

**REVIEW OF NONPROFIT, FOR-PROFIT,
AND OTHER ENTITIES
FINANCIAL REPORTING PACKAGES**

For Fiscal Years Ended October 1, 2017,
Through September 30, 2018

Pursuant to Section 215.97(12)(f), Florida Statutes



Sherrill F. Norman, CPA
Auditor General

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REVIEW OF NONPROFIT, FOR-PROFIT, AND OTHER ENTITIES FINANCIAL REPORTING PACKAGES

For Fiscal Years Ended October 1, 2017, Through September 30, 2018

SUMMARY

The Florida Single Audit Act (FSAA)¹ requires each nonstate entity that receives State financial assistance and meets the FSAA audit threshold requirements to provide for a Florida single audit. Upon completion of the audit, a financial reporting package is to be filed with the State awarding agencies and with us within 45 days after delivery of the financial reporting package to the auditee but no later than 9 months after the end of the auditee's fiscal year.² Among other things, the financial reporting package is to contain a nonstate entity's audited financial statements, schedule of expenditures of State financial assistance, independent auditor's reports, and management letter.

As of June 30, 2019, 236 nonprofit, for-profit, and other entities that met the FSAA audit threshold requirements had filed financial reporting packages with us for fiscal years ended October 1, 2017, through September 30, 2018. Pursuant to State law,³ we reviewed a sample of 60 of the 236 financial reporting packages to determine compliance with applicable reporting requirements and found that the information provided was generally presented in accordance with generally accepted accounting principles, generally accepted government auditing standards (GAGAS), the FSAA, Department of Financial Services (DFS) rules,⁴ and Auditor General rules.⁵ However, we noted:

Finding 1: Contrary to State law, 24 financial reporting packages were not timely filed with us, including 14 financial reporting packages filed 9 to 264 days after the 9-month deadline and 10 others filed 53 to 175 days after delivery of the financial reporting package to the auditee.

Finding 2: The 60 sampled financial reporting packages did not always comply with applicable FSAA, DFS rules, and Auditor General rules requirements as:

- For 12 of the 58 applicable financial reporting packages, the auditors miscalculated and reported incorrect dollar thresholds for distinguishing Type A and Type B State projects on the schedule of findings and questioned costs.
- For 6 of the 20 applicable financial reporting packages, the auditors did not include an independent auditor's management letter or, if there were no items related to State financial assistance required to be reported in a management letter, indicate in the schedule of findings and questioned costs that a management letter was not required.
- For 5 of the 23 applicable financial reporting packages, the entities did not provide on the schedule of expenditures of State financial assistance (SFA) the total SFA expended for each individual State project and the Catalog of SFA number.

¹ Section 215.97, Florida Statutes.

² Section 10.657(2), Rules of the Auditor General.

³ Section 215.97(12)(f), Florida Statutes.

⁴ DFS Rules, Chapter 69I-5, Florida Administrative Code.

⁵ Chapter 10.550, Rules of the Auditor General for Local Governmental Entity Audits, and Chapter 10.650, Rules of the Auditor General for Florida Single Audit Act Audits of Nonprofit and For-Profit Organizations.

BACKGROUND

The Florida Single Audit Act (FSAA) requires each nonstate entity that expends a total amount of State financial assistance (SFA),⁶ equal to or in excess of the \$750,000 audit threshold,⁷ to have a Florida single audit conducted in accordance with the FSAA.

State law⁸ and Department of Financial Services (DFS) rules⁹ establish several requirements that independent certified public accountants (CPAs) must follow when conducting Florida single audits of nonprofit, for-profit, and other entities. To assist auditors in complying with these requirements, generally accepted government auditing standards, and applicable laws, rules, and regulations, we developed rules¹⁰ and other guidelines that provide, among other things, procedural guidance for CPAs to follow. These rules and guidelines are made available on our Web site.

Upon completion of a Florida single audit, a financial reporting package is to be filed with the State awarding agency and us.¹¹ The financial reporting package is to be filed in accordance with Auditor General rules.¹² Pursuant to Auditor General rules,¹³ each financial reporting package is to be a single document and contain, among other things, the entity's audited financial statements, schedules, and notes thereto; the independent auditor's report on the basic financial statements and report on internal control and compliance; a management letter with the auditor's comments and recommendations; and the auditor's reports and related financial information required pursuant to the FSAA and Auditor General rules including:

- A schedule of expenditures of SFA.
- A report that includes an opinion (or disclaimer of opinion) as to the fair presentation of the schedule of expenditures of SFA.
- A report on compliance, and on internal control over compliance, with major State project requirements.
- A schedule of findings and questioned costs.
- A summary schedule of prior audit findings, if applicable.
- A corrective action plan, if applicable.

⁶ Section 215.97(2)(r), Florida Statutes, defines SFA as State resources, not including Federal financial assistance and State matching on Federal programs, provided to a nonstate entity to carry out a State project. SFA may be provided directly by State awarding agencies or indirectly by nonstate entities. SFA does not include procurement contracts used to buy goods or services from vendors and contracts to operate State-owned and contractor-operated facilities.

⁷ Section 215.97(2)(a), Florida Statutes.

⁸ Section 215.97(10) and (11), Florida Statutes.

⁹ DFS Rules, Chapter 69I-5, Florida Administrative Code.

¹⁰ Chapters 10.550 and 10.650, Rules of the Auditor General. Chapter 10.550, Rules of the Auditor General, prescribes FSAA auditing and reporting standards for local governmental entities, including those that meet the definition in Section 215.97(2)(k), Florida Statutes, but are not local governmental entities as enumerated in Section 218.39, Florida Statutes. Such entities are referred to as "other entities" in this report. Chapter 10.650, Rules of the Auditor General, prescribes FSAA auditing and reporting standards for nonprofit and for-profit organizations.

¹¹ Section 215.97(8)(g), Florida Statutes.

¹² Section 215.97(8)(h), Florida Statutes.

¹³ Sections 10.557(3) and 10.656(3), Rules of the Auditor General.

State law¹⁴ requires us to perform ongoing reviews of a sample of financial reporting packages filed with us pursuant to the FSAA to determine compliance with the reporting requirements of the FSAA and applicable rules. As of June 30, 2019, 236 nonprofit, for-profit, and other entities that met the FSAA audit threshold had filed financial reporting packages with us for fiscal years ended October 1, 2017, through September 30, 2018.

FINDINGS AND RECOMMENDATIONS

Finding 1: Noncompliance - Financial Reporting Package Filing Requirements

Auditor General rules¹⁵ provide that financial reporting packages required to be filed pursuant to the Florida Single Audit Act (FSAA)¹⁶ are to be filed with the State awarding agencies and us within 45 days after delivery of the financial reporting package to the auditee but no later than 9 months after the end of the auditee's fiscal year. The auditee is to indicate in correspondence accompanying the financial reporting package the date the financial reporting package was delivered to the auditee.

As of June 30, 2019, 236 nonprofit, for-profit, and other entities¹⁷ that met the FSAA audit threshold requirements had filed financial reporting packages with us for fiscal years ended October 1, 2017, through September 30, 2018. However, 24 of those entities did not comply with the financial reporting package filing requirements. Specifically:

- 14 entities, listed on ***EXHIBIT A*** to this report, filed financial reporting packages with us 8 to 264 or an average of 48 days after the 9-month deadline.
- 11 other entities, listed on ***EXHIBIT B*** to this report, filed financial reporting packages with us 53 to 175 or an average of 128 days after the delivery of the financial reporting package to the auditee.

Timely audits are necessary to ensure compliance with Auditor General rules and that management and those charged with governance are promptly informed of control deficiencies and noncompliance with the FSAA. Additionally, timely filed financial reporting packages provide for timely review by the applicable State entities with oversight responsibilities.

Recommendation: Audited entities should ensure that Florida single audits are timely conducted and that financial reporting packages are timely filed in accordance with State law.

Finding 2: Financial Reporting Package Completeness

To determine the extent to which the filed financial reporting packages complied, for selected significant matters, with generally accepted accounting principles (GAAP), generally accepted government auditing standards (GAGAS), the FSAA, Department of Financial Services (DFS) rules,¹⁸ and Auditor General

¹⁴ Section 215.97(12)(f), Florida Statutes.

¹⁵ Sections 10.558(3) and 10.657(2), Rules of the Auditor General.

¹⁶ Section 215.97(8)(g), Florida Statutes.

¹⁷ For the purpose of our review, "other entities" are local governmental entities other than those enumerated in Section 218.39, Florida Statutes. The only other entity considered for this review project was the West Florida Regional Planning Council.

¹⁸ DFS Rules, Chapter 69I-5, Florida Administrative Code.

rules,¹⁹ we selected a sample of 60 of the 236 financial reporting packages we received as of June 30, 2019, and performed completeness reviews.

We found that most of the 60 financial reporting packages included audited financial statements, schedules, and notes thereto; the required independent auditor's reports on the basic financial statements and on internal control and compliance; and other information required by GAAP, GAGAS, the FSAA, DFS rules, and Auditor General rules. However, we also noted that:

- Auditors, for 12 of the 58 applicable financial reporting packages, reported incorrect dollar thresholds for distinguishing Type A and Type B State projects on the schedule of findings and questioned costs because the auditors did not calculate the thresholds in accordance with DFS rules.²⁰ As the DFS risk-assessment process requires auditors to consider the threshold in determining major State projects and selecting the State projects to audit, threshold miscalculations could cause auditors to overlook high-risk State projects, reducing the audit's effectiveness and accountability over the projects.
- Auditors, for 6 of the 20 applicable financial reporting packages, did not comply with the requirement in State law²¹ and Auditor General rules²² to include an independent auditor's management letter or, if there were no items related to State financial assistance required to be reported in a management letter, to indicate in the schedule of findings and questioned costs that a management letter was not required. Management letters communicate, of record, to those charged with governance, audit findings and recommendations to remedy the findings. If an auditor determines that a management letter is not required, a statement in the schedule of findings and questioned costs documents that determination for the financial reporting package user.
- Entities, for 5 of the 23 applicable financial reporting packages, did not comply with the DFS rules²³ requirement to provide on the schedule of expenditures of SFA the total SFA expended for each individual State project and the Catalog of SFA number. The reporting of summarized information on the schedule of expenditures of SFA provides a useful reference for managing State projects.

Recommendation: Audited entities and their auditors should ensure that financial reporting packages contain all the required information presented in accordance with applicable laws and rules.

¹⁹ Chapters 10.550 and 10.650, Rules of the Auditor General.

²⁰ DFS Rule 69I-5.008(2) and (3), Florida Administrative Code.

²¹ Section 215.97(2)(e), Florida Statutes.

²² Section 10.656(3)(e), Rules of the Auditor General.

²³ DFS Rules, Chapter 69I-5, Florida Administrative Code.

OBJECTIVES, SCOPE, AND METHODOLOGY

Pursuant to Section 11.45, Florida Statutes, the Auditor General conducts audits of governmental entities and performs other engagements to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

The objectives of this project were to determine whether the financial reporting packages filed with us for nonprofits, for-profits, and other entities that met the Florida Single Audit Act (FSAA) threshold:

- Complied with generally accepted accounting principles, generally accepted government auditing standards (GAGAS), the FSAA,²⁴ Department of Financial Services (DFS) rules,²⁵ and Auditor General rules.²⁶
- Were prepared by independent certified public accountants (CPAs) properly licensed by the Florida Board of Accountancy.

The scope of this project included a review of a sample of 60 of the 236 financial reporting packages filed with us as of June 30, 2019, for nonprofits, for-profits, and other entities that met the FSAA audit threshold for fiscal years ended October 1, 2017, through September 30, 2018. For the purpose of our review, "other entities" are local governmental entities other than those enumerated in Section 218.39, Florida Statutes. The results of our review of local governmental entity compliance with FSAA reporting requirements for the entities enumerated in Section 218.39, Florida Statutes, will be the subject of a separate report.

We planned and performed the review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our objectives.

Our review was necessarily limited to the contents of the financial reporting packages filed with us and did not extend to an examination of the CPAs' working papers or a determination of whether the auditors followed all applicable GAGAS in the actual conduct of the audits. Because our review was limited to the content of the financial reporting packages filed with us, our review cannot be used as the basis for determining the extent of the entities' compliance with applicable laws, rules, contractual requirements, or bond covenants. Likewise, our review would not disclose whether the auditor reported all instances of noncompliance or reportable internal control deficiencies noted during the audit, or whether certain required financial disclosures were completely omitted.

²⁴ Section 215.97, Florida Statutes.

²⁵ DFS Rules, Chapter 69I-5, Florida Administrative Code.

²⁶ Chapters 10.550 and 10.650, Rules of the Auditor General.

AUTHORITY

Section 215.97(12)(f), Florida Statutes, requires the Auditor General to perform ongoing reviews of a sample of financial reporting packages filed pursuant to the Florida Single Audit Act to determine compliance with the reporting requirements of the Act and applicable Department of Financial Services rules and Auditor General rules. Pursuant to the provisions of State law, I have directed that this report be prepared to present the results of our review of nonprofit, for-profit, and other entity financial reporting packages for fiscal years ended October 1, 2017, through September 30, 2018.

A handwritten signature in blue ink that reads "Sherrill F. Norman". The signature is written in a cursive style with a large initial "S".

Sherrill F. Norman, CPA
Auditor General

EXHIBIT A

NONPROFIT, FOR-PROFIT, AND OTHER ENTITIES FINANCIAL REPORTING PACKAGES FILED AFTER 9-MONTH DEADLINE

FOR FISCAL YEARS ENDED OCTOBER 1, 2017, THROUGH SEPTEMBER 30, 2018

Entity	Package Received	Number of Days Late
1 Bridging Freedom, Inc.	06/21/2019	264
2 Feeding Florida, Inc.	06/06/2019	67
3 Mid-Florida Area Agency on Aging, Inc.	11/19/2018	50
4 Central Florida Area Health Education Center, Inc.	05/17/2019	47
5 Early Learning Coalition of Northwest Florida	05/17/2019	47
6 Crosswinds Youth Services, Inc.	05/08/2019	39
7 Clay County Council on Aging, Inc.	11/05/2018	36
8 Everglades Area health Education Center, Inc.	04/29/2019	29
9 Senior Connection Center, Inc.	10/22/2018	22
10 Lockheed Martin Corporation	10/19/2018	19
11 Northrop Grumman Corporation	10/19/2018	19
12 Florida Network of Youth & Family Services, Inc.	04/09/2019	9
13 Walton County Citizens Advisory Council on Aging, Inc.	10/09/2018	9
14 Space Exploration Technologies Corporation (SpaceX)	10/08/2018	8
Average Number of Days Late		48

EXHIBIT B

**NONPROFIT, FOR-PROFIT, AND OTHER ENTITIES
FINANCIAL REPORTING PACKAGES
FILED MORE THAN 45 DAYS AFTER FINANCIAL REPORTING PACKAGE
WAS DELIVERED TO THE ENTITY'S GOVERNING BODY**

FOR FISCAL YEARS ENDED OCTOBER 1, 2017, THROUGH SEPTEMBER 30, 2018

Entity	Number of Days Package	
	Filed After Delivery to Auditee	Filed Late
1 Florida Health Sciences Center, Inc.	175	130
2 University of Central Florida Foundation, Inc.	173	128
3 Embry-Riddle Aeronautical University, Inc	165	120
4 University of North Florida Foundation	164	119
5 Warner University, Inc	163	118
6 Council on Aging of Volusia County	141	96
7 Citrus Research and Development Foundation	130	85
8 University of Florida Foundation, Inc.	105	60
9 Florida Association of Free and Charitable Clinics, Inc.	80	35
10 Florida Institute of Technology, Inc.	56	11
11 Redlands Christian Migrant Association, Inc.	53	8
Average Number of Days	128	73