REPORTS REQUIRED BY THE SINGLE AUDIT ACT AND GOVERNMENT AUDITING STANDARDS

DECEMBER 31, 2014



TABLE OF CONTENTS

	<u>Page</u>
INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE AND REPORT ON SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY OMB CIRCULAR A-133	1-3
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS - FOR THE YEAR ENDED DECEMBER 31, 2014	4-8
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS	9-10
SCHEDULE OF FINDINGS AND QUESTIONED COSTS - FOR THE YEAR ENDED DECEMBER 31, 2014	11-17
INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF BASIC FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS	18-19

Bonadio & Co., llp

INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE AND REPORT ON SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY OMB CIRCULAR A-133

August 12, 2015

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

Report on Compliance for Each Major Federal Program

We have audited the County of Onondaga, New York's (the County) compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have direct and material effect on each of the County's major federal programs for the year ended December 31, 2014. The County's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

The County's basic financial statements include the operations of Onondaga Community College, Onondaga County Convention Center/War Memorial Complex Management Corporation, Onondaga County Housing Development Fund Company, Onondaga County Industrial Development Agency, Friends of the Rosamond Gifford Zoo and the Onondaga Tobacco Asset Securitization Corporation whose federal awards are not included in the schedule of expenditures of federal awards for the year ended December 31, 2014. Our audit, described below, did not include the federal awards of the above entities as these entities conducted separate audits in accordance with OMB Circular A-133, if required.

Management's Responsibility

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the County's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the County's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

432 North Franklin Street, Suite 60 Syracuse, New York 13204 p (315) 476-4004 f (315) 475-1513

www.bonadio.com

(Continued)

INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE AND REPORT ON SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY OMB CIRCULAR A-133 (Continued)

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of the County's compliance.

Opinion on Each Major Federal Program

In our opinion, the County complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each major federal program for the year ended December 31, 2014.

Other Matters

The results of our auditing procedures disclosed an instance of noncompliance, which are required to be reported in accordance with OMB Circular A-133 and which is described in the accompanying schedule of findings and questioned costs as item 2014-001. Our opinion on each major federal program is not modified with respect to these matters.

The County's response to the noncompliance finding identified in our audit is described in the accompanying schedule of findings and questioned costs. The County's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

Report on Internal Control over Compliance

Management of the County is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the County's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the County's internal control over compliance.

Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we identified certain deficiencies in internal control over compliance that we consider to be material weaknesses.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 2014-001 through 2014-002 to be material weaknesses.

(Continued)

INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE AND REPORT ON SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY OMB CIRCULAR A-133

Report on Internal Control over Compliance

(Continued)

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.

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

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose.

Report on the Schedule of Expenditures of Federal Awards

We have audited the financial statements of the governmental activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the County of Onondaga, New York (the County) as of and for the year ended December 31, 2014, and the related notes to the financial statements, which collectively comprise the County's basic financial statements. We issued our report thereon dated April 13, 2015, which contained unmodified opinions on those financial statements. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. We have not performed any procedures with respect to the audited financial statements subsequent to April 13, 2015. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

Federal Grantor/Program Title	CFDA #	Pass-Through Grantor ID #	Federal Expenditures
U.S. Department of Agriculture:			
Direct Program: Urban and Community Forestry Program	10.675		\$ 196,148
Pass-Through New York State Education Department: Child Nutrition Cluster:			
School Breakfast Program National School Lunch Program	10.553 10.555		8,466 13,808
Total Child Nutrition Cluster			22,274
Pass-Through NYS Department of Health: Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)	10.557 10.557 10.557	C025777 C025815	1,629,546 263,446 6,598,256
Total WIC			8,491,248
Pass-Through New York State (NYS) Department of Family Assistance: State Administrative Matching Grants for Supplemental Nutrition Assistance Program Pass-Through NYS Department of Health:	10.561		4,432,661
State Administrative Matching Grants for Supplemental Nutrition Assistance Program State Administrative Matching Grants for Supplemental Nutrition Assistance Program	10.561 10.561	C026674	67,500 50,490
Total State Administrative Matching Grants for Supplemental Nutrition Assistance Program			4,550,651
Total U.S. Department of Agriculture			13,260,321
U.S. Department of Housing and Urban Development: Direct Programs:			
Community Development Block Grants/Entitlement Grants	14.218		2,059,149
Emergency Solutions Grants Program	14.231		180,689
Home Investment Partnerships Program	14.239		465,043
Continuum of Care Program	14.267		57,608
Lead-Based Paint Hazard Control in Privately-Owned Housing Pass-Through City of Syracuse:	14.900		2,170,767
Lead-Based Paint Hazard Control in Privately-Owned Housing	14.900	04811	65,332
Total Lead-Based Paint Hazard Control in Privately-Owned Housing			2,236,099
Total U.S. Department of Housing and Urban Development			4,998,588

Federal Grantor/Program Title	CFDA#	Pass-Through Grantor ID #	Federal Expenditures
U.S. Department of Justice:			
Direct Programs: Edward Byrne Memorial State and Local Law Enforcement Assistance Discretionary Grants Program	16.580		(30,000)
State Criminal Alien Assistance Program	16.606		6,917
Bulletproof Vest Partnership Program	16.607		13,796
Public Safety Partnership and Community Policing Grants	16.710		74,085
Edward Byrne Memorial Justice Assistance Grant Program Pass-Through NYS Division of Criminal Justice Services:	16.738		172,887
Edward Byrne Memorial Justice Assistance Grant Program Edward Byrne Memorial Justice Assistance Grant Program	16.738 16.738	C632351	102,978 11
Total Edward Byrne Memorial Justice Assistance Grant Program			275,876
Juvenile Justice and Delinquency Prevention Allocation to States	16.540		114,842
DNA Backlog Reduction Program DNA Backlog Reduction Program	16.741 16.741	DN-BX-0001 DN-BX-K009	9,267 207,919
Total DNA Backlog Reduction Program			217,186
Paul Coverdell Forensic Sciences Improvement Grant Program Paul Coverdell Forensic Sciences Improvement Grant Program	16.742 16.742	T662006 T662190	19,031 17,086
Total Paul Coverdell Forensic Sciences Improvement Grant Program			36,117
Total U.S. Department of Justice			708,819
U.S. Department of Labor: Pass-Through NYS Office for the Aging: Senior Community Service Employment Program	17.235		97,413
Total U.S. Department of Labor			97,413
U.S. Department of Transportation: Pass-Through NYS Department of Transportation:			
Highway Planning and Construction	20.205		6,454,078
Metropolitan Transportation Planning	20.505		198,760
Interagency Hazardous Materials Public Sector Training and Planning Grants	20.703		72
Pass-Through NYS Governor's Traffic Safety Committee: State and Community Highway Safety	20.600		135,668
Total U.S. Department of Transportation			6,788,578
National Endowment of the Arts: Promotion of the Arts, Grants to Organizations and Individuals	45.024		(346)
Total National Endowment of the Arts			(346)
Institute of Museum and Library Services: Pass-Through NYS Department of Education: Grants to States	45.310		13,870
Total Institute of Museum and Library Services			13,870

FOR THE TEAR ENDED DEGENIBER 31, 2014			
Federal Grantor/Program Title	CFDA#	Pass-Through Grantor ID #	Federal Expenditures
U.S. Environmental Protection Agency:			
Pass-Through NYS Department of Health: State Indoor Radon Grants State Indoor Radon Grants	66.032 66.032	T027073 C022169	3,218 1,150
Total State Indoor Radon Grants			4,368
Pass-Through NYS Environmental Facilities Corporation: ARRA - Capitalization Grants for Clean Water State Revolving Funds	66.458		1,158,900
Total U.S. Environmental Protection Agency			1,163,268
U.S. Department of Education: Pass-Through Syracuse City School District: Special Education Grants to the States (IDEA, Part B)	84.027		50,146
Pass-Through Department of Health: Special Education - Grants for Infants and Families	84.181	C027495	209,116
Total U.S. Department of Education			259,262
U.S. Election Assistance Commission: Direct Program:			420.000
Help America Vote Act Requirements Payments	90.401		439,009
Total U.S. Election Assistance Commission			439,009
U.S. Department of Health and Human Services: Direct Programs:			
Comprehensive Community Mental Health Svcs. for Children with Serious Emotional Disturbances	93.104		1,385,671
Healthy Start Initiative	93.926		834,788
Voting Access for Individuals with Disabilities - Grants to States	93.617		(27,790)
Pass-Through National Association of County and City Health Officials: Medical Reserve Corps Small Grant Program Total Medical Reserve Corps Small Grant Program	93.008 93.008 93.008 93.008	MRC 1120 MRC 1220 MRC 13-0020-C MRC 14-0020	2,068 4,492 6,033 3,500
Pass-Through NYS Office of Mental Health:			
Projects for Assistance in Transition from Homelessness	93.150		439,298
Pass-Through NYS Office for the Aging: Special Programs for the Aging, Title III, Part D, Disease Prevention and Health Promotion Services	93.043		23,489
Aging Cluster: Special Programs for the Aging, Title III, Part B, Grants for Supportive Services and Senior Centers Special Programs for the Aging, Title III, Part C, Nutrition Services Nutrition Services Incentive Program	93.044 93.045 93.053		359,182 647,756 236,871
Total Aging Cluster			1,243,809
Special Program for the Aging, Title IV and Title II, Discretionary Projects	93.048		64,000

Federal Grantor/Program Title	CFDA #	Pass-Through Grantor ID #	Federal Expenditures
U.S. Department of Health and Human Services (Continued):			
Pass-Through NYS Office for the Aging (Continued): National Family Caregiver Support, Title III, Part E	93.052		217,973
Medicare Enrollment Assistance Program	93.071		11,596
Affordable Care Act - Maternal, Infant and Early Childhood Home Visiting Program	93.505		356,348
Centers for Medicare and Medicaid Services (CMS) Research, Demonstrations and Evaluations	93.779		18,369
Pass-Through NYS Department of Family Assistance: Child Support Enforcement	93.563		2,271,091
Refugee and Entrant Assistance - Voluntary Agency Programs	93.567		1,766,024
Low-Income Home Energy Assistance	93.568		11,668,969
Child Care and Development Block Grant	93.575		13,174,450
Stephanie Tubbs Jones Child Welfare Services Program	93.645		590,360
Foster Care - Title IV-E	93.658		5,589,130
Adoption Assistance	93.659		3,225,553
Social Services Block Grant	93.667		2,755,435
Chafee Foster Care Independence Program	93.674		206,856
Temporary Assistance for Needy Families	93.558		43,435,213
Pass-Through NYS Department of Health: Temporary Assistance for Needy Families	93.558	C028081	161,682
Total Temporary Assistance for Needy Families			43,596,895
Immunization Cooperative Agreements	93.268	028306	104,099
Children's Health Insurance Program	93.767	C027842	1,001
Expanded Partner Services	93.940	4724-01	51,631
Preventive Health Services - Sexually Transmitted Disease Control Grants Preventive Health Services - Sexually Transmitted Disease Control Grants Preventive Health Services - Sexually Transmitted Disease Control Grants	93.977 93.977 93.977	C027658A T028064 C027977	38,676 2,835 135,466
Total Preventative Health Services - Sexually Transmitted Disease Control Grants			176,977

Federal Grantor/Program Title	CFDA #	Pass-Through Grantor ID #	Federal Expenditures
U.S. Department of Health and Human Services (Continued):			
Pass-Through NYS Department of Health (Continued):			
Preventive Health and Health Services Block Grant	93.991	C026674	7,409
Preventive Health and Health Services Block Grant	93.991	C023001	12,344
Total Preventive Health and Health Services Block Grant			19,753
Maternal and Child Health Services Block Grant to the States	93.994	C023001	13,460
Maternal and Child Health Services Block Grant to the States	93.994		17,825
Maternal and Child Health Services Block Grant to the States	93.994	C026523	83,492
Total Maternal and Child Health Services Block Grant to the States			114,777
Pass-Through Health Research, Inc.:			
Public Health Emergency Preparedness	93.069	15-0687-01	37,324
Public Health Emergency Preparedness	93.069	C026523	(3,959)
Total Public Health Emergency Preparedness			33,365
Hospital Preparedness Program and Public Health Emergency Preparedness Aligned			
Cooperative Agreement	93.074		102,825
ocoporativo i grocino il	00.07		
Pass-Through NYS Office of Alcohol and Substance Abuse Services:			
Block Grant for Prevention and Treatment of Substance Abuse	93.959		1,906,181
Pass-Through NYS Office of Mental Health:			
Medical Assistance Program	93.778		523,000
Pass-Through NYS Department of Health:	30.770		020,000
Medical Assistance Program	93.778		444,003,662
Total Medical Assistance Program			444,526,662
Total U.S. Department of Health and Human Services			536,465,678
U.S. Department of Homeland Security and Emergency Services:			
Pass-Through NYS Division of Homeland Security and Emergency Services:			
Emergency Management Performance Grants	97.042		12,250
Interoperable Emergency Communications	97.055		321,500
Homeland Security Grant Program	97.067		362,016
Homeland Security Grant Program	97.067	C176505	28,210
Homeland Security Grant Program	97.067		248,834
Homeland Security Grant Program	97.067		51,908
Homeland Security Grant Program	97.067		17,368
Homeland Security Grant Program	97.067		181,845
Homeland Security Grant Program		C972110	358,262
Homeland Security Grant Program		C972120	153,198
Homeland Security Grant Program	97.067	C972130	61,441
Total Homeland Security Grant Program			1,463,082
Total U.S. Department of Homeland Security and Emergency Services			1,796,832
Total Expenditures of Federal Awards			\$ 565,991,292

NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE YEAR ENDED DECEMBER 31, 2014

1. BASIS OF PRESENTATION

Pass-Through Programs

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

Non-Monetary Federal Programs

The County is awarded financial assistance programs that do not result in cash receipts or disbursements, termed "non-monetary programs." During the fiscal year ended December 31, 2014, the County distributed \$6,598,256 of Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) food instruments to eligible persons participating in the WIC Program (CFDA 10.557), \$11,025,707 of energy assistance to eligible persons under the Low-Income Home Energy Assistance Program (CFDA 93.568) and \$434,873,999 of medical goods and services were received by eligible persons participating in the Medical Assistance Program (CFDA 93.778), as listed in the accompanying schedule.

2. BASIS OF ACCOUNTING

The SEFA is presented on the modified accrual basis of accounting and the amounts presented are derived from the County's general ledger. Federal expenditures are recorded when an allowable cost is incurred under the applicable program and is due and payable. For programs with funding ceilings and caps, federal expenditures are only recorded and presented in the SEFA up to such amounts. Negative amounts shown in the Schedule represent adjustments or credits made in the normal course of business to amounts reported as expenditures as prior years.

3. INDIRECT COSTS

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

4. MATCHING COSTS

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

5. SUBRECIPIENTS

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

Federal Programs with Subrecipients	<u>CFDA</u>	<u>Amount</u>	
Edward Byrne Memorial Justice Assistance Grant			
Program	16.738	\$	81,100
Highway Planning and Construction	20.205		1,137,051
Metropolitan Transportation Planning	20.505		198,760
Special Programs for the Aging, Title III, Part D, Disease			
Prevention and Health Promotion Services	93.043		13,941
Special Programs for the Aging, Title III, Part B, Grants			
for Supportive Services and Senior Centers	93.044		288,349
Special Programs for the Aging, Title III,			
Part C Nutrition Services	93.045		677,540
National Family Caregiver Support, Title III, Part E	93.052		213,113
Nutrition Services Incentive Program	93.053		233,705
Projects for Assistance in Transition for Homelessness	93.150		439,298
Child Support Enforcement	93.563		555,905
Block Grant for Prevention and Treatment of Substance			
Abuse	93.959		1,904,472

SCHEDULE OF FINDINGS AND QUESTIONED COSTS FOR THE YEAR ENDED DECEMBER 31, 2014

Part I - Summary of Auditor's Results

Financial Statements

Type of auditor's report issued:	Unmodified	t
Internal control over financial reporting: Material weakness(es) identified? Significant deficiencies identified? Noncompliance material to financial statements noted?	yes yes yes	⋈ no⋈ none reported⋈ no
Federal Awards		
Internal control over major programs: Material weakness(es) identified? Significant deficiencies identified?	⊠ yes □ yes	□ no⊠ none reported
Type of auditor's report issued on compliance for major programs:	Unmodified	i
Any audit findings disclosed that are required to be reported in accordance with Section 510(a) of OMB Circular A-133?	⊠ ves	□ no

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

• The dollar threshold to determine Type A programs was \$3,000,000. The major federal programs of the County for the year ended December 31, 2014 were as follows:

U.S. Department of Agriculture

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

U.S. Department of Transportation

• Highway Planning and Construction (20.205)

U.S. Department of Health and Human Services

- Low-Income Home Energy Assistance (93.568)
- Adoption Assistance (93.659)
- Temporary Assistance for Needy Families (93.558)
- Medical Assistance Program (93.778)
- The County was not considered a low-risk auditee for the year ended December 31, 2014.

Part II - Findings and Questioned Costs Relating to Federal Awards

Reference: 2014-001

U.S. Department of Health and Human Services

Pass-through entities: NYS Department of Family Assistance

Adoption Assistance 93.659

Onondaga County Department of Social Services

Program Year: 2014

Criteria:

According to OMB Circular A-133 Part III Eligibility para. (2) (g), once a child is determined eligible to receive Title IV-E adoption assistance, he or she remains eligible and the subsidy continues until the age of 18 (or 21, if the IV-E agency determines that the child has a mental or physical disability which warrants the continuation of assistance).

Internal controls should provide reasonable assurance that the County complies with eligibility requirements according to OMB Circular A-133.

Cause/Condition:

The County's current policies and procedures are not operating effectively to ensure the LDSS 2970 Authorization Forms (Authorization Forms) are retained in accordance with policies and procedures. In 8 of 40 cases tested, the Authorization Forms were not retained.

Current policies and procedures are not operating effectively to ensure the County claims all available Title IV-E funding for those cases deemed eligible. This occurred in 8 of 40 cases tested.

- In 2 of these 8 instances, the Level of Difficulty rate used did not agree to the adoption subsidy agreement resulting in the County not claiming all eligible Title IV-E funding.
- In 5 of these 8 instances, Title IV-E fund claiming was discontinued while the case remained eligible.
- In 1 of these 8 instances, as a result of missing medical information, Title IV-E funding was not claimed, despite the permanent nature of the disabled child.

Current policies and procedures are not operating effectively to ensure the County only claims Title IV-E funding for those cases deemed eligible. This occurred in 4 of 40 cases tested.

- In 2 of these 4 instances, the Level of Difficulty rate used did not agree to the adoption subsidy agreement resulting in known questioned costs of \$1,111.
- In 1 of these 4 instances, the case file was missing proper medical information to support disabled status, resulting in known questioned costs of \$7,958.
- In 1 instance, the County failed to properly identify when a child turned 18 years old, resulting in known questioned costs of \$210.

In 2 of 40 cases tested, there was a lack of evidence to demonstrate the County's attempt to make contact with the adopted parent via certification letters and/or telephone.

Part II - Findings and Questioned Costs Relating to Federal Awards (Continued)

Reference: 2014-001 (Continued)

Questioned Costs:

\$9,279 known questioned costs.

Effect:

The County was not in compliance with eligibility requirements in accordance with OMB Circular A-133 resulting in questioned costs.

Recommendation:

We recommend that the County reinforce existing policies and procedures that require a review of eligibility determination be made to ensure claims for Title IV-E funding are done for all eligible cases and claims are properly discontinued when a case is no longer eligible. In addition, the County should retain all LDSS 2970 Authorization Forms and document evidence to support efforts were made to contact adopted parents.

Management's Response:

After the 2013 audit, the Department instituted a number of changes to address the errors identified. The most significant change was the creation and implementation of an electronic case tracking system for the subsidy work. This application has increased significantly our ability to manage cases receiving subsidies. We believe the implementation of this tracking has lead to improved oversight of the program.

For the 2014 audit, the specific cases the Department acknowledges as errors were the result of human error. During the year, the supervisor of the area will conduct periodic trainings with staff to reinforce correct interpretations of standards, and will conduct periodic case reviews to determine whether calculations are performed correctly.

The Department respectfully contests the above exception with questioned costs of \$7,958. The case involves a youth with significant disabilities who turned age 18. Most errors involve some action either not taken, missing documentation to substantiate a decision, or an incorrect decision. The issue with this finding appears to be more one of judgment. The explanation is as follows.

The regulations state, once a child is determined eligible to receive Title IV-E Adoption Assistance, s/he remains eligible and the assistance continues until:

- •The child reaches age 18 and is hard-to-place, or
- •The child reaches age 21 if the social services district determines that the child has a mental or physical disability that warrants the continuation of federal assistance, or
- •The LDSS/ACS determines that the adoptive parents are no longer legally responsible for the support of the child or if the LDSS/ACS determines that the child is no longer receiving any support from parents.

Part II - Findings and Questioned Costs Relating to Federal Awards (Continued)

Reference: 2014-001 (Continued)

Management's Response (Continued):

The regulations further indicate that a redetermination of eligibility is needed, and go on to make a distinction between "handicapped" children and "hard to place" children. The steps for redetermination for "hard to place" are explicit. However, no specific steps are found in the regulations with respect to documentation requirements for "handicapped" children.

The child in the test case was a handicapped child. According to our review of his records, his condition which included subclinical ADHD, adjustment disorder with mixed disturbance of emotions and conduct, oppositional-defiant disorder were permanent in nature. Therefore, in our judgment, his condition met the regulatory criteria for continued 4-E eligibility.

Auditor's Response:

Based upon review of the contested case, the finding is valid. The case file included no indication that this child had been determined to be permanently disabled thus warranting the continuation of Title IV-E assistance without updated medical information following the child reaching age 18. As such, the child was determined to not be eligible for Title IV-E assistance.

Reference: 2014-002

U.S. Department of Health and Human Services

Pass-through entities: NYS Department of Family Assistance

Low-Income Home Energy Assistance 93.568 Onondaga County Department of Social Services

Program Year: 2014

Criteria:

According to OMB Circular A-133, Part III Eligibility, para. (1), assistance may only be provided to a) households in which one or more individuals receive Temporary Assistance for Needy Families ("TANF"), Supplemental Security Income ("SSI") or Supplemental Nutrition Assistance Program ("SNAP") benefits, or other certain needs-tested veterans benefits; or b) households with incomes which do not exceed the greater of 150 percent of the State's established poverty level, or 60% of the State median income.

According to OMB Circular A-133, Part III Activities Allowed or Unallowed, para. (1), funds may be used to assist eligible households to meet the costs of home energy, i.e. heating or cooling their residences (42 USC 8621(a) and 8624(b)(1)).

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

Cause/Condition:

The County's current policies and procedures are not operating effectively to ensure individuals fall within the income guidelines for receiving assistance. The following deficiency was noted during testing

• In 4 of 40 cases tested, the recipient's income was calculated incorrectly, however, the benefit amount was correct as the recipients were still classified in the correct tier.

Questioned Costs:

None.

Effect:

The County was not in compliance with OMB Circular A-133 requirements resulting in known questioned costs of less than \$10,000.

Recommendation:

We recommend that the County review its existing policies and procedures over eligibility and activities allowed or unallowed as it specifically relates to the calculation of benefit amounts. We recommend that policies and procedures be developed, documented and implemented that require benefit amount calculations to be reviewed by a supervisor to ensure accuracy.

Part II - Findings and Questioned Costs Relating to Federal Awards (Continued)

Reference: 2014-002 (Continued)

Management's Response:

The Onondaga County HEAP/ Energy Assistance Unit is committed to providing heating assistance benefits to those applicants in need in a timely, efficient and accurate manner. The recent introduction of the online application procedures as well as other methods that have eased the client's application process has resulted in increased applications in an already small window of processing time. Policy and procedure are constantly under review internally to better accomplish the task presented. Recent changes in training methods, Supervisor- worker communication and streamlining of local procedures have shown positive results.

The Audit findings indicate there are oversight errors as well as policy errors that have occurred. The following will be implemented to address those errors;

- New staff and staff in need of reinforcement of HEAP policy will attend the State provided HEAP worker trainings this fall.
- Audit findings will continue to be discussed at HEAP season preparation meetings for workers to take place in September and November.
- Some of the errors cited can be attributed to the high volume of work presented in a relatively small window of time. Special attention in trainings will be focused on this and how to overcome it with self-review and fact checking.
- Recent changes in the approach to Supervisor-Worker communication will enable the management team to respond more quickly to areas in need of attention.

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

Reference: 13-01

Status: Management has taken corrective action.

Reference: 13-02

Status: See current year finding 2014-001.

Reference: 13-03

Status: See current year finding 2014-002.

Bonadio & Co., LLP

INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF BASIC FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

April 13, 2015

To the Honorable County Executive, Joanne M. Mahoney, Honorable Members of the County Legislature and Honorable County Comptroller Robert E. Antonacci

County of Onondaga, New York:

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in Government Auditing Standards issued by the Comptroller General of the United States, the financial statements of the governmental activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of County of Onondaga, New York (the County), as of and for the year ended December 31, 2014, and the related notes to the financial statements, which collectively comprise the County's basic financial statements, and have issued our report thereon dated April 13, 2015. Our report includes a reference to other auditors who audited the financial statements of Onondaga County Community College, Onondaga Civic Development Corporation and Friends of the Rosamond Gifford Zoo as described in our report on County of Onondaga, New York's financial statements. This report does not include the results of the other auditors' testing of internal control over financial reporting or compliance and other matters that are reported on separately by those auditors. The financial statements of Friends of the Rosamond Gifford Zoo were not audited in accordance with Government Auditing Standards.

Internal Control Over Financing Reporting

In planning and performing our audit of the financial statements, we considered the County's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the County's internal control. Accordingly, we do not express an opinion on the effectiveness of the County's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

432 North Franklin Street, Suite 60 Syracuse, New York 13204 p (315) 476-4004 f (315) 475-1513

www.bonadio.com

(Continued)

INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF BASIC FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS (Continued)

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the County's basic financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of This Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.