**Audit Procedures Training** 

# COLORADO DEPARTMENT OF HUMAN SERVICES – DIVISION OF CHILD CARE

### Overview

- History
  - CDHS has been contracting with Qualistar Colorado to provide child care resource and referral services since the mid-1990's.
  - CDHS has been contracting with CO Dept of Education since 1999 to provide coordination and oversight of Colorado's Early Childhood Councils.



### Goals and Objectives

- The main objectives of the resource and referral contract are to provide
  - resource and referral services to parents of young children; and,
  - professional development services for early childhood professionals.
- The EC Councils are charged with creating locally-based, early childhood systems that provide effective, efficient comprehensive, and high quality services to children and families.

## Typical Contract Expenditures for these projects

- Payroll
- Rent
- Phone
- Printing expenses
- Office supplies
- Travel for in-state meetings
- Staff professional development



# Recent CDHS Audit of Child Care and Development Fund Programs

### Snapshot of a Recent Audit

- CDHS Audit Division completed the audit
- Audit findings included the following:

Dollars Audited	Allowable Expenditures	Questioned Costs
\$106,286.55	\$5,602.04	\$100,684.51

### Audit Standards Applied

Auditors compared expenditures to the budget and budget narrative in contract

Auditors also applied cost principles for non-profit organizations contained in OMB Circular A-122

Circular is available online at: <a href="http://www.whitehouse.gov/omb/circular">http://www.whitehouse.gov/omb/circular</a> s a122 2004/

### Main Cost Principles in A-122

- Reasonable
- Necessary
- Prudent
- Allocable
- Authorized

- Consistent
- Documented
- No Pre-Payment
- Capital Assets and Depreciation Expense



## Audit Findings

### Three Key Audit Findings

- 1. No Documentation
- 2. Insufficient Documentation
- 3. Unallowable Expenditures

Total Questioned Costs													
No Documentation	Insufficient Documentation	Unallowable Expenditure	Total Questioned Costs										
\$90,262.00	\$8,902.45	\$1,520.06	\$100,684.51										

### No Documentation

- Without proper documentation, expenditures cannot be reimbursed because auditors cannot determine the goods or services purchased
- Contractors need to provide monthly reimbursement request form indicating budget line associated with expenditure as well as all detailed supporting documentation (e.g., receipts, invoices)

### Insufficient Documentation

- Although documentation was provided, it was insufficient to allow reimbursement
- All contractors need to provide complete, detailed receipts and/or invoices for expenditures
- If a portion of an expenditure was charged to the contract, contractors must provide an explanation of the prorata share applied to the expenditure

### Unallowable Expenditure

Some expenditures are not allowable either based upon the terms of the contract or cost principles of OMB Circular A-122

### Examples:



- Purchases exceeding budget line caps
- Purchases coded under incorrect budget line
- Purchases for personal use (e.g., bottled water, catered staff lunch)
- Payment of salary exceeding actual hours worked

## Expenditure Analysis Procedure

## Five Considerations for All Expenditures

- 1. Review budget narrative
- 2. Determine if expenditure is in accordance with terms of contract
- 3. Monitor budget cap
- 4. Analyze program(s) benefiting from expenditure
  - If the contract is sole beneficiary, then can charge solely to contract
  - If the contract is one of multiple beneficiaries, then need to apply a pro-rata share
- 5. Document expenditure properly



### Review the Budget Narrative

Record purchases only on the proper budget line – if expense is not allowed pursuant to budget narrative, it cannot be charged to that budget line

### • Example:

 If the operating budget line is specifically for rent expenses, professional accounting or audit expenses should not be included on that line.



### Review Terms of Contract

Need to determine if expenditure is in accordance with the terms of the contract

#### • Example:

 Does a catered lunch for staff further the provision of contracted services to local parents or child care providers?



### Monitor Budget Cap

Carefully monitor each budget line throughout the contract period to avoid overspending

#### Example:

 If the payroll cap is \$12,000 for the year, you may want to only reimburse actual expenses up to \$1,000 per month to avoid depleting the funds before the end of the contract period (NOTE: you must pay actual expenses, not just an average amount)

## Analyze Program(s) Benefiting from Expenditure

- If the contract is sole beneficiary, then can charge solely to contract
- If the contract is one of multiple beneficiaries, then need to apply a prorata share (i.e., each program must pay its fair share)
- Example:
- Is this contract the sole beneficiary of anti-virus software purchased by your organization?

## Document Expenditure Properly

- Contractors need to provide monthly reimbursement request form indicating budget line associated with expenditure as well as all detailed supporting documentation (e.g., receipts, invoices)
- Slides 21-51 provide examples of necessary documentation for expense reimbursement

## **Necessary Documentation**

### Invoices and Receipts

- Must contain detailed description of the goods or services purchased
- Must be verified by checking for:
  - Proper authorization
  - Correct addition
  - No previous balance or late fees/interest
- Any discounts for prompt payment or volume purchase must be reported as a credit or reduction of expenditures

### Invoices and Receipts (contd.)

- Dinner Receipt A
  - Lists name and contact info for deli
  - Lists only the total of purchase (no details of food and/or drink purchased)
  - Lists tip
  - Contains employee's signature

Not Sufficient for Reimbursement



- Lists name and contact info for deli
- Lists specific food and/or drink purchased and the total of the purchase
- Lists tip
- Contains employee's signature

Sufficient for Reimbursement



## Good Example of Reimbursement Request – Pt 1

Reimbursement Request Form completed and signed

Qualistar Early Learning Partner Core Services Reimbursement Request Form - 2008- 2009											
Agency/Program:	The second secon	SDA #									
Reimbursement for P	eriod Beginning: April 1, 2009	Ending: April 30, 2009									
	<u>Referrals</u>										
Budget Items	Current Request	YTD Cumulative Request									
Personnel Salaries	\$2,073.65	\$15,655.12									
Fringe Benefits - %	\$0.00	\$2,992.06									
Operating Expenses	\$200.00	<b>3</b> \$4,070.07									
Travel	\$848.57 57.786	\$2,016.56									
Supplies	\$0.00	\$332.81									
Equipment	\$0.00	\$0.00									
NACCRRAware	\$0.00	\$2,175.00									
Administration (15% maximum)	\$0.00	\$0.00									
Referral Budget SUBTOTAL	\$3,122.22	\$27,241.62									

## Good Example of Reimbursement Request – Pt 2

Accompanied by expense detail describing each expense contained in each budget line

Expense 5060 Mileage Rein • Check	bursement 4/23/2009	4769	palakan kiling		2,553.64
Total 5060 Mileage	Reimbursemen	it	The state of the s	01-Quali	4.50
5080 · Insurance • Check	4/10/2009	4753	State Farm Specialty Products	04.0	4.5
Total 5080 · Insuranc	e ·		outer any openiaty Products	01-Quali	200.00
5111 · Travel • Check	4/10/2009	4746	e de la companya del companya de la companya del companya de la co		200.00
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5325 · Benefits/Healt	h Insurance	and the second second second second		e a carteau e e a	74.38
	4/30/2009	4.09 Payrl		01-Quali	0.00
Total 5325 Benefits/I	Health Insuranc	e			0.00
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ncome				·	3,122.22
					-568.58

NOTE: Per the previous slide, mileage reimbursement and travel can be combined for travel total and both payroll lines can be combined for payroll total

### **Necessary Documentation**

- Payroll and Fringe Benefits
  - Must provide accurate, detailed timesheets
  - After-the-fact determination of the actual activity of the employee (no budget estimates)
  - Must account for the total activity of the employee (100% time reporting)
  - Must be signed by employee or supervisor with firsthand knowledge of employee's activities
  - Prepared at least monthly

## Good Example of Personnel Activity Report

#### **Good:**

- Lists *all* hours worked on each program
- Lists total hours worked
- Contains employee's signature
- Contains approval signature by supervisor

Period End: 7/11/08		Posit						l and		Coo		tor
Date ⇔	6/3	7/1	7/2	7/3	7/4		7/7	7/8	7/4	and the same	7/11	
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Community Partnerships			-	+-						-	+	$\vdash$
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ublic Awareness/newsletter		-	+	1			-	+	-	1	+	-
Coordinate Projects	1	12	12	+1-			$\vdash$	12		++	+-	
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Provider Services	-	+	+	+ -	1		1	+-	1	2	1	
Recruit & Support Providers	-	μ.	H	++			1			+~	1	
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Quality Assurance Activities		1	11					11		1		
20011171121121121121												Totals
OTAL HOURS WORKED	8	8	18	C			8	18	18	18	8	80
Holiday					8	44		1_		-	4	
Sick Leave/Sick Bank				1				4		1		
Personal Leave						-1			1_		4-	
Annual Leave			1_	1_	1		1		1-	1	4-	-
Other Leave:		1		1	1_		_	1	1_	4-	4	-
Leave w/o Pay	1	1		2.00	-			-	-			
OTAL HOURS PAID	16	1							L			190
												80

#### Missing:

Nothing

## Example of Insufficient Documentation for Payroll Exp

#### Good:

Contains | employee's signature

#### Time Statement - July - December 2008

I certify that the salary/benefit charges applied to the Child Care Development Fund Contract by and between Qualistar Early Learning and July – December 2008, were used to perform the scope of services as outlined in the contract. I understand that I must notify immediately if a change in allocation becomes necessary.



2/10/2010 Date

I certify that I performed duties outlined in the Scope of Services in the contract between Qualistar Early Learning and funded by the Child Care Development Fund Contract:

Program management, and direct services including coordination and delivery of training for child
care providers, participation in the Early Childhood Council Services. Professional
Development Committee, distribution of training information including posting to the Qualistar
online training calendar and the coordination and provision of child care quality rating and
improvement services.

The duties outlined above were performed in 40 hours per week (1.0 FTE). The Qualistar funding paid for 5 hours per week (.125 FTE) and was blended with other funding sources to cover the 1.0 FTE. Twenty-seven hours per week (.675 FTE) was funded by the Child Care Recruitment and Training program, and 8 hours per week (.2 FTE) was funded by the Child Care Recruitment and Training program, and 8 hours per week (1.0 FTE).



2/10/2010 Date

#### Missing:

- Does not provide specific hours worked on each program
- Statement describes how position was funded
- Contains no approval signature

## Necessary Documentation (cont.)

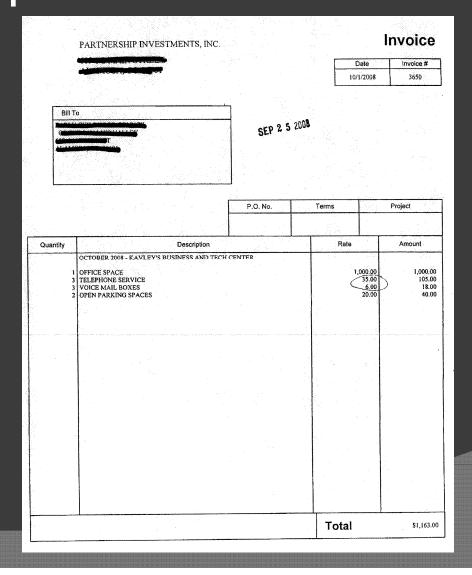
- Rent, Advertising, & Phone Expenditures
  - Must provide complete, detailed bill or invoice
  - Need proof of payment
  - Also need explanation regarding the portion of the bill that was charged to the contract



## Example of Documentation for Rent Expense

#### **Good:**

 Actual rent invoice is presented



#### Missing:

- Does not contain approval signature
- Need explanation of division of rent expenses across programs

## Example of Insufficient Documentation for Rent Expense

#### Good:

Does contain approval signature

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APPROVED FOR PAYMENT DATE 6/25/08

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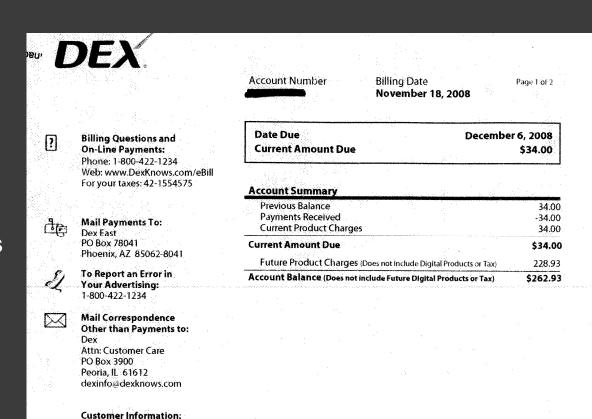
#### Missing:

- Rent division spreadsheet is not sufficient for reimbursement
- Need actual rent invoice for each month for reimbursement
- Need explanation of division of rent expenses across programs

## Example of Documentation for Advertising Expense

#### Good:

- Actual bill for advertising expenses
- Grantee's payment request form contained approval signature



**RURAL COMMUNITY RESOURCE** 

CENTER PO BOX 284 YUMA CO 80759-0284 1-970-848-3867

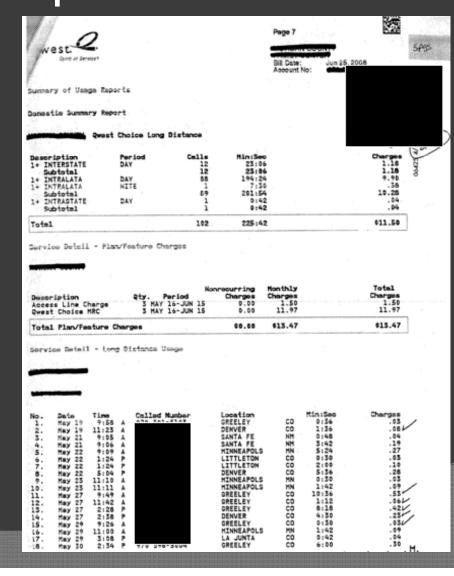
#### Missing:

 Need complete advertising expenses bill for reimbursement (page 1 of 2 is not sufficient)

## Example of Documentation for Phone Expense

#### **Good:**

Actual bill for phone expenses



#### Missing:

- Need complete phone bill for reimbursement
- Need explanation of division of phone expenses across programs

## Necessary Documentation (cont.)

- Meal Expenditures
  - Must provide complete, detailed receipt
  - Also need to ensure compliance with grantee's travel or meal policy (e.g., dinner caps)
  - NOTE: The purchase of alcohol with State or Federal funds is prohibited



## Good Example of Documentation for Meal Expense

#### **Good:**

- Actual receipt is presented
- Receipt lists food and/or drink purchased
- Receipt marked to clearly indicate day and meal purchased



#### Missing:

Nothing

## Good Example of Documentation for Group Meal Expense

#### **Good:**

- Actual receipt is presented
- Receipt lists food and/or drink purchased
- Employee's meal circled and no alcohol charged to contract
- Receipt marked to clearly indicate day and meal purchased



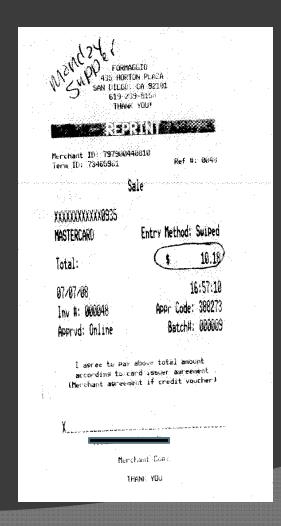
#### Missing:

Nothing

## Example of Insufficient Documentation for Meal Exp

#### **Good:**

- Actual receipt is presented
- Receipt marked to clearly indicate day and meal purchased



#### Missing:

- Detailed receipt listing food and/or drink purchased
- This receipt only provides the total of the purchase

- Meeting Expenditures
  - Must provide complete, detailed receipts and/or invoices for all purchases
  - Need list of attendees and their associated organization
  - Also need meeting agenda and explanation of how the meeting fulfills the objectives of the contract



#### **Good:**

- Actual receipt is presented
- Receipt lists food and/or drink purchased
- Payment request form states purchased for training meeting



#### Missing:

- Agenda from training
- List of attendees and their respective organizations

- Training Expenditures
  - Must provide confirmation of registration and payment for all attendees
  - Also need training agenda

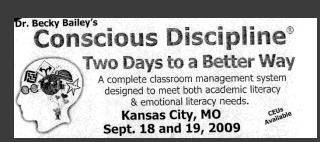


# Example of Documentation for Training Expense

Congratulations

#### **Good:**

- Provided training overview and registration form
- Registration confirmation was provided
- Payment request form has approval signature
- Proof of payment was provided



#### Missing:

Nothing

Your registration is con held at The Westin Cro beginning Friday, Sept information is: phone (	own Center Ho tember 18th a	otel located at O and ending Satu	ne East Pershin rday, September	g Road Kansas r 19th, 2009. The	City, MO 64108, hotel contact	to be

#### CHECK/CREDIT CARD REQUEST FORM

Purpose: Registration Fee for Conscious Discipline Training for Cathy Meekins

	Two	Hundred	Ninety-Five	and	00/100	Dollars	
PAY TO TH ORDE OF:	IE IA						

- Miscellaneous Expenditures (e.g., office supplies, postage, groceries)
  - Must provide complete, detailed bill, invoice, or receipt
  - Need explanation regarding how good or service purchased was used to fulfill the objectives of the contract
  - Also need explanation regarding the portion of the bill that was charged to the contract to ensure contract is only paying its fair share

#### **Good:**

 Detailed receipt listing item purchased



#### Missing:

• Need explanation of why this purchase was solely charged to contract (was the contract the sole beneficiary of this purchase)

#### **Good:**

 Detailed receipt listing items purchased



#### Missing:

- Need explanation of how these items were used to fulfill the objectives of the contract
- Need explanation why this purchase was solely charged to contract (was the contract the sole beneficiary of this purchase)

#### **Good:**

Actual invoice from retailer

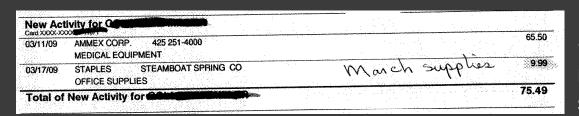
## 09.03.13 418303 P.O.S. 418303 Sale 37.99 418303 37.99 30 days 0.00 Current 90 days **BALANCE DUE BALANCE DUE**

#### Missing:

 Need itemized receipt stating specific good(s) purchased

#### **Good:**

Proof of payment provided



#### Missing:

 Need itemized receipt stating specific good(s) purchased

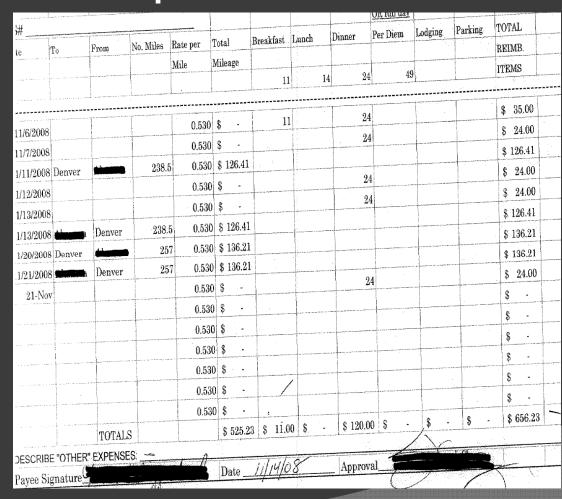


- Travel Expenditures (e.g., mileage, lodging, meals)
  - Need detailed travel log including start and end addresses and purpose of trip for mileage expenses
  - Must provide complete, detailed bill, invoice, or receipts (i.e., detailed meal receipt, final hotel invoice showing paid in full, actual airline ticket and baggage fee receipts)
  - Also need explanation if travel was solely for benefit of this contract or if cost should be allocated between or among various contracts

## Example of Documentation for Travel Expense

#### **Good:**

- Lists start & end locations with accurate mileage
- Agendas for meetings attended provided
- Contains employee's signature
- Contains approval signature by supervisor



#### Missing:

- No receipts for meal purchases provided
- Lists travel after date of approval signatures

# Example of Documentation for Travel Expense

#### **Good:**

- Lists start & end locations with accurate mileage
- Describes purpose of each trip
- Contains employee's signature

5	D	From	To	Miles
Date	Purpose of trip		TVP	120
7/21/08	Visit to Thompson Wiley Pres	7.7	Qualister + TGYS	134.5
7/25/08	Visut to Qualistar + TG45	Office		121
7/28/08	Visit to Qualistar + TG45 Visit to Qualistar (Farins)	Office	Qualistar	9
1129/08	ABCD Meeting	Office	Foothuls Gateway	1-1
1				
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#### Missing:

 Does not contain approval signature by supervisor



Total Miles 284, 50

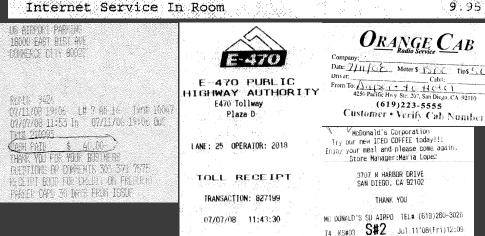
Amount of reimbursement
Total Miles X \$.30 = 85.35

## Example of Documentation for Travel Expense

#### Good:

- Payment request form lists all purchases by subject
- Form contains employee's signature and approval signature of supervisor
- Detailed receipts to support expenditures included with payment request form

Category	Grant	Memo	Amount
Travel	Q-Ref	Parking	\$4000
Travel	Cope	TOIS	\$ 200
Travel	O-Ref	Mesis	\$8967
Travel	Q-Ref	Cabfare	\$ 30.00
Supplies	Q-Ref	Internet	\$,2000



CLASS TOLL PAYMENT

02 \$2,00 CASH

#### Missing:

 Internet service rounded up, not actual cost

9:95

FAT IN

0.50

6.89

20.00

Order #374

1 2 CHSBURGER MEAL 1 MFD COKE

SUB TOTAL

EAT IN TAX

CASH TENDERED

 One meal receipt was total only (no detail of food or drink purchased)



#### • Gift Card Purchases

- Must provide detailed receipt showing quantity of gift cards purchased and the amounts on each card
- SDAs must maintain documentation tracking the inventory and distribution of the gift cards (including which specific card was given to which specific recipient and the reason for giving the card)
- NOTE: Unless all of the gift cards are properly distributed by the end of the contract period, reimbursement for the cards would not be allowable

## Calculating a Pro-Rata Share

### Pro-rata Share



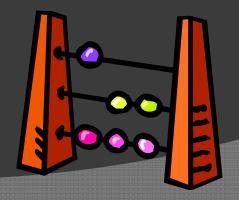
- If the contract pays only a portion of any expenditure *OR* if the expenditure benefits more than one contract or program, the grantee needs to calculate the proper prorata share to be paid by the contract
- Contractors need to provide an explanation of that pro-rata share with all reimbursement requests

## Examples of Pro-rata Share Calculations

- Employee's hours worked on grant versus total hours worked for the organization
  - This could be applied to payroll (including holiday and vacation pay), fringe benefits, office supplies for that particular employee

## Examples of Pro-rata Share Calculations

- Actual expenses related to grant versus total actual expenses for entire organization
  - This could be applied to expenditures such as rent, phone, copy/printing costs, and office supplies for the entire organization



## Examples of Pro-rata Share Calculations

- Costs allocated based upon the number of FTEs per grant
  - This could be applied to expenditures such as rent, phone, copy/printing costs, and office supplies for the entire organization



# Conclusion

## Summary

- Carefully analyze all expenditures for compliance with contract terms and OMB Circular A-122 cost principles
- Provide <u>all</u> necessary supporting documentation for monthly reimbursement requests (reimbursement request forms, invoices, receipts, personnel activity reports, pro-rata share calculations and explanations, etc.).

## Please submit any questions to:

- Leslie Bulicz, Associate
   Director CDHS Division of Child Care
- 303-866-4556
- Leslie.Bulicz@state.co.us

- Becca Lembke, Auditor
   CDHS Audit Division
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Division of Child Care (Program) Questions

**Audit Division (Audit or Compliance) Questions**