CAPACITY FOR INFECTIOUS DISEASES (ELC)	93.323		2,165,279	-
ACTIVITIES TO SUPPORT STATE, TRIBAL, LOCAL AND TERRITORIAL (STLT) HEALTH DEPARTMENT				
RESPONSE TO PUBLIC HEALTH OR HEALTHCARE CRISES	93.354		3,069,042	40,000
IMPROVING THE HEALTH OF AMERICANS THROUGH PREVENTION AND MANAGEMENT OF DIABETES				
AND HEART DISEASE AND STROKE	93.426		1,943,532	644,100
THE AFFORDABLE CARE ACT: BUILDING EPIDEMIOLOGY, LABORATORY, AND HEALTH INFORMATION				
SYSTEMS CAPACITY IN THE EPIDEMIOLOGY AND LABORATORY CAPACITY FOR INFECTIOUS DISEASE	00.504		40.000	
(ELC) AND EMERGING INFECTIONS PROGRAMS (EIP) COOPERATIVE AGREEMENTS; PPHF	93.521		13,389	-
STATE PUBLIC HEALTH APPROACHES FOR ENSURING OUTLINE CAPACITY - FUNDED IN PART BY 2012	93.735		48,289	40.000
PREVENTION & PUBLIC HEALTH FUNDS (PPHF-2012)	93.733		40,209	48,289
PPHF: HEALTH CARE SURVEILLANCE/HEALTH STATISTICS - SURVEILLANCE PROGRAM ANNOUNCEMENT: BEHAVIORAL RISK FACTOR SURVEILLANCE SYSTEM FINANCED IN PART BY 2012				
PREVENTION & PUBLIC HEALTH FUND (PPHF-2012)	93.745		300,848	_
STATE AND LOCAL PUBLIC HEALTH ACTIONS TO PREVENT OBESITY, DIABETES, HEART DISEASE AND	30.140		000,040	
STROKE (PPHF)	93.757		146,646	_
PREVENTIVE HEALTH AND HEALTH SERVICES BLOCK GRANT FUNDED SOLELY WITH PREVENTION AND	00.101		110,010	
PUBLIC HEALTH FUNDS (PPHF)	93.758		66,916	20,424
STATE SURVEY AND CERTIFICATION OF HEALTH CARE PROVIDERS & SUPPLIERS TITLE (XVIII) MEDICARE	93.777		3,585,426	
STATE SURVEY AND CERTIFICATION OF HEALTH CARE PROVIDERS & SUPPLIERS TITLE (XIX) MEDICAID	93.796		183,209	-
ORGANIZED APPROACHES TO INCREASE COLORECTAL SCREENING	93.800		381,697	253,910
HOSPITAL PREPAREDNESS PROGRAM (HPP) EBOLA PREPAREDNESS AND RESPONSE ACTIVITIES	93.817		754,885	456,064
MATERNAL, INFANT, AND EARLY CHILDHOOD HOME VISITING GRANT PROGRAM	93.870		1,952,010	1,563,286
NATIONAL BIOTERROISM HOSPITAL PREPAREDNESS PROGRAM	93.889		123,875	22,379
CANCER PREVENTION AND CONTROL PROGRAMS FOR STATE, TERRITORIAL AND TRIBAL				
ORGANIZATIONS	93.898		1,172,860	-
HIV EMERGENCY RELIEF PROJECT GRANTS	93.914		30,383,694	20,427,878
HIV CARE FORMULA GRANTS	93.917		14,592,023	4,288,674
HEALTHY START INITIATIVE	93.926		966,890	576,707
HIV PREVENTION ACTIVITIES - HEALTH DEPARTMENT BASED	93.940		7,202,439	735,366
HUMAN IMMUNODEFICIENCY VIRUS (HIV)/ACQUIRED IMMUNODEFICIENCY SYNDROME (AIDS)	02.044		404.075	
SURVEILLANCE ASSISTANCE PROCEDAMS FOR CURONIC DISEASE PREVENTION & CONTROL	93.944		494,275	-
ASSISTANCE PROGRAMS FOR CHRONIC DISEASE PREVENTION & CONTROL	93.945		85,695	-
COOPERATIVE AGREEMENTS TO SUPPORT STATE BASED SAFE MOTHERHOOD AND INFANT HEALTH INITIATIVE PROGRAMS	93.946		102,364	
HEREITHATIATIVE I TOOTAINO	30.340		102,304	-

Year Ended September 30, 2019		Pass		
		Through		
	Federal CFDA	Entity	Total	Passed
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number	ldentifying Number	Federal Expenditures	Through to Subrecipients
HUMAN SUPPORT SERVICES CLUSTER:				
Department of Health (continued)				
PREVENTIVE HEALTH SERVICES - SEXUALLY TRANSMITTED DISEASES CONTROL GRANTS	93.977		807,251	-
PREVENTIVE HEALTH & HEALTH SERVICES BLOCK GRANT	93.991		1,266,285	354,831
MATERNAL AND CHILD HEALTH SERVICES BLOCK GRANT TO THE STATES	93.994		6,671,667	2,153,770
Total Department of Health			116,205,197	41,126,222
Office of Human Rights				
FAIR HOUSING ASSISTANCE PROGRAM - STATE AND LOCAL	14.401		42,054	-
EMPLOYMENT DISCRIMINATION - TITLE VII OF THE CIVIL RIGHTS ACT OF 1964	30.001		200,553	
Total Office of Human Rights			242,607	<u> </u>
Department of Health Care Finance				
CHILDREN'S HEALTH INSURANCE PROGRAM	93.767		56,965,645	-
MEDICAL ASSISTANCE PROGRAM	93.778		2,238,146,995	-
ARRA - MEDICAL ASSISTANCE PROGRAM	93.778 93.791		6,113,780	2,249,999
MONEY FOLLOWS THE PERSON REBALANCING DEMONSTRATION  Total Department of Health Care Finance	93.791		1,190,712 2,302,417,132	2,249,999
Total Department of Health Care i mance			2,302,417,132	2,243,333
Department of Human Services				
SNAP FRAUD FRAMEWORK IMPLEMENTATION GRANT	10.535		112,910	-
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) - FOOD STAMPS STATE ADMINISTRATIVE MATCHING GRANTS FOR THE SUPPLEMENTAL NUTRITION ASSISTANCE	10.551		173,109,637	-
PROGRAM	10.561		26,700,398	-
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) PROCESS AND TECHNOLOGY			20,100,000	
IMPROVEMENT GRANTS	10.580		56,831	-
EMERGENCY SOLUTIONS GRANT PROGRAM	14.231		2,464,985	-
CONTINUUM OF CARE PROGRAM	14.267		5,175,875	-
VETERANS AFFAIRS MEDICAL CENTER TANF POLICY ACADEMY FOR INNOVATIVE EMPLOYMENT STRATEGIES (PAIES)	64.009 93.475		1,020,182 20,470	-
TEMPORARY ASSISTANCE FOR NEEDY FAMILIES	93.558		115,013,012	-
REFUGEE & ENTRANT ASSISTANCE - STATE ADMINISTERED	93.566		1,602,378	-
COMMUNITY SERVICES BLOCK GRANT	93.569		12,079,600	10,738,256
SOCIAL SERVICES BLOCK GRANT	93.667		10,053,874	-
FAMILY VIOLENCE PREVENTION & SERVICES/GRANT FOR BATTERED WOMEN'S SHELTERS - GRANTS				
TO STATES & INDIAN TRIBES	93.671 93.778		748,814	-
MEDICAL ASSISTANCE PROGRAM  Total Department of Human Services	93.770		13,652,605 <b>361,811,571</b>	10,738,256
Total Department of Human Services			301,011,371	10,730,230
Department on Disability Services	04.400		45.007.400	
REHABILITATION SERVICES - VOCATIONAL REHABILITATION GRANTS TO STATES	84.126		15,297,186	-
REHABILITATION SERVICES - INDEPENDENT LIVING SERVICES - OLDER INDIVIDUALS WHO ARE BLIND SUPPORTED EMPLOYMENT SERVICES FOR INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES	84.177 84.187		165,113 204,509	-
SPECIAL PROGRAMS FOR THE AGING - TITLE IV & TITLE II - DISCRETIONARY PROJECTS	93.048		258,504	-
ACL INDEPENDENT LIVING STATE GRANTS	93.369		398,829	-
ACL ASSISTIVE TECHNOLOGY	93.464		345,846	-
DEVELOPMENTAL DISABILITIES PROJECTS OF NATIONAL SIGNIFICANCE	93.631		332,275	-
MEDICAL ASSISTANCE PROGRAM	93.778		14,017,435	-
SOCIAL SECURITY DISABILITY INSURANCE	96.001		12,512,101	-
Total Department on Disability Services			43,531,798	<u> </u>
Office on Disability Rights				
DEVELOPMENTAL DISABILITIES BASIC SUPPORT AND ADVOCACY GRANTS	93.630		613,531	-
Total Office on Disability Rights			613,531	

Year Ended September 30, 2019		Pass		
		Through		
	Federal	Entity	Total	Passed
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	CFDA Number	ldentifying Number	Federal Expenditures	Through to Subrecipients
Tederal Grantor / Fass-Till ough Grantor / Frogram or Gruster Title	Number	Number	Lxperiultures	Jubi ecipients
HUMAN SUPPORT SERVICES CLUSTER:				
Child and Family Services				
GUARDIANSHIP ASSISTANCE	93.090		2,540,438	
PROMOTING SAFE AND STABLE FAMILIES	93.556		888,553	
COMMUNITY-BASED CHILD ABUSE PREVENTION GRANTS	93.590		216,629	
CHAFEE EDUCATION AND TRAINING VOUCHERS PROGRAM (ETV)	93.599 93.603		53,729 56,691	
ADOPTION AND LEGAL GUARDIANSHIP PROGRAM CHILDREN'S JUSTICE GRANTS TO STATES	93.643		66,171	
CHILD WELFARE - SERVICES - STATE GRANTS	93.645		389,069	
FOSTER CARE - TITLE IV-E	93.658		35,600,140	
ADOPTION ASSISTANCE - TITLE IV-E	93.659		9,584,793	
CHILD ABUSE AND NEGLECT STATE GRANTS	93.669		61,787	
CHAFEE FOSTER CARE INDEPENDENCE PROGRAM	93.674		824,250	
Total Child and Family Services	00.0.	•	50,282,250	
		•	00,202,200	
Department of Behavioral Health				
CONTINUUM OF CARE PROGRAM	14.267		239,863	
CRIMINAL AND JUVENILE JUSTICE AND MENTAL HEALTH COLLABORATION PROGRAM	16.745		100,415	
COMPREHENSIVE COMMUNITY MENTAL HEALTH SERVICES FOR CHILDREN WITH SERIOUS EMOTIONAL				
DISTURBANCES (SED)	93.104		1,225,957	
PROJECTS FOR ASSISTANCE IN TRANSITION FROM HOMELESSNESS (PATH)	93.150		227,677	
SUBSTANCE ABUSE MENTAL HEALTH SERVICES (SAMHS) - PROJECTS OF REGIONAL AND NATIONAL				
SIGNIFICANCE	93.243		4,458,657	
MEDICARE - HOSPITAL INSURANCE	93.773		2,780,521	
MEDICAL ASSISTANCE PROGRAM	93.778		5,454,586	
OPIOD STR	93.788		10,645,353	
BLOCK GRANTS FOR COMMUNITY MENTAL HEALTH SERVICES	93.958		2,170,948	
BLOCK GRANTS FOR PREVENTION AND TREATMENT OF SUBSTANCE ABUSE	93.959		6,701,122 <b>34,005,099</b>	
Total Department of Behavioral Health		;	34,005,099	
PRIMARY & SECONDARY EDUCATION CLUSTER:				
District of Columbia Public Schools				
FARM TO SCHOOL GRANT PROGRAM	10.575		99,476	
LANGUAGE GRANT PROGRAM	12.900		157,364	
INNOVATIVE APPROACHES TO LITERACY, FULL-SERVICE COMMUNITY SCHOOLS; AND PROMISE				
NEIGHBORHOODS	84.215		325,649	
DC SCHOOL CHOICE INCENTIVE PROGRAM	84.370		17,500,000	
COOPERATIVE AGREEMENTS TO PROMOTE ADOLESCENT HEALTH THROUGH SCHOOL-BASED HIV/STD				
PREVENTION AND SCHOOL-BASED SURVEILLANCE	93.079		369,045	
HEAD START	93.600		13,441,989	
Total District of Columbia Public Schools		:	31,893,523	
Office of the Otate Commission dent of Education				
Office of the State Superintendent of Education	10 550		44 040 004	44 040 00
SCHOOL BREAKFAST PROGRAM	10.553		11,012,881	11,012,88
NATIONAL SCHOOL LUNCH PROGRAM	10.555		26,349,375	26,349,37
SPECIAL MILK PROGRAM FOR CHILDREN CHILD AND ADULT CARE FOOD PROGRAM	10.556 10.558		1,528,150 10,891,246	1,77 10,688,27
CHILD AND ADULT CARE FOOD PROGRAM SUMMER FOOD SERVICE PROGRAM FOR CHILDREN	10.556		2,949,112	2,906,26
SUMMER FOOD SERVICE PROGRAM FOR CHILDREN EMERGENCY FOOD ASSISTANCE PROGRAM (ADMINISTRATIVE COST)	10.559		2,949,112 440,952	392,06
CHILD NUTRITION DISCRETIONARY GRANTS LIMITED AVAILABILITY	10.579		121,578	121,57
CHILD NOTRITION DISCRETIONARY GRANTS LIMITED AVAILABILITY, NON-CASH AWARD	10.579		3,409,492	121,57
FRESH FRUIT AND VEGETABLE PROGRAM	10.582		2,083,948	1,989,33
ADULT EDUCATION - BASIC GRANTS TO STATES	84.002		681,980	668,80
TITLE I GRANTS TO LOCAL EDUCATIONAL AGENCIES (LEA)	84.010		50,856,587	50,174,38
TITLE I STATE AGENCY PROGRAM FOR NEGLECTED & DELINQUENT CHILDREN	84.013		95,175	94,35
SPECIAL EDUCATION - GRANT TO STATES	84.027		19,290,919	16,637,09
CAREER & TECHNICAL EDUCATION - BASIC GRANTS TO STATES	84.048		5,097,310	4,490,56
SPECIAL EDUCATION - PRESCHOOL GRANTS	84.173		172,211	129,12

Year Ended September 30, 2019				
		Pass		
		Through		
	Federal	Entity	Total	Passed
Fordered Oversteen / Book Thomason h. Oversteen / Book was an Objective Title	CFDA	Identifying	Federal	Through to
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number	Number	Expenditures	Subrecipients
PRIMARY & SECONDARY EDUCATION CLUSTER:				
Office of the State Superintendent of Education (continued)				
EDUCATION FOR HOMELESS CHILDREN AND YOUTH	84.196		239,943	189,753
CHARTER SCHOOLS	84.282		1,743,430	1,562,146
21ST CENTURY COMMUNITY LEARNING CENTERS - AFTER SCHOOL	84.287		1,855,463	1,768,981
ENGLISH LANGUAGE ACQUISITION	84.365		1,079,263	1,049,082
MATHEMATICS & SCIENCE PARTNERSHIP	84.366		(832,049)	(832,049)
IMPROVING TEACHER QUALITY STATE GRANTS	84.367		9,182,652	8,853,232
GRANTS FOR STATE ASSESSMENTS & RELATED ACTIVITIES	84.369		4,470,774	-
DC SCHOOL CHOICE INCENTIVE PROGRAM	84.370		784,981	(117,799)
STATEWIDE LONGTITUDINAL DATA SYSTEMS	84.372		(16,167)	(16,167)
SCHOOL IMPROVEMENT GRANTS	84.377		1,666,177	1,561,480
COLLEGE ACCESS CHALLENGE GRANT PROGRAM	84.378		(15)	(15)
STUDENT SUPPORT AND ACADEMIC ENRICHMENT GRANTS	84.424		5,149,953	5,002,201
COOPERATIVE AGREEMENTS TO PROMOTE ADOLESCENT HEALTH THROUGH SCHOOL-BASED HIV/STD				
PREVENTION AND SCHOOL-BASED SURVEILLANCE	93.079		80,348	-
AFFORDABLE CARE ACT PERSONAL RESPONSIBILITY EDUCATION PROGRAM	93.092		214,621	47,686
SUBSTANCE ABUSE MENTAL HEALTH SERVICES (SAMHS) - PROJECTS OF REGIONAL AND NATIONAL	00.002		2,02.	,000
SIGNIFICANCE	93.243		1,214,799	1,033,097
EVERY STUDENT SUCCEEDS ACTS (ESSA)/PRESCHOOL DEVELOPMENT GRANTS	93.434		3,515,840	.,000,00.
CHILD CARE & DEVELOPMENT BLOCK GRANT	93.575		20,231,706	17,443,894
HEAD START	93.600		950,549	619,500
Total Office of the State Superintendent of Education	30.000	•	188,854,369	164,082,364
Total Office of the otale superintendent of Education		:	100,004,003	104,002,304
University of the District of Columbia				
AGRICULTURAL RESEARCH_BASIC AND APPLIED RESEARCH	10.001		20,552	-
SPECIALTY CROP BLOCK GRANT PROGRAM - FARM BILL	10.170		169,215	-
PAYMENTS TO AGRICULTURAL EXPERIMENT STATIONS UNDER THE HATCH ACT	10.203		889,632	-
COOPERATIVE EXTENSION SERVICE	10.500		1,178,754	-
PARTNERSHIP AGREEMENTS	10.699		1,738	-
SCIENCE, TECHNOLOGY, BUSINESS AND/OR EDUCATION OUTREACH	11.620		52,115	-
BASIC, APPLIED, AND ADVANCED RESEARCH IN SCIENCE AND ENGINEERING	12.630		240,070	_
ASSISTANCE TO WATER RESOURCES RESEARCH INSTITUTES	15.805		84,398	-
EDUCATION - OFFICE OF STEM ENGAGEMENT, NASA	43.008		56,628	_
EDUCATION AND HUMAN RESOURCES	47.076		956,074	_
NATIONAL NUCLEAR SECURITY ADMINISTRATION (NNSA) MINORITY SERVING INSTITUTION (MSI)				
PROGRAM	81.123		1,930	_
FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANTS (SEOG)	84.007		575,274	_
HIGHER EDUCATION - INSTITUTIONAL AID	84.031		6,877,174	_
FEDERAL WORK-STUDY PROGRAM	84.033		228,578	_
TRIO - TALENT SEARCH	84.044		462,439	_
TRIO - UPWARD BOUND	84.047		305,758	_
FEDERAL PELL GRANT PROGRAM	84.063		7,840,124	_
FEDERAL DIRECT STUDENT LOANS	84.268		20,757,656	
SUBSTANCE ABUSE MENTAL HEALTH SERVICES (SAMHS) - PROJECTS OF REGIONAL AND NATIONAL	04.200		20,131,030	-
SIGNIFICANCE	93.243		29,242	
				-
NATIONAL CENTER FOR ADVANCING TRANSLATIONAL SCIENCES	93.350		44,652	-
COMMUNITY SERVICES BLOCK GRANT_DISCRETIONARY AWARDS	93.570		(13,993)	-
SCHOLARSHIPS FOR HEALTH PROFESSIONS STUDENTS FROM DISADVANTAGED BACKGROUNDS	93.925		382,598	-
SENIOR COMPANION PROGRAM	94.016		311,437	-
HOMELAND SECURITY-RELATED SCIENCE, TECHNOLOGY, ENGINEERING AND MATHEMATICS (HS STEM)	07 404		77 111	
CAREER DEVELOPMENT PROGRAM	97.104	-	77,414	-
Total University of the District of Columbia			41,529,459	•

Year Ended September 30, 2019		Pass		
	Federal CFDA	Through Entity Identifying	Total Federal	Passed Through to
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number	Number	Expenditures	Subrecipients
GOVERNMENT SERVICES CLUSTER:				
Department of Transportation				
HIGHWAY RESEARCH AND DEVELOPMENT PROGRAM	20.200		2,986,787	-
HIGHWAY PLANNING AND CONSTRUCTION	20.205		211,431,766	-
HIGHWAY TRAINING AND EDUCATION	20.215		416,198	-
RECREATIONAL TRAILS PROGRAM	20.219		145,007	-
METROPOLITAN TRANSPORTATION PLANNING	20.505		320,771	-
ENHANCED MOBILITY OF SENIORS AND INDIVIDUALS WITH DISABLITIES	20.513		(4,665)	-
STATE AND COMMUNITY HIGHWAY SAFETY	20.600		3,711,275	-
NATIONAL INFRASTRUCTURE INVESTMENTS	20.933		854,832	-
Total Department of Transportation			219,861,971	•
District Department of the Environment				
PESTICIDE APPLICATOR TRAINING	10.025		11,634	-
ATLANTIC COASTAL FISHERIES COOPERATIVE MANAGEMENT ACT	11.474		12,935	-
STATE MEMORANDUM OF AGREEMENT PROGRAM FOR THE REIMBURSEMENT OF TECHNICAL				
SERVICES	12.113		241,022	-
SPORT FISH RESTORATION PROGRAM	15.605		1,835,017	57,216
SPORTFISHING AND BOATING SAFETY ACT	15.622		89,526	89,526
STATE WILDLIFE GRANTS	15.634		92,380	-
AIR POLLUTION CONTROL PROGRAM SUPPORT	66.001		1,386,069	-
STATE INDOOR RADON GRANTS	66.032		101,019	-
SURVEYS, STUDIES, INVESTIGATIONS ACTIVITIES RELATING TO THE CLEAN AIR ACT	66.034		273,215	-
MULTIPURPOSE GRANTS TO STATES AND TRIBES	66.204		138,216	
CONSTRUCTION GRANTS FOR WASTEWATER TREATMENT WORKS	66.418		3,618,469	533,734
WATER POLLUTION CONTROL STATE, INTERSTATE, TRIBAL PROGRAM SUPPORT	66.419		1,285,822	-
WATER QUALITY MANAGEMENT PLANNING	66.454		100,000	60,000
NONPOINT SOURCE IMPLEMENTATION GRANTS	66.460		949,681	277,566
CHESAPEAKE BAY PROGRAM	66.466		1,763,195	607,459
CAPITALIZATION GRANTS FOR DRINKING WATER STATE REVOLVING FUNDS	66.468		5,458	-
PERFORMANCE PARTNERSHIP GRANTS	66.605		193,001	-
POLLUTION PREVENTION GRANTS PROGRAM	66.708 66.717		524,475 70,235	48,198
SOURCE REDUCTION ASSISTANCE	66.801		354,235	40,190
HAZARDOUS WASTE MANAGEMENT STATE PROGRAM SUPPORT UNDERGROUND STORAGE TANK PREVENTION, DETECTION & COMPLIANCE PROGRAM	66.804		759,572	-
STATE AND TRIBAL RESPONSE PROGRAM GRANTS	66.817		282,611	
STATE ENERGY PROGRAM	81.041		250,727	50,000
WEATHERIZATION ASSISTANCE FOR LOW-INCOME PERSONS	81.042		745,743	489,838
STATE ENERGY PROGRAM SPECIAL PROJECTS	81.119		156	156
STATE HEATING OIL AND PROPANE PROGRAM	81.138		7,097	100
CHILD LEAD POISONING PREVENTION PROGRAM	93.197		304,656	55,625
LOW INCOME HOME ENERGY ASSISTANCE	93.568		11,706,700	9,394,902
CHILD LEAD POISONING PREVENTION SURVEILLANCE FINANCED IN PART BY PREVENTION AND PUBLIC				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
HEALTH (PPHF) PROGRAM	93.753		(695)	-
COMMUNITY ASSISTANCE PROGRAM STATE SUPPORT SERVICES ELEMENT (CAP-SSSE)	97.023		66,309	13,332
COOPERATING TECHNICAL PARTNERS	97.045		62,979	58,750
Total District Department of the Environment			27,231,459	11,736,302
GOVERNMENT OPERATIONS CLUSTER:				
Office of the Mayor				
RETIRED AND SENIOR VOLUNTEER PROGRAM	94.002		130,837	13,379
STATE COMMISSIONS	94.003		254,493	116,250
AMERICORPS	94.006		3,075,437	3,075,437
TRAINING AND TECHNICAL ASSISTANCE	94.009		205,354	29,000
Total Office of the Mayor			3,666,121	3,234,066

Year Ended September 30, 2019				
		Pass		
		Through		
	Federal	Entity	Total	Passed
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	CFDA Number	ldentifying Number	Federal Expenditures	Through to Subrecipients
GOVERNMENT OPERATIONS CLUSTER:				
Office of the Inspector General	00.775		0.474.055	
STATE MEDICAID FRAUD CONTROL UNITS  Total Office of the Inspector General	93.775		2,174,955 <b>2,174,955</b>	-
Total Office of the hispector General			2,174,955	<u> </u>
Office on Aging				
SPECIAL PROGRAMS FOR THE AGING - TITLE VII, CHAPTER 3 - PROGRAMS FOR PREVENTION OF				
ELDER ABUSE, NEGLECT, AND EXPLOITATION	93.041		23,544	23,544
SPECIAL PROGRAMS FOR THE AGING - TITLE VII, CHAPTER 2 - LONG TERM CARE OMBUDSMAN	00.040		045.000	045.000
SERVICES FOR OLDER INDIVIDUALS  SERVICES FOR OLDER INDIVIDUALS  SERVICES FOR OLDER INDIVIDUALS  SERVICES FOR OLDER INDIVIDUALS	93.042		215,260	215,260
SPECIAL PROGRAMS FOR THE AGING - TITLE III, PART B - GRANTS FOR SUPPORTIVE SERVICES AND SENIOR CENTERS	93.044		1,778,520	1,380,366
SPECIAL PROGRAMS FOR THE AGING - TITLE III, PART C - NUTRITION SERVICES	93.045		3,565,907	1,000,000
ALZHEIMER'S DISEASE DEMONSTRATION GRANTS TO STATES	93.051		107,913	-
NATIONAL FAMILY CAREGIVERS SUPPORT TITLE III PART E	93.052		1,014,925	1,014,925
NUTRITION SERVICES INCENTIVE PROGRAM	93.053		662,281	-
AFFORDABLE CARE ACT - MEDICARE IMPROVEMENTS FOR PATIENTS AND PROVIDERS	93.518		7,521	7,521
MEDICAL ASSISTANCE PROGRAM	93.778		2,460,846	-
CENTERS FOR MEDICARE & MEDICAID SERVICES (CMS) RESEARCH, DEMONSTRATIONS AND				
EVALUATIONS	93.779		128,796	-
Total Office on Aging			9,965,513	2,641,616
Office of the Attorney General				
SMART PROSECUTION INITIATIVE	16.825		138,897	-
CHILD SUPPORT ENFORCEMENT PROGRAM	93.563		18,960,677	-
CHILD SUPPORT ENFORCEMENT RESEARCH	93.564		49,324	-
GRANTS TO STATES FOR ACCESS AND VISITATION PROGRAM	93.597		96,556	-
Total Office of the Attorney General			19,245,454	-
DC Public Library				
GRANTS TO STATES	45.310		943,402	-
NATIONAL LEADERSHIP GRANTS	45.312		86,473	-
Total DC Public Library			1,029,875	•
Department of Employment Services				
LABOR FORCE STATISTICS	17.002		639,330	_
EMPLOYMENT SERVICE/WAGNER-PEYSER FUNDED ACTIVITIES	17.207		2,087,968	-
UNEMPLOYMENT INSURANCE	17.225		130,179,594	-
ARRA - UNEMPLOYMENT INSURANCE	17.225		56,309	-
SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM	17.235		462,916	-
WIOA ADULT PROGRAM	17.258		2,435,786	-
WIOA YOUTH ACTIVITIES	17.259		3,284,203	-
WORK OPPORTUNITY TAX CREDIT PROGRAM (WOTC)	17.271		66,000	-
TEMPORARY LABOR CERTIFICATION FOR FOREIGN WORKERS	17.273		10,131	-
WIOA DISLOCATED WORKER FORMULA GRANTS CONSULTATION AGREEMENTS	17.278 17.504		6,094,973 502,600	-
DISABLED VETERANS OUTREACH PROGRAM	17.801		318,749	-
LOCAL VETERANS EMPLOYMENT REPRESENTATIVE	17.804		237,804	-
Total Department of Employment Services			146,376,363	
D 1 (E) (1 1 E)				
Board of Election and Ethics	00 404		E4E 000	
HELP AMERICA VOTE ACT REQUIREMENTS PAYMENTS 2018 HELP AMERICA VOTE ACT ELECTION SECURITY GRANTS	90.401 90.404		515,298 207,421	-
Total Board of Election and Ethics	50.707		722,719	
Total Board of Election and Eurica			122,113	

# Schedule of Expenditures of Federal Awards by District Agency

Year Ended September 30, 2019				
		Pass		
		Through	<b>-</b>	5 /
	Federal CFDA	Entity Identifying	Total Federal	Passed Through to
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number	Number	Expenditures	Subrecipients
DUDU O AFETY A HIGTIGE OF HOTED				
PUBLIC SAFETY & JUSTICE CLUSTER:				
Homeland Security / Emergency Management NON-PROFIT SECURITY PROGRAM	97.008		1,121,385	1,121,385
PUBLIC ASSISTANCE - PRESIDENTIAL DECLARED DISASTER	97.036		(586,337)	(586,337)
HAZARD MITIGATION GRANT	97.039		947,268	801,479
EMERGENCY MANAGEMENT PERFORMANCE GRANTS	97.042		3,363,295	-
PRE-DISASTER MITIGATION	97.047		695,229	499,375
HOMELAND SECURITY GRANT PROGRAM	97.067		51,606,824	40,060,086
SECURING THE CITIES PROGRAM	97.106		1,257,920	339,866
Total Homeland Security / Emergency Management			58,405,584	42,235,854
Metropolitan Police Department				
NATIONAL CRIMINAL HISTORY IMPROVEMENT PROGRAM (NCHIP)	16.554		284,866	-
PUBLIC SAFETY PARTNERSHIP & COMMUNITY POLICING GRANTS	16.710		449,771	201,417
EDWARD BYRNE MEMORIAL COMPETITIVE GRANT PROGRAM	16.751		358,169	
NATIONAL MOTOR CARRIER SAFETY	20.218		843,023	-
SAFETY DATA IMPROVEMENT PROGRAM	20.234		4,992	-
MOTOR CARRIER SAFETY ASSISTANCE HIGH PRIORITY ACTIVITIES GRANTS AND COOPERATIVE				
AGREEMENTS	20.237		81,386	-
BOATING SAFETY FINANCIAL ASSISTANCE	97.012		756,159	
Total Metropolitan Police Department			2,778,366	201,417
Fire and Emergency Medical Services				
RAIL FIXED GUIDEWAY PUBLIC TRANSPORTATION SYSTEM STATE SAFETY OVERSIGHT FORMULA				
GRANT PROGRAM	20.528		140,581	-
ASSISTANCE TO FIREFIGHTERS GRANT	97.044		(42)	-
PORT SECURITY GRANT PROGRAM	97.056		145,016	-
Total Fire and Emergency Medical Services			285,555	<del>-</del>
Criminal Justice Coordinating Council				
STATE JUSTICE STATISTICS PROGRAM FOR STATISTICAL ANALYSIS CENTERS	16.550		158,700	-
Total Criminal Justice Coordinating Council			158,700	
DC National Guard				
NATIONAL GUARD MILITARY OPERATIONS AND MAINTENANCE (O&M) PROJECTS	12.401		6,255,057	-
NATIONAL GUARD CHALLENGE PROGRAM	12.404		2,168,189	-
Total DC National Guard			8,423,246	-
Department of Corrections SECOND CHANCE ACT PRISONER REENTRY INITIATIVE	16.812		222,997	_
Total Department of Corrections	10.012		222,997	-
Office of Justice Grants Administration/Office of Victim Services	16.017		420.040	427 200
SEXUAL ASSAULT SERVICES FORMULA PROGRAM	16.017 16.540		439,212 323,274	437,386 309,124
JUVENILE JUSTICE AND DELINQUENCY PREVENTION - ALLOCATION TO STATES  NATIONAL CRIMINAL HISTORY IMPROVEMENT PROGRAM (NCHIP)	16.554		19,400	19,400
CRIME VICTIM ASSISTANCE PROGRAM	16.575		6,535,258	6,398,585
CRIME VICTIM ASSISTANCE I NOGRAMI CRIME VICTIM ASSISTANCE/DISCRETIONARY GRANTS	16.582		395,425	355,389
VIOLENCE AGAINST WOMEN FORMULA GRANTS	16.588		759,887	736,080
RESIDENTIAL SUBSTANCE ABUSE TREATMENT FOR STATE PRISONERS	16.593		80,528	80,528
EDWARD BYRNE MEMORIAL JUSTICE ASSISTANCE GRANT PROGRAM	16.738		440,815	340,594
PAUL COVERDELL FORENSIC SCIENCES IMPROVEMENT GRANT PROGRAM	16.742		222,974	222,974
EDWARD BYRNE MEMORIAL COMPETITIVE GRANT PROGRAM	16.751		19,046	19,046
BYRNE CRIMINAL JUSTICE INNOVATION PROGRAM	16.817		17,719	17,719
VISION 21	16.826		194,868	189,760
Total Office of Justice Grants Administration/Office of Victim Services			9,448,406	9,126,585

# Schedule of Expenditures of Federal Awards by District Agency

• •		Pass		
	Federal CFDA	Through Entity Identifying	Total Federal	Passed Through to
Federal Grantor / Pass-Through Grantor / Program or Cluster Title	Number	Number	Expenditures	Subrecipients
PUBLIC SAFETY & JUSTICE CLUSTER:				
Department of Forensics Sciences				
FORENSIC DNA BACKLOG REDUCTION PROGRAM	16.741		468,178	
Total Department of Forensics Sciences		;	468,178	
Office of Administrative Hearing				
MEDICAL ASSISTANCE PROGRAM	93.778		245,000	
Total Office of Administrative Hearing		•	245,000	
ECONOMIC DEVELOPMENT AND REGULATION CLUSTER:				
Office of Municipal Planning				
HISTORIC PRESERVATION FUND GRANTS-IN-AID	15.904		566,237	55,000
NATIONAL MARITIME HERITAGE GRANTS	15.925		24,352	24,35
Total Office of Municipal Planning		;	590,589	79,35
Commission on Arts & Humanities				
PROMOTION OF THE ARTS - PARTNERSHIP AGREEMENTS	45.025		706,990	
Total Commission on Arts & Humanities		;	706,990	
Department of Housing and Community Development				
COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG) COMMUNITY DEVELOPMENT BLOCK GRANTS/ENTITLEMENT GRANTS (CDBG), OUTSTANDING LOAN	14.218		29,973,208	11,563,49
BEGINNING BALANCE	14.218		284,586,590	
HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)	14.239		3,991,548	1,350,00
HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME), OUTSTANDING LOAN BEGINNING BALANCE	14.239		118,093,902	
HOUSING TRUST FUND	14.275		290,283	
LEAD HAZARD REDUCTION DEMONSTRATION GRANT PROGRAM	14.905		(569,403)	(424,07
Total Department of Housing and Community Development		:	436,366,128	12,489,42
Public Service Commission				
PIPELINE SAFETY PROGRAM STATE BASE GRANT	20.700		485,327	
Total Public Service Commission		•	485,327	
Deputy Mayor for Economic Development				
COMMUNITY ECONOMIC ADJUSTMENT ASSISTANCE FOR ESTABLISHMENT, EXPANSION,				
REALIGNMENT, OR CLOSURE OF A MILITARY INSTALLATION	12.607		(27,274)	
SPORTFISHING AND BOATING SAFETY ACT  Total Deputy Mayor for Economic Development	15.622	•	27,274	
		:		
Department of Small & Local Business Development PROCUREMENT TECHNICAL ASSISTANCE FOR BUSINESS FIRMS	12.002		418,992	
Total Department of Small & Local Business Development	12.002		418,992	
Department of Insurance, Securities and Banking		•		
INSURANCE MARKET REFORM GRANT	93.811		452,433	
Total Department of Insurance, Securities and Banking		:	452,433	
OFFICE OF THE CHIEF FINANCIAL OFFICE CLUSTER:				
Office of the Chief Financial Officer				
STATE ADMINISTRATIVE MATCHING GRANTS FOR THE SUPPLEMENTAL NUTRITION ASSISTANCE				
PROGRAM	10.561		648,747	
Total Office of the Chief Financial Officer	10.001		648,747	
Total Office of the Office Financial Officer				

## Notes to Schedules of Expenditures of Federal Awards Year Ended September 30, 2019

## 1. Summary of Significant Accounting Policies

#### **Reporting Entity**

The Schedules of Expenditures of Federal Awards (the "Schedules" or the "SEFA") include the activity of all federal award programs administered by the Government of the District of Columbia (the "District"), except for the District of Columbia Housing Finance Agency (HFA), for the fiscal year ended September 30, 2019. This component unit engaged other auditors to perform an audit in accordance with Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), and, as such the federal awards for this entity are excluded from the Schedules.

Federal award programs include direct expenditures, monies passed through to nonstate agencies (i.e., payments to subrecipients), nonmonetary assistance, and loan programs.

#### **Basis of Presentation**

The Schedules present total federal awards expended for each individual federal program in accordance with the Uniform Guidance. Federal award program titles are reported as presented in the Catalog of Federal Domestic Assistance (Catalog). Federal award program titles not presented in the Catalog are identified by Federal awarding agency's two digit prefix (or 99) followed by (contract number or UNKNOWN).

#### **Basis of Accounting**

The expenditures for each of the federal award programs are presented in the Schedules on a modified accrual basis. The modified accrual basis of accounting incorporates an estimation approach to determine the amount of expenditures incurred if not yet billed by a vendor. Thus, those Federal programs presenting negative amounts on the Schedules are the result of prior year estimates being overstated and/or reimbursements due back to the grantor.

#### **Matching Costs**

Matching costs, the nonfederal share of certain programs costs, are not included in the Schedules.

#### 2. Relationship to Federal Financial Reports

The regulations and guidelines governing the preparation of Federal financial reports vary by Federal agency and among programs administered by the same agency. Accordingly, the amounts reported in the Federal financial reports do not necessarily agree with the amounts reported in the accompanying Schedules, which are prepared on the basis explained in Note 1.

#### 3. Indirect Cost Rate

The District did not elect to use the 10-percent de minimis indirect cost rate allowed under the Uniform Guidance.

## Notes to Schedules of Expenditures of Federal Awards Year Ended September 30, 2019

## 4. Federally Funded Loan Programs

#### Community Development Block Grants (CFDA #14.218)

The amount of total program expenditures in the accompanying schedules is \$29,973,208, which includes current year loan disbursements. The outstanding loans cumulative balance as of September 30, 2019, is \$293,258,337.

#### Home Investment Partnerships Program (CFDA #14.239)

The amount of total program expenditures in the accompanying schedules is \$3,991,548, which includes current year loan disbursements. The outstanding loans cumulative balance as of September 30, 2019, is \$117,209,243.

#### Federal Direct Student Loan Program (CFDA #84.268)

The District, through the University of the District of Columbia (UDC), participates in the Federal Direct Student Education Loan Program. Beginning July 1, 2010, UDC began participating in the Federal Direct Loans Program. In fiscal year 2019, new loans made to students enrolled at UDC under the Federal Loan Program, CFDA #84.268 totals \$20,757,656. This amount is included in the Schedules.

Beginning Balance	\$ 200,780,899
Add: New Loans	20,757,656
	221,538,555
Lacar Dain single as we sate	
Less: Principal payments	<u> </u>
Ending Balance	\$ 221,538,555

# 5. Rebates from the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

During fiscal year 2019, the District received cash rebates from infant formula manufacturers totaling \$3,445,800 on sales of formula to participants in the WIC program (CFDA #10.557), which are netted against total expenditures included in the Schedules.

Rebate contracts with infant formula manufacturers are authorized by 7 CFR 246.16(m) as a cost containment measure. Rebates represent a reduction of expenditures previously incurred for WIC food benefit costs.

#### 6. Unemployment Insurance

State unemployment tax revenues and government, tribal, and non-profit reimbursements in lieu of State taxes (State UI funds) must be deposited to the Unemployment Trust Fund in the U.S. Treasury, and are primarily used to pay benefits under the federally-approved State unemployment law. Consequently, State UI funds as well as Federal funds are included in the total expenditures of CFDA #17.225 in the accompanying Schedules.

# Notes to Schedules of Expenditures of Federal Awards Year Ended September 30, 2019

## The composition of CFDA #17.225 in fiscal year 2019 is as follows:

State UI Benefits	\$ 111,803,147
Federal UI and Extended UI Benefits	7,925,545
Federal UI Administrative Expenditures	10,450,902
	_
Subtotal	130,179,594
Additional Federal Unemployment Compensation	
ARRA - Federal UI	56,309
Total	\$ 130,235,903

# Schedule of Findings and Questioned Costs

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

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

#### **Basic Financial Statements**

- 1. The basic financial statements of the District as of and for the year ended September 30, 2019, were audited by other auditors whose report dated January 22, 2020, expressed unmodified opinions on the governmental activities, the business-type activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the District.
- 2. The audit by other auditors identified no material weaknesses and no significant deficiencies in internal control over financial reporting in connection with the basic financial statements of the District as of and for the year ended September 30, 2019.
- 3. The audit by other auditors identified no instances of noncompliance that are material to the basic financial statements of the District as of and for the year ended September 30, 2019.

#### Schedules of Expenditures of Federal Awards (SEFA)

Type of auditor's report issued on the SEFA:	Unmodified		lified	
Internal control over financial reporting on the SEFA:				
Material weakness(es) identified?		yes	X	_no
Significant deficiency(ies) identified?		_yes	X	none _reported
Noncompliance material to financial statements noted?		yes	Χ	no
Federal Awards				
Internal control over major federal programs:				
Material weakness(es) identified?	X	_yes		_no
<ul> <li>Significant deficiency(ies) identified?</li> </ul>	X	_yes		none _reported

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Type of auditor's report issued on compliance for major programs:

			Type of Report
#	Major Program/Cluster	CFDA Number(s)	Issued
1	Supplemental Nutrition Assistance		
	Program Cluster	10.551, 10.561	Qualified
2	Child Nutrition Cluster	10.553, 10.555,	
		10.556, 10.559	Unmodified
3	Community Development Block		
	Grants/Entitlement Grants Cluster	14.218	Unmodified
4	HOME Investment Partnerships Program	14.239	Qualified
5	Housing Opportunities for Persons with		
	AIDS	14.241	Unmodified
6	Unemployment Insurance	17.225	Unmodified
7	Student Financial Assistance Cluster	84.007, 84.033,	
		84.063,	
		84.268, 93.925	Unmodified
8	Special Education Cluster	84.027, 84.173	Unmodified
9	Temporary Assistance for Needy Families		
	Cluster	93.558	Adverse
10	Community Services Block Grant	93.569	Unmodified
11	Head Start	93.600	Qualified
12	Foster Care - Title IV-E	93.658	Qualified
13	Adoption Assistance - Title IV-E	93.659	Qualified
14	Medicaid Cluster	93.775, 93.777, 93.778	Unmodified
15	HIV Emergency Relief Project Grants	93.914	Qualified
16	HIV Care Formula Grants	93.917	Qualified

There were audit findings that are required to be reported in accordance with 2 CFR 200.516(a) of the Uniform Guidance for the year ended September 30, 2019.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

The major Federal programs of the District for the year ended September 30, 2019 were as follows:

#	Major Program/Cluster	CFDA Number(s)
1	Supplemental Nutrition Assistance Program Cluster	10.551, 10.561
2	Child Nutrition Cluster	10.553, 10.555, 10.556,
		10.559
3	Community Development Block Grants/Entitlement Grants	
	Cluster	14.218
4	HOME Investment Partnerships Program	14.239
5	Housing Opportunities for Persons with AIDS	14.241
6	Unemployment Insurance	17.225
7	Student Financial Assistance Cluster	84.007, 84.033, 84.063,
		84.268, 93.925
8	Special Education Cluster	84.027, 84.173
9	Temporary Assistance for Needy Families Cluster	93.558
10	Community Services Block Grant	93.569
11	Head Start	93.600
12	Foster Care - Title IV-E	93.658
13	Adoption Assistance - Title IV-E	93.659
14	Medicaid Cluster	93.775, 93.777, 93.778
15	HIV Emergency Relief Project Grants	93.914
16	HIV Care Formula Grants	93.917

The dollar threshold used to distinguish between Type A and Type B programs was \$12,365,298 for Federal awards for the year ended September 30, 2019.

Auditee qualified as low risk auditee?	Yes	X	_ No

## **Section II - Financial Statement Findings**

There were no findings related to the basic financial statements and the schedules of expenditures of federal awards which are required to be reported in accordance with generally accepted government auditing standards (GAGAS).

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

#### Section III - Federal Award Findings and Questioned Costs

Finding Number: 2019-001 Prior Year Finding Number: 2018-001

Compliance Requirement: Special Tests and Provisions - ADP System for SNAP

Program: Government Department/Agency:

Department of Human Services (DHS)/DC Access System (DCAS)

Program Management Administration

Supplemental Nutrition Assistance Program Cluster (SNAP)

CFDA #: 10.551, 10.561

U.S. Department of Agriculture

Award #: Various

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 2 CFR Section 272.10(a), "All State agencies are required to sufficiently automate their SNAP operations and computerize their systems for obtaining, maintaining, utilizing, and transmitting information concerning SNAP."

Per 2 CFR Section 272.10(b), "In order to meet the requirements of the Act and ensure the efficient and effective administration of the program, a SNAP system, at a minimum, shall be automated in each of the following program areas (1) Certification and (2) Issuance Reconciliation and Reporting. Under Certification - States agencies must determine eligibility and calculate benefits or validate the eligibility worker's calculations by processing and storing all casefile information necessary for the eligibility determination and benefit computation (including but not limited to all household members' names, addresses, dates of birth, social security numbers, individual household members' earned and unearned income by source, deductions, resources and household size). Also, State agencies must redetermine or revalidate eligibility and benefits based on notices of change in households' circumstances."

**Condition** - The District is self-reporting findings it noted from its ongoing efforts to resolve issues with the ADP system for SNAP. The issues identified and the estimated impact follows:

- 3,655 cases of overpayments were identified which resulted from a batch sequence being misaligned in the release of DCAS 2.17 as part of an overhaul of the SNAP certification process. The error in the batch sequence meant that payments were issued to individuals prior to their case being reassessed to ensure the individual was still eligible for recertification. As a result, there were SNAP overpayments erroneously issued for the months of October and November 2018. The root cause of the issue was technical and was identified on December 7, 2018. A fix went into production shortly after on December 12, 2018, which resolved the issue and prevented it from happening in future months. DCAS also updated the technical QA process. Total impact of the error amounted to \$796,690.
- 5,410 cases of overpayments were identified which resulted from late recertifications defaulting to
  the first day of the month of what would be the customers new certification period rather than the
  actual date the SNAP beneficiary returned the application or all verifications. The DCAS system

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

flags all customers due to recertification by selecting cases scheduled to have their certification period expire in 60 days. With each case selected for recertification, a DCAS "recertification Record" or "evidence is created that must be closed prior to the last day of the customers certification period; if not closed, the recertification will be denied. Once the recertification record has been denied, the DCAS system enables caseworkers to complete a late recertification by extending the time (30 days) in which the recertification evidence can still be edited. While the date of the certification was defaulted to the first day of the new certification period, the date could still be edited by caseworkers and should have been manually reviewed. However, workers were not accustomed to changing this value (date) because of the belief in the DCAS system calculating the correct certification period start date. In May 2019, enhancements were done to update the new certification period start date to the date when the last verification is cleared on the case during the case period. These will pro-rate customer's benefits from that date. Total impact of the error amounted to \$761,488.

- 1,001 cases of underpayments were identified which resulted from the DCAS system double counting income which leads to some SNAP customers exceeding the income limit eligibility rules and others to have reduced benefit. After the release of a system enhancement in May 2019, it created an error for customers aged 65 and more, who received multiple incomes from the Social Security Administration. The information received from the Social Security Administration file known as Bendex, began to treat retirement income separately, rather than in combination with any disability income received. This error was discovered in July 2019. The impact of the error amounted to \$93,781. Approximately 100 cases are expected to be reviewed by the program each month.
- 1,982 of SNAP cases actively receiving a benefit for which SNAP customers did not have a social security number at the time of the application or recertification. As previously reported in the prior year, DHS was in the process of analyzing the number of SNAP customers affected by this issue. The updated results of that analysis show from the time period between October 2016 and October 2019, there are 1,982 SNAP cases actively receiving a benefit. Per SNAP policy, each of these individuals made their best effort to apply for an SSN at time of application and the District did not deny them the opportunity to participate. DHS submitted a plan under legal review, to issue a one-time mass "request for information" notice to all 1,982 SNAP beneficiaries, providing 60 days to provide an SSN or verify the status of their SSA Application. DHS is targeting the start of the project in December 2019/January 2020. Until a permanent system fix is developed and delivered, program staff will work a monthly report that will feed into an ongoing notice mail merge process. Until clients have provided an update, the true number of the overpayment is unknown.

These amounts represent 1% of the total amounts paid by DHS in claims for beneficiary payments. DHS paid a total of \$173,109,637 in beneficiary payments to all SNAP beneficiaries in fiscal year 2019.

Questioned Costs - Known amount is \$1,464,397.

**Context** - This is a condition identified per review of DHS' compliance with specified requirements resulting from a system implementation.

**Effect** - Without an effectively designed and operated system in place, ineligible beneficiaries may receive benefits under the SNAP grant and DHS may make payments on behalf of those beneficiaries resulting in noncompliance with the eligibility requirements. Inaccurate beneficiary allotment payments could result in participants receiving benefits that they are not entitled to receive under the program.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

**Cause** - DHS did not effectively design and operate the new ADP system for SNAP which resulted to inaccurate benefit payments.

**Recommendation** - We recommend that DHS continue to evaluate and improve the new ADP system for SNAP to ensure that it addresses all the administration requirements of the SNAP program.

Related Noncompliance - Material noncompliance.

Views of Responsible Officials and Planned Corrective Actions - The Department of Human Services (DHS) and the Department of Health Care Finance (DHCF) DCAS team agree with the findings noted in this report. All of the findings are known issues that have been addressed through prior system fix/enhancement or separate mitigation plans. The overpayments impacting 3,655 cases as part of an overhaul of the SNAP certification process and the 5,410 cases impacted by recertification dates defaulting to the first day of the month have been addressed through prior system fix/enhancement or separate mitigation plans. The corrective actions and enhanced quality assurance monitoring have prevented similar issues from occurring in fiscal year 2020. To date, the nature of overpayments as reported have not occurred in fiscal year 2020. DHS and DCAS technical teams will continue to monitor the system and report issues as they occur.

The DCAS system enhancement to resolve the 1,001 cases impacted by the BENDEX Interface and double counting income has completed the requirements and design stage. The new design will apply to SNAP, TANF and non-MAGI Medical applicant and beneficiaries. The key issues experienced with the BENDEX interface were: (1) Double counting Social Security Title II benefit; (2) Gross vs. Net Social Security Title II benefit; and, (3) Benefit Identification Code (BIC) mapping to Benefit Type mapping. The DCAS technical team is in the process of finalizing the rest of the development schedule. The fix is expected to be delivered in Spring 2021.

The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-002 Prior Year Finding Number: 2018-002

Compliance Requirement: Special Tests and Provisions - EBT Card Security

<u>Program:</u> <u>Government Department/Agency:</u>

U.S. Department of Agriculture Department of Human Services

(DHS)/Office of Finance and Treasury

Supplemental Nutrition Assistance Program Cluster (SNAP) (OFT)

CFDA #: 10.551, 10.561

Award #: Various

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 7 CFR Section 274.8(b)(3), As an addition to or component of the Security Program required of Automated Data Processing (ADP) systems, the State agency shall ensure that the following electronic benefits transfer (EBT) security requirements are established:

- (i) Storage and control measures to control blank unissued EBT cards and PINs, and unused or spare POS devices;
- (ii) Measures to ensure communication access control. Communication controls shall include the transmission of transaction data and issuance information from POS terminals to work-stations and terminals at the data processing center;
- (iii) Message validation;
- (iv) Administrative and operational procedures;
- (v) A separate EBT security component shall be incorporated into the State agency Security Program for ADP systems. The periodic risk analyses required by the Security Program shall address the following items specific to an EBT system (B) Completeness and timeliness of the reconciliation system; and
- (vi) The State agency shall incorporate the contingency plan approved by FNS into the Security Program.

**Condition** - OCFO/OFT for DHS are required to maintain adequate security over, and documentation/records for EBT cards, to prevent their theft, embezzlement, loss damage, destruction, unauthorized transfer, negotiation, or use. OCFO/OFT have contracted with Fidelity National Information Service (FIS) for the issuance and security of the EBT cards; however, it is OCFO/OFT's ultimate responsibility to ensure the contractor has controls in place to maintain adequate security over, and documentation/records of EBT cards. During our tests of the design and implementation of internal controls, we noted the following issues:

• For three (3) out of the 60 samples, although the EBT balance sheets for both workstations agreed with the received and returned amounts on the EBT Issuance Logs, we noted that the Destruction Logs were not provided. We were therefore unable to confirm the amounts destroyed on these dates.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

- For one (1) out of the 60 samples, although the EBT balance sheets for both workstations agreed with the received and returned amounts on the EBT Issuance Logs, we noted that the destruction detail for one card was not included on the Destruction Log.
- For 30 out of the 60 samples, although both EBT balance sheets reconciled with the EBT card issuance logs included in the package, we noted the following deficiencies:
  - o For eight (8) of the samples, for at least one customer, the form of identification noted was a referral; however, but no Photo ID Referral form was attached. In addition, for three (3) of these samples, for at least one customer the Photo-ID Program Referral form was missing a supervisor signature on the referral page. Further, we noted that for one (1) of these samples, for at least one customer, the staff portion of the Intake Form was missing information. The staff did not identify the form of identification used, although a referral form was attached.
  - For eight (8) of the samples, for at least one customer, the Photo-ID Referral Authorization was missing a supervisor signature on the referral page. In addition, for one (1) of these samples, for at least one customer, the staff portion of the Intake Form was missing information. The staff did not identify the form of identification used, although a referral form was attached.
  - o For seven (7) of the samples, for at least one customer, the approval signature on the Photo-ID Referral form appeared to be a photocopy or an electronic signature, which we determined was not allowable. In addition, for one (1) of these samples, we noted that for at least for one customer, the Photo-ID Referral form was missing a signature. We also noted that for one (1) of these samples, for at least one customer, the staff portion of the Intake Form was missing information. The staff did not identify the form of identification used, although a referral form was attached. We further noted that for one (1) of these samples, for at least one customer on the Photo-ID Referral form under section B. the recipient information did not correlate to the information on the intake form.
  - o For four (4) of the samples, we noted that for at least one customer, Photo-ID Referral Form Authorization Approval appeared to be pre-signed and dated. For one (1) of these samples, for at least one customer, the approval signature on the Photo-ID Referral form appeared to be a photocopy or an electronic signature, which we determined was not allowable. For one (1) of these samples, for at least one customer no identification form was selected on the intake form.
  - o For one (1) of the samples, we noted that for at least one customer, the form of identification referenced on the intake form was DC, but a Photo-ID Program Referral form was provided that was missing the eligibility worker's information. In addition, we noted that for at least one customer, Section C on the Photo-ID Program Referral form was missing the eligibility worker's signature and the approval signature date was not completed. We also noted that for at least one customer, Section C on the Photo-ID Program Referral form is missing the eligibility worker's information. We further noted that for at least one customer, the Photo-ID Program Referral form had an approval signature that is either electronic or photocopied under C. Authorization, which we determined was not allowable.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Questioned Costs - None.

**Context** - This is a condition identified per review of DHS' compliance with specified requirements using a statistically valid sample.

**Effect** - Without adequate internal controls to ensure compliance with EBT Card Security requirements, there is an increased risk that the inventory of EBT cards will not be properly maintained and accounted for.

**Cause** - OCFO/OFT for DHS does not have adequate policies and procedures in place to ensure adequate safeguarding, documentation and monitoring of EBT cards.

**Recommendation** - We recommend that OCFO/OFT for DHS implement formal policies and procedures to maintain adequate security over, and documentation/records for EBT Cards.

**Related Noncompliance** - Material noncompliance.

*Views of Responsible Officials and Planned Corrective Actions* - The OCFO/OFT for DHS concurs with this finding. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

2019-003 Finding Number: Prior Year Finding Number: 2018-003 **Compliance Requirement:** Eligibility

Program: Government Department/Agency: U.S. Department of Agriculture District of Columbia Public Schools

(DCPS)

Child Nutrition Cluster

CFDA #: 10.553, 10.555, 10.556, 10.559

Award #: 1DC300302

Award Year: 10/01/2018 - 09/30/2019

Criteria - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

#### 7 CFR Section 210.8 states:

"Claims for reimbursement: The school food authority shall establish internal controls which ensure the accuracy of lunch counts prior to the submission of the monthly Claim for Reimbursement. At a minimum, these internal controls shall include: an on-site review of the lunch counting and claiming system employed by each school within the jurisdiction of the school food authority; comparisons of daily free, reduced price and paid lunch counts against data which will assist in the identification of lunch counts in excess of the number of free, reduced price and paid lunches served each day to children eligible for such lunches; and a system for following up on those lunch counts which suggest the likelihood of lunch counting problems."

Condition - We selected a sample of 120 students and 40 Community Eligibility Program (CEP) schools in fiscal year 2019 to test DCPS' compliance with eligibility requirements. The sample of 120 consisted of 60 students who were determined to be eligible through the application process, and 60 students who were directly certified through participation in other federal assistance programs. During our test work over the eligibility requirement for the Child Nutrition Cluster, we noted deficiencies in DCPS' eligibility determination process. These deficiencies also affected DCPS' ability to report complete and accurate meal count claims for reimbursement to the Office of the State Superintendent of Education (OSSE). Specifically, we noted the following:

For direct applications and schools not participating in CEP, claim reimbursement is based on the individual student level. There are four (4) students and ten (10) students per student account history in WebSMARTT or Mosaic, respectively, where the student was served a meal on a day the student was recorded as absent based on the absence record in Aspen. Starting January 2019, DCPS started a new process wherein they reconcile the number of meals served and student attendance for the day and subsequently adjust the claims based on the result of such reconciliation. Using the same student samples with noted exception above, we tested transactions after January 2019 and noted that there was no exception for lunch claims after the January 2019 reconciliation process. We noted however, one (1) student directly certified and one (1) student not participating in CEP, per student account history in WebSMARTT or Mosaic, respectively, were served breakfast on a day the student was recorded as absent based

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

on the absence record in Aspen. We also noted that the new process does not reconcile breakfast served.

• For schools participating in CEP, claim reimbursement is based on total meals served on a daily basis. For three (3) instances in forty (40) schools tested, wherein the production records and edit check summary showed that the school claimed more meals than what was actually served for the month. We also noted one (1) meal production report not reviewed and approved by an appropriate reviewer.

Questioned Costs - Known amount is \$11,601.

**Context** - This is a condition identified per review of DCPS' compliance with specified requirements using a statistically valid sample.

**Effect** - DCPS did not comply with the eligibility and reporting requirements of the Child Nutrition Cluster.

Cause - DCPS does not have fully effective internal controls over the eligibility determination process to ensure participants are accurately being assessed for free and reduced price lunch, and that meal count claims submitted for reimbursement include only claims for students who are eligible. Additionally, DCPS must reassess existing controls to ensure that the student receiving the meal is properly identified to avoid having a served meal associated with a child marked as absent.

**Recommendation** - We recommend DCPS to continue to enhance its controls over eligibility and reporting to ensure compliance with the requirements of the Child Nutrition Cluster. This includes (1) Data corrections are properly recorded in WebSMARTT or Mosaic; and (2) Enhance controls at the point of sale to improve the accuracy of identifying the student as they are served the meal.

**Related Noncompliance** - Noncompliance.

**Views of Responsible Officials and Planned Corrective Actions** - DCPS agrees with the conditions and recommendations of this finding. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-004
Prior Year Finding Number: N/A

Compliance Requirement: Special Tests and Provisions - Verification of Free and Reduced-Price

Applications (NSLP)

<u>Program:</u> <u>Government Department/Agency:</u>

U.S. Department of Agriculture District of Columbia Public Schools

(DCPS)

**Child Nutrition Cluster** 

CFDA #: 10.553, 10.555, 10.556, 10.559

Award #: 1DC300302

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

The compliance supplement requires that by November 15th of each school year, DCPS must verify the current free and reduced-price eligibility of households selected from a sample of applications that it has approved for free and reduced-price meals. The verification sample size is based on the total number of approved applications on file on October 1st.

**Condition** - We selected three (3) of the twenty (20) verifications performed by DCPS during the year and noted that one (1) of the three (3) verifications, DCPS did not properly review the application. Specifically, the applicant should have not been approved for reduced price meal as the participant did not have the income eligibility. As such, DCPS was not able to make changes to the participant's eligibility status based on the participant's documentation.

Questioned Costs - Not determinable.

**Context** - This is a condition identified per review of DCPS' compliance with specified requirements using a statistically valid sample.

**Effect** - DCPS did not comply with the special test and provisions requirement of the Child Nutrition Cluster.

**Cause** - DCPS does not have fully effective internal controls over the verification process to ensure that it correctly identifies any error made in the eligibility determination.

**Recommendation** - We recommend DCPS to continue to enhance its controls over verification of free and reduced-priced application requirements of the Child Nutrition Cluster. Additionally, DCPS must reassess existing internal controls to possibly include another layer of review control to validate the verifications made.

Related Noncompliance - Noncompliance.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

**Views of Responsible Officials and Planned Corrective Actions** - DCPS agrees with the conditions and recommendations of this finding. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-005
Prior Year Finding Number: N/A
Compliance Requirement: Eligibility

Program: Government Department/Agency:

U.S. Department of Housing and Urban Development

Department of Housing and
Community Development (DHCD)

Home Investment Partnerships Program

CFDA #: 14.239

Award #: M18-SG110100

Award Year: 08/22/2018 - 09/01/2026

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

The maximum of HOME rents, which include utilities or the utility allowance, are the lesser of: fair market rent for comparable units in the area, as established by HUD under 24 CFR section 888.111, or a rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the median income for the area as determined by HUD with adjustments for the number of bedrooms. Twenty percent of the HOME-assisted units must be occupied by very low-income families and meet one of the following rent requirements: (1) the rent does not exceed 30 percent of the annual income of a family whose income equals 50 percent of the median income for the area as determined by HUD, with adjustments for larger or smaller families; or (2) the rent does not exceed 30 percent of the families adjusted income (24 CFR sections 92.216 and 92.252).

**Condition** - During our testing over Eligibility, we noted that the rent charged and paid by some of the eligible family exceeded 30 percent of their household income. Specifically, out of the seven (7) households we sampled and tested, the rent (including utilities or utility allowances) paid by four (4) households exceeded 30% of their household income.

#### **Ouestioned Costs** - Not determinable.

**Context** - This is a condition determined per review of DHCD's compliance with specified eligibility requirements using a statistically valid sample. The Program financed the construction of a 64-unit affordable housing development that was completed in the fiscal year.

**Effect** - DHCD was unable to demonstrate that the rent charged and paid by families residing at the property did not exceed the amount determined by HUD.

**Cause** - DCHD did not have policies and procedures in place to review rent charged to tenants at the beginning of their residence to ensure it did not exceed the amount specified by the regulations. Per discussions with DHCD, the property used the Low-Income Housing Tax Credit program (LIHTC) calculation to determine eligibility for the households instead because they believed it was the most restrictive program.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

**Recommendation** - We recommend that DHCD utilize the guidelines provided by the U.S. Housing and Urban Development in determining eligibility and to ensure that they meet the limits on the rents that can be charged.

**Related Noncompliance** - Material noncompliance.

Views of Responsible Officials and Planned Corrective Actions - The Portfolio and Asset Management Division (PAMD) initiated its work on the project known as the "Maycroft" located at 1474 Columbia Road, NW, in the late summer of 2018. At this time, PAMD was provided governing documents including the funds provided by the Department for acquisition, critical repairs, and substantial rehabilitation of the premises. The funding sources were as follows:

- Housing Production Trust Funds (HPTF) of \$7,536,648; and
- Low Income Housing Tax Credits (LIHTC) of \$1,093,562.

When the Initial Income Certification was conducted by the property staff and confirmed with DHCD, (between late summer 2018 and early spring 2019), all applicants' eligibility was confirmed as aligned with the LIHTC restrictions. The LIHTC restrictions are outlined in the Indenture of Restrictive Covenants and HPTF program requirements described in the Affordable Housing Covenant. At that time, the HOME loan had not yet been transferred to PAMD, and tenant eligibility was not confirmed for the HOME Investment Partnerships Program. Typically, PAMD would not incorporate this project for routine HOME compliance until one year after is received into the PAMD portfolio.

DHCD agrees with the conditions and recommendations of this finding. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-006 Prior Year Finding Number: N/A

Compliance Requirement: Special Tests and Provisions - Housing Quality Standards

Program: Government Department/Agency:

U.S. Department of Housing and Urban Development

Department of Housing and
Community Development (DHCD)

Home Investment Partnerships Program

CFDA #: 14.239

Award #: M18-SG110100

Award Year: 08/22/2018 - 09/01/2026

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

During the period of affordability (i.e. the period for which the non-Federal entity must maintain subsidized housing) for HOME assisted rental housing, the participating jurisdiction must perform on-site inspections to determine compliance with property standards and verify the information submitted by the owners no less than (a) every 3 years for projects containing 1 to 4 units, (b) every 2 years for projects containing 5 to 25 units, and (c) every year for projects containing 26 or more units.

**Condition** - During our testing over Special Tests and Provisions - Housing Quality Standards, we noted that no inspection was performed for some units that had been identified as due for inspection. Specifically, we noted that although DHCD identifies those units on which housing quality inspections are due, of the four (4) units examined, one (1) unit was not inspected. In addition, we noted that for one other property, deficiencies noted in the inspection report were not completed timely or by the compliance due date.

Questioned Costs - Not determinable.

**Context** - This is a condition determined through the review of DHCD's property inspection compliance tracker.

**Effect** - DHCD was unable to demonstrate that housing units were inspected as required to ensure they met the required housing quality standards. In addition, DHCD was unable to demonstrate that needed repairs are completed timely as required.

**Cause** - DCHD did not have policies and procedures in place to ensure that inspections were performed for all housing units identified as due for inspection, and that needed repairs were completed timely. Per discussion with DHCD, the property was miscategorized in their records and was not inspected as it should have.

**Recommendation** - We recommend that DHCD put policies and procedures in place to ensure that inspections are performed for those units on which housing quality inspections are due, and to ensure that any needed repairs are completed timely.

**Related Noncompliance** - Noncompliance.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

*Views of Responsible Officials and Planned Corrective Actions* - As it pertains to the unit that was not inspected, this was due to miscommunication between separate divisions within the agency and highlighted the need for more efficient communication within the agency. A more robust data management system with a newly-contracted loan servicer will improve data integrity efforts and prevent such data errors.

Regarding the property lacking confirmation of completed repairs, DHCD made repeated attempts to contact the property to verify completion but was unsuccessful. The inspections team was repeatedly denied access to the property and correspondence remained unanswered. Due to the COVID-19 health emergency, previously planned follow-up visits were unable to be completed.

DHCD agrees with the conditions and recommendations of this finding. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-007
Prior Year Finding Number: N/A

Compliance Requirement: Activities Allowed or Unallowed and Allowable Costs/Cost Principles

Program: Government Department/Agency:

U.S. Department of Housing and Urban Development Department of Health (DOH)

Housing Opportunities For Persons With Aids

CFDA #: 14.241 Award #: DCH18-F001

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 2 CFR Section 200.430 Compensation - Personal Services:

"Costs of compensation are allowable to the extent that they satisfy the specific requirements of this part, and that the total compensation for individual employees:

- (1) Is reasonable for the services rendered and conforms to the establish written policy of the non-Federal entity consistently applied to both Federal and non-Federal activities;
- (2) Follows an appointment made in accordance with a non-Federal entity's laws and/or rules or written policies and meets the requirements of Federal statute, where applicable; and
- (3) Is determined and supported as provided in paragraph (i) of this section, Standards for Documentation of Personnel Expenses, when applicable."

#### 2 CFR Section 200.430(i):

"Standards for Documentation of Personnel Expenses (1) Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- (i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- (ii) Be incorporated into the official records of the non-Federal entity;
- (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities;
- (iv) Encompass both federally assisted and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy;
- (v) Comply with the established accounting policies and practices of the non-Federal entity;
- (vi) [Reserved]

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

- (vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.
- (viii) Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards."

Condition - We noted that DOH continued to allocate payroll expenditures to the Housing Opportunities For Persons With Aids (HOPWA) program during fiscal year 2019 based on budgeted percentages. These percentages were entered into the PeopleSoft Human Resources/Payroll System (PeopleSoft) at the beginning of the fiscal year and were based on management's estimate of the respective employee's level of effort for each program. PeopleSoft calculated the payroll costs every payroll cycle for each employee and program based on the predetermined percentage, and reported it through the Labor Distribution Report (485 Report). However, management did not perform a periodic comparison of actual costs to the budgeted costs and make any necessary adjustment as required by 2 CFR Section 200.430. Specifically, 14 out of 19 sampled payroll items tested for the HOPWA grant were recorded based on estimated hours and not actual hours.

#### Ouestioned Costs - Not determinable.

**Context** - This is a condition identified per review of DOH's compliance with specified requirements using a statistically valid sample. Payroll costs including fringe benefits, for the HOPWA program in fiscal year 2019 were \$281,737.

**Effect** - DOH was unable to demonstrate that the payroll expenditures charged to the HOPWA grant accurately reflected the time incurred on the program and were properly supported in accordance with 2 CFR Part 200.430 time and effort reporting requirements.

Cause - DOH did not have policies and procedures in place to review and reconcile the estimated amounts of payroll expenditures charged to the HOPWA program to the actual expenditures incurred. Per corrective action plans and status updates submitted by DOH to BDO in fiscal year 2019, DOH has a plan still in progress to develop a program manager-level certification of employee time and effort reflected in biweekly payroll records (485 Reports). It has not been completed by the end of fiscal year 2019.

**Recommendation** - We recommend that DOH fully implement its current corrective action plan to deploy policies and procedures to periodically compare employees' estimated hours per the 485 Report to the actual hours incurred and make any necessary adjustments as required by 2 CFR 200.430.

#### Related Noncompliance - Noncompliance.

Views of Responsible Officials and Planned Corrective Actions - The Department of Health (DOH) concurs with the finding. While 14.241 (HOPWA) was not reviewed for the prior year's single audit, consistent with the prior year's CAP for this same finding, DOH reached several milestones to address this deficiency. At the start of fiscal year 2020, the agency's Time and Effort Certification standard operating procedure (SOP) was issued and distributed to DOH personnel, and a uniform time and effort certification tool and attestation for supervisors was developed. These actions will support the required periodic comparison of actual costs to the budgeted costs and make any necessary adjustment

# Schedule of Findings and Questioned Costs Year Ended September 30, 2019

as required by 2 CFR 200.430. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-008
Prior Year Finding Number: N/A

Compliance Requirement: Activities Allowed or Unallowed and Allowable Costs/Cost Principles

Program:Government Department/Agency:U.S. Department of EducationUniversity of the District of Columbia

(UDC)

0.3. Department of Education

Student Financial Assistance Cluster

CFDA #: 84.007, 84.033, 84.063, 84.268, 93.925

Award #: Various Award Year: Various

*Criteria* - 2 CFR 200.502(a), *Determining Federal Awards Expended*. The determination of when a Federal award is expended must be based on when the activity related to the Federal award occurs. Generally, the activity pertains to events that require the non-Federal entity to comply with Federal statutes, regulations, and the terms and conditions of Federal awards, such as: expenditure/expense transactions associated with awards including grants, cost-reimbursement contracts under the FAR, compacts with Indian Tribes, cooperative agreements, and direct appropriations; the disbursement of funds to subrecipients; the use of loan proceeds under loan and loan guarantee programs; the receipt of property; the receipt of surplus property; the receipt or use of program income; the distribution or use of food commodities; the disbursement of amounts entitling the non-Federal entity to an interest subsidy; and the period when insurance is in force.

**Condition** - Certain grant expenditures for CFDA 93.925, Scholarships for Health Professions Students from Disadvantaged Backgrounds and CFDA 84.268, Federal Direct Student Loans programs approximately \$578,000 were inaccurately included in the SEFA. As a result, UDC subsequently adjusted the SEFA to remove these transactions from being reported as federal expenditures.

Questioned Costs - None.

**Context** - This is a condition identified per review of UDC's compliance with specified requirements.

**Effect** - The SEFA may not be fairly presented, in all material respects, in relation to the basic financial statements taken as a whole.

**Cause** - UDC did not have the means to show adjustments to amounts being reported under the original format of the schedule to ensure adequate preparation and review of the SEFA.

**Recommendation** - We recommend that UDC implement format changes to the forms used to collect the SEFA information to allow for the inclusion of adjustments to the ledger balances to ensure federal funds are reported at the appropriate amounts.

Related Noncompliance - Noncompliance.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Views of Responsible Officials and Planned Corrective Actions - UDC concurs with the condition and recommendation of the finding. The recommended format change to the form will allow for the presentation of the reconciliation between the ledger and the final reported federal expenditures. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-009
Prior Year Finding Number: 2018-006
Compliance Requirement: Eligibility

Program:

U.S. Department of Health and Human Services

Temporary Assistance for Needy Families Cluster (TANF)

CFDA #: 93.558 Award #: Various

Award Year: 10/01/2018 - 09/30/2019

**Government Department/Agency:** 

Department of Human Services (DHS)/Economic Security Administration (ESA)

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 45 CFR Section 205.60 (a), "The State agency will maintain or supervise the maintenance of records necessary for the proper and efficient operation of the plan, including records regarding applications, determination of eligibility, the provision of financial assistance, and the use of any information obtained under Section 205.55, with respect to individual applications denied, recipients whose benefits have been terminated, recipients whose benefits have been modified, and the dollar value of these denials, terminations and modifications. Under this requirement, the agency will keep individual records which contain pertinent facts about each applicant and recipient. The records will include information concerning the date of application and the date and basis of its disposition; facts essential to the determination of initial and continuing eligibility (including the individual's social security number, need for, and provision of financial assistance); and the basis for discontinuing assistance."

**Condition** - During our testing over beneficiary eligibility compliance requirements of the Temporary Assistance for Needy Families (TANF) program, we selected a sample of 60 beneficiaries in fiscal year 2019 to test DHS' compliance with eligibility requirements. We noted the following:

- For two (2) out of 60, the applications that were completed prior to the fiscal year payment selected for testing were not found in the Document Imaging Management System (DIMS). Therefore, we were unable to verify the household composition, the Income reported, the Social Security Numbers for all individuals included in the application, or whether a fleeing felon is included on the application.
- For one (1) out of 60, the most recent application prior to the fiscal year 2019 payment selected
  for testing was not completed properly. We obtained the application two years prior to the
  fiscal year 2019 payment to confirm certain information. However, we noted that this
  application was missing even numbered pages. Therefore, we were unable to verify the Social
  Security numbers for all individuals on the application, and whether the applicant was a US
  citizen.
- For one (1) out of 60, DHS was unable to provide sufficient documentation to support that assistance was not provided to any individual who was fleeing to avoid prosecution, or custody or confinement after conviction, for a felony or attempt to commit a felony, or who is violating a condition of probation or parole imposed under Federal or State law as the question was not addressed on the application.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

For 60 out of 60, DHS was unable to provide support that would allow us to test that cash
assistance was not provided to an individual during the 10-year period that began on the date
the individual was convicted in Federal or State court of having made a fraudulent statement
or representation with respect to place of residence in order to simultaneously receive
assistance from two or more States under TANF, Title XIX, or the Food Stamp Act of 1977, or
benefits in two or more States under the Supplemental Security Income program under Title XVI
of the Social Security Act.

These amounts represent 100% of the total eligibility amounts tested related to the 60 sampled items of \$318,499.

In addition, while testing a sample of 60 sample items for TANF Special Tests and Provisions - Penalty for refusal to Work, for one (1) out of the 60 samples, we noted that the beneficiary payment determined from DCAS for the month of August 2019 was incorrect as the benefit paid was \$503 instead of \$472. The beneficiary was overpaid \$31.

Questioned Costs - Known amount is \$318,530.

**Context** - This is a condition identified per review of DHS' compliance with specified requirements using a statistically valid sample.

**Effect** - Without properly maintaining documentation to support eligibility determinations, ineligible beneficiaries may receive benefits under the TANF grant and DHS may make payments on behalf of those beneficiaries resulting in noncompliance with the eligibility requirements.

**Cause** - DHS did not consistently adhere to its established policies and procedures requiring it to maintain documentation supporting participant eligibility.

**Recommendation** - We recommend that DHS strengthen its existing policies and procedures over the review and maintenance of appropriate documentation to ensure compliance with eligibility requirements.

Related Noncompliance - Material noncompliance.

Views of Responsible Officials and Planned Corrective Actions - The District does not dispute the findings provided by BDO for the noted eligibility. ESA will follow through on the outlined internal control procedures to ensure that documentation is maintained to support eligibility decisions and that customer files are properly retained. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-010
Prior Year Finding Number: 2018-007
Compliance Requirement: Reporting

<u>Program:</u>
U.S. Department of Health and Human Services

<u>Government Department/Agency:</u>
Department of Human Services (DHS)

Temporary Assistance for Needy Families Cluster (TANF)

CFDA #: 93.558 Award #: Various

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

According to Title IV-A, Section 411 of the Social Security Act (the Act), 45 CFR 265.3, and the American Recovery and Reinvestment Act (ARRA) of 2009, (Public Law 111-5), each State must file an annual report containing information on the TANF program and the State's maintenance-of-effort (MOE) program(s) for that year, including strategies to implement the Family Violence Option, State diversion programs, and other program characteristics. States are required to submit the ACF-196R report quarterly, beginning in FFY 2015, in lieu of the SF-425, Federal Financial Report (financial status). Each State files quarterly expenditure data on the State's use of Federal TANF funds, State TANF MOE expenditures, and State expenditures of MOE funds in separate State programs. If a State is expending Federal TANF funds received in prior fiscal years, it must file a separate quarterly TANF Financial Report for each fiscal year that provides information on the expenditures of that year's TANF funds. This form must be used for reporting regular TANF grant funds, Contingency Funds, and ARRA-Emergency Fund for **TANF** State **Programs** funds. See TANF-ACF-PI-2014-02, available http://www.acf.hhs.gov/programs/ofa/resource/tanf-acf-pi-2014-02, for more information.

**Condition** - During our test work over the quarterly ACF-196R, we noted the following:

- For Grant Identifying number G-1702DCTANF there was a variance between the amount reported on the ACF-196R and the amount included in SOAR for the original report for the 4th quarter. We noted that less expenditures were included on the SEFA/CFOSolve Report (\$8,956,660) than included on the ACF-196R (\$9,000,119), resulting in a variance of (\$43,459).
- For Grant Identifying number G-1802DCTANF there was a variance between the amount reported on the ACF-196R and the amount included in SOAR for the original report for the 4th quarter. We noted that less expenditures were included on the SEFA/CFOSolve Report (\$25,413,526) than included on the ACF-196R (\$25,452,546), resulting in a variance of (\$39,020).
- For Grant Identifying number G-1901DCTANF there was a variance between the amount reported on the ACF-196R and the amount included in SOAR for the final adjusted report for the 4th quarter. We noted that less expenditures were included on the SEFA/CFOSolve Report (\$82,100,371) than included on the ACF-196R (\$82,242,278), resulting in a variance of (\$141,907).

Questioned Costs - None.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Context - This is a condition identified per review of DHS' compliance with specified requirements.

*Effect* - Without proper internal controls and policies and procedures in place to ensure that ACF-196R balances were properly reported, the TANF program incorrectly reported expenditures on the final ACF-196R report for each of the three grants open in fiscal year 2019. In addition, inadequate internal controls may lead to incorrect reporting of performance data.

**Cause** - Management did not have proper internal controls and policies and procedures in place to ensure that the ACF-196R properly reviewed prior to approval.

**Recommendation** - We recommend that DHS implement policies, procedures and controls that will ensure the amounts reported for each open grant are accurate for ACF-196R prior to approval.

**Related Noncompliance** - Noncompliance.

**Views of Responsible Officials and Planned Corrective Actions** - DHS concurs with this finding. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-011 Prior Year Finding Number: 2018-008

Compliance Requirement: Special Tests and Provisions - Child Support Non-Cooperation

<u>Program:</u> <u>Government Department/Agency:</u>

U.S. Department of Health and Human Services Department of Human Services

(DHS)/Economic Security
Administration (ESA)

Temporary Assistance for Needy Families Cluster (TANF)

CFDA #: 93.558 Award #: Various

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 45 CFR Section 264.30 (a) (1) The State agency must refer all appropriate individuals in the family of a child, for whom paternity has not been established or for whom a child support order needs to be established, modified or enforced, to the child support enforcement agency (i.e., the IV-D agency). (2) Referred individuals must cooperate in establishing paternity and in establishing, modifying, or enforcing a support order with respect to the child.

Per 45 CFR Section 264.30 (c) The IV-A agency must then take appropriate action by: (1) Deducting from the assistance that would otherwise be provided to the family of the individual an amount equal to not less than 25 percent of the amount of such assistance; or (2) Denying the family any assistance under the program.

Per the Code of the District of Columbia - Section 4-205.55. (a) The Mayor shall give timely and adequate notice in cases of intended action to discontinue, withhold, terminate, suspend, reduce assistance, or make assistance subject to additional conditions, or to change the manner or form of payment to a protective, vendor, or 2-party payment. (1) "Timely" means that the notice is postmarked at least 15 days before the date upon which the action would become effective, except as provided in Section 4-205.54(d). (2) "Adequate" means that the written notice includes a statement of what action the Mayor intends to take, the reasons for the intended action, the specific law and regulations supporting the action, an explanation of the individual's right to request a hearing, and the circumstances under which assistance will be continued if a hearing is requested.

**Condition** - During our compliance test work for the Special Tests and Provisions - Child Support Non-Cooperation compliance requirement, we tested 60 cases out of 2,097 cases referred by Child Support Enforcement (CSE) to the TANF program as having not cooperated with Child Support. Of the 60 cases selected for control testing, we noted the following exceptions:

• For one (1) instance, the sanction letter that was sent to the customer was contradicting, although the sanction was imposed in a timely manner and for the correct amount, the heading and part of the body of the letter indicated that a sanction was being lifted but the amount included in the letter indicated that a sanction was being imposed on July 1, 2019. In addition, in the sanction letter there was no reference to specific laws and regulations supporting the decision to sanction the customer and reduce the benefit amount.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

- For five (5) instances, we were unable to review the sanction letters as DHS/ESA was unable to retrieve the letters due to data validation errors.
- For ten (10) instances, we noted that although the amounts or percentages reflected in the sanction letters were correct, there were no references to specific laws and regulations supporting the decisions to sanction and reduce the benefit amounts.
- For one (1) instance, we noted that both a work sanction and a child support sanction were listed in DCAS from the conversion from ACEDS effective May 1, 2016. However, the higher child support noncooperation sanction is actually being imposed and there is no evidence that a child support sanction letter was sent out through ACEDS (or subsequently DCAS).

#### Questioned Costs - Unknown.

**Context** - This is a condition identified per review of DHS' compliance with specified requirements using a statistically valid sample.

**Effect** - Without adequate internal controls to ensure compliance with TANF Child Support Non-Cooperation requirements, there is an increased risk that TANF beneficiaries will receive incorrect TANF benefits.

**Cause** - Management is not adhering to their policies and procedures to ensure that DHS is in compliance with TANF Child Support Non-Cooperation compliance requirements.

**Recommendation** - We recommend that DHS enforce existing policies and procedures and implement internal controls to ensure that Child Support Non-Cooperation sanctions are consistently applied and adequate documentation is maintained to support DHS' compliance with the TANF Child Support Non-Cooperation compliance requirements.

**Related Noncompliance** - Material noncompliance.

**Views of Responsible Officials and Planned Corrective Actions** - DHS concurs with this finding. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-012 Prior Year Finding Number: 2018-009

Compliance Requirement: Special Tests and Provisions - Income Eligibility and Verification

System

Program:

U.S. Department of Health and Human Services

Temporary Assistance for Needy Families Cluster (TANF)

CFDA #: 93.558 Award #: Various

Award Year: 10/01/2018 - 09/30/2019

Government Department/Agency:

Department of Human Services (DHS)/Economic Security Administration (ESA)

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 45 CFR Section 205.56(a)(1)(i), "The State agency shall review and compare the information obtained from each data exchange against information contained in the case record to determine whether it affects the applicant's or the recipient's eligibility or the amount of assistance."

Per 45 CFR Section 205.60 (a), "The State agency will maintain or supervise the maintenance of records necessary for the proper and efficient operation of the plan, including records regarding applications, determination of eligibility, the provision of financial assistance, and the use of any information obtained under Section 205.55, with respect to individual applications denied, recipients whose benefits have been terminated, recipients whose benefits have been modified, and the dollar value of these denials, terminations and modifications. Under this requirement, the agency will keep individual records which contain pertinent facts about each applicant and recipient. The records will include information concerning the date of application and the date and basis of its disposition; facts essential to the determination of initial and continuing eligibility (including the individual's social security number, need for, and provision of financial assistance); and the basis for discontinuing assistance."

**Condition** - During our test work of 60 cases selected to test the Special Tests and Provisions - Income Eligibility and Verification Systems (IEVS), we noted that DHS was unable to provide sufficient documentation to support all eligibility determinations tested during the fiscal year 2019 audit. Specifically, out of the 60 beneficiary disbursements tested, we noted the following exception:

 For one (1) instance, we noted that although information was obtained through the IEVS as reported in DC Access System (DCAS) around the date of application or recertification, there was no information received from the Social Security Administration due to a special character apostrophe in the first name of this beneficiary. Therefore, the required income verification was not obtained or documented.

Questioned Costs - Not determinable.

**Context** - This is a condition identified per review of DHS' compliance with specified requirements using a statistically valid sample.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

**Effect** - The District is not in full compliance with its policies and with Federal program compliance requirements surrounding records maintenance. Further, ineligible TANF beneficiaries may receive benefits under the TANF grant and the District may make payments on behalf of those beneficiaries.

**Cause** - Controls are not adequate to ensure that the District adheres to its established policies and procedures requiring it to maintain documentation supporting participant eligibility.

**Recommendation** - We recommend that DHS enforce existing policies and procedures and implement additional policies and procedures for maintaining and monitoring case record documentation to ensure that Income Eligibility and Verification System requirements are complied with.

**Related Noncompliance** - Noncompliance.

Views of Responsible Officials and Planned Corrective Actions - DHS agrees with the finding in this report. The root cause for the one (1) instance, in which the required income verification was not obtained or documented through the IEVS due to a special character apostrophe in the beneficiary's first name has been identified. The special character in the beneficiary's name prevented the DCAS IEVS interface from storing the returned, person-level details on the case file because of the way the data is stored in backend tables. In this scenario, an automated batch job selected all active recordsperson level details of the beneficiary and sent through the IEVS; however, due to the special character in the beneficiary's first name, the automated batch job could not insert return data into the necessary data tables. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-013
Prior Year Finding Number: N/A

Compliance Requirement: Special Tests and Provisions - Penalty for Refusal to Work

<u>Program:</u> <u>Government Department/Agency:</u>

U.S. Department of Health and Human Services Department of Human Services

(DHS)/Economic Security Administration (ESA)

Temporary Assistance for Needy Families Cluster (TANF)

CFDA #: 93.558 Award #: Various

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 45 CFR Section 261.14 (a) and (b), "If an individual refuses to engage in work required under Section 407 of the Act, the State must reduce or terminate the amount of assistance payable to the family, subject to any good cause or other exceptions the State may establish. Such reduction is governed by the provisions of 45 CFR Section 261.16. The State must, at a minimum, reduce the amount of assistance otherwise payable to the family pro rata with respect to any period during the month in which the individual refuses to work. The State may impose a greater reduction, including terminating assistance."

**Condition** - During our test work of 60 samples selected to test the Special Tests and Provisions - Penalty for Refusal to Work, we noted the following:

- For one (1) instance the customer had no participation hours in CATCH for fiscal year 2019 but had a POWER exemption through April 30, 2019. BDO noted that the customer was not sanctioned for the month of May or June 2019 although DIMS indicates that the customer did not begin working until mid-June. Therefore, we determined that this customer was not sanctioned as required, and the benefits were not properly reduced.
- For one (1) instance the customer had no work participation, was not sanctioned and was assigned to the Office of Work Opportunity (OWO) Closed Cases during the entire time. Per DHS/ESA it was due to an erroneous assessment and assignment decision. Therefore, we determined that this customer was not sanctioned as required, and the benefits were not properly reduced.
- For one (1) instance the customer was not assigned to a service provider until July 13, 2019 and was not sanctioned for months with no hours reported. Therefore, we determined that this customer was not sanctioned as required, and the benefits were not properly reduced.
- For one (1) instance the benefits were approved on May 23, 2019. The customer was assigned to OWO from May 2019 and was not assigned to a vendor. There is no evidence that customer was sanctioned for lack of participation between June and September 2019. Therefore, we determined that this customer was not sanctioned as required, and the benefits were not properly reduced.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Total payments made to these four (4) beneficiaries for the months that they did not have reported hours subsequent to when they should have been sanctioned were \$8,882.

Questioned Costs - Not determinable.

**Context** - This is a condition identified per review of DHS' compliance with specified requirements using a statistically valid sample.

**Effect** - Participants may erroneously receive full federal benefits, when they should have sanctions to reduce their federal benefits under the TANF program.

**Cause** - Controls are not operating effectively to ensure that the TANF program applies appropriate sanctions on participants who refuse to fulfill the minimum working requirements to receive or maintain benefits.

**Recommendation** - We recommend that DHS enforce existing policies and procedures and implement additional policies and procedures to ensure that Penalty for Refusal to Work requirements are complied with.

Related Noncompliance - Noncompliance.

**Views of Responsible Officials and Planned Corrective Actions** - DHS agrees with the finding in the report and this recommendation. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-014
Prior Year Finding Number: 2018-010
Compliance Requirement: Reporting;

Special Tests and Provisions - Penalty for Failure to Comply With Work

**Verification Plan** 

Program: Government Department/Agency:

U.S. Department of Health and Human Services Department of Human Services (DHS)

Temporary Assistance for Needy Families Cluster (TANF)

CFDA #: 93.558 Award #: Various

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 45 CFR Section 261.60 (a), "A State must report the actual hours that an individual participates in an activity, subject to the qualifications in paragraphs (b) and (c) of this section and Section 261.61(c). It is not sufficient to report the hours an individual is scheduled to participate in an activity. (b) For the purposes of calculating the work participation rates for a month, actual hours may include the hours for which an individual was paid, including paid holidays and sick leave. For participation in unpaid work activities, it may include excused absences for hours missed due to a maximum of 10 holidays in the preceding 12-month period and up to 80 hours of additional excused absences in the preceding 12-month period, no more than 16 of which may occur in a month, for each work-eligible individual. Each State must designate the days that it wishes to count as holidays for those in unpaid activities in its Work Verification Plan. It may designate no more than 10 such days. In order to count an excused absence as actual hours of participation, the individual must have been scheduled to participate in a countable work activity for the period of the absence that the State reports as participation. A State must describe its excused absence policies and definitions as part of its Work Verification Plan, specified at Section 261.62. (c) For unsubsidized employment, subsidized employment, and OJT, a State may report projected actual hours of employment participation for up to six months based on current, documented actual hours of work. Any time a State receives information that the client's actual hours of work have changed, or no later than the end of any six-month period. the State must re-verify the client's current actual average hours of work, and may report these projected actual hours of participation for another six-month period. (d) A State may not count more hours toward the participation rate for a self-employed individual than the number derived by dividing the individual's self-employment income (gross income less business expenses) by the Federal minimum wage. A State may propose an alternative method of determining self-employment hours as part of its Work Verification Plan. (e) A State may count supervised homework time and up to one hour of unsupervised homework time for each hour of class time. Total homework time counted for participation cannot exceed the hours required or advised by a particular educational program."

Per 45 CFR Section 261.61 (a), "A State must support each individual's hours of participation with documentation in the case file. In accordance with Section 261.62, a State must describe in its Work Verification Plan the documentation it uses to verify hours of participation in each activity."

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

According to the DC State Verification Plan, the D.C. Department of Human Services (DHS), Department of Human Services Monitoring Unit reviews and audits all documentation submitted by vendors reflecting the activities of recipients in TANF Employment program. This documentation includes time sheets, activity logs, school records, pay stubs, and verification of employment, work experience and on-the-job training. The Monitoring Unit completes this audit process to determine if sufficient documentation exists to substantiate reported time and attendance data, to warrant a payment to TANF Employment program vendors, and submission of countable hours for federal reporting purposes. The District projects hours of participation in unsubsidized, self-employment for six months or until the recipient's next scheduled recertification, whichever is sooner.

Per 45 CFR Section 265.7 (a)-(c), "Each State's quarterly reports (the TANF Data Report, the TANF Financial Report (or Territorial Financial Report), and the SSP-MOE Data Report) must be complete and accurate and filed by the due date."

For disaggregated data report, 'a complete and accurate report' means that:

- (1) The reported data accurately reflect information available to the State in case records, financial records, and automated data systems, and include correction of the quarterly data by the end of the fiscal year reporting period;
- (2) The data are free from computational errors and are internally consistent (e.g., items that should add to totals do so);
- (3) The State reports data for all required elements (i.e., no data are missing);
- (4)(i) The State provides data on all families; or (ii) if the State opts to use sampling, the State reports data on all families selected in a sample that meets the specification and procedures in the TANF Sampling Manual (except for families listed in error); and
- (5) Where estimates are necessary (e.g., some types of assistance may require cost estimates), the State uses reasonable methods to develop these estimates.

For an aggregated data report, "a complete and accurate report" means that:

- (1) The reported data accurately reflect information available to the State in case records, financial records, and automated data systems;
- (2) The data are free from computational errors and are internally consistent (e.g., items that should add to totals do so);
- (3) The State reports data on all applicable elements; and
- (4) Monthly totals are unduplicated counts for all families (e.g., the number of families and the number of out-of-wedlock births are unduplicated counts)."

45 CFR Section 265.7 (f) states that "States must maintain records to adequately support any report, in accordance with Section 75.361 through 75.370 of this title."

**Condition** - During our test work over a sample of 60 participants for Special Tests and Provisions - Penalty for Failure to Comply with Work Verification Plan and Reporting, we noted:

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

- For nineteen (19) instances, we noted that although the hours reported met or exceeded the required work participation hours, DHS/ESA was unable to provide documentation to support the hours reported.
- For eight (8) instances, the agency could not provide documentation to support the projected hours included in DCAS as required in the Work Verification Plan. For six (6) of these instances, the participants did not meet the work participation requirements and was properly sanctioned; for one (1) instance, the participant did not meet the work participation requirements and there was no sanction until months after it should have been imposed; while in one (1) other instance, the participant did not meet the work participation requirement and no sanction was noted as the participant was assigned to the DHS CATCH 2.7.
- For five (5) instances, we noted that these participants did not meet the work participation requirement, as the average of approved hours was less than the hours required per week. No sanction was noted. In addition, for four (4) of these instances no support was provided for the hours recorded in DCAS.
- For three (3) instances, we noted that the actual or projected hours reported for the participant were less than the hours included on the support.
- For two (2) instances, we noted that the support used to project hours for the participant was dated more than six months before the month tested and therefore should not have been used. In addition, one (1) of these participants did not meet the work participation requirement and no sanction was noted.
- For one (1) instance, we noted that the agency was unable to provide documentation to support the 4 hours included under the code (T63) "Deeming", which is used for reporting "Deemed Core Hours" or hours of participation in work experience or community service programs for work-eligible individuals under specific circumstances.
- For two (2) instances, we noted that the agency was unable to locate timesheets. Therefore, we were unable to confirm that approved hours were properly supported. In addition, the agency reported that the participants worked less hours than the approved hours in CATCH.
- For one (1) instance, we noted that for this sample item the hours for two timesheets could not be identified as the dates on the timesheets for the last two weeks of the month of October 2018 were cut off. DHS/ESA was unable to provide the hard copies for these timesheets.
- For one (1) instance, we noted that although CATCH identified 0 hours of work participation requirement, the Eligibility population identified 20 hours of work participation requirement. Although the hours reported met the work participation requirement, the agency could not provide documentation to support the projected hours included in DCAS as required in the Work Verification Plan.
- For one (1) instance, we noted that that although this participant was exempt through March 2019 from compliance with this requirement due to having a child under 1, the hours reported on the ACF-199 (30 hours) did not agree with the "required" hours (20 hours). In addition, we noted that although the hours reported met or exceeded the required work participation hours, DHS/ESA was unable to provide documentation to support the hours reported.
- For one (1) instance, we noted that the actual or projected hours reported for the participant were more than the recalculated average hours based on the support provided.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

The information tested in our sample represents the underlying data used in Reporting for the  $1^{st}$  and  $2^{nd}$  quarters of fiscal year 2019. Consequently, DHS incorrectly reported data in the ACF-199 report for the  $1^{st}$  and  $2^{nd}$  quarters of fiscal year 2019.

Questioned Costs - Not determinable.

**Context** - This is a condition identified per review of DHS' compliance with specified requirements using a statistically valid sample.

*Effect* - Data within the ACF-199 report may not be complete and accurate. Specifically, if the work participation data is not substantiated, or inconsistencies are noted, it may result in inaccurate data being reported and may lead to an incorrect ACF-199 report, and could result in an incorrect allocation of Federal Funds to the state.

**Cause** - Controls are not operating effectively over the documentation of work participation data to ensure that adequate evidence of the work participation is maintained.

**Recommendation** - We recommend that DHS enforce existing policies and procedures and implement additional controls to ensure that adequate documentation is maintained to substantiate the work participation data reported in the ACF-199 report in accordance with the District of Columbia Work Verification Plan.

We also recommend that DHS implement policies, procedures and controls that will enable an accurate reconciliation between the data sources used in the preparation of the ACF-199 report to ensure proper reporting of data elements, such as child care subsidies.

**Related Noncompliance** - Material noncompliance.

**Views of Responsible Officials and Planned Corrective Actions** - DHS agrees with the finding in the report. DHS is aware of the issues and is working to implement fixes in DCAS which align hours with employment activity. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-015
Prior Year Finding Number: N/A

Compliance Requirement: Subrecipient Monitoring

<u>Program:</u>
U.S. Department of Health and Human Services

Government Department/Agency:
Department of Human Services (DHS)

Community Services Block Grant (CSBG)

CFDA #: 93.569 Award #: Various

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

In accordance with the Uniform Guidance in 2 CFR Section 200.331(a) Requirements for Pass-Through Entities requires that pass-through entities must: Ensure that every sub-award is clearly identified to the subrecipient as a sub-award and includes certain information outlined in the section noted above, including FFATA; pre-award assessment, indirect cost rated for the award, CFDA number, finding and award follow-up and other pertinent actions.

In accordance with the requirements of 2 CFR Section 1402.300, the non-Federal entity is responsible for complying with all requirements of the Federal award. For all Federal awards, this includes the provisions of FFATA, which includes requirements on executive compensation, and also requirements implementing the Act for the non-Federal entity at 2 CFR part 25 Financial Assistance Use of Universal Identifier and System for Award Management and 2 CFR part 170 Reporting Subaward and Executive Compensation Information.

In accordance with 2 CFR Part 170, Appendix A, under the Federal Funding Accountability and Transparency Act (FFATA), the department is required to collect and report information on each subaward or amendment of \$25,000 or more in federal funds in the FFATA Subaward Reporting System.

**Condition** - Our examination of the program's subrecipient monitoring requirements included a review of the Federal Funding Accountability and Transparency Act (FFATA) requirements for the Community Services Block Grant. The Department of Human Services failed to submit subaward data to fulfill the FFATA requirements.

#### **Questioned Costs** - None.

**Context** - This is a condition identified per review of DHS' compliance with specified monitoring requirements on the program's subrecipient.

**Effect** - The District is not in compliance with the FFATA requirements as it failed to submit subaward data for the Community Services Block Grant Program.

**Cause** - Management did not have proper internal controls and policies and procedures in place to ensure that the FFATA requirements were performed.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

**Recommendation** - We recommend that DHS implement policies, procedures and controls that will ensure the CSBG personnel comply with all the required laws, guidelines and requirement under the award.

Related Noncompliance - Noncompliance.

Views of Responsible Officials and Planned Corrective Actions - DHS agrees with the finding in the report and this recommendation. FFATA initiated but lapsed and inactive during fiscal year 2019. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-016
Prior Year Finding Number: N/A

Compliance Requirement: Special Tests and Provisions - Monitoring of Income Eligibility

Requirement

Program: Government Department/Agency:

U.S. Department of Health and Human Services

District of Columbia Public Schools

(DCPS)

Head Start CFDA #: 93.600

Award #: 03CH010214-04-00; 03CH010214-05-00

03CD4015-04-00; 03CH3445-06-00

Award Year: 09/01/2018-08/31/2020; 02/1/2019-06/30/2020

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 45 CFR Chapter XIII 1302.12(b), Determining, verifying, and documenting eligibility, DCPS is required to ensure federally funded children meet the income and age eligibility requirements.

DCPS uses the Head Start School-wide Model (HSSWM). This model verifies that children enrolled in Pre-K and Preschool in DCPS Title 1 classrooms meet categorical eligibility requirements based on DCPS' funded enrollment. DCPS vetted their eligibility model with the Department of Health and Human Services (HHS) Administration for Children and Families (ACF), who came up with a unique set of specifications for DCPS to minimize the risk of non-compliance with the income and age eligibility requirements.

DCPS has three partner agencies: the DC Department of Human Services (DHS), Children and Family Services Agency (CFSA) and the Office of the State Superintendent of Education (OSSE), who collect eligibility data on children who meet categorical eligibility, defined as children who are homeless, those in foster care, children in a family receiving Temporary Assistance for Needy Families (TANF), or who were admitted into the program in the prior year. These partner agencies provide data to DCPS on children in these categories. DCPS performs a match of the eligibility data provided by the partner agencies against the initial enrollment audit data and subsequent monthly enrollment data (the "data match") to determine DCPS' categorically eligible children.

**Condition** - We noted that the automated system used by DCPS to compile the Head Start's monthly data match was not operating during the majority of the months in fiscal year 2019. DCPS was not able to provide the two (2) monthly data match sampled, as such, we were unable to determine DCPS' compliance with the program's categorical eligibility requirement.

Questioned Costs - Not determinable.

**Context** - This is a condition identified per review of DCPS' compliance with specified requirements using a statistically valid sample.

Effect - DCPS did not comply with the specific program requirement in managing the program.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

**Cause** - It appears that policies and procedures, including a review over monitoring, preparation and review of the program's categorical eligibility requirement is not functioning as intended.

**Recommendation** - We recommend that DCPS re-evaluate its policies and procedures to ensure that policies and alternative procedures are instituted to enable DCPS monitor its program eligibility requirement.

Related Noncompliance - Material noncompliance.

Views of Responsible Officials and Planned Corrective Actions - DCPS agrees with the conditions and recommendations of this finding. In the Spring of 2020, the Early Childhood Education Division (ECED) piloted a process to obtain income verification on all Head Start families that were not categorically eligible via TANF or SSI. Forms and processes were developed to begin usage during enrollment for school year 2020-2021. Because DCPS does not have Head Start funding for school year 2020-2021, ECED will not be implementing this Head Start eligibility verification process during this school year. However, the process that was piloted in school year 2019-2020 will be implemented should DCPS receive Head Start funding in the future. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-017
Prior Year Finding Number: N/A

Compliance Requirement: Special Tests and Provisions - Program Governance

Program: Government Department/Agency:

U.S. Department of Health and Human Services

District of Columbia Public Schools

(DCPS)

Head Start CFDA #: 93.600

Award #: 03CH010214-04-00; 03CH010214-05-00

03CD4015-04-00; 03CH3445-06-00

Award Year: 09/01/2018-08/31/2020; 02/1/2019-06/30/2020

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

U.S. Code 42 USC 9839(a)(2)(A), (B), and (D) states that each Head Start agency shall make available to the public a report published at least once in each fiscal year that discloses the following information from the most recently concluded fiscal year: (a) the total amount of public and private funds received and the amount from each source; (b) an explanation of budgetary expenditures and proposed budget for the fiscal year; and (c) the results of the most recent review by the Secretary and the financial audit.

**Condition** - We noted that the required annual report for school year 2018-2019 was not prepared and published as of audit date.

Questioned Costs - None.

**Context** - This is a condition identified per review of DCPS' compliance with specified requirements.

*Effect* - DCPS did not comply with the specific program governance requirement.

**Cause** - It appears that policies and procedures, including a review over monitoring, preparation and review of this program governance requirement is not functioning as intended.

**Recommendation** - We recommend that DCPS re-evaluate its policies and procedures to ensure that preparation and review of this requirement is monitored by an appropriate official who would ensure that information submitted is complete, accurate, consistent, submitted and published within the required timeframe.

Related Noncompliance - Material noncompliance.

Views of Responsible Officials and Planned Corrective Actions - DCPS agrees with the conditions and recommendations of this finding. The Early Childhood Education Division of DCPS was going through significant staffing turnover at the end of school year 2018-2019 which led to missing the deadline for creating and submitting an annual report. DCPS is preparing a school year 2018-2019 annual report (in retrospect) and will publish the report to the DCPS website by October 31, 2020.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

An annual report for the school year 2019-2020 school year was prepared and posted on the DCPS web site and was distributed to internal staff and external stakeholders.

The Early Childhood Education Division has trained three levels of staff (Chief, Deputy Chief, Directors and Administrative Coordinators) on the Head Start requirement for an annual report. When/if DCPS applies and receives Head Start funding in the future, individuals in all these positions will ensure a report is prepared. The Division will also put in place an annual program calendar to identify due dates for all Head Start required reports in order to anticipate and track progress.

The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-018 Prior Year Finding Number: 2018-011 **Compliance Requirement:** Eligibility

Program: Government Department/Agency: U.S. Department of Health and Human Services

Child and Family Services Agency

(CFSA)

Foster Care - Title IV-E CFDA #: 93.658 Award #: Various

Award Year: 10/01/2018 - 09/30/2019

Criteria - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

45 CFR Section 92.20(b)(2), "Accounting records, "Grantees and sub grantees must maintain records which adequately identify the source and application of funds provided for financially assisted activities. These records must contain information pertaining to grant or subgrant awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays or expenditures, and income."

45 CFR Section 233.90(b)(3), states "a Title IV-E agency may provide foster care maintenance payments on behalf of youth who have attained age 18, but are under the age of 19, and who are full-time students expected to complete their secondary schooling or equivalent vocational or technical training before reaching 19."

- 45 CFR Section 1356.30(f), "In order for a child care institution to be eligible for title IV-E funding, the licensing file for the institution must contain documentation which verifies that safety considerations with respect to the staff of the institution have been addressed."
- 45 CFR Section 1356.30(a) states, "The Title IV-E agency must provide documentation that criminal records checks have been conducted with respect to prospective foster and adoptive parents."
- 42 U.S. Code Section 671(a)(20)(A), "In order for a State to be eligible for payments under this part, it shall have a plan approved by the Secretary which provides procedures for criminal records checks of national crime information databases for any prospective foster or adoptive parent before the foster or adoptive parent may be finally approved for placement of a child regardless of whether foster care maintenance payments or adoption assistance payments are to be made on behalf of the child under the State plan."
- 42 U.S. Code Section 671(a)(20)(B), "In order for a State to be eligible for payments under this part, it shall have a plan approved by the Secretary which provides that the State shall check any child abuse and neglect registry maintained by the State for information on any prospective foster or adoptive parent and on any other adult living in the home of such a prospective parent, and request any other State in which any such prospective parent or other adult has resided in the preceding 5 years, to enable the State to check any child abuse and neglect registry maintained by such other State for such

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

information, before the prospective foster or adoptive parent may be finally approved for placement of a child."

Furthermore, per 45 CFR Section 1356.21(a), "Statutory and regulatory requirements of the Federal foster care program, "To implement the foster care maintenance payments program provisions of the title IV-E plan and to be eligible to receive Federal financial participation (FFP) for foster care maintenance payments under this part, a Title IV-E agency must meet the requirements of this section, 45 CFR 1356.22, 45 CFR 1356.30, and Parts 472, 475(1), 475(4), 475(5), 475(6)."

**Condition** - During our audit we noted that in fiscal year 2019, the Foster Care program had total disbursements of \$5,043,554 for 7,371 Maintenance payments. We selected a sample of 60 participants representing disbursed federal funds totaling \$40,389, we noted the following deficiencies:

- For three (3) of 60 samples, CFSA was unable to provide documentation supporting that a youth over 18 was a full-time student expected to complete their secondary schooling or equivalent vocational or technical training.
- For seventeen (17) of 60 samples, CFSA was not able to provide the licensing documentation or documentation provided was outside of the audit period for the selected individuals.
- For one (1) of 60 samples, the licensing documentation provided was unsigned.
- For twelve (12) of 60 samples, CFSA did not provide evidence that criminal record checks, including fingerprint-based checks from the national crime information databases and check registry were performed.
- For one (1) of 60 samples, the background check provided for review by CFSA did not pertain to the period under audit. There was no evidence that a background check was performed every two (2) years.
- For one (1) of 60 samples, CSFA did not provide a neglect registry check for the prospective foster parent.
- For one (1) of 60 samples, documentation provided for a group home does not allow us to determine that CFSA performed the required review of background checks and check registries that the group home was required to perform.

These deficiencies represent 39% of the total disbursements tested.

Questioned Costs - Known amount is \$15,853.

**Context** - This is a condition identified per review of CFSA's compliance with specified requirements using a statistically valid sample.

Effect - CFSA was not in compliance with the eligibility requirements of the Foster Care program.

*Cause* - CFSA does not have adequate controls in place to ensure that eligibility files are being properly reviewed and the required documentation is being maintained to evidence compliance with eligibility requirements.

#### Schedule of Findings and Questioned Costs Year Ended September 30, 2019

**Recommendation** - We recommend CFSA reevaluate and strengthen its existing policies and procedures over the review and maintenance of appropriate documentation to ensure compliance with eligibility requirements in accordance with the program.

Related Noncompliance - Material noncompliance.

Views of Responsible Officials and Planned Corrective Actions - The CFSA appreciates the level of detail and clarity in the detail-level catalogue of findings that was provided to us in support of this Schedule of Findings and Questioned Costs. CFSA concurs with the findings. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-019
Prior Year Finding Number: N/A
Compliance Requirement: Reporting

Program: Government Department/Agency:

U.S. Department of Health and Human Services Child and Family Services Agency

(CFSA)

Foster Care - Title IV-E CFDA #: 93.658

Award #: Various

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per OMB No. 0970-0205, Form CB-496, Title IV-E Programs Quarterly Financial Report, "is required to be submitted at the end of each fiscal quarter by each State or Tribe with an approved plan under title IV-E of the Social Security Act to administer the Foster Care, Adoption Assistance, and Guardianship Assistance programs. In submitting this form, each State or Tribal grantee meets its statutory and regulatory requirements to report actual program expenditures made in the preceding fiscal quarter and to provide an estimate of program expenditures anticipated in the upcoming fiscal quarter."

**Condition** - During our review and reconciliation of the CB-496 quarterly reports, we observed that the Agency did not report project evaluation costs. In the 3rd and 4th quarters, CFSA duplicated and misclassified costs resulting in overclaimed evaluation costs. These errors were identified under 6a FMAP Rate-Project Intervention and Other Waiver Based Expenditures and in 6b 50% FFP Rate - Project Intervention and Other Waiver Based Expenditures.

Questioned Costs - Known amount is \$48,649.

**Context** - This is a condition identified per review of CFSA's compliance with specified requirements using a statistically valid sample.

*Effect* - Without proper internal controls and policies and procedures in place to ensure that CB- 496 balances were properly reported, the Foster Care program incorrectly reported project evaluation expenditures on the CB-496 reports for two of the four quarters in fiscal year 2019. Lack of proper internal controls over review of CB-496 may lead to incorrect reporting of performance data.

**Cause** - CFSA overstated amounts reported and misclassified evaluation costs because of duplicated transactions. Thus, Management did not have proper internal controls and policies and procedures in place to ensure that the CB-496 was properly reviewed prior to approval.

**Recommendation** - We recommend that CFSA implement additional procedures that will ensure the amounts reported are accurate in the CB-496 quarterly reports prior to approval.

Related Noncompliance - Material noncompliance.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

*Views of Responsible Officials and Planned Corrective Actions* - CFSA concurs with the facts of the finding. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-020
Prior Year Finding Number: 2018-012
Compliance Requirement: Eligibility

Program:

Government Department/Agency:

Child and Family Sandage Agency

U.S. Department of Health and Human Services Child and Family Services Agency

(CFSA)

Adoption Assistance - Title IV-E

CFDA #: 93.659 Award #: Various

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

According to 45 CFR Section 92.20(b)(2), Accounting records, "Grantees and sub grantees must maintain records which adequately identify the source and application of funds provided for financially assisted activities. These records must contain information pertaining to grant or subgrant awards and authorizations, obligations, unobligated balances, assets, liabilities, outlays or expenditures, and income."

42 U.S. Code Section 671(a)(20)(A), "in order for a State to be eligible for payments under this part, it shall have a plan approved by the Secretary which provides procedures for criminal records checks of national crime information databases for any prospective foster or adoptive parent before the foster or adoptive parent may be finally approved for placement of a child regardless of whether foster care maintenance payments or adoption assistance payments are to be made on behalf of the child under the State plan."

42 U.S. Code Section 671(a)(20)(B), "In order for a State to be eligible for payments under this part, it shall have a plan approved by the Secretary which provides that the State shall check any child abuse and neglect registry maintained by the State for information on any prospective foster or adoptive parent and on any other adult living in the home of such a prospective parent, and request any other State in which any such prospective parent or other adult has resided in the preceding 5 years, to enable the State to check any child abuse and neglect registry maintained by such other State for such information, before the prospective foster or adoptive parent may be finally approved for placement of a child."

42 U.S. Code Section 673(a)(4)(A), "Notwithstanding any other provision of this section, a payment may not be made pursuant to this section to parents or relative guardians with respect to a child (i) who has attained (I) 18 years of age, or such greater age as the State may elect under section 675(8)(B)(iii) of this title; or (II) 21 years of age, if the State determines that the child has a mental or physical handicap which warrants the continuation of assistance; (ii) who has not attained 18 years of age, if the State determines that the parents or relative guardians, as the case may be, are no longer legally responsible for the support of the child; or (iii) if the State determines that the child is no longer receiving any support from the parents or relative guardians, as the case may be. (B) Parents or relative guardians who have been receiving adoption assistance payments or kinship guardianship assistance payments under this section shall keep the State or local agency administering the program under this

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

section informed of circumstances which would, pursuant to this subsection, make them ineligible for the payments, or eligible for the payments in a different amount."

**Condition** - In fiscal year 2019, CFSA had total disbursements of \$9,202,854 for 11,721 subsidy payments. We selected a sample of 60 participants representing disbursed funds totaling \$47,915 to test compliance with eligibility requirements. Based on our review, we noted that management's internal control over compliance with the program's eligibility requirements were not operating effectively to prevent or detect noncompliance with the program requirements. Our audit revealed the following deficiencies:

- For six (6) out of 60 samples, the date that the determination was performed was not included on the Title IV-E FACES Eligibility Determination screen as there was no event included on these pages labeled as "Determination".
- For one (1) out of 60 samples, CFSA was unable to provide a Title IV-E FACES Eligibility Determination screen.
- For one (1) out of 60 samples, the adoption referrals provided by CFSA were not dated by referring worker and it was not dated and/or signed by the supervisor.
- For sixty (60) out of 60 samples, CFSA was unable to provide evidence that the annual subsidy application was reviewed and that the reviews were properly documented. Additionally, for one (1) out of 60 samples we noted that CFSA mailed the letter on November 11, 2019, which is after the fiscal year under audit.
- For fifteen (15) out of 60 samples, CFSA was unable to provide documentation evidencing that prospective adoptive parent(s) were issued a license, had received a criminal history record check, including a fingerprint-based check, and received a child abuse and registry check. Additionally, for ten (10) of these samples, no documentation was provided that allowed us to verify the number of members in the household and that all adults over 18 received a background check and child abuse and neglect registry.
- For three (3) out of 60 samples, CFSA was unable to provide documentation evidencing that prospective adoptive parent(s) had received a child abuse and neglect registry check.
- For five (5) out of 60 samples, CFSA provided documentation that was outside the period to demonstrate whether the license and check register and criminal history record check, including a fingerprint-based check were done at the time of the adoption. Additionally, for one (1) of these samples, we noted no documentation to support that background check and child abuse and neglect registry check were performed for at least one adult over 18 in the house.
- For seven (7) out of 60 samples, we noted no documentation to support that background checks and child abuse and neglect registry checks were performed for at least one adult over 18 years of age in the house.
- For one (1) out of 60 samples, CFSA provided a subsidy agreement that was signed more than one (1) year prior to the final decree and was therefore null and void.
- For one (1) out of 60 samples, the recalculated subsidy rate did not agree with the rate included in the signed subsidy agreement nor the approved rate for years 2017 or 2018.
- For one (1) out of 60 samples, CFSA provided a subsidy agreement that was missing pages 2 and 3, we were therefore unable to determine what was the agreed upon subsidy rate for this sample.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

• For one (1) out of 60 samples, Report and Recommendation Part I (Child's Asset Statement) that is usually completed by CFSA personnel was not included in the subsidy record.

These deficiencies represent 100% of the total disbursements tested.

Questioned Costs - Known amount is \$47,915.

**Context** - This is a condition identified per review of CFSA's compliance with specified requirements using a statistically valid sample.

*Effect* - Without proper controls in place to ensure case files are properly reviewed and documentation maintained, CFSA was not in compliance with the eligibility requirements of the Adoption Assistance program. In addition, we were unable to determine whether each child remains eligible and whether the subsidy should have continued.

**Cause** - CFSA does not have adequate controls in place to ensure that eligibility files are being properly reviewed and required documentation is being maintained to ensure compliance with eligibility requirements as required by the program.

**Recommendation** - We recommend CFSA evaluate and strengthen its existing policies and procedures over the review and maintenance of appropriate documentation to ensure compliance with eligibility requirements of the program.

Related Noncompliance - Material noncompliance.

Views of Responsible Officials and Planned Corrective Actions - The CFSA appreciates the level of detail and clarity in the detail-level catalogue of findings that was provided to us in support of this Schedule of Findings and Questioned Costs. CFSA concurs with the findings. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-021
Prior Year Finding Number: N/A
Compliance Requirement: Reporting

<u>Program:</u> <u>Government Department/Agency:</u>

U.S. Department of Health and Human Services Child and Family Services Agency

(CFSA)

Adoption Assistance - Title IV-E

CFDA #: 93.659 Award #: Various

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per OMB No. 0970-0205, Form CB-496, Title IV-E Programs Quarterly Financial Report, "is required to be submitted at the end of each fiscal quarter by each State or Tribe with an approved plan under title IV-E of the Social Security Act to administer the Foster Care, Adoption Assistance, and Guardianship Assistance programs. In submitting this form, each State or Tribal grantee meets its statutory and regulatory requirements to report actual program expenditures made in the preceding fiscal quarter and to provide an estimate of program expenditures anticipated in the upcoming fiscal quarter."

**Condition** - During our review and reconciliation of the CB-496 quarterly report, we noted that there was a net variance of \$9,033 between the amounts reported on the CB-496 and the Stamping Report in the 2nd quarter ended March 31, 2019.

Questioned Costs - Known amount is \$9,033.

**Context** - This is a condition identified per review of CFSA's compliance with specified requirements using a statistically valid sample.

*Effect* - Without proper internal controls and policies and procedures in place to ensure that CB- 496 balances were properly reported, the Adoption Assistance Program incorrectly reported expenditures on the CB-496 report for the 2nd quarter in fiscal year 2019. Lack of proper internal controls over review of CB-496 may lead to incorrect reporting of performance data.

*Cause* - CFSA erroneously included some non-allowable costs such as respite care and nursing care (for eligible children). Thus, CFSA's Management did not have proper internal controls and policies and procedures in place to ensure that the CB-496 was properly reviewed prior to approval.

**Recommendation** - We recommend that CFSA implement additional procedures that will ensure the amounts reported are accurate in the CB-496 quarterly reports prior to approval.

Related Noncompliance - Noncompliance.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

*Views of Responsible Officials and Planned Corrective Actions* - CFSA concurs with the facts of the finding. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-022 Prior Year Finding Number: N/A

Compliance Requirement: Activities Allowed or Unallowed and Allowable Costs/Cost Principles

Program:

Government Department/Agency:

Department of Health and Human Services

Department of Health Care Finance

U.S. Department of Health and Human Services

Department of Health Care Finance
(DHCF)/Department of Human Services

(DHS)/Economic Security

Administration (ESA)

Medicaid Cluster

CFDA #: 93.775, 93.777, 93.778

Award #: 1905DC5MAP

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per Section 1927 of the Social Security Act (42 USC 1396r-8): Drug manufacturers are required to provide a listing to CMS of all covered outpatient drugs and; and on a quarterly basis, are required to provide their average manufacturer's price and their best prices for each covered outpatient drug. Based on these data, CMS calculates a unit rebate amount for each drug, which it then provides to States. Each State agency under this subchapter shall report to each manufacturer not later than 60 days after the end of each rebate period and in a form consistent with a standard reporting format established by the Secretary, information on the total number of units of each dosage form and strength and package size of each covered outpatient drug dispensed after December 31, 1990, for which payment was made under the plan during the period, and shall promptly transmit a copy of such report to the Secretary.

The CMS Medicaid Drug Rebate Data Guide requires that upon receipt of a quarterly invoice, labelers have 37 calendar days from the invoice postmark date to pay rebates before interest begins to accrue. In those instances where states have used a meter to postmark the envelope and the United States Postal Service (USPS) or common mail carrier has also postmarked the envelope, the postmark date of the USPS or common mail carrier should be used to track the interest start date. For invoices that are submitted electronically, states should be able to identify the date on which the electronic invoice was received in order to properly track the interest start date.

Interest stops accruing on the postmark date of the labeler's mailed check, the date the state applies a credit to the labeler, or the date on which a state provides written acknowledgment to the labeler of the resolution. On the 38th day from the date interest originally began accruing, any unpaid interest becomes principal and interest accrues on the new principal amount beginning on the 38th day after that.

**Condition** - During our review of 60 samples of drug rebates, we noted that two rebates totaling \$25,612 were paid over a year late. One invoice totaling \$14,228 for the quarter ended 6/30/2017 was 552 days late and another invoice totaling \$11,384 for the quarter ended March 31, 2017 was 438 days late. In addition, we noted that for one (1) of the 60 drug rebates tested, the manufacturer did not pay the rebate within 37 days after receiving the invoice from the DHCF, however, no interest was calculated and charged to the drug manufacturer.

Questioned Costs - Not determinable.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

**Context** - This is a condition identified per review of DHCF's compliance with the drug rebates requirements using a statistically valid sample.

**Effect** - Without adequate policies and procedures in place, there is no assurance that drug rebates are paid, or interest is assessed when rebates are not paid timely.

**Cause** - The contractor's system for processing rebates does not have the capability to calculate interest once an account is paid in full. The system will only calculate interest if the account has an open balance.

**Recommendation** - We recommend that DHCF establish policies and procedures to ensure that rebates are paid timely and interest is calculated and assessed when drug rebates are not paid timely.

Related Noncompliance - Noncompliance.

Views of Responsible Officials and Planned Corrective Actions - DHCF agrees with the facts described in the Condition above. Please note, however, that DHCF's drug rebate vendor made efforts to collect both of the outstanding balances noted in the Condition including sending dunning notices and including the details of outstanding receivables in section 3 of each subsequent invoice. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-023
Prior Year Finding Number: 2018-013
Compliance Requirement: Eligibility

<u>Program:</u>
U.S. Department of Health and Human Services

<u>Government Department/Agency:</u>
Department of Health Care Finance

(DHCF)/Department of Human Services
edicaid Cluster
(DHS)/Economic Security

Administration (ESA)

Medicaid Cluster CFDA #: 93.775, 93.777, 93.778

Award #: 1905DC5MAP

Award Year: 10/01/2018 - 09/30/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

The Medicaid State Plan: Citation 42 CFR Section 431.17AT-79-29. Section 4.7 (Maintenance of Records) states, "The Medicaid agency maintains or supervises the maintenance of records necessary for the proper and efficient operation of the plan, including records regarding applications, determination of eligibility, the provision of medical assistance, and administrative costs and statistical, fiscal and other records necessary for reporting and accountability, and retains these records in accordance with Federal requirements. All requirements of 42 CFR 431.17 are met."

Economic Security Administration (ESA) Policy Manual, Section 1.3, "All eligibility criteria and clarifying information are documented on the Record of Case Action, form 1052. The case record should speak for itself. An outside reviewer shall be able to follow the chronology of events in the case be reading the narrative. All application documents including verification and correspondence must be date-stamped. For working recipients, the record should include the dates pay is received and how often the recipient is paid. When the recipient's statement is the best available source, the record should include the application/recipient and agency efforts to verify the information. All address changes should be documented."

**Condition** - During testing over beneficiary eligibility for the Medicaid benefits, we noted that the District's Economic Security Administration (ESA) was unable to provide sufficient documentation to support the beneficiary's eligibility determination during the fiscal year 2019 audit. Specifically, out of a sample of 132 participant files tested, we noted the following exceptions:

- One (1) participant file where ESA did not include the applicant's resources in the ACEDS system when determining eligibility.
- Two (2) participant files where ESA did not perform the recertification within the required timeframe. For one of those two cases, the Level of Care assessment was not completed timely, therefore, the participant's benefits were extended for another year.

The Department of Health Care Finance, as the State Medicaid Agency, lacks a quality control oversight system to ensure that eligibility documentation is maintained to support the eligibility decision.

Questioned Costs - Not determinable.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

**Context** - This is a condition identified per review of ESA's compliance with specified requirements using a statistically valid sample.

**Effect** - Lack of supporting documentation for program services and noncompliance with program requirements could result in disallowances of costs and participants could be receiving benefits that they are not entitled to receive under the program.

**Cause** - DHCF and ESA did not appear to adhere to internal control procedures to ensure that resources disclosed on an application were properly entered into the ACEDS system, and that recertification of benefits were performed as required. In addition, DHCF did not complete the Level of Care Assessments in a timely manner to facilitate the recertifications of beneficiaries.

**Recommendation** - We recommend that ESA improve internal control procedures to ensure that information disclosed in the applicant's application is properly entered in the ACEDS system and that recertifications are performed within established timeframes. In addition, we recommend that DHCF establish a quality control system to ensure that Level of Care assessments are completed timely to support the eligibility determination decision.

**Related Noncompliance** - Noncompliance.

Views of Responsible Officials and Planned Corrective Actions - DHCF concurs that in 1/132 instance, it was unable to produce a level of care (LOC) assessment document corresponding to an eligibility approval made during fiscal year 2019. The subject assessment was completed in April 2018 by DHCF's former contractor, Delmarva, and the resulting document was stored in the contractor-owned database, "Blue Crab." In July 2018, DHCF implemented D.C. Care Connect (DCCC) as the sole case management system of record for all long-term services and supports (LTSS). The subject LOC document is outstanding due to data migration errors that occurred during the transmission of LTSS documents from Blue Crab system to DCCC. DHCF does not propose any corrective action at this time because the data migration between systems has been complete since July 2018 with implementation of the DCCC as the single LTSS case management system owned and operated by DHCF. Accordingly, DHCF does not anticipate this issue to arise in the FY 2020 Single Audit, as the eligibility universe will be comprised only of determinations made during FY 2020, which is subsequent to the July 2018 implementation of DCCC.

For all other matters with which DHS and DHCF concur, the District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-024 Prior Year Finding Number: 2018-015

Compliance Requirement: Activities Allowed or Unallowed and Allowable Costs/Cost Principles

<u>Program:</u> <u>Government Department/Agency:</u>

U.S. Department of Health and Human Services

Department of Health (DOH)

HIV Emergency Relief Project Grants

CFDA #: 93.914

Award #: 2 H89HA00012-29-00, H89HA00012-28-00 Award Year: 03/01/2019 - 02/29/2020, 03/01/2018 -

02/28/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 2 CFR Section 200.430 Compensation - Personal Services:

"Costs of compensation are allowable to the extent that they satisfy the specific requirements of this part, and that the total compensation for individual employees:

- (1) Is reasonable for the services rendered and conforms to the establish written policy of the non-Federal entity consistently applied to both Federal and non-Federal activities;
- (2) Follows an appointment made in accordance with a non-Federal entity's laws and/or rules or written policies and meets the requirements of Federal statute, where applicable; and
- (3) Is determined and supported as provided in paragraph (i) of this section, Standards for Documentation of Personnel Expenses, when applicable."

#### 2 CFR Section 200.430(i):

"Standards for Documentation of Personnel Expenses (1) Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- (i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- (ii) Be incorporated into the official records of the non-Federal entity;
- (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities;
- (iv) Encompass both federally assisted and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy;
- (v) Comply with the established accounting policies and practices of the non-Federal entity;
- (vi) [Reserved]

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

- (vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.
- (viii) Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards."

Condition - We noted that DOH continued to allocate payroll expenditures to the HIV Emergency Relief Project Grant (HIVER) program during fiscal year 2019 based on budgeted percentages. These percentages were entered into the PeopleSoft Human Resources/Payroll System (PeopleSoft) at the beginning of the fiscal year and were based on management's estimate of the respective employee's level of effort for each program. PeopleSoft calculated the payroll costs every payroll cycle for each employee and program based on the predetermined percentage, and reported it through the Labor Distribution Report (485 Report). However, management did not perform a periodic comparison of actual costs to the budgeted costs and make any necessary adjustment as required by 2 CFR Section 200.430. Specifically, 37 out of 60 sampled payroll items tested for the HIVER grant were recorded based on estimated hours and not actual hours.

#### Questioned Costs - Not determinable.

**Context** - This is a condition identified per review of DOH's compliance with specified requirements using a statistically valid sample. Payroll costs including fringe benefits, for the HIVER program in fiscal year 2019 were \$3,034,788.

**Effect** - DOH was unable to demonstrate that the payroll expenditures charged to the HIVER grant accurately reflected the time incurred on the program and were properly supported in accordance with 2 CFR Part 200.430 time and effort reporting requirements.

*Cause* - DOH did not have policies and procedures in place to review and reconcile the estimated amounts of payroll expenditures charged to the HIVER program to the actual expenditures incurred. Per corrective action plans and status updates submitted by DOH to BDO in fiscal year 2019, DOH has a plan still in progress to develop a program manager-level certification of employee time and effort reflected in bi-weekly payroll records (485 Reports). It has not been completed by the end of fiscal year 2019.

**Recommendation** - We recommend that DOH fully implement its current corrective action plan to deploy policies and procedures to periodically compare employees' estimated hours per the 485 Report to the actual hours incurred, and make any necessary adjustments as required by 2 CFR 200.430.

Related Noncompliance - Material noncompliance.

Views of Responsible Officials and Planned Corrective Actions - The Department of Health (DOH) concurs with the finding. Consistent with the prior year's CAP for this finding, DOH reached several milestones to address this deficiency. At the start of fiscal year 2020, the agency's Time and Effort Certification standard operating procedure (SOP) was issued and distributed to DOH personnel, and a uniform time and effort certification tool and attestation for supervisors was developed. These actions will support the required periodic comparison of actual costs to the budgeted costs and make any

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

necessary adjustment as required by 2 CFR 200.430. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

Finding Number: 2019-025 Prior Year Finding Number: 2018-016

Compliance Requirement: Activities Allowed or Unallowed and Allowable Costs/Cost Principles

<u>Program:</u> <u>Government Department/Agency:</u>

U.S. Department of Health and Human Services

Department of Health (DOH)

**HIV Care Formula Grants** 

CFDA #: 93.917

Award #: 2 X07HA00045-29-00, 2 X07HA00045-28-00 Award Year: 04/01/2019 - 03/31/2020, 04/01/2018 -

03/31/2019

*Criteria* - The Uniform Guidance in 2 CFR Section 200.303 requires that non-Federal entities receiving Federal awards (i.e., auditee management) establish and maintain internal control designed to reasonably ensure compliance with Federal statues, regulations, and the terms and conditions of the Federal award.

Per 2 CFR Section 200.430 Compensation - Personal Services:

"Costs of compensation are allowable to the extent that they satisfy the specific requirements of this part, and that the total compensation for individual employees:

- (1) Is reasonable for the services rendered and conforms to the establish written policy of the non-Federal entity consistently applied to both Federal and non-Federal activities;
- (2) Follows an appointment made in accordance with a non-Federal entity's laws and/or rules or written policies and meets the requirements of Federal statute, where applicable; and
- (3) Is determined and supported as provided in paragraph (i) of this section, Standards for Documentation of Personnel Expenses, when applicable."

#### 2 CFR Section 200.430(i):

"Standards for Documentation of Personnel Expenses (1) Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- (i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- (ii) Be incorporated into the official records of the non-Federal entity;
- (iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities;
- (iv) Encompass both federally assisted and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity's written policy;
- (v) Comply with the established accounting policies and practices of the non-Federal entity;
- (vi) [Reserved]

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

- (vii) Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.
- (viii) Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards."

Condition - We noted that DOH continued to allocate payroll expenditures to the HIV Care Formula Grant (HIV Care) program during fiscal year 2019 based on budgeted percentages. These percentages were entered into the PeopleSoft Human Resources/Payroll System (PeopleSoft) at the beginning of the fiscal year and were based on management's estimate of the respective employee's level of effort for each program. PeopleSoft calculated the payroll costs every payroll cycle for each employee and program based on the predetermined percentage, and reported it through the Labor Distribution Report (485 Report). However, management did not perform a periodic comparison of actual costs to the budgeted costs and make any necessary adjustment as required by 2 CFR 200.430. Specifically, 32 out of 60 sampled payroll items tested for the HIV Care grant were recorded based on estimated hours and not actual hours.

Questioned Costs - Not determinable.

**Context** - This is a condition identified per review of DOH's compliance with specified requirements using a statistically valid sample. Payroll costs including fringe benefits, for the HIV Care program in fiscal year 2019 were \$1,503,757.

**Effect** - DOH was unable to demonstrate that the payroll expenditures charged to the HIV Care grant accurately reflected the time incurred on the program and were properly supported in accordance with 2 CFR Part 200.430 time and effort reporting requirements.

Cause - DOH did not have policies and procedures in place to review and reconcile the estimated amounts of payroll expenditures charged to the HIV Care program to the actual expenditures incurred. Per corrective action plans and status updates submitted by DOH to BDO in fiscal year 2019, DOH has a plan still in progress to develop a program manager-level certification of employee time and effort reflected in bi-weekly payroll records (485 Reports). It has not been completed by the end of fiscal year 2019.

**Recommendation** - We recommend that DOH fully implement its current corrective action plan to deploy policies and procedures to periodically compare employees' estimated hours per the 485 Report to the actual hours incurred, and make any necessary adjustments as required by 2 CFR 200.430.

Related Noncompliance - Material noncompliance.

Views of Responsible Officials and Planned Corrective Actions - The Department of Health (DOH) concurs with the finding. Consistent with the prior year's CAP for this finding, DOH reached several milestones to address this deficiency. At the start of fiscal year 2020, the agency's Time and Effort Certification standard operating procedure (SOP) was issued and distributed to DOH personnel, and a uniform time and effort certification tool and attestation for supervisors was developed. These actions will support the required periodic comparison of actual costs to the budgeted costs and make any

## Schedule of Findings and Questioned Costs Year Ended September 30, 2019

necessary adjustment as required by 2 CFR 200.430. The District's corrective action is described in the Management's Corrective Action Plan included as Appendix B of the attached Management's Section.

#### GOVERNMENT OF THE DISTRICT OF COLUMBIA

OFFICE OF THE CHIEF FINANCIAL OFFICER



**Jeffrey S. DeWitt** Chief Financial Officer

## Appendix A

# Government of the District of Columbia Summary Schedule of Prior Audit Findings

Finding Number	Program Name & CFDA #	Type of Finding	Current Status
2018-001 Prior Year Finding: 2017- 004 DHS/DCAS	US Dept. of Agriculture Supplemental Nutrition Assistance Program Cluster  10.551, 10.561	Special Tests and Provisions - ADP System for SNAP	Status: Finding repeated in the current year (2019-001).  Reason for Recurrence: In FY19, DHS experienced additional DCAS processing issues causing SNAP overpayments and underpayments. These issues have been fixed through system enhancements with the exceptions of the BENDEX and SSN issues which are ongoing.  FY 2019/2020 Corrective Action Plan: The proposed solution will address each of these issues in the following manner:  Error in the batch sequence resulted in 3,655 cases being erroneously issued for two months  The overpayment dates are in October and November 2018 and were reported upon original submission date of February 17, 2019. DHS/DCAS updated the technical QA process to prevent batch failures, and a fix went into production shortly after on December 12, 2019.

Finding	Program Name &	Type of	Cumpant Status
Number	CFDA #	Finding	Current Status
			5,410 cases of overpayments were
			identified which resulted from late
			recertifications defaulting to the
			<u>first day of the month</u>
			The overpayment dates of this 5,410 reflects all cases impacted from 2016 through 2019. In fiscal year 2019, the
			impacted cases were 1,789 totaling \$160,621.
			Overpayments were reported on February 17, 2019. A memo was sent to staff in March 2019 and DHS/DCAS
			added a system validation in May 2019. Enhancements were completed in DCAS to update the new
			certification period start date to the date.
			1,001 cases of underpayments from the DCAS system double counting income
			Overpayment date was in July 2019 and were reported on February 17, 2019. DHS/DCAS required a manual report of duplicate benefit types worked by the program and redesigned the BENDEX System.
			1,982 of SNAP cases actively receiving a benefit without SSN
			Overpayment dates are between October 2016 and October 2019. The cost for specific fiscal year is unknown as issue was initially reported in 2018. Overpayments were reported on February 17, 2019. DHS/DCAS mitigation strategy is to update system logic to identify individuals without a SSN at time of application, and enable system to
			terminate cases after 30-60 days from initial application if SSN has not been provided.
			Partially Corrected:

Einding	Program Name G	Type of	
Finding Number	Program Name & CFDA #	Type of Finding	Current Status
			Start date: Previously started May 2019 Estimated completion date: September 30, 2021
2018-002 Prior Year Finding: 2017- 005 DHS/OFT	US Dept. of Agriculture Supplemental Nutrition Assistance Program Cluster  10.551, 10.561	Special Tests and Provisions - EBT Card Security	Status: Finding repeated in the current year (2019-002).  Reason for Recurrence: Several of the discrepancies are related to the failure to comply with the policies and procedures in place regarding the Photo ID Referral Form and the EBT Intake Form. DHS and OCFO will continue to work together and with FIS and UPO to ensure contractor policies and procedures are followed, DHS procedures are adhered to with the referral form, and that newly updated UPO procedures to address the findings are implemented.  FY 2019/2020 Corrective Action Plan: As a result of the findings, OCFO/OFT is committed to working with Fidelity National Information Services (FIS) to ensure:  • Strict procedures and practices are in place to ensure contract compliance. UPO has hired a new manager and maintains a supervisor at each location. This change was effective November 4, 2019 and has made a positive impact on the requirement to review and sign off on Balance sheets within 48 hours and positive improvements in the facilities implemented by new management, including the handling of card issuance during the COVID pandemic.  • All Intake Procedures and Processes found in the EBT Manual are followed thoroughly

Finding	Program Name &	Type of	
Number	CFDA #	Finding	Current Status
			by all employees. Effective as of September 22, 2020, UPO updated the Employee Manual with new standard operating procedures to combat and prevent further incidents of errors, including the handling and acceptance of only fully complete Referral forms without photo copied signatures. UPO will continue to enforce the progressive disciplinary process for errors or omissions identified in the course of daily operations.
			• All UPO Staff have been updated on the new procedures and practices for operational efficiency, effective September 22, 2020. Each staff member will sign a form stating they understand and will follow the new policy and processes in the Employee Manual by September 28, 2020.
			• The Quality Improvement Plan created and implemented in February 2019 is still in effect and enforced. The quality review process involves a multilayer system check for performance improvement. This counterbalancing system is regulated using 4 layers of review: daily at the staff and the supervisor/manager level, weekly at the division director level, and quarterly at UPO's Office of Performance Management level. This process should ensure all aspects of the program are reviewed and assessed by the appropriate personnel. The new manager will continue to look for opportunities to create policy, procedures, and practices that

Finding	Program Name &	Type of	
Number	CFDA #	Finding	Current Status
			ensure all checks and balances are appropriately followed to minimize and eliminate audit findings as well as create operational efficiency. This will continue to be an ongoing effort.
			DHS Activities:
			All DPO Staff will complete the Photo ID Referral form in its entirety at the time of request. No forms will be pre-signed by DPO Staff and the use of all photocopies will be disposed of and this practice will be eliminated immediately. Prior to being signed by a Supervisor, all EBT referrals must be completed with all identifying information along with proper signatures. DPO Management sent out an email on September 18, 2020 regarding the EBT Authorization referral process. All Service Center Managers will follow up with staff during the Service Center huddles regarding the completion of the form. A copy of all EBT Authorization referral forms will be retained and maintained in a secured place by the Program Manager and a review of these forms will be randomly conducted on a quarterly basis by a designated person from the Deputy of Program Operations' Office.
			Partially Corrected: Start date: Previously started September 2020 Estimated completion date: September 30, 2021
2018-003 Prior Year Finding: 2017- 006	US Dept. of Agriculture Child Nutrition Cluster	Eligibility	Status: Finding repeated in the current year (2019-003).
DCPS	10.553, 10.555,		Reason for Recurrence: During January of 2019, DCPS implemented a new process wherein

Finding	Program Name &	Type of	
Number	CFDA #	Finding	Current Status
	10.556, 10.559		they reconcile the number of meals served and student attendance for the day and subsequently adjust the claims based on the result of the reconciliation; however, this reconciliation did not include breakfast. The finding identified by the auditors during the current year related to breakfast.
			FY 2019/2020 Corrective Action Plan: The DCPS corrective action plan includes the following steps:
			Conduct weekly and monthly meal reconciliation reports for SOP schools by comparing DCPS student absence data with the Mosaic POS weekly and monthly meal counts to identify erroneous meals. The reconciliation process will be updated to include breakfast.
			<ul> <li>Conduct weekly and monthly meal reconciliation reports for CEP schools by comparing DCPS in seat attendance (ISA) totals to the Mosaic weekly and monthly meal count totals to identify overages in meal served.</li> </ul>
			<ul> <li>Pull two reports from the Mosaic POS system when compiling data for a claim period. The first is the All Schools Sales Overview Report, which lists total meal counts for the given month by school. The second is the Daily Sales Summary Report, which lists daily meal counts by school.</li> </ul>
			Close the claim period in the Mosaic POC system to ensure meal counts do not get modified after claim reports are pulled.

Finding	Program Name &	Type of	
Number	CFDA #	Finding	Current Status
			Continue training our vendors, specifically field service workers, to ensure meal transactions are complete inputted in the Mosaic POS system before claim period reports are pulled.
			<ul> <li>Recommunicate the requirement that all meal production reports are reviewed and approved by the cafeteria manager daily.</li> </ul>
			Partially Corrected: Start date: Previously started January 1, 2019 Estimated completion date: November 30, 2020
2018-004 Prior Year Finding: N/A DOES	US Dept. of Labor Unemployment Insurance	Special Tests and Provisions - UI Benefit Payments	Corrected.
2018-005 Prior Year Finding: N/A DCPS	US Dept. of Education DC School Choice Incentive Program 84.370	Reporting	Corrected.
2018-006 Prior Year Finding: 2017- 010 DHS/ESA	US Dept. of HHS Temporary Assistance for Needy Families Cluster (TANF) 93.558	Eligibility	Status: Finding repeated in the current year (2019-009).  Reason for Recurrence: Several staff members failed to properly index and tag documents to electronic case records, creating an increased number of "orphan documents", which could not be located in DIMS during the audit. DHS is continuing to make improvements in both systems and processes, as it relates to the improvement of locating documents. Internal case reviews are occurring monthly to ensure applications and supporting documents are being properly scanned and associated with the

Finding	Program Name &	Type of	
Number	CFDA #	Finding	Current Status
			correct case in DIMS, for
			completeness. The Self-Attested
			SNAP and TANF Supplemental Form
			has been included with the Combined Application to ensure cash assistance
			is not being provided to individuals
			during the 10-year period which
			began on the date the individual was
			convicted in Federal or State Court of
			having made a fraudulent statement
			or representation with respect to
			place of residence in order to
			simultaneously receive assistance from two or more states.
			Hom two or more states.
			FY 2019/2020 Corrective Action
			Plan: To ensure that files are properly
			retained, and that documentation is
			maintained:
			DHS, Division of Program Operations
			(DPO) Executive Management Team
			will continue to receive and monitor
			statistical scanning reports (Pending and Hold Batch and Orphan/Default
			reports) from the Office of
			Information Systems (OIS) to check
			for staff scanning inconsistencies
			such as documents scanned that are
			considered orphaned (unable to
			attach to a case) across all service centers. The DPO Management
			Office will monitor to ensure that
			documents are scanned and tagged
			on the same day they are received
			per the Business Process Redesign
			(BPR). The Office of Information
			Systems (OIS) will provide access to
			all DPO Management staff for the upgraded Datacap/DIMS Management
			Dashboard. This new dashboard will
			provide and produce reports per
			Service Center/Division of scanning
			inconsistencies at the worker and
			. •
			inconsistencies at the worker and Service Center level. DPO Management will use this new upgrade to make sure that all documents are scanned and tagged properly into DIMS. OIS is in the process of designing the dashboard

Finding	Dragram Nama G	Type of	
Finding Number	Program Name & CFDA #	Type of Finding	Current Status
Nullibel	CI DA #	i iliuliig	and the anticipated launch date is
			December 31, 2020.
			December 51, 2020.
			DHS, Division of Program Development, Training and Quality Assurance (DPDT & QA), Office of Quality Assurance will continue to
			conduct monthly internal audits on the Orphan/Default report to ensure applications and supporting
			documents are being properly scanned and associated with the correct case in DIMS and checking for
			completeness. The Office of Quality Assurance will continue to report the
			findings to DPO Executive Management Team.
			Effective October 1, 2019, DHS developed and included a Self-
			attestation Supplemental form to add to the current application to verify
			information that cash assistance was
			not provided to an individual during the 10-year period that began on the
			date the individual was convicted in Federal or State court of having made a fraudulent statement or
			representation with respect to place of residency in order to
			simultaneously receive assistance
			from two or more States. In addition, DHS is continuing to work
			on revising the consolidated
			application to add the self-
			attestation questions for the
			customer to answer if they have falsely made a statement or
			misrepresentation with respect to
			place of residence in order to
			simultaneously receive assistance
			from two or more States.
			Partially Corrected:
			Start date: Previously started October 2019
			Estimated completion date:
			September 30, 2021

Finding	Program Name &	Type of	
Number	CFDA #	Finding	Current Status
2018-007	US Dept. of HHS	Reporting	Status:
Prior Year	Temporary	, reporting	Finding repeated in the current year
Finding: N/A	Assistance for		(2019-010).
DHS	Needy Families		(2017-010).
	Cluster (TANF)		Reason for Recurrence:
			Reconciliation of variances between
	93.558		TANF expenditures reported on the
			196R to TANF expenditures on SEFA
			was incomplete.
			·
			FY 2019/2020 Corrective Action
			Plan:
			TANF's 4th quarter ACF-196Rs are
			due on November 14th and are based
			on the expenditures reflected in
			SOAR as of September 30th at that
			point in time. The District's year-end
			financial close concludes in
			December concurrently with the
			CAFR. Adjustments to the TANF grant
			made after November 14th and
			reflected on the SEFA will not be
			reflected on the ACF-196Rs. DHHS- ACF does not allow access to their
			system to revise the ACF-196R's until
			the first quarter of the subsequent
			fiscal year. Consequently, TANF
			expenditures on the SEFA will not
			match the expenditures reported on
			the TANF AFC-196R submitted on
			November 14th.
			OCFO will modify procedures to
			acknowledge that expenditures on
			the AFC-196 will not match the TANF
			expenditures on the SEFA due to
			adjustments made after the
			November 14th, and document the
			performance of a variance analysis
			and reconciliation to identify,
			explain, and support the difference
			in expenditures between the two
			documents.
			Partially Corrected:
			Partially Corrected:
			Start date: September 30, 2020
			Estimated completion date: January 31, 2021
			January 31, 2021

Finding	Program Name &	Type of	Current Status
Number	CFDA #	Finding	Current Status
2018-008	US Dept. of HHS	Special Tests	Status:
Prior Year	Temporary	and Provisions -	Finding repeated in the current year
Finding: 2017-	Assistance for	Child Support	(2019-011).
011	Needy Families	Non-	
DHS/ESA	Cluster (TANF)	Cooperation	Reason for Recurrence:
	93.558		New issues with DCAS notices attributed to this finding reoccurring which were not found before; however, issues previously identified
			pertaining to internal controls were not found to reoccur this audit cycle. DHS' remediation activities are focused on ensuring notices contain correct required citations to federal regulations to support the agency's
			decision and that notices do not release from DCAS due to a "Data Invalidation Error".
			FY 2019/2020 Corrective Action Plan: DHS will work with DCAS to identify notices that failed to send and ensure they are re-sent. Additionally, DHS and DCAS will develop a process to ensure proper notices are sent, timely, on a regular basis.
			DHS will work to enhance and create notices to ensure the language is clear and concise and that the Federal regulation citations are included to support the Department's decision.
			DHS, Division of Program Development, Training and Quality Assurance, will continue to conduct random monthly internal case reviews of Child Support Sanction requests received by the Office of Attorney General, Child Support Services Division (OAG/CSSD) on a monthly basis to ensure the sanction was imposed accurately and timely. This review will also monitor notices for content and issuance.
			Partially Corrected: Start date: Previously started

Finding	Program Name & CFDA #	Type of	Command Status
Number	CFDA #	Finding	Current Status September 2020
			Estimated completion date:
			September 30, 2021
			,
2018-009 Prior Year Finding: 2017- 012 DHS/ESA	US Dept. of HHS Temporary Assistance for Needy Families Cluster (TANF) 93.558	Special Tests and Provisions - Income Eligibility and Verification System	Status: Finding repeated in the current year (2019-012).  Reason for Recurrence: The DCAS system cannot review and compare information obtained from the BENDEX Interface against information contained in the case record to determine whether it affects the applicants' or the recipients' eligibility or the amount of assistance due to a special character, an apostrophe, in the first name of the customer. DHS will work with DHCF/DCAS Project Team to develop system enhancements to automate the IEVS Batch Job containing special characters in the customers' names. In the interim, the DHCF/DCAS Triage Team monitors the IEVS Return File for exceptions and will manually process the data transmission.  FY 2019/2020 Corrective Action Plan: The DHCF/DCAS IT team is working to develop a long-term system enhancement to automate this process. In the interim, the DHCF/DCAS Triage team monitors the IEVS return file for exceptions and will manually process the data
			ransmissions.  Partially Corrected: Start date: Previously started September 2020
			Estimated completion date: September 30, 2021
2018-010	US Dept. of HHS Temporary Assistance for	Reporting; Special Tests and Provisions -	Status: Finding repeated in the current year (2019-014).

Finding Number	Program Name & CFDA #	Type of Finding	Current Status
•	_		Current Status
Prior Year	Needy Families	Penalty for	
Finding: 2017-	Cluster (TANF)	Failure to	Reason for Recurrence:
014		Comply With	There are three (3) issues which
DHS	93.558	Work	contribute to this finding. The first is
		Verification	the interface between DCAS and Q5i
		Plan	resulting in discrepancies and errors.
			DHS is continuing to work with the
			DCAS Team and Q5i system managers
			to ensure there is a clean and
			accurate file from DCAS to Q5i. The
			second issue is with documentation.
			DHS will continue to work with
			providers and case reviewers to
			ensure consistency and accuracy
			across files. Enhanced quality
			assurance reviews will be conducted
			to monitor and track discrepancies
			early in the process by: 1) Ensuring
			customers are assigned to a Service
			Provider; 2) The Service Provider has
			taken the necessary actions to
			engage and conduct outreach to the
			customers; and, 3) Ensuring sanctions
			are being requested timely. The
			third issue is verified hours in CATCH
			do not match reported hours on the
			ACF-199. DHS continues to review
			the systems' logic, in addition to
			working to amend the verification
			_
			plan to comply with federal
			requirements.
			EV 2040/2020 C
			FY 2019/2020 Corrective Action
			Plan:
			DHS is working with DHCF/DCAS to
			ensure that the hours in DCAS will be
			tied to an employer. The issue arises
			when there may be multiple
			employers for a participant, yet
			hours have not been tied to a specific
			employer in DCAS. Going forward,
			hours will be tied to an employer, so
			that when an employment evidence
			ends, the hours will also end. This
			information will then follow with the
			Q5i interface and thus be properly
			reflected on the ACF-199 report.
			Terrected on the ACF-199 report.

Cip dip a	Dragge Mama G	Type of	
Finding Number	Program Name & CFDA #	Type of Finding	Current Status
			To remediate the current data issues, two cleanup actions will be undertaken:
			1. A list of all customers in DCAS with no work participation and an open work participation evidence will be generated and all of these cases will have their work participation evidence closed.
			2. A list of all customers who have work hours recorded in the system will have their work hours checked against their pay stubs or other verification items and corrected in DCAS.
			Additionally, workers with DCAS access will receive refresher training on how to use the work participation and work hours evidences.
			Furthermore, DHS is implementing the following activities:
			<ol> <li>DHS will closely monitor TANF customers assigned to the "Closed" queue, daily, to ensure that customers are assigned to the appropriate queue.</li> </ol>
			DHS, Division of Program Development, Training and Quality Assurance will conduct random monthly internal case reviews for customers that show zero participation hours in CATCH to ensure the customer was: 1.) Assigned to a provider; 2.) The provider has taken the necessary actions to engage and conduct outreach to the customers; and, 3.) That Sanctions are being requested timely. The Audit Unit will also review DCAS to ensure the
			sanction was imposed accurately and timely. The DHS Office of

		_	
Finding Number	Program Name &	Type of	Current Status
Number	CFDA #	Finding	Quality Assurance (OQA) will also review the notices to ensure the content is correct and the notices are being released from DCAS.  2. DHS will work with employment stakeholders (DHS staff, Service Providers, and Customers) to revise the TANF Work Verification Plan to reference program model changes along with challenges presented by the 2020 COVID-19 public health pandemic. A DHS Working Group will be convened in the first quarter of FY 2021, with recommendations submitted to DHS leadership in the second quarter and submitted to the US Department of Health and Human Services (HHS) for approval in the third quarter.  Partially Corrected: Start date: Previously started September 2019 Estimated completion date: September 30, 2021
2018-011 Prior Year Finding: 2017- 015 CFSA	US Dept. of HHS Foster Care - Title IV-E 93.658	Eligibility	Status: Finding repeated in the current year (2019-018).  Reason for Recurrence: CFSA systematically worked over the past 12 months to digitize its licensing records for easier access and retrieval. We estimate that, by March of 2021, we were able to create digital copies of approximately 50% of the entire licensing documentation catalogue for active foster parents. This is due, in part, to a resource shortage, as a key member of the team responsible for this project left the Agency.

Finding	Program Name &	Type of	Current Status
Finding Number	Program Name & CFDA #	Type of Finding	Current Status  The recurrence of the finding reflects that improvements are still needed. Some of the planned improvements include closer coordination between CFSA administrations which are responsible for licensing documentation; enhanced, direct collaboration with contracted providers; and faster follow-up. The planned corrective action is to increase the digitization of new licensing records, and to resume the digitization of existing licensing records at the conclusion of the public health emergency.  FY 2019/2020 Corrective Action Plan:  For bullet #1 of findings noted, where CFSA was unable to provide documentation supporting that a youth over 18 was a full-time student expected to complete their secondary schooling or equivalent vocational or technical training:  CFSA has a "system edit" in its FACES management information system to claim IV-E reimbursement only when the social worker has entered information in the system that indicates compliance with those requirements. In this case, all three youth self-reported full-time employment and their assigned social workers (as is required in CFSA's Title IV-E State Plan) indicated in the FACES employment module that each of them was working full time. When ACF promulgates rules defining the documentation requirements for IV-E claiming for youth ages 18-21, CFSA will adjust its record keeping requirements accordingly.  For bullets #2 through #7 of
			findings noted:
			CFSA has worked diligently over the past 12 months to continue

Finding	Program Name &	Type of	
Number	CFDA #	Finding	Current Status
			digitization of its licensing records
			for easier access and retrieval.
			Corrective action following the FY 2018 Single Audit under Uniform
			Guidance included standard
			cataloguing of documentation for
			new foster parents, accountability
			process improvements, and diligent
			scanning and storing of key
			documentation. During the District's
			public health emergency in response to the coronavirus pandemic,
			retrieval of supporting
			documentation that had not been
			already digitized was difficult, which
			accounts for the rather high number
			of unprovided licensing files
			(compared to previous Single Audit under Uniform Guidance audits). The
			planned corrective action following
			the end of the public health
			emergency is to resume digitization
			of existing licensing records, and to
			implement real-time digitization of
			new licensing records.
			Partially Corrected:
			Start date: Previously started
			July 1, 2019
			Estimated completion date:
			For bullet #1 of findings noted -
			Within a reasonable time period, not
			to exceed 180 days, following a federal update to the Title IV-E
			Foster Care Eligibility Review tool.
			Exact time to corrective action
			cannot be determined until we
			understand the nature of the federal
			compliance rule.
			For bullets #2 through #7 of findings
			noted - Within 12 months following
			the end of the public health
			emergency.
2018-012	US Dept. of HHS	Eligibility	Status:
Prior Year	Adoption Assistance		Finding repeated in the current year
Finding: 2017-	- Title IV-E		(2019-020).
016			

Finding	Program Name &	Type of	
Number	CFDA #	Finding	Current Status
CFSA	93.659		Reason for Recurrence:  CFSA systematically worked over the past 12 months to digitize its licensing records for easier access and retrieval. We estimate that, by March of 2021, we were able to create digital copies of approximately 50% of the entire licensing documentation catalogue for active foster parents. This is due, in part, to a resource shortage, as a key member of the team responsible for this project left the Agency.
			The recurrence of the finding reflects that licensing records for cases adopted 7-10 years ago remain a challenge. It also highlights that improvements are still needed. Some of the planned improvements include closer coordination between CFSA administrations which are responsible for licensing documentation; enhanced, direct collaboration with contracted providers; and faster follow-up. The planned corrective action is to increase the digitization of new licensing records at both initial licensing of the foster home, and during the adoption finalization.
			FY 2019/2020 Corrective Action Plan: To a great extent, document retrieval for this year's Single Audit under Uniform Guidance was proven difficult due to the public health emergency due to the coronavirus pandemic. CFSA has worked diligently over the past 12 months to continue digitization of its licensing records for easier access and retrieval. Corrective action following the FY 2018 Single Audit under Uniform Guidance included standard cataloguing of documentation for new foster parents, accountability process improvements, and diligent scanning and storing of key documentation. During the District's

Finding	Program Name &	Type of	
Number	CFDA #	Finding	Current Status
Number		T mums	public health emergency in response to the coronavirus pandemic, retrieval of supporting documentation that had not been already digitized was difficult, which accounts for the rather high number of unprovided licensing files (compared to previous Single Audit under Uniform Guidance audits). The planned corrective action following the end of the public health emergency is to resume digitization of existing licensing records, and to implement real-time digitization of new licensing records.  Partially Corrected: Start date: Previously started January 1, 2018 Estimated completion date: Within 6 to 12 months following the end of the public health emergency.
2018-013 Prior Year Finding: 2017- 019 DHCF/ DHS/ESA	US Dept. of HHS Medicaid Cluster 93.775, 93.777, 93.778	Eligibility	Status: Finding repeated in the current year (2019-023).  Reason for Recurrence: In one instance, staff failed to enter the resources listed on the application into the system of record (ACEDS) in order to determine eligibility. Monthly ESA case reviews, including of the Orphan/Default report, will be conducted to ensure the application contents match the information entered in the eligibility determination system, checking for completeness and that eligibility is being determined accurately and timely.  FY 2019/2020 Corrective Action Plan:  DHS Activities:

Finding	Program Name &	Type of	
Number	CFDA#	Finding	Current Status
			ESA will adopt the outlined internal
			control procedure to ensure that
			documentation is maintained to
			support eligibility decisions and that
			the customer files are properly
			retained.
			<ul> <li>DHS, Division of Program</li> </ul>
			Operations (DPO) Executive
			Management Team will continue
			to receive and monitor statistical
			scanning reports (Pending and
			Hold Batch and Orphan/Default
			reports) from the Office of
			Information Systems (OIS) to
			check for staff scanning
			inconsistencies such as
			documents scanned that are considered orphaned (unable to
			attach to a case) across all
			service centers. The Office of
			Information Systems (OIS) will
			provide access to all DPO
			Management staff for the
			upgraded Datacap/DIMS
			Management Dashboard. This new
			dashboard will provide and
			produce reports per Service
			Center/Division of scanning
			inconsistencies at the worker and
			Service Center level. DPO
			Management will develop a
			periodic monitoring procedure
			utilizing the upgraded report
			functionality to ensure that
			documents are scanned and
			tagged properly into DIMS. OIS is
			in the process of designing the
			dashboard and the anticipated
			launch date is December 31,
			2020. DPO will share reports from this dashboard regarding any
			inconsistencies with DHCF at bi-
			weekly compliance meetings
			noted below.
			noted below.
			DHS, Division of Program
			Development, Training and
			Quality Assurance (DPDT & QA),
	<u> </u>	<u> </u>	Quality Assurance (DI DI a QA),

Finding	Drogram Namo G	Type of	
Finding Number	Program Name &	Type of	Current Status
Number	CFDA #	Finding	Current Status  Office of Quality Assurance will continue to conduct monthly internal audits on the Orphan/Default report to ensure applications and supporting documents are being properly scanned and associated with the correct case in DIMS and checking for completeness. The Office of Quality Assurance will continue to report the findings to DPO Executive Management Team.  • DHS/ESA, Training Unit will draft a memorandum in FY21, Quarter 1, to share with DHS/ESA eligibility staff to reiterate Medicaid requirements for resources and assets when determining eligibility. After completion, the memo will be shared by DPO Management staff during its routine daily meetings.  • DHCF will strengthen its oversight of DHS' maintenance of eligibility documentation in the following ways:  • Require DHS to establish and submit to DHCF, a written policy, procedure, and workflow document corresponding to (1) the OIS process reviewing scanning inconsistencies across service centers, and (2) the DPDTQA internal audit process for Orphan/Default reports regarding the reliability and accuracy of documents in DIMS. The policy and procedure documents will be completed by November 30, 2020;

Finding	Program Nama G	Type of	
Finding Number	Program Name & CFDA #	Type of Finding	Current Status
Number	CFDA #	Finding	Current Status  Convene and implement a standing bi-weekly meeting between DEP, and DHS' DPDTQA to monitor and discuss compliance with documentation requirements, including the findings regarding the aforementioned orphan documents, and DIMS procedures. The bi-weekly meetings will commence by December 30, 2020;  Update the MOU between DHCF and DHS to include the respective agency responsibilities in relation to oversight of eligibility documents. The MOU will be updated by December 15, 2020.  Partially Corrected: Start date: October 2020 Estimated completion date: September 2021
2018-014 Prior Year Finding: N/A DHCF	US Dept. of HHS Medicaid Cluster 93.775, 93.777, 93.778	Special Tests and Provisions - Utilization Control and Program Integrity	Corrected.
2018-015 Prior Year Finding: 2017- 020 DOH	US Dept. of HHS HIV Emergency Relief Project Grants 93.914	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	Status: Finding repeated in the current year (2019-024).  Reason for Recurrence: The FY 2019 finding was issued while the corrective action plan (CAP) for the prior year's (FY 2018) finding was still in the process of being implemented. The CAP included the issuance of an agency-wide Standard Operating Procedure for Time and Effort Certification, plus

Finding	Program Name &	Type of	
			Current Status
Number	CFDA #	Finding	development of a sufficient format (i.e., system and tool) for obtaining supervisors' documented review and certification of their staff's budget-to-actual time on a quarterly basis.  FY 2019/2020 Corrective Action Plan: The current corrective action plan (CAP) is progressing and will be fully implemented by January 31, 2021. Corrective actions include the provision of instructions and on-going mandatory training for 100% of supervisors on procedures for reviewing payroll summaries, certifying actual proportion of time and effort of employees and making adjustments on budgets and employee activities by cost objective.  Partially Corrected: Start date: Previously started October 1, 2019 Estimated completion date: January 31, 2021
2018-016 Prior Year Finding: 2017- 021 DOH	US Dept. of HHS HIV Care Formula Grants 93.917	Activities Allowed or Unallowed and Allowable Costs/Cost Principles	Status: Finding repeated in the current year (2019-025).  Reason for Recurrence: The FY 2019 finding was issued while the corrective action plan (CAP) for the prior year's (FY 2018) finding was still in the process of being implemented. The CAP included the issuance of an agency-wide Standard Operating Procedure for Time and Effort Certification, plus development of a sufficient format (i.e., system and tool) for obtaining supervisors' documented review and certification of their staff's budget-to-actual time on a quarterly basis.  FY 2019/2020 Corrective Action Plan:

Finding Number	Program Name & CFDA #	Type of Finding	Current Status
			The current corrective action plan (CAP) is progressing and will be fully implemented by January 31, 2021. Corrective actions include the provision of instructions and on-going mandatory training for 100% of supervisors on procedures for reviewing payroll summaries, certifying actual proportion of time and effort of employees and making adjustments on budgets and employee activities by cost objective.  Partially Corrected: Start date: Previously started October 1, 2019 Estimated completion date: January 31, 2021

## GOVERNMENT OF THE DISTRICT OF COLUMBIA

OFFICE OF THE CHIEF FINANCIAL OFFICER



**Jeffrey S. DeWitt** Chief Financial Officer

## Appendix B

## Government of the District of Columbia Management's Corrective Action Plan

			Estimated	
Page			Completion	
	Finding	Contact	-	Corrective Action
Number	Finding	Contact	Date	Corrective Action
42	2019-001	Steph Bloch	September 30,	The Department of Human Services (DHS)
		Newman, Deputy	2021	and the Department of Health Care Finance
		Administrator for Innovation &		DCAS team (DHCF) agrees with the findings.
		Change		The proposed solution will address each of
		Management		these issues in the following manner:
				Error in the batch sequence resulted in
				3,655 cases being erroneously issued for two months
				The overpayment dates are in October and November 2018 and were reported upon
				original submission date of February 17,
				2019. DHS/DCAS updated the technical QA process to prevent batch failures, and a fix
				went into production shortly after on December 12, 2019.
				,
				5,410 cases of overpayments were identified which resulted from late
				recertifications defaulting to the first day
				of the month
				The overpayment dates of this 5,410
				reflects all cases impacted from 2016 through 2019. In fiscal year 2019, the
				impacted cases were 1,789 totaling
				\$160,621.
				Overpayments were reported on February
				17, 2019. A memo was sent to staff in
				March 2019 and DHS/DCAS added a system

Dogo			Estimated	
Page Number	Finding	Contact	Completion Date	Corrective Action
Number	Finding	Contact	Date	validation in May 2019. Enhancements were completed in DCAS to update the new certification period start date to the date.  1,001 cases of underpayments from the DCAS system double counting income  Overpayment date was in July 2019 and were reported on February 17, 2019. DHS/DCAS required a manual report of duplicate benefit types worked by the program and redesigned the BENDEX System.  1,982 of SNAP cases actively receiving a benefit without SSN  Overpayment dates are between October 2016 and October 2019. The cost for specific fiscal year is unknown as issue was initially reported in 2018. Overpayments were reported on February 17, 2019. DHS/DCAS mitigation strategy is to update system logic to identify individuals without a SSN at time of application, and enable system to
				terminate cases after 30-60 days from initial application if SSN has not been provided.
45	2019-002	Clarice Wood, Associate Treasurer	September 30, 2021	The OCFO/OFT and DHS concur with the findings.  As a result of the findings, OCFO/OFT is committed to working with Fidelity National Information Services (FIS) to ensure:  • Strict procedures and practices are in place to ensure contract compliance. UPO has hired a new manager and maintains a supervisor at each location. This change was effective November 4, 2019 and has made a positive impact on the requirement to review and sign off on Balance sheets within 48 hours and positive improvements in the facilities implemented by new management, including the handling of card issuance during the COVID pandemic.

Page			Estimated Completion	
Number	Finding	Contact	Date	Corrective Action
_	Finding	Contact	-	<ul> <li>All Intake Procedures and Processes found in the EBT Manual are followed thoroughly by all employees. Effective as of September 22, 2020, UPO updated the Employee Manual with new standard operating procedures to combat and prevent further incidents of errors, including the handling and acceptance of only fully complete Referral forms without photo copied signatures. UPO will continue to enforce the progressive disciplinary process for errors or omissions identified in the course of daily operations.</li> <li>All UPO Staff have been updated on the new procedures and practices for operational efficiency, effective September 22, 2020. Each staff member will sign a form stating they understand and will follow the new policy and processes in the Employee Manual by September 28, 2020.</li> <li>The Quality Improvement Plan created and implemented in February 2019 is still in effect and enforced. The quality review process involves a multilayer system check for performance improvement. This counterbalancing system is regulated using 4 layers of review: daily at the staff and the supervisor/manager level, weekly at the division director level, and quarterly at UPO's Office of Performance Management level. This process should ensure all aspects of the program are reviewed and assessed by the appropriate personnel. The new manager will continue to look for opportunities to create policy, procedures, and practices that ensure all checks and balances are appropriately followed to minimize and</li> </ul>
				appropriately followed to minimize and eliminate audit findings as well as create operational efficiency. This will continue to be an ongoing effort.

Page			Estimated Completion	
Number	Finding	Contact	Date	Corrective Action
				DHS Activities:  All DPO Staff will complete the Photo ID Referral form in its entirety at the time of request. No forms will be pre-signed by DPO Staff and the use of all photocopies will be disposed of and this practice will be eliminated immediately. Prior to being signed by a Supervisor, all EBT referrals must be completed with all identifying information along with proper signatures. DPO Management sent out an email on September 18, 2020 regarding the EBT Authorization referral process. All Service Center Managers will follow up with staff during the Service Center huddles regarding the completion of the form. A copy of all EBT Authorization referral forms will be retained and maintained in a secured place by the Program Manager and a review of these forms will be randomly conducted on a quarterly basis by a designated person from the Deputy of Program Operations' Office.
48	2019-003	Rob Jaber, Director OFNS, District of Columbia Public Schools	November 30, 2020	DCPS agrees with the conditions and recommendations of this finding.  The DCPS corrective action plan includes the following steps:  • Conduct weekly and monthly meal reconciliation reports for SOP schools by comparing DCPS student absence data with the Mosaic POS weekly and monthly meal counts to identify erroneous meals. The reconciliation process will be updated to include breakfast.  • Conduct weekly and monthly meal reconciliation reports for CEP schools by comparing DCPS in seat attendance (ISA) totals to the Mosaic weekly and monthly meal count totals to identify overages in meal served.  • Pull two reports from the Mosaic POS system when compiling data for a claim

Page			Estimated Completion	
Number	Finding	Contact	Date	Corrective Action
				period. The first is the All Schools Sales Overview Report, which lists total meal counts for the given month by school. The second is the Daily Sales Summary Report, which lists daily meal counts by school.  • Close the claim period in the Mosaic POC system to ensure meal counts do
				<ul> <li>POC system to ensure meal counts do not get modified after claim reports are pulled.</li> <li>Continue training our vendors, specifically field service workers, to ensure meal transactions are complete inputted in the Mosaic POS system before claim period reports are pulled.</li> <li>Recommunicate the requirement that all meal production reports are reviewed and approved by the cafeteria manager daily.</li> </ul>
50	2019-004	Rob Jaber, Director OFNS, District of Columbia Public Schools	November 30, 2020	DCPS agrees with the conditions and recommendations of this finding.  DCPS will add an additional layer of review control to validate verifications made. This will occur by increasing the number of compliance team members to review the verifications from one to three. In addition to the FARM Assistant, the Specialist, Nutrition, Compliance & Partnerships, and the Manager, Nutrition, Compliance & Partnerships (or designee) will independently review the verifications and then meet together as a team to discuss and ensure they have come to the same conclusion on eligibility. This will occur annually during the assigned review period.
52	2019-005	Genee Hayes, Manager Portfolio and Asset Management Division	December 31, 2021	DHCD agrees with the conditions and recommendations of this finding.  Since there are confirmed issues of noncompliance, PAMD will conduct an ad hoc desk audit in the first quarter of FY21; a detailed on-site review will not occur due to the COVID-19 health emergency. PAMD

Page			Estimated Completion	
Number	Finding	Contact	Date	Corrective Action
Number	i ilidiliş	Contact	Duce	will create a detailed corrective action plan for the Maycroft's property management team to employ going forward. The monitoring will include any current tenant households that were miscalculated at move-in (30%), and any new households that have moved into the community since initial lease-up. Once the COVID-19 health emergency is over, PAMD will prioritize an on-site review of this property.
54	2019-006	Genee Hayes, Manager Portfolio and Asset Management Division	March 1, 2021	DHCD agrees with the conditions and recommendations of this finding.  DHCD recognizes the need to have better policies and procedures and tracking in place to ensure that inspections are performed for those units in which housing quality inspections are required, and to ensure that any needed repairs are completed timely. As part of this policy development, DHCD will work with internal legal counsel to explore permissible enforcement procedures that address instances where management refuses to allow re-inspections or simply is unable or unwilling to correct needed repairs.  PAMD has renewed attempts to contact the property to verify completion of repairs and will prioritize an on-site visit as soon as onsite physical inspections resume after the COVID-19 public health emergency ends.
56	2019-007	Clara Ann McLaughlin, Chief, Office of Grants Management	January 31, 2021	The Department of Health concurs with the finding.  The current corrective action plan (CAP) is progressing and will be fully implemented by January 31, 2021. Corrective actions include the provision of instructions and ongoing mandatory training for 100% of supervisors on procedures for reviewing payroll summaries, certifying actual proportion of time and effort of employees and making adjustments on budgets and employee activities by cost objective.

Page Number	Finding	Contact	Estimated Completion Date	Corrective Action
59	2019-008	Munetsi Musara, Chief Financial Officer	May 1, 2020	UDC concurs with the condition and recommendation of the finding.  UDC updated the format on the reporting form to allow for the inclusion of any required adjustments to allow federal expenditures to be reported the appropriate amounts.
61	2019-009	Garlinda Bryant-Rollins, Deputy Administrator of the Division of Program Operations	September 30, 2021	The District does not dispute the findings provided by BDO for the noted eligibility  To ensure that files are properly retained, and that documentation is maintained: DHS, Division of Program Operations (DPO) Executive Management Team will continue to receive and monitor statistical scanning reports (Pending and Hold Batch and Orphan/Default reports) from the Office of Information Systems (OIS) to check for staff scanning inconsistencies such as documents scanned that are considered orphaned (unable to attach to a case) across all service centers. The DPO Management Office will monitor to ensure that documents are scanned and tagged on the same day they are received per the Business Process Redesign (BPR). The Office of Information Systems (OIS) will provide access to all DPO Management staff for the upgraded Datacap/DIMS Management Dashboard. This new dashboard will provide and produce reports per Service Center/Division of scanning inconsistencies at the worker and Service Center level. DPO Management will use this new upgrade to make sure that all documents are scanned and tagged properly into DIMS. OIS is in the process of designing the dashboard and the anticipated launch date is December 31, 2020.  DHS, Division of Program Development, Training and Quality Assurance (DPDT & QA), Office of Quality Assurance will continue to conduct monthly internal audits on the Orphan/Default report to ensure applications and supporting documents are being properly scanned and associated with

Page			Estimated Completion	
Number	Finding	Contact	Date	Corrective Action
				the correct case in DIMS and checking for completeness. The Office of Quality Assurance will continue to report the findings to DPO Executive Management Team.
				Effective October 1, 2019, DHS developed and included a Self-attestation Supplemental form to add to the current application to verify information that cash assistance was not provided to an individual during the 10-year period that began on the date the individual was convicted in Federal or State court of having made a fraudulent statement or representation with respect to place of residency in order to simultaneously receive assistance from two or more States. In addition, DHS is continuing to work on revising the consolidated application to add the self-attestation questions for the customer to answer if they have falsely made a statement or misrepresentation with respect to place of residence in order to simultaneously receive assistance from two or more States.
63	2019-010	Morris Thorpe, Controller	January 31, 2021	DHS concurs with this finding.  TANF's 4th quarter ACF-196Rs are due on November 14th and are based on the expenditures reflected in SOAR as of September 30th at that point in time. The District's year-end financial close concludes in December concurrently with the CAFR. Adjustments to the TANF grant made after November 14th and reflected on the SEFA will not be reflected on the ACF-196Rs. DHHS-ACF does not allow access to their system to revise the ACF-196R's until the first quarter of the subsequent fiscal year. Consequently, TANF expenditures on the SEFA will not match the expenditures reported on the TANF AFC-196R submitted on November 14th.  OCFO will modify procedures to
				acknowledge that expenditures on the AFC- 196 will not match the TANF expenditures

Page			Estimated Completion	
Number	Finding	Contact	Date	Corrective Action on the SEFA due to adjustments made after the November 14th, and document the performance of a variance analysis and reconciliation to identify, explain, and support the difference in expenditures between the two documents.
65	2019-011	David J. Ross, Deputy Administrator of the Division of Customer Workforce, Employment and Training	September 30, 2021	DHS concurs with this finding.  DHS will work with DCAS to identify notices that failed to send and ensure they are resent. Additionally, DHS and DCAS will develop a process to ensure proper notices are sent, timely, on a regular basis.  DHS will work to enhance and create notices to ensure the language is clear and concise and that the Federal regulation citations are included to support the Department's decision.  DHS, Division of Program Development, Training and Quality Assurance, will continue to conduct random monthly internal case reviews of Child Support Sanction requests received by the Office of Attorney General, Child Support Services Division (OAG/CSSD) on a monthly basis to ensure the sanction was imposed accurately and timely. This review will also monitor notices for content and issuance.
67	2019-012	Steph Bloch Newman, Deputy Administrator for Innovation & Change Management	September 30, 2021	DHS agrees with the finding in this report  The DHCF/DCAS IT team is working to develop a long-term system enhancement to automate this process. In the interim, the DHCF/DCAS Triage team monitors the IEVS return file for exceptions and will manually process the data transmissions.
69	2019-013	David J. Ross, Deputy Administrator of the Division of Customer Workforce, Employment and Training	September 30, 2021	DHS agrees with the findings in the report and this recommendation.  DHS, Division of Customer Workforce, Employment and Training (DCWET) is working to automate customer assignments for active TANF customers that are participating in the TANF grant. This

Page		_	Estimated Completion	
Number	Finding	Contact	Date	Corrective Action
				automation will ensure that customers are being assigned to a Temporary Employment Provider (TEP) timely. DHS/DCWET anticipates that this feature will be deployed on September 30, 2020.
				DHS, Division of Customer Workforce, Employment and Training, Sanction Unit staff will closely monitor TANF customers assigned to the "Closed" queue, daily, to ensure that customers are assigned to the appropriate queue. In addition, the Sanction Unit will work with the DHS IT Department to create an automated process to run a quarterly review of all cases in the "Closed" queue to ensure that only customers with a closed TANF case remain in the "Closed" queue.
				DHS, Division of Program Development, Training and Quality Assurance will conduct random monthly internal case reviews for customers that show zero participation hours in CATCH to ensure the customer was:  1.) Assigned to a provider;  2.) The provider has taken the necessary actions to engage and conduct outreach to the customers; and,  3.) That Sanctions are being requested timely. The Audit Unit will also review DCAS to ensure the sanction was imposed accurately and timely. The DHS Office of Quality Assurance (OQA) will also review the notices to ensure the content is correct and the notices are being released from DCAS.
71	2019-014	Brian Campbell, Senior Policy Advisor	September 30, 2021	DHS agrees with the findings in the report.  DHS is working with DHCF/DCAS to ensure that the hours in DCAS will be tied to an employer. The issue arises when there may be multiple employers for a participant, yet hours have not been tied to a specific employer in DCAS. Going forward, hours will be tied to an employer, so that when an employment evidence ends, the hours will also end. This information will then follow with the Q5i interface and thus be properly reflected on the ACF-199 report.

_			Estimated	
Page Number	Finding	Contact	Completion Date	Corrective Action
Nullibel	Fillullig	Contact	Date	To remediate the current data issues, two
				cleanup actions will be undertaken:
				<ol> <li>A list of all customers in DCAS with no work participation and an open work participation evidence will be generated and all of these cases will have their work participation evidence closed.</li> </ol>
				<ol> <li>A list of all customers who have work hours recorded in the system will have their work hours checked against their pay stubs or other verification items and corrected in DCAS.</li> </ol>
				Additionally, workers with DCAS access will receive refresher training on how to use the work participation and work hours evidences.
				Furthermore, DHS is implementing the following activities:
				DHS will closely monitor TANF     customers assigned to the "Closed"     queue, daily, to ensure that customers     are assigned to the appropriate queue.
				DHS, Division of Program Development, Training and Quality Assurance will conduct random monthly internal case reviews for customers that show zero participation hours in CATCH to ensure the customer was: 1.) Assigned to a provider; 2.) The provider has taken the necessary actions to engage and conduct outreach to the customers; and, 3.) That Sanctions are being requested timely. The Audit Unit will also review DCAS to ensure the sanction was imposed accurately and timely. The DHS Office of Quality Assurance (OQA) will also review the notices to ensure the content is correct and the notices are being released from DCAS.
				DHS will work with employment stakeholders (DHS staff, Service Providers, and Customers) to revise the

			Estimated	
Page			Completion	
Number	Finding	Contact	Date	Corrective Action TANF Work Verification Plan to
				reference program model changes
				along with challenges presented by the
				2020 COVID-19 public health pandemic.
				A DHS Working Group will be convened
				in the first quarter of FY 2021, with
				recommendations submitted to DHS
				leadership in the second quarter and
				submitted to the US Department of Health and Human Services (HHS) for
				approval in the third quarter.
				approvat in the time quarter.
75	2019-015	Tunde Eboda,	September 30,	DHS agrees with the finding in the report.
		Program	2020	DHS/CSBG office has reestablished the
		Officer/State CSBG		FSRS.gov (FFATA reporting portal) account
		Administrator		and have begun to update all required
				information for current federal fiscal year
				(FY 2020) and henceforth. Additionally, the
				CSBG office has modified the existing article
				(Reports) of the Grant Agreement between DHS and the sub-grantee organization in
				order to meet the sub-grantee requirements
				of the FFATA.
77	2010 011	61 1011	N1/A	DCDC WILLIAM INC.
77	2019-016	Cheryl Ohlson, Ph.D., Deputy	N/A; Implementation	DCPS agrees with the conditions and recommendations of this finding.
		Chief of Early	will occur	
		Childhood	if/when DCPS	DCPS does not have Head Start funding for
		Education,	receives Head	SY 20-21; therefore, DCPS did not move
		Office of Elementary	Start funding	forward with implementation of an income verification process. If/when DCPS receives
		Schools, District		Head Start funding again, an income
		of Columbia		verification process will be implemented,
		Public Schools		per Head Start requirements using the
				process and forms developed in the pilot.
				DCPS will implement the process with all
				families who apply for Head Start.
79	2019-017	Cheryl Ohlson,	October 31,	DCPS agrees with the conditions and
		Ph.D., Deputy	2021	recommendations of this finding.
		Chief of Early		DCDC to work a Hand Charles of the CV 20 24
		Childhood Education,		DCPS is not a Head Start grantee in SY 20-21 so an annual report will not be produced.
		Office of		DCPS is preparing a SY 18-19 annual report
		Elementary		(in retrospect) and will publish the report to
		Schools, District		the DCPS website by October 31, 2020. In
		of Columbia		addition, The Early Childhood Education
		Public Schools		Division has trained three levels of staff

			Estimated	
Page	F2 42	Carata at	Completion	Compating Assista
Number	Finding	Contact	Date	Corrective Action (Chief, Deputy Chief, Directors and
				Administrative Coordinators) on the Head
				Start requirement for an annual report.
				When/if DCPS applies and/or receives Head
				Start funding again, individuals in all these
				positions will ensure a report is prepared.  The Division will also put in place an annual
				program calendar to identify due dates for
				all Head Start required reports in order to
				anticipate and track progress.
81	2019-018	John Simmons,		CFSA concurs with the findings.
		Jr., Business	\\/:+\-:	For hollet #4 of Coding parts down as
		Services Administrator	Within a reasonable	For bullet #1 of findings noted, where CFSA was unable to provide documentation
		Administrator	time period,	supporting that a youth over 18 was a full-
			not to exceed	time student expected to complete their
			180 days,	secondary schooling or equivalent vocational
			following a federal update	or technical training:
			to the Title IV-	CFSA has a "system edit" in its FACES
			E Foster Care	management information system to claim
			Eligibility	IV-E reimbursement only when the social
			Review tool. Exact time to	worker has entered information in the system that indicates compliance with those
			corrective	requirements. In this case, all three youth
			action cannot	self-reported full-time employment and
			be determined until we	their assigned social workers (as is required in CFSA's Title IV-E State Plan) indicated in
			understand the	the FACES employment module that each of
			nature of the	them was working full time. When ACF
			federal	promulgates rules defining the
			compliance rule.	documentation requirements for IV-E claiming for youth ages 18-21, CFSA will
				adjust its record keeping requirements
				accordingly.
			Within 12	For bullets #2 through #7 of findings
			months	noted:
			following the	CFSA has worked diligently over the past 12
			end of the public health	months to continue digitization of its
			emergency.	licensing records for easier access and
				retrieval. Corrective action following the FY
				2018 Single Audit under Uniform Guidance included standard cataloguing of
				documentation for new foster parents,
				accountability process improvements, and
				diligent scanning and storing of key

Page			Estimated Completion	
Number	Finding	Contact	Date	Corrective Action
				documentation. During the District's public health emergency in response to the coronavirus pandemic, retrieval of supporting documentation that had not been already digitized was difficult, which accounts for the rather high number of unprovided licensing files (compared to previous Single Audit under Uniform Guidance audits). The planned corrective action following the end of the public health emergency is to resume digitization of existing licensing records, and to implement real-time digitization of new licensing records.
84	2019-019	John Simmons, Jr., Business Services Administrator	September 30, 2020	CFSA concurs with the facts of the finding.  CFSA will submit a negative adjustment on the Q4 FY 2020 claim for the proposed disallowed costs.  Because project evaluation activities have ended along with the Waiver itself, expense reporting and claiming for this activity is discontinued going forward.
86	2019-020	John Simmons, Jr., Business Services Administrator	Within 6 to 12 months following the end of the public health emergency.	CFSA concurs with the findings.  To a great extent, document retrieval for this year's Single Audit under Uniform Guidance was proven difficult due to the public health emergency due to the coronavirus pandemic. CFSA has worked diligently over the past 12 months to continue digitization of its licensing records for easier access and retrieval. Corrective action following the FY 2018 Single Audit under Uniform Guidance included standard cataloguing of documentation for new foster parents, accountability process improvements, and diligent scanning and storing of key documentation. During the District's public health emergency in response to the coronavirus pandemic, retrieval of supporting documentation that had not been already digitized was difficult, which accounts for the rather high number of unprovided licensing files (compared to previous Single Audit under Uniform

Page			Estimated Completion	
Number	Finding	Contact	Date	Corrective Action
				Guidance audits). The planned corrective action following the end of the public health emergency is to resume digitization of existing licensing records, and to implement real-time digitization of new licensing records.
89	2019-021	John Simmons, Jr., Business Services Administrator	September 30, 2020	CFSA concurs with the facts of the finding.  CFSA will submit a negative adjustment on the Q4 FY 2020 claim for the proposed disallowed costs.  Calculation of the IV-E Adoption Assistance maintenance claim involves a manual analysis of expenditure data to include costs that are systemically excluded due to "AFDC-relatedness" requirements that are obsolete. During the calculation of the 2nd quarter claim, CFSA erroneously claimed \$9,033 in FFP based on IV-E unallowable expenditures made on behalf of three children who we identified during the manual analysis. These unallowable expenditures are uncommon.  The Business Services Administration staff have updated the claiming process to include a secondary edit to exclude such costs from the claim when they occur.
91	2019-022	Melisa Byrd, Senior Deputy Director and Medicaid Director	November 30, 2020	DHCF agrees with the facts of the finding.  Please note, however, that DHCF's drug rebate vendor made efforts to collect both of the outstanding balances noted in the Condition including sending dunning notices and including the details of outstanding receivables in section 3 of each subsequent invoice.  In order to apply interest to amounts paid late, but prior to the production of the next quarterly invoice, DHCF's drug rebate vendor is calculating interest on outstanding balances weekly rather than quarterly.  DHCF concurs with the findings.
		Senior Deputy		

Page	Finding	Contact	Estimated Completion	Corrective Action
Number	Finding	Director and	Date	Corrective Action  DHS Activities:
		Medicaid Director		ESA will adopt the outlined internal control procedure to ensure that documentation is maintained to support eligibility decisions and that the customer files are properly retained.
			December 31, 2020	• DHS, Division of Program Operations (DPO) Executive Management Team will continue to receive and monitor statistical scanning reports (Pending and Hold Batch and Orphan/Default reports) from the Office of Information Systems (OIS) to check for staff scanning inconsistencies such as documents scanned that are considered orphaned (unable to attach to a case) across all service centers. The Office of Information Systems (OIS) will provide access to all DPO Management staff for the upgraded Datacap/DIMS Management Dashboard. This new dashboard will provide and produce reports per Service Center/Division of scanning inconsistencies at the worker and Service Center level. DPO Management will develop a periodic monitoring procedure utilizing the upgraded report functionality to ensure that documents are scanned and tagged properly into DIMS. OIS is in the process of designing the dashboard and the anticipated launch date is December 31, 2020. DPO will share reports from this dashboard regarding any inconsistencies with DHCF at bi-weekly compliance meetings noted below.
			December 31, 2020	DHS, Division of Program Development, Training and Quality Assurance (DPDT & QA), Office of Quality Assurance will continue to conduct monthly internal audits on the Orphan/Default report to ensure applications and supporting documents are being properly scanned and associated with the correct case in DIMS and checking for completeness. The Office of Quality Assurance will

Page Number	Finding	Contact	Estimated Completion Date	Corrective Action
Humber	i iliuliig	Contact	ναιε	continue to report the findings to DPO Executive Management Team.
			FY2021 Quarter 1	<ul> <li>DHS/ESA, Training Unit will draft a memorandum in FY21, Quarter 1, to share with DHS/ESA eligibility staff to reiterate Medicaid requirements for resources and assets when determining eligibility. After completion, the memo will be shared by DPO Management staff during its routine daily meetings.</li> <li>DHCF will strengthen its oversight of DHS' maintenance of eligibility documentation in the following ways:</li> </ul>
			November 30, 2020	o Require DHS to establish and submit to DHCF, a written policy, procedure, and workflow document corresponding to (1) the OIS process reviewing scanning inconsistencies across service centers, and (2) the DPDTQA internal audit process for Orphan/Default reports regarding the reliability and accuracy of documents in DIMS. The policy and procedure documents will be completed by November 30, 2020;
			December 30, 2020	<ul> <li>Convene and implement a standing bi-weekly meeting between DEP, and DHS' DPDTQA to monitor and discuss compliance with documentation requirements, including the findings regarding the aforementioned orphan documents, and DIMS procedures. The bi-weekly meetings will commence by December 30, 2020;</li> </ul>
			December 15, 2020	<ul> <li>Update the MOU between DHCF and DHS to include the respective agency responsibilities in relation to oversight of eligibility</li> </ul>

Page			Estimated Completion	
Number	Finding	Contact	Date	Corrective Action
				documents. The MOU will be updated by December 15, 2020.
95	2019-024	Clara Ann McLaughlin, Chief, Office of Grants Management	January 31, 2021	The Department of Health concurs with the finding  The current corrective action plan (CAP) is progressing and will be fully implemented by January 31, 2021. Corrective actions include the provision of instructions and ongoing mandatory training for 100% of supervisors on procedures for reviewing payroll summaries, certifying actual proportion of time and effort of employees and making adjustments on budgets and employee activities by cost objective.
98	2019-025	Clara Ann McLaughlin, Chief, Office of Grants Management	January 31, 2021	The Department of Health concurs with the finding  The current corrective action plan (CAP) is progressing and will be fully implemented by January 31, 2021. Corrective actions include the provision of instructions and ongoing mandatory training for 100% of supervisors on procedures for reviewing payroll summaries, certifying actual proportion of time and effort of employees and making adjustments on budgets and employee activities by cost objective.