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State and Local Government Finance Division



Agenda:

- Why make these changes?
- Review 2020 Audit Process Changes
- 2021 Rule and Business Process Changes
- Financial Performance Indicators of Concern
- Response Letters and Preparation Guidance

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Background

Three years ago, we launched an initiative to improve our audit review process and utilize available technology.



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What were some of our goals? Actions Needed?

We needed to prioritize limited staff resources for local governments that had a higher risk of financial failure or significant internal control weaknesses. We wanted to spend less resources on units with a lower risk.

We needed to improve the awareness and engagement of local governing boards.

We wanted to better utilize the audit reports and the audit community.

We needed to update the Administrative Code to improve the business process.

We wanted to reduce the amount of time between the annual audit and the governing board's awareness of financial condition.

We needed stronger automation tools and revised business processes that would help us utilize our data better to assess risk.



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DALE R. FOLWELL, CPA
Vale 1. Foliable, CPA

Recall 2020 Audit Review Process Changes:

- Significant changes in 2020 reporting.
- New in 2020: Risk-based approach to audit reviews.
- Enhanced information requested on Transmittal Document that auditors submit and on Unit Data from Audit worksheet.
- No routine GAAP reviews.
- Revised Data Input Process. Amounts on "Unit Data from Audit Worksheet" were "self-reported" beginning with 2020 audit.

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Additional 2020 Audit Review Process Changes:

- Finance Officers verified that data provided on data input form agreed with audited financial statements.
- Corrections of financial statements required the finance officer to resubmit and reverify unit data from audit worksheet.
- Additional information on rows 202 209 of "Unit Data from Audit Worksheet" captured information on finance officer appointment and NCGS 159 compliance.



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Vale J. Foliable, CPA

Summary of Administrative Code Changes:

- If the governing body of a government unit is notified by its independent auditor that the audited financial statements presented to the governing body included one or more significant deficiencies, material weaknesses, other findings or if the auditor determined that Financial Performance Indicators of Concern were identified based on information presented in the audited financial statements, then the governing body shall develop a "Response to the Auditor's Findings, Recommendations, and Fiscal Matters"
- Link to Administrative code here Chapter 03 20 NCAC 03 .0508
- Code Changes are effective for a FYE 2021 implementation.

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"notified by its independent auditor"

- "Notified" defined below:
- Comments include in one of the communication letters to the governing body, such as the management letter; or
- Provided to the Board during the Auditor's presentation of the financial statements as concerns the government will need to respond to the LGC about.



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Tale I. Folunce CPA

"presented to the governing body"

The auditor shall present the audit and any compliance reports to the government unit's governing body not later than **45** days after the submission of the audit report to the LGC.

The presentation to the Board should include:

- a) descriptions of findings, including material weaknesses and significant deficiencies, and other communications from the auditor regarding internal;
- b) the status of the prior year audit findings;
- c) the values of Financial Performance Indicators based on information presented in the audit; and
- d) notification to the governing body that the governing body shall develop a "Response to the Auditor's Findings, Recommendations, and Fiscal Matters.
- Reference for change: 20 NCAC 03 .0502

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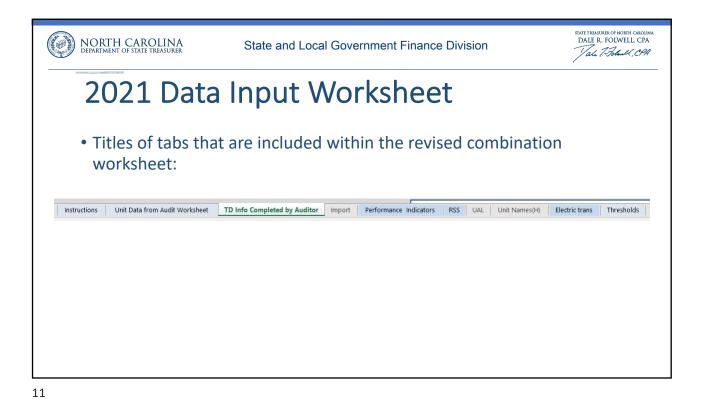
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"included one or more significant deficiencies, material weaknesses"

Sources of Significant deficiencies or material weaknesses:

- Revised Worksheet 2021 Data Input Worksheet combines the former Transmittal Document that auditors prepare at the time of report submission and the Unit Data from Audit Worksheet that is verified by the Finance Officer.
- These two sources, presented on two separate tabs in the Data Input worksheet, populate the Performance Indicator Tab.



"other findings"

- "Other findings" acknowledges the professional judgement and expertise of the auditor based on their knowledge of the local governmental unit.
- "Other findings" are issues that do not rise to the level of significant or material. The auditor may present these items to the board as an issue the unit should address in their LGC Response Letter.
- For example: An auditor recognizes that neither the Mayor nor the Finance Officer present interim financial information to the board in a regular/timely manner. The delayed reporting is not a material or significant finding. The auditor can choose to present this "other finding" to the board as an issue, resulting in a required response to the LGC.



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Tale T. Folonik, CPA

"other findings"

- If an issue is in a management letter, does it need to be included in the response letter? Perhaps. If the auditor is recommending a business process change that does not affect internal controls, but one that is an efficiency issue then it might not be included in a response letter. If a recommendation relates to internal control improvement, then it should be address addressed in the response letter to us.
- Items in the management letter can be identified as recommendations or Internal Control improvements. Those items in a management letter that, in the auditor's professional opinion should be implemented by the unit, should be communicated to the Board as being required to be included in the "response" letter.
- The Auditor is informing the Board that a "Response" letter is needed by the LGC and the items that must be addressed in that "Response" letter.



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"if the auditor determined that Financial Performance Indicators of Concern" (cont.)

- Note: Data evaluation change for FYE 2021 The LGC will be grouping and evaluating units, not by population, but by the amount of the General Fund expenditures. We used our existing database, collected over decades, to rework our thresholds. A comparable unit now will be defined as one with a similar sized General Fund budget and similar services.
- The revised thresholds using the General Fund budgets, as opposed to population levels, were developed so that a governmental unit that had an FBA concern in a prior year would have an FBA concern going forward. Units should not see a significant change in the categories they fall into unless they have actually had a significant change in FBA.



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Yal J. Folunce, CPA

Why did we need to Redefine the Data Thresholds to use General Fund Budgeted Levels?

- Budget levels provide a more meaningful metric. Expenditure levels dictate needs for cash levels and reserves, such as FBA.
- Population does not drive numerous metrics in such a direct manner.
- We developed a UAL predictive model in conjunction with NCSU and needed to realign our actual data analysis to mesh with the predictive data.
- The NCSU staff worked with population metrics initially and found it difficult to draw any conclusions.

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if the auditor determined that Financial Performance Indicators of Concern

- With the rule changes and the data evaluation reset, the LGC developed a list of Financial Performance Indicators of Concern and defined "healthy" versus "concern" levels.
- Performance indicators are key ratios that we have monitored historically. They are now available to the auditor and local government at the time of the audit
- For example: The LGC determined that, based on prior years' data, the minimum threshold for Fund Balance Available as a % of expenditures for municipalities with General Fund expenditures of \$1,000,000 is 34%. The median for this-sized budget is 63%. Governments in the lower quartile have an FBA that is a Financial Performance Indicator of Concern.



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Yal J-John CPA

Revised Budget Thresholds: Municipalities

Municipalities				
General Fund Expenditures below:	Median FBA as % of Expenditures without Powell Bill	Minimum Thresholds FBA as % of Expenditures	# of Months FBA using Annualized Expenditures	
\$100,000	260%	100%	12.00	
\$100,000 to \$999,999	132%	71%	8.52	
\$1,000,000 to \$9,999,999	63%	34%	4.08	
Above \$10,000,000	46%	25%	3.00	

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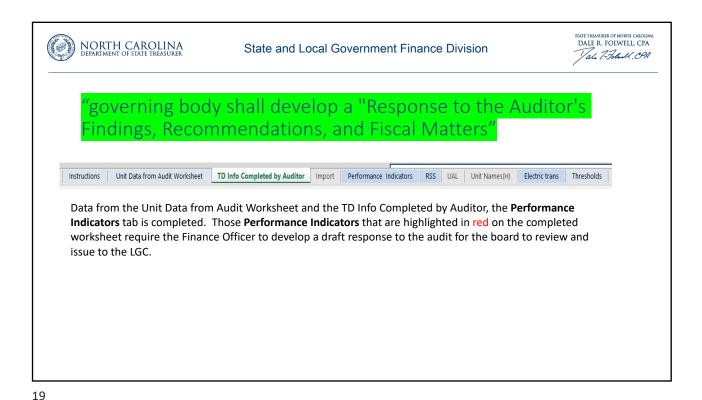
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Revised Budget Thresholds: Counties

Counties	4		
General Fund Expenditures below:	Median FBA as % of Expenditures without Powell Bill	Minimum Thresholds FBA as % of Expenditures	# of Months FBA using Annualized Expenditures
Below \$100,000,000	39%	20%	2.40
\$100,000,000 and above	32%	16%	1.92

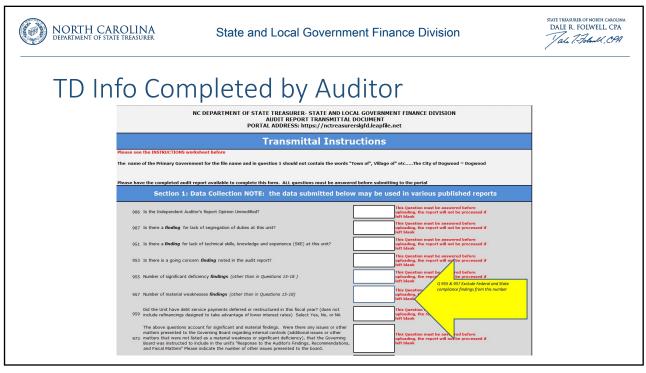


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The self-appointed information for your wint's work used to generate the following trends and performance indicators. We have created that Performance indicators and the Control of the Control of

Financial Performance Indicators of Concern

- Unit Data from Audit Worksheet is completed by the auditor or Finance Officer and verified by the Finance Officer
- Information in worksheet should tie to the government's financial statements.
- Transmittal Information tab is completed by auditor.
- Information on these documents and historical data in the LGC database generate the Financial Performance Indicators of Concern (FPICs).
- Indicators that are outside acceptable thresholds are highlighted in red.
- The governing boards should get a copy of the FPICs at the time the audit is presented to them.





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TD Info Completed by Auditor (cont.)

- Improved formatting, requiring questions to be answered before report will be process.
- Local government's name will be selected from dropdown list and the unit number we use will then populate.



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Val. J. Foliadi, CPA

2021 Audit Filing and Reporting:

- The audit contract that includes these changes is on our website at <u>Contracts</u>
- All changes are effective beginning with June 30, 2021 audits.
- Prior years audits may use the previous process in 2021 or the revised 2021 process. Beginning in 2022, all audits, regardless of year, will use revised process.

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Walking through the Revised Process



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Tale 1-Foliable, CPA

First: Let's Change EVERYTHING at once!

- Goodbye to Leapfile!
- Auditors used Leapfile Portal to submit documents electronically.
- Portal was no longer supported by State IT but was critical to our business process.
- An outage during audit review season would be risky for us. We needed a replacement tool for the fall of 2021.
- Leapfile was also inefficient for our staff to use for processing audits.

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Vale 1. Folial CPA

LGC File Transfer Portal:

- Replaces LeapFile transfer portal.
- Portal will have options for submitting information and files on each type of document; audits, contracts, and invoices.
- We are currently developing and testing this functionality and plan to release it in time for the 2021 review season later this summer.
- We are targeting an August 1st implementation date.
- The LGC File portal will probably be rolled out by document type with audit submission going first.
- Contracts and invoices will go shortly after.

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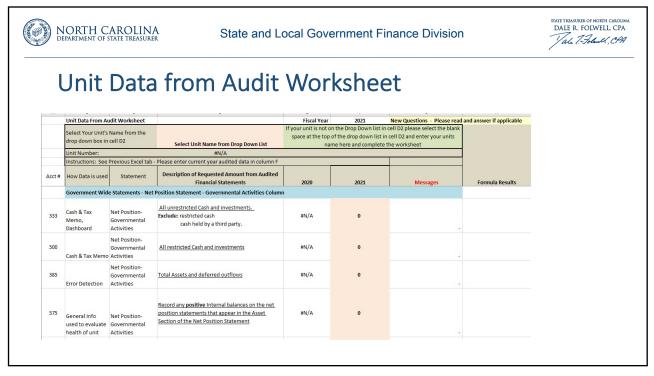
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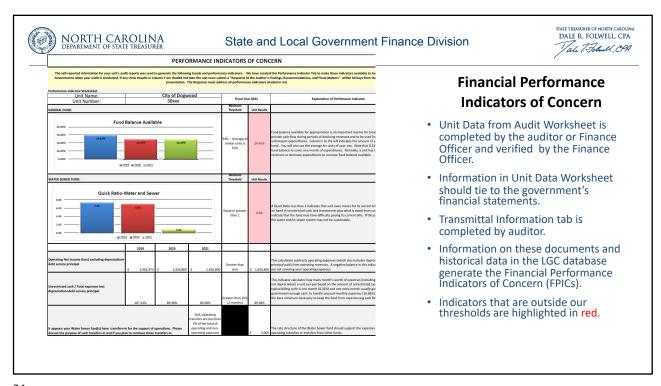
2021 Audit Process: Summary

- Beginning with FYE 2021, the LGC will not initiate communications about concerns or findings. The end of an era!
- The Transmittal Document (TD) Info Completed by Auditor and the Unit Data from Audit Worksheet verified by the Finance Officer, provide information needed for "Financial Performance Indicators of Concern" (FPICs) that are outside our acceptable parameters.
- Note: The 2021 Revised Data Input Worksheet will **NOT** be available on our website until at least August 1, 2021.

NORTH CAROLINA DEPARTMENT OF STATE TREASURER	State and Local Governm	ent Finance Division	STATE TREASURER OF NORTH CAROLINA DALE R. FOLWELL, CPA Jale 1-John M. CPA			
TD Info Co	mpleted by Au	ditor				
Please see the INSTRUC						
	eted audit report available to complete this form. ALL questions must be answer					
Section 1: Data Collection NOTE: the data submitted below may be used in various published reports						
906 Is the Indepe	ndent Auditor's Report Opinion Unmodified?	This Question must be answered before uploading, the report will not be processed if left blank				
907 Is there a fin	ding for lack of segregation of duties at this unit?	This Question must be answered before uploading, the report will not be processed if left blank				
951 Is there a fin	ding for lack of technical skills, knowledge and experience (SKE) at this unit?	This Question must be answered before uploading, the report will not be processed if left blank				
953 Is there is a	going concern <i>finding</i> noted in the audit report?	This Question must be answered before uploading, the report will not be processed if left blank				
955 Number of sig	nificant deficiency findings (other than in Questions 15-18)	This Question must be uploading, the report be processed if				
957 Number of ma	sterial weaknesses <i>findings</i> (other than in Questions 15-18)	This Question uploading, left blank				
	nave debt service payments deferred or restructured in this fiscal year? (does not ncings designed to take advantage of lower interest rates) Select Yes, No, or NA	This Question uploading, the re-				
matters prese 973 matters that Board was ins	sestions account for significant and material findings. Were there any issues or other intend to the Governing Board regarding internal controls (additional issues or other were not listed as a material weakness or significant deficiency), that the Governing tructed to include in the units "Response to the Auditor's Findings, Recommendations, Ittes" Please indicate the number of other issues presented to the board.	This Question must be analyed before uploading, the report will not be processed if left blank				
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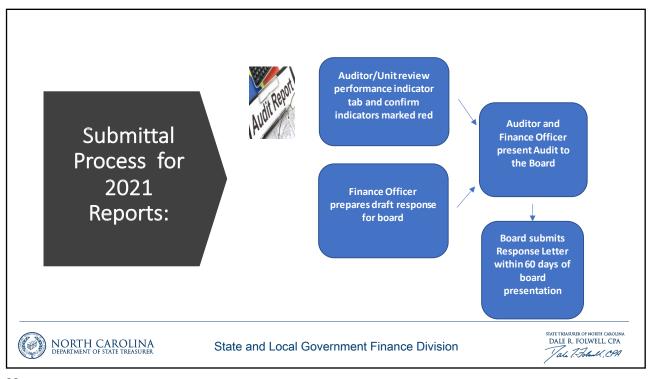


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2021 Audit Process: Summary (cont.)

 One or more Financial Performance Indicators of Concern, significant deficiencies or material weaknesses, or other findings will require the local government to prepare and submit a response to the LGC regarding the outcome of their audit.





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2021 Submittal Process:

- Administrative Rule changes require auditors to present the audit report to the governing board or an audit committee within <u>45</u> days of submitting to the LGC.
- If a response letter is required the unit, the Finance Officer should provide the Board a draft Response Letter, preferably at the same board meeting.
- Within <u>60</u> days of the board meeting in which the financial statements and the proposed response was presented, the detailed audit response should be filed with the LGC.
- Response Letters should be signed by entire governing board, Finance Officer and Manager or Administrator.



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2021 Audit Process: Financial Performance Indicators of Concern (FPICs):

- The total General Fund FBA and Debt Service Fund balance, excluding Powell Bill Funds/total expenditures plus transfers out, less bond proceeds, was less than the threshold for unit's budget size.
- The uncollected portion of the <u>budgeted</u> tax levy for the GF was equal to or more than 3%.
- The estimated property tax revaluation decreased from the previous tax revaluation.
- Does the local government have an effective pre-audit process to ensure that pervasive budgetary over-expenditures do not occur at the budget ordinance level? – Auditor Question on Transmittal Document

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2021 Audit Process: FPICs (Continued):

- Is the unit on the LGC's Unit Assistance List (UAL)?
- Is there a trend of late Audit Reports over the three years.
- Are any statutory violations disclosed in the audit report?
- The number of material and/significant findings or other findings that the Auditor reported to the government.
- Did the unit make any debt payments late or violate any bond covenants Auditor Question on Transmittal Document



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Vale 1. Foliable, CPA

2021 Audit Process: FPICs (Continued):

- Water and Sewer or Electric Funds Quick Ratio is less than one.
- WS/Electric Funds Unrestricted Cash/Total expenses, plus debt service principal, less depreciation, are less than 16% (two months of unrestricted cash on hand).
- WS/Electric Funds Operating Net Income (Loss), excluding depreciation, is less than zero.
- WS Funds Operating transfers are more than 3% of the total operating and nonoperating expenses.
- Electric Fund transfers exceed amounts described in NCGS 159B-39 for specific municipalities.
- · DEQ, Court Mandates or similar action exceeds 3% of the WS/Electric Fund budgets and is unbudgeted.
- For County's only: If the landfill is within 5 years of closure, how the closure/post closure costs will be funded? - Auditor Question on TD

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Vale T. Foland, CPA

Indicators of Concern

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- Information in Unit Data Worksheet should tie to the government's financial statements.
- Transmittal Information tab is completed by auditor.
- Information on these documents and historical data in the LGC database generate the Financial Performance Indicators of Concern (FPICs).
- Indicators that are outside our thresholds are highlighted in red.

Finance Officer's Response Draft for Board

Webpage is still in development.

The **Response Preparation Guidance** webpage will mimic the Financial Performance Indicators tab in the Data Input Worksheet.

The page will provide tools and information for the Finance Officer to prepare draft response for the Board. Including:

- · Suggested actions to consider for specific issues,
- Links to Best Practices,
- LGC memos we have developed or information that might assist with the specific issue, and
- Draft language and a template for the letter.



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Why a Unit Response letter vs. a unit letter?

- We wanted to compress the time between the annual audit and the governing board's awareness of unit's financial condition or internal control concerns.
- Auditors have considerable creditability with their local government clients. We wanted to utilize the CPA/client relationship to provide education to the governing boards.
- We needed to increase the overall awareness and engagement of local governing boards.



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DALE R. FOLWELL, CPA
Val. J. Foliadi, CPA

Case Study: City of Dogwood

- After the auditor for Dogwood completed the 2021 audit, they informed the Finance Officer that they had several items highlighted as Financial Performance Indicators of Concern.
- First, the City's General Fund was below the minimum of 34% for a local government with a Budget of \$1,000,000 or less.
- Second, several departments in the GF and in the Water and Sewer Fund had overspent the adopted budget, raising concerns that the City's pre-audit business process was not working well.
- Finally, the City did not reconcile bank statements timely during the year. The governing board did not have accurate information to make decisions during the year. Item was reported as a material weakness in the City's audit.

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What Possible Actions Should the City take to Remedy the FPIC's related to the General Fund?

- Review and revise the current year's budget. Any expenditures that we can postpone/cancel? Do we need a hiring freeze?
- Any bad business processes contributing to poor financial condition, such as a low tax collection rate? How can we address that now so that June 2022 is improved?
- Do we have a fund balance policy for our General Fund?
- What were the over expenditures noted by the auditor and why did they occur?

Response Preparation Guidance will include a sample list of potential finding and proposed actions that a governmental unit might consider taking to remedy the issue. Related language for a draft will also be provided.



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Proposed solutions to Dogwood FPICs:

Proposed list of reductions in <u>current year's</u> budget. Give us specifics. What have you done? Might be items such as:

- Vacant positions will be evaluated prior to posting to determine if we can accomplish the work in a less expensive manner with a contractor or part-time employee
- Delay in several capital improvement purchases until the next fiscal year.
- Over expenditures were researched and were due to several purchases made right at June 30, 2021. Revise purchase order (PO) process to cut off at May 21 to allow Finance staff to process year end work cleanly.

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Draft General Fund Language

- The City is **NOT** required to use our paragraphs or letter templates. We plan to provide these tools to help the local government work more efficiently.
- From a dropdown box on the Response Preparation Guidance that
 references the FPICs that are highlighted in red, the City 's Finance Officer
 selected the following paragraph to update with specific City information and
 actions.

In the [Unit Type]'s General Fund, the percentage of fund balance available for appropriation relative to expenditures is in the lowest quartile for comparably-sized budgets. As of June 30, 2021, the amount of available fund balance was \$[FBA] or [FBA] percentage]% of total fund expenditures. We have already analyzed its budget ordinance for the current fiscal year and determined that we will take the following action(s).

[Include detailed list of actions taken in the current year.]



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What Possible Action(s) Should the City take to Remedy the FPIC's related to the Material Weakness in Internal Controls?

- Review the business process and staff responsibilities.
- Why are the bank reconciliations not getting done routinely?
- Do we need some additional help?
- Can we work more efficiently with additional training?
- Can we use some of our lapsed salary for any vacant positions to hire a temporary staff person to process work timely?

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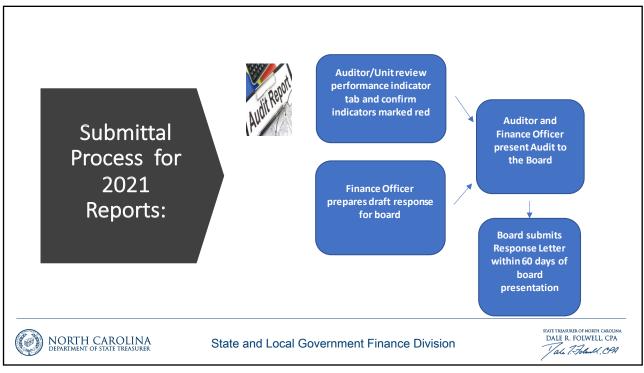


Draft Internal Control Language

 Again, from a dropdown box on the Response Preparation Guidance that references the specific FPICs that are highlighted in red, the City's Finance Officer selected the following paragraph to update with specific City information and actions.

The [Unit Type]'s auditor reported as a material weakness that [summarize material weaknesses]. We have developed a corrective action plan to eliminate this weakness and it is presented on page [xx] of our audit report. To help ensure that this issue does not recur, we have taken the following action(s).

[Include detailed list of actions taken in the current year.]





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DALE R. FOLWELL, CPA
Tale T-Soland, CPA

CONTACT INFORMATION

- SLGFD phone number 919-814-4300
- Email:
 - <u>Susan.Mccullen@nctreasurer.com</u>

