

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



Tonya Grindon
Nashville Humane Association
213 Oceola Avenue
Nashville, TN 37209

Dear Ms. Grindon:

Please find attached the Monitoring Report of the Nashville Humane Association relating to the contract it has with the Metropolitan Government of Nashville and Davidson County for the fiscal year ending June 30, 2012.

The Office of Financial Accountability is charged with the responsibility of monitoring grant funds, including Direct Appropriations, from Metropolitan Nashville Government to any nonprofit organization. Staff from the Office of Financial Accountability conducted the review on November 1, 2012.

We appreciate the assistance provided by your agency during the course of the review. If you have any questions, please call me at 615-880-1035.

Sincerely,

Fred Adom, CPA
Director

cc: Joy Beach, Executive Director
Richard M. Riebeling, Director of Finance
Talia Lomax-O'dneal, Deputy Director of Finance
Gene Nolan, Deputy Director of Finance
Kim McDoniel, Chief of Accounts
Mark Swann, Internal Audit

Kevin Brown, Office of Financial Accountability
Essie Robertson, Office of Financial Accountability
Brad Thompson, Office of Financial Accountability



Metropolitan Government of Nashville and Davidson County

NASHVILLE HUMANE ASSOCIATION

◆ Monitoring Report ◆

Conducted by



Office of Financial Accountability

January 11, 2013

MONITORING REPORT

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INTRODUCTION

The Office of Financial Accountability (hereinafter referred to as “OFA”) has completed a monitoring review of Nashville Humane Association. A monitoring review is substantially less in scope than an audit. The OFA did not audit the financial statements and, accordingly, does not express an opinion or any assurances regarding the financial statements of the Nashville Humane Association or any of its component units. The OFA is responsible for the internal monitoring of Metropolitan Government of Nashville and Davidson County (hereinafter referred to as “Metro”) agencies that receive federal and state financial assistance, including cooperative agreements and non-profit organizations that receive appropriations and Community Enhancement Funds from Metro government. In summary, any agreement(s) that imposes performance and/or financial requirements on Metro government is subject to review by the OFA.

The purpose of this review was to assess the agency’s compliance with contractual requirements set forth in the following contract with Metro Government:

Contract	Type	Amount	Contact Term	
L-2640	Direct Appropriations	\$12,500	July 1, 2011	June 30, 2012

Agency Background

The Nashville Humane Association is a nonprofit organization whose mission is to promote the humane treatment of pets. It accomplishes this mission by finding good caretakers and homes for pets, educating the public about their responsibility to help control the pet population, providing treatment and care to ensure the well-being of animals in the community.

OBJECTIVES, SCOPE AND METHODOLOGY

The objectives of our review were:

- 1) To determine whether the agency had the resources and capacity to administer the grant funds.
- 2) To determine if costs and services were allowable and eligible.
- 3) To verify that program objectives were met.
- 4) To test the reliability of the financial and programmatic reporting.
- 5) To verify contractual compliance.

The scope of our review was limited to the contract term July 1, 2011 through June 30, 2012.

Review procedures included meeting with agency management and staff, reviewing the design of internal controls as a basis for establishing our test work, reviewing board minutes and obtaining written representations from management. In addition, we examined certain financial records and supporting documentation necessary to ensure compliance with contractual requirements set forth in contract L-2640. Specific procedures included:

- Interviewing the employees responsible for grant management, financial reporting and accountability.
- Reviewing supporting documentation of expenditures for allowability, necessity and reasonableness.
- Reviewing the agency's general ledger and verifying the accuracy of all invoices submitted to Metro.
- Reviewing documentation to determine that funds were used for intended beneficiaries and expended in accordance with the spending plan of the contract.
- Reviewing documentation to support program activities for consistency with grant requirements.
- Assessing the financial stability of the agency and its ability to continue to administer the grant program funded by Metro.

RESULTS OF REVIEW

SUMMARY OF RESULTS

Criteria	Yes	No
Sufficient Resources and Capacity to Administer Funds?	✓	
Costs and Services Allowable and Eligible?	✓	
Program Objectives Met?	✓	
Reporting Requirements Met?		✓
Sufficient Internal Control Environment?	✓	
Compliance with Civil Rights Requirements?	✓	

RESULTS OF REVIEW

The overall results of the monitoring review are provided in this section. Results are based on test work performed and include conclusions regarding specific review objectives and, if applicable, recommendations for improvement and an action plan for implementation. Where applicable, the Findings and Recommendations section of this report provides more insight into any issues identified below.

1. Sufficient Resources and Capacity to Administer Grant Funds

Our review of the agency's accounting system and the qualifications of the individuals assigned to manage the accounting records indicate that the agency possesses the necessary resources and professional expertise to effectively administer the grant funds.

2. Allowable and Eligible Costs and Services

Our review covered all of the core compliance areas identified by OMB Circular A-133: *Audit of States, Local Government, and Non-Profit Organizations*. Costs incurred by the agency complied with applicable guidelines stated in OMB Circular A-122.

Additionally, the Metro Grants Manual requires separate accounting of the Metropolitan Nashville Government grant funds to prevent co-mingling of Metro Funds with other sources of funding. The agency was in compliance with this requirement. Different revenue classes as well as expenditure classes have been established to separately track the sources and amounts of funding. Also, the agency can easily and accurately report their expenses supported by the Metro grant.

Based on our test work, costs and services during the period were allowable and eligible however the agency expended grant funds inconsistent with the approved Spending Plan, without grantor approval (see Finding 1 for more details). Such expenses could have resulted in questioned costs.

RESULTS OF REVIEW

3. Program and Performance Objectives

The contract stipulates that the agency shall use the funds to provide the following outcomes:

- 2,500-3,000 owned or stray pets will be provided shelter or will be referred to other rescue organizations for shelter
- 40,000 people will be provided animal related resources via phone calls, emails, walk-in visits, website hits, and other outreach efforts
- 2,500 pets will be prepared for and adopted out (preparations for adoption may include heartworm (dogs) and feline leukemia/FIV (cats) testing, vaccinations, spay and neutering, and/or flea treatments)
- 5,000 pets will be spayed and neutered through the Community Spay/Neuter Program and the ROVER mobile spay/neuter program.

Based on our review of program documentation and discussions with staff, program performance objectives were met and the agency was in compliance with contractual program objectives.

4. Reliability of Financial and Programmatic Reporting

The contract requires submission of an annual audit report performed by a Certified Public Accountant. The contract also requires the agency to submit to Metro year end reports of the program outcome and a final expenditures report, no more than 45 days after the close of the contract.

We reviewed all applicable financial and programmatic reports required by the contract, including audited financial statements. Based on our review, the agency did not comply with all financial and programmatic reporting requirements.

5. Internal Control Environment

In order to determine the adequacy of the design of internal controls, we obtained and reviewed an independent auditor's report on internal control over financial reporting and/or a completed internal control questionnaire. This audit procedure was performed solely as a basis for determining our test work and to assist us in

RESULTS OF REVIEW

making suggestions for improvement to management. We did not evaluate the operating effectiveness of internal controls over financial reporting.

Our review of the design of the agency's internal controls did not reveal any control deficiencies. Further, nothing came to our attention that would necessitate suggestions for improvement in internal control activities to management.

6. Civil Rights Requirements

Our review did not reveal anything to indicate that the agency was noncompliant with civil rights requirements. The agency also has necessary written policies and procedures relating to civil rights. The agency has not received any complaints regarding any form of discrimination. Further, civil rights and ADA postings are publicly displayed.

FINDINGS AND RECOMMENDATIONS

1. Failed to Seek a Budget Revision

The Nashville Humane Association modified the budgeted line items of the contract without seeking approval. The agency's budgeted spending plan and the amounts reported on the final expenditure report were as follows:

Line Item	Budget	Reported
Salaries & Wages	\$0	\$7,280
Employee Benefits & Payroll Tax	\$0	\$1,530
Professional Fees	\$10,000	\$1,690
Supplies	\$2,500	\$2,000
Total	\$12,500	\$12,500

The grant contract states under Section A2, "The Recipient must spend these funds consistent with the Spending Plan, attached and incorporated herein as Attachment 1." The agency should have sought and obtained approval prior to expending grant funds on expenditure items not consistent with the spending plan. As a result of the failure to obtain a budget revision, the final expenditure report is not consistent with the grant contract. The OFA did not question these costs to be reimbursed to Metro.

Recommendation: The agency should take the necessary steps to ensure the grant funds are being utilized for as planned. The agency should also implement a policy to ensure that appropriate grantor approvals are sought prior to making revisions to the spending plans approved by the grantor.

Corrective Action Plan Required

Please submit a corrective action plan indicating the actions the agency intends to take to address the finding identified in this report. The corrective action plan should be submitted within 30 days from the report date to the address below:

Division of Grants Coordination
PO Box 196300
Nashville, TN 37219
ATTN: Director