

# VERMONT INFORMATION TECHNOLOGY LEADERS, INC.

# **COMPLIANCE REPORTS**

JUNE 30, 2017

JMM & ASSOCIATES CERTIFIED PUBLIC ACCOUNTANTS

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## Vermont Information Technology Leaders, Inc.

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#### Vermont Information Technology Leaders, Inc. Summary Schedule of Prior Audit Findings Year Ended June 30, 2016

www.vitl.net

#### Finding No. 2016-001

Federal Programs: CFDA 93.778: Medical Assistance Program

Significant deficiency:

Criteria: Grant expenses should be supported by detailed employee timesheets.

Condition: VITL's timesheets did not adequately document grant related hours.

*Recommendation:* VITL should improve its internal controls over payroll transactions to ensure there is adequate documentation of direct and indirect labor.

Current year status: No similar findings were noted in the current year.

#### **Finding No. 2016-002**

Federal Programs: CFDA 93.778: Medical Assistance Program

Significant deficiency:

Criteria: Unallowable costs should be segregated from grant expenses.

Condition: VITL charged unallowable costs to federal awards.

*Recommendation:* VITL Should improve internal controls over grant accounting to ensure only allowable costs are charged to federal awards.

Current year status: No similar findings were noted in the current year.

#### Finding No. 2016-003

Federal Programs: CFDA 93.778: Medical Assistance Program

#### Significant deficiency:

Criteria: Expenditures should be made in compliance with federal procurement procedures.

*Condition:* VITL did not have a comprehensive procurement policy to govern the purchase of goods and services with federal awards.

## Finding No. 2016-003 (continued)

*Recommendation:* VITL should adopt a procurement policy that includes the required procedures as prescribed by federal regulations.

*Current year status:* VITL adopted a procurement policy in March 2017 and it was applied to applicable purchases after that date.



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

To the Board of Directors of Vermont Information Technology Leaders, Inc. Burlington, Vermont

We have audited, in accordance with the 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 Vermont Information Technology Leaders, Inc. (a nonprofit organization), which comprise the statement of financial position as of June 30, 2017, and the related statements of activities, functional expenses and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated July 24, 2018.

#### Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Organization'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 opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Organization's internal control. Accordingly, we do not express an opinion on the effectiveness of Vermont Information Technology Leaders, Inc.'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.

Our consideration of internal control was for the limited purpose described above and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. Given these limitations, during our audit, we did not identify any deficiencies in internal control that we consider to be material weaknesses. We did identify certain deficiencies in internal control, described in the accompanying schedule of findings and questioned costs as findings #2017-001 and #2017-002, which we consider to be significant deficiencies.

#### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether Vermont Information Technology Leaders, Inc.'s 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 instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the accompanying schedule of findings and questioned costs as items #2017-001 and #2017-002.

#### Vermont Information Technology Leaders, Inc.'s Response to Findings

Vermont Information Technology Leaders, Inc.'s (VITL) response to the findings identified in our audit is described in the accompanying schedule of findings and questioned costs. VITL's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

#### 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 Organization'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 Organization's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Jmm & associates

July 24, 2018



## INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE REQUIRED BY THE UNIFORM GUIDANCE

To the Board of Directors of Vermont Information Technology Leaders, Inc. Burlington, Vermont

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

We have audited Vermont Information Technology Leaders, Inc.'s compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of the Organization's major federal programs for the year ended June 30, 2017. Vermont Information Technology Leaders, Inc.'s major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

#### 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 Vermont Information Technology Leaders, Inc.'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 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 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 Vermont Information Technology Leaders, Inc.'s compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

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

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#### Opinion on Each Major Federal Program

In our opinion, Vermont Information Technology Leaders, Inc. 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 major federal programs for the year ended June 30, 2017.

#### Other Matters

The results of our auditing procedures disclosed 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 as items #2017-001 and #2017-002. Our opinion on each major federal program is not modified with respect to these matters.

Vermont Information Technology Leaders, Inc.'s (VITL) response to the noncompliance findings identified in our audit is described in the accompanying schedule of findings and questioned costs. VITL'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 Vermont Information Technology Leaders, Inc. 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 Organization'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 Vermont Information Technology Leaders, Inc.'s internal control over compliance.

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 requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control over compliance is a deficiencies, in internal control over compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control over compliance is a deficiencies, in internal control over compliance is a deficiencies, in internal control over compliance is a deficiency or a combination of deficiencies, 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.

Our consideration of internal control over compliance was for the limited purpose described above, 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. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, we identified certain deficiencies in internal control over compliance s described in the accompanying schedule of findings and questioned costs as items #2017-001 and #2017-002, we consider to be significant deficiencies.

Vermont Information Technology Leaders, Inc.'s response to the internal control over compliance findings identified in our audit is described in the accompanying schedule of findings and questioned costs. VITL's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

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.

Jmm & associates

July 24, 2018

## VERMONT INFORMATION TECHNOLOGY LEADERS, INC. SCHEDULE OF FINDINGS AND QUESTIONED COSTS FOR THE YEAR ENDED JUNE 30, 2017

# Section I - Summary of Auditor's Results

# Financial Statements

Type of auditor's report issued		Unmodified.	
Internal control over financial repor Material weakness identified	ting:	No.	
Significant deficiency identified not considered to be a material weakness		Yes.	
Noncompliance material to financia statements noted	ll.	None reported.	
Federal Awards			
Internal control over major program Material weakness identified	IS:	No.	
Significant deficiency identified not considered to be a material weakness		Yes.	
Type of auditor's report issued on compliance for major programs		Unmodified.	
Any audit findings disclosed that ar to be reported in accordance with 2 CFR 200.516(a)	e required	Yes.	
Identification of major programs:			
CFDA #93.778	Medical Assis	tance Program	
Dollar threshold used to distinguish between Type A & Type B program		\$750,000.	
Auditee qualified as low-risk audited	e	No.	

## SECTION II – FINANCIAL STATEMENT FINDINGS

## <u>#2017-001</u>

#### Significant deficiency

*Criteria:* Costs incurred should be reported as direct or indirect, depending on the nature of the expense.

Condition: VITL incorrectly reported certain indirect costs as direct costs.

Context: Approximately \$95,000 was improperly classified and then corrected during the audit.

*Effect:* Potential understatement of indirect cost rate and overstatement of direct grant costs.

Cause: Inadequate accounting policies and procedures over expense transactions.

*Recommendation:* VITL should improve its internal controls over cost accounting to ensure expenses are properly reported as direct and indirect.

*Views of responsible officials:* As part of the state review of VITL's grant billing, the state has interpreted the cost principles related to indirect costs differently than in prior years. The two expenses noted in this year's audit findings had, in previous audits, been identified as direct expenses. However, to improve our internal control over the identification of direct versus indirect costs, VITL, will implement a new procedure to review any new purchases in accordance with its cost policy statement (VITL Policy FIN-08).

### <u>#2017-002</u>

#### Significant deficiency

*Criteria:* Report package is due to Federal Audit Clearinghouse within 9 months of the end of the Organization's fiscal year.

Condition: VITL did not meet the required deadline.

*Context:* Submission of the report package was late due to a delay in the review of VITL's draft financial reports by its State oversight agency.

Effect: Lack of compliance could potentially jeopardize future funding.

Cause: Lack of timely review by VITL's oversight agency.

Recommendation: VITL should take appropriate steps to ensure compliance in the future.

## #2017-002 (continued)

*Views of responsible officials:* VITL acknowledges that it was unable to submit its report package to the Federal Audit Clearinghouse by the required reporting date. VITL had prepared and submitted its calculation of the final billing for its FY17 DVHA and Summit grants along with a draft of its FY17 audited financial statements to the State by October 2017. The State has acknowledged that its review of VITL's annual grant funds did not reach a conclusion due to a number of unavoidable factors and that it was not able to provide VITL with the information necessary to meet the filing deadline.

## SECTION III – FEDERAL AWARD FINDINGS

### <u>#2017-001</u>

Significant deficiency

Federal program: CFDA 93.778: Medical Assistance Program

See Financial Statement Finding Item #2017-001.

Questioned costs: Not determined.

## <u>#2017-002</u>

Significant deficiency

Federal program: CFDA 93.778: Medical Assistance Program

See Financial Statement Finding Item #2017-002.

Questioned costs: Not determined.



Vermont Information Technology Leaders, Inc.

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Vermont Information Technology Leaders, Inc. Corrective Action Plan Year Ended June 30, 2017

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## Finding No. 2017-001

Federal Programs: CFDA 93.778: Medical Assistance Program

#### Corrective action plan:

VITL will implement a procedure that will review new costs to determine their correct determination as either direct or indirect based on whether their benefit can be directly identified with a cost objective or if they are incurred for a common or joint purpose benefitting more than one cost objective. This determination will be reviewed and approved by the CFO.

### Person Responsible:

Robert Turnau, CFO, Vermont Information Technology Leaders, Inc.

Timetable for corrective action:

120 days from VITL board approval of audited financials.

### Finding No. 2017-002

Federal Programs: CFDA 93.778: Medical Assistance Program

Corrective action plan:

In the future, VITL will keep on record any documentation and/or communication from any third party whose actions impact VITL's ability to meet the Federal Audit Clearinghouse submission requirements.

Person Responsible:

Robert Turnau, CFO, Vermont Information Technology Leaders, Inc.

Timetable for corrective action:

No later than 9 months from the end of VITL's fiscal year.