

Office of Inspector General Corporation for National and Community Service

AGREED-UPON PROCEDURES REVIEW OF CORPORATION FOR NATIONAL AND COMMUNITY SERVICE SENIOR CORPS GRANTS AWARDED TO COUNCIL ON AGING OF VOLUSIA COUNTY, FL

OIG REPORT NUMBER 07-17



Corporation for
**NATIONAL &
COMMUNITY
SERVICE** 

Prepared by:

Office of Inspector General
Washington, DC 20525

This report was issued to Corporation management on August 27, 2007. Under the laws and regulations governing audit follow-up, the Corporation is to make final management decisions on the report's findings and recommendations no later than February 27, 2008, and complete its corrective actions by August 27, 2008. Consequently, the reported findings do not necessarily represent the final resolution of the issues presented.



OFFICE OF INSPECTOR GENERAL

August 27, 2007

TO: Rocco Gaudio
Director, Field Financial Management Center

Darryl James
Southern Cluster Manager

FROM: Carol Bates (signature on file)
Assistant Inspector General for Audit

SUBJECT: Office of Inspector General Report 07-17, *Agreed-Upon Procedures Review of Corporation for National and Community Service Senior Corps Grants Awarded to Council on Aging of Volusia County, FL*

Attached is the final report on our application of agreed-upon procedures to the Senior Corps grants awarded by the Corporation to Council on Aging of Volusia County, Florida.

Under the Corporation's audit resolution policy, a final management decision on the findings in this report is due by February 27, 2008. Notice of final action is due by August 27, 2008.

If you have any questions pertaining to the report, please contact Ronald Huritz, Audit Manager, at 202-606-9355.

Enclosure

cc: Gail Camputaro, Executive Director, COA of Volusia County, FL
Elizabeth Seale, Chief Operating Officer
Nicola Goren, Chief of Staff
Tess Scannell, Director, Senior Corps
William Anderson, Deputy Chief Financial Officer
Sherry Blue, Audit Resolution Coordinator
Michael Berning, Director, Field Liaison
Suzanne Richards, Director, Florida State Office
Ronald Huritz, OIG Audit Manager
Shamika Scott, OIG Auditor



1201 New York Avenue, NW ★ Suite 830, Washington, DC 20525
202-606-9390 ★ Hotline: 800-452-8210 ★ www.cncsig.gov

Senior Corps



**AGREED-UPON PROCEDURES APPLIED TO
CORPORATION FOR NATIONAL AND COMMUNITY SERVICE
GRANTS AWARDED TO
COUNCIL ON AGING OF VOLUSIA COUNTY, FLORIDA**

CONTENTS

Section	Page
Executive Summary	1
Background	1
Agreed-Upon Procedures Scope	1
Summary of Results	2
Summary of Questioned Costs.....	3
Exit Conference	3
Results of Agreed-Upon Procedures	3

Appendices

- A: Agreed-Upon Procedures
- B: Council on Aging of Volusia County’s Response to Agreed-Upon Procedures Report
- C: Corporation’s Response to Agreed-Upon Procedures Report

EXECUTIVE SUMMARY

The Office of Inspector General (OIG), Corporation for National and Community Service (Corporation), performed an agreed-upon procedures (AUP) review of Senior Corps grants awarded to the Council on Aging of Volusia County, FL (COA). The Corporation was concerned about the COA's inability to provide a general ledger to support claimed costs. We performed this review at the request of the Corporation's Southern Service Center and Florida State Office. The purpose of the review was to determine whether some categories of Federal costs claimed by COA for its Foster Grandparent Program (FGP) and Retired and Senior Volunteer Program (RSVP) were allowable, allocable, and in compliance with applicable laws, regulations, and terms and conditions of the grants.

We found that: COA's method of charging employee salaries to the grants did not comply with Federal regulations; various policies and procedures were inadequate; FGP and RSVP program requirements were not met; matching funds were not supported; and accounting duties in COA's Finance Department were not separated.

BACKGROUND

The Corporation awards grants and cooperative agreements to assist in the creation of full-time and part-time national and local community service programs. The Senior Corps program is one of the Corporation's three major service initiatives. The purpose of the Corporation's Foster Grandparent Program is to provide grants to qualified organizations to engage persons age 60 and older, with limited incomes, in providing assistance to disadvantaged or disabled youth. The purpose of the RSVP program is to provide grants to qualified organizations to engage persons age 55 and older, in providing assistance that includes tutoring children in reading and math, providing counsel to new business owners, offering relief services to victims of natural disasters, and helping community organizations operate more efficiently. Individuals serving in COA's FGP and RSVP programs work with abused and neglected children, and perform a number of community oriented activities.

AGREED-UPON PROCEDURES SCOPE

We performed the agreed-upon procedures listed in Appendix A for COA's FGP and RSVP grants as follows:

Program	Award No.	Award Period	AUP Review Period
FGP	04SFSFL008	4/1/2004-3/31/2007	4/1/2005-3/31/2006
RSVP	04SRSFL007	4/1/2004-3/31/2007	4/1/2005-3/31/2006

We conducted our field work from November 2006 to February 2007.

SUMMARY OF RESULTS

1. Salaries of COA employees charging time to the grants were not in compliance with Office of Management and Budget Circulars.
2. Allocations for personnel, fringe benefits and travel expenses were based on budgeted labor hours of each COA department. There were no time and activity reports to support the actual labor hours attributed to each grant.
3. In-kind volunteer meals were mistakenly claimed as Federal share.
4. COA used an inconsistent allocation methodology for claiming volunteer support expenses.
5. COA's policies and procedures did not address how operating funds were drawn down from the Department of Health and Human Services Payment Management System.
6. COA's policies and procedures did not address its current practice for reporting costs on Financial Status Reports (FSRs).
7. COA did not have adequate supporting documentation for funds claimed from its General fund that were used as match for the Senior Corps grants.
8. There was a lack of separation of duties in COA's Finance Department.
9. COA did not fulfill its FGP program responsibilities in the following areas:
 - a. Documentation of volunteer orientation and in-service training;
 - b. Documentation to support annual volunteer evaluations;
 - c. Documentation of written assignment/care plans for FGP volunteers during the AUP review period;
 - d. Documentation regarding the eligibility of the children to be served;
 - e. Memoranda of Understanding with volunteer stations did not include all required elements.
10. COA did not fulfill its RSVP program responsibilities in the following areas:
 - a. Documentation that RSVP volunteers met the age requirement;
 - b. Documentation that RSVP volunteers agreed to serve without compensation;
 - c. Documentation provided of written assignment descriptions for each RSVP volunteer;
 - d. Completion of RSVP enrollment forms.

For each of the issues summarized above and more fully described on the following pages of this report, we recommend that the Corporation perform on-site monitoring or other oversight methods to ensure implementation of corrective actions and adherence to grant provisions and regulations. The COA policies and procedures need to be tested by the Corporation to verify that controls are effective. The Corporation should recover, from non-

Federal funds, the questioned costs identified in this report.

SUMMARY OF QUESTIONED COSTS

Finding	Questioned Costs		
	FGP	RSVP	Amount
1	\$61,514	\$54,011	\$115,525
2	\$15,075	\$11,971	\$ 27,046
3	\$13,202		\$ 13,202
		Total	\$155,773

EXIT CONFERENCE

We provided a discussion draft of this report and conducted an exit conference with COA and Corporation representatives on April 11, 2007. Their responses to the draft report are included in this report as Appendices B and C, respectively. In addition, we included our summary of COA’s comments in this report where appropriate.

We performed the procedures described in Appendix A, which were agreed to by the OIG and the Corporation, solely to assist Corporation management in reviewing specific categories of claimed costs and volunteer files for the grantee’s FGP and RSVP program. This agreed-upon procedures review was performed in accordance with generally accepted government auditing standards.

Program	Award No.	Award Period	AUP Review Period
FGP	04SFSFL008	4/1/2004-3/31/2007	4/1/2005-3/31/2006
RSVP	04SRSFL007	4/1/2004-3/31/2007	4/1/2005-3/31/2006

RESULTS OF AGREED-UPON PROCEDURES

COA could not provide detailed general ledger information from its accounting system. Therefore, we relied on a spreadsheet, prepared by COA, of actual costs incurred for the RSVP and FGP programs. The grant costs on the spreadsheet agreed with the costs reported on the Financial Status Reports. We sampled the files of 20 FGP volunteers and 65 RSVP volunteers using volunteer rosters obtained from COA. Results of procedures performed are provided below.

In its response to the draft report, COA stated that the OIG was invited to test the system and request specific details to complete its work, but that the OIG did not follow up. The OIG auditor did conduct an onsite review of transactions in the accounting system, and requested general ledger information to support FSRs. OMB Circular A-110 requires that grant recipients maintain financial management systems that provide for accounting records that are supported by source documents. Although we made repeated requests for detailed general ledger information, none was provided. It is the grantee’s responsibility, not that of

the OIG, to support costs claimed. The Standard General Ledger report, provided as an attachment to COA's response, includes one month's detail. A general ledger report covering the full period of our agreed-upon procedures was not provided. COA has not provided sufficient general ledger detail to support its claimed costs.

1. Salaries of COA employees charging time to the grants were not in compliance with OMB regulations.

Time and activity reports of COA employees who charged time to the RSVP and FGP grants did not contain sufficient details, as required by Corporation regulations and OMB Circulars. The time sheets did not specify or distribute time by grant or cost objective. The time sheets captured the total hours worked each day but did not contain any details as to how the time should be charged to specific grants.

According to 2 C.F.R. § 230, Appendix B, Selected Items of Cost 8, Compensation for Personal Services, states the following:

m. Support of salaries and wages.

(1) Charges to awards for salaries and wages, whether treated as direct costs or indirect costs, will be based on documented payrolls approved by a responsible official(s) of the organization. The distribution of salaries and wages to awards must be supported by personnel activity reports, as prescribed in subparagraph 8.m.(2) of this appendix, except when a substitute system has been approved in writing by the cognizant agency.

(2) Reports reflecting the distribution of activity of each employee must be maintained for all staff members (professionals and nonprofessionals) whose compensation is charged, in whole or in part, directly to awards. In addition, in order to support the allocation of indirect costs, such reports must also be maintained for other employees whose work involves two or more functions or activities if a distribution of their compensation between such functions or activities is needed in the determination of the organization's indirect cost rate(s) (e.g. , an employee engaged part-time in indirect cost activities and part-time in a direct function). Reports maintained by non-profit organizations to satisfy these requirements must meet the following standards:

(a) The reports must reflect an after-the-fact determination of the actual activity of each employee. Budget estimates (i.e. estimates determined before the services are performed) do not qualify as support for charges to awards.

(b) Each report must account for the total activity for which employees are compensated and which is required in fulfillment of their obligations to the organization.

(c) The reports must be signed by the individual employee, or by a responsible supervisory official having first hand knowledge of the activities performed by the employee, that the distribution of activity represents a reasonable estimate of the actual work performed by the employee during the periods covered by the reports.

(d) The reports must be prepared at least monthly and must coincide with one or more pay periods.

(3) Charges for the salaries and wages of nonprofessional employees, in addition to the supporting documentation described in subparagraphs (1) and (2), must also be supported by records indicating the total number of hours worked each day maintained in conformance with Department of Labor regulations implementing the Fair Labor Standards Act (FLSA) (29 CFR part 516). For this purpose, the term “nonprofessional employee” shall have the same meaning as “nonexempt employee,” under FLSA.

(4) Salaries and wages of employees used in meeting cost sharing or matching requirements on awards must be supported in the same manner as salaries and wages claimed for reimbursement from awarding agencies.

COA stated that it was unaware of the time and activity requirement, and that the timekeeping deficiency had not been pointed out during the Corporation’s monitoring visit or in the monitoring report.

During the exit conference, COA management personnel stated that they believed the time sheets for both the FGP and RSVP program directors included each director’s title and name, and, therefore, should be sufficient evidence of which grant program should be charged. However, during our review of director time sheets, we did not find the title of any of the COA employees charging time to the grants.

As a result, COA is not in compliance with OMB regulations and we, therefore, question personnel expenses of \$115,525 as follows:

Award No.	Questioned Personnel Expenses
04SFSFL008	\$61,514
04SRSFL007	54,011
Total	<u>\$115,525</u>

Recommendations

We recommend that the Corporation:

- Require COA to complete time and activity reports for all employees in accordance with OMB regulations.
- Disallow the questioned labor charges of \$61,514 to the FGP grant and \$54,011 to the RSVP grant, and recoup the questioned amounts from non-Federal funds.

COA's Response

COA asserts that time sheets, which include the director's name in combination with position descriptions for the FGP and RSVP Program Directors, are sufficient documentation because the project directors spend 100 percent of their time in each program. COA stated that the salary for the remaining personnel charging time to the FGP and RSVP grants was attributed to indirect salaries, wages, and related fringe benefits, all costs of which it believes were allocated according to the OMB regulations that permit the allocation of indirect costs under a substitute system approved by COA's local oversight agency, the Florida Department of Elder Affairs (DOEA).

Corporation Response

The Corporation's Florida State Office refutes COA's repeated assertion that COA was given approval to apply DOEA's allocation system for budgeting costs in the 2004 renewals of its RSVP and FGP grants. The Florida State Office stated that it did not negotiate or approve COA's use of the DOEA cost allocation system, and that it will determine the allowability of costs and respond to the OIG's findings and recommendations in its management decision once the final report is published.

OIG Comments

As indicated on Page 4, 2 C.F.R. § 230, Appendix B, Selected Items of Cost 8, Compensation for Personal Services, states:

m. Support of salaries and wages.

(1) Charges to awards for salaries and wages, whether treated as direct costs or indirect costs, will be based on documented payrolls approved by a responsible official(s) of the organization. The distribution of salaries and wages to awards must be supported by personnel activity reports, as prescribed in subparagraph 8.m.(2) of this appendix, except when a substitute system has been approved in writing by the cognizant agency.

*(2) Reports reflecting the distribution of activity of each employee must be maintained for all staff members (professionals and nonprofessionals) whose compensation is charged, **in whole or in part**, [emphasis added] directly to awards. In addition, in order to support the allocation of indirect costs, such reports must also be maintained for other employees whose work involves two or more functions or activities if a distribution of their compensation between such functions or activities is needed in the determination of the organization's indirect cost rate(s).*

(a) The reports must reflect an after-the-fact determination of the actual activity of each employee. Budget estimates (i.e. estimates determined before the services are performed) do not qualify as support for charges to awards.

Documentation provided by COA during our fieldwork included employee time sheets that captured total hours worked each day, but did not contain any details as to how the time

should be charged to specific grants or cost objectives. As stated in the regulation, reports reflecting the distribution of activity of each employee must be maintained for all staff whose salaries are charged **in whole or in part** directly to the grant awards. COA did not provide documentation of written approval from the Corporation that a substitute system for charges of salaries and wages had been approved. As a result, our finding and recommendations remain unchanged.

2. Allocations of salaries, fringe benefit and travel expenses were based on budgeted labor hours of each COA department.

COA stated that its indirect expense allocation model was established by the Florida DOE and is required to be followed in allocating indirect costs to all program functions it administers. During the OIG’s review of the model, we found that the basis of allocating personnel, fringe benefit and travel expenses was determined by the percentage of labor hours for each COA department. We determined that, without time and activity reports, COA is unable to accurately calculate the percentage of labor hours of each employee to be used in the allocation. In addition, payroll register data provided to the OIG did not support the labor allocation that the grantee stated it was using.

According to 2 C.F.R. § 230 Appendix A, Section D, Allocation of Indirect Costs and Determination of Indirect Cost Rates, *Direct Allocation Method*, the direct allocation of some indirect costs is acceptable, provided each joint cost is prorated using a base which accurately measures the benefits provided to each award or other activity. The bases must be established in accordance with reasonable criteria and be supported by current data. However, COA is not using a base for allocating personnel, fringe benefit and travel expenses that meets the OMB requirements. The personnel expenses are questioned in Finding #1. We question fringe benefit expenses of \$12,192 for the FGP grant, and \$10,956 for the RSVP grant. We also question travel-related expenses of \$2,883 for the FGP grant and \$1,015 for the RSVP grant.

Award No.	Questioned Fringe Benefit Expenses	Questioned Travel Expenses
04SFSFL008	\$12,192	\$2,883
04SRSFL007	<u>10,956</u>	<u>1,015</u>
Total	<u>\$23,148</u>	<u>\$3,898</u>

Recommendations

We recommend that the Corporation:

- Require COA to determine a basis for allocating costs to the RSVP and FGP grants. Once determined, the allocation basis must be verifiable and consistently applied.

- Disallow the questioned fringe benefit expenses of \$23,148 and travel expenses of \$3,898, and recoup the questioned amounts from non-Federal funds.

COA's Response

COA did not concur with the finding or recommendations. It stated that the salaries, fringe benefits and travel expenses for direct employees were charged at actual amounts, not budgeted amounts. The remaining salaries, fringe benefits and travel expenses were for employees in support roles that are necessary to the overall operation of the organization, although a direct relationship to any particular cost objective cannot be shown. It stated that there was no way to determine the benefits by accounting for time, so other means were used. COA utilizes the MIP accounting system to support its accounting function. The software has the indirect cost allocation rate programmed into the system to allow for automatic calculation and expense distribution to every program function cost center.

Corporation Response

The Corporation's Florida State Office stated that it did not negotiate or approve COA's use of the DOEA cost allocation system, and that it will determine the allowability of costs and respond to our findings and recommendations in its management decision once the final report is published.

OIG Comments

As stated in the finding, during the OIG's review of the allocation model, we found that the basis of allocating personnel, fringe benefit and travel expenses was supposedly determined by the percentage of labor hours for each COA department. However, the percentage of labor hours for each department is not supported by corresponding time sheets. No documentation was provided during our fieldwork for the method of allocating staff payroll costs that COA discussed in its response. We were told that the actual costs of staff payroll were allocated at 45 percent because Foster Grandparents represent 45 percent of the total number of individuals paid through the payroll system.

We continue to recommend that the Corporation: (a) require COA to establish a verifiable and consistently applied basis for allocating costs to the RSVP and FGP grants, and (b) disallow and recoup the questioned costs from non-Federal sources.

3. In-kind volunteer meals were mistakenly claimed as Federal share.

COA claimed \$13,202 of volunteer meals as Federal share for the FGP program. However, the meals were received as in-kind donations. COA's financial director stated that this was an error. He inadvertently misclassified the cost of meals to the Federal share of expenses. During the exit conference, COA stated that an accounting spreadsheet that was provided to the OIG was prepared outside of the accounting system, and that the data was a manually prepared summary of costs, not an official report. However, this report was submitted by COA to the Corporation's Southeast Service Center in response to its request for a copy of COA's general ledger. Because a detailed general ledger was never produced, the OIG relied

on the spreadsheet of actual costs because it reconciled to the costs claimed by COA on its FSRs. During our review, COA changed the classification of the meals but did not update the FSR to reflect the change. Therefore, the meal expenses of \$13,202 charged as Federal share are questioned.

Award No.	Questioned Costs
04SFSFL008	\$13,202

Recommendations

We recommend that the Corporation:

- Disallow the questioned costs of \$13,202 and recoup the questioned amounts from non-Federal funds, or
- Require that COA submit an amended FSR to reflect any changes to classification of costs incurred for the FGP grant.

COA's Response

COA noted that the accounting report in question was a spreadsheet report prepared outside of its MIP accounting system, as it had stated during the exit conference. It stated that data formatted and supplied directly to the OIG was a manually prepared summary of costs, and was not an official report. It stated further that the spreadsheet was prepared for the OIG and was not submitted to the Corporation for normal reporting purposes. When it was discovered that an error had been made on the initial spreadsheet provided to the OIG, a corrected spreadsheet was prepared and resubmitted. As for updating official reports to the Corporation, the Federal share of meals claimed did not change as a result of the reclassification so no adjustment was necessary. COA requested that the questioned costs pertaining to meal expenses be rescinded entirely since nothing was charged to the Federal portion.

OIG Comments

We note again that the spreadsheet in question was provided to Corporation staff, not to the OIG, in response to a request by the Corporation's Southeast Service Center to review COA's general ledger. Even though it was not an official report, the documentation was provided to show support for costs charged to the grant. COA has stated that the information was provided outside of its accounting system, but on Page 4 of its response (see Appendix B), it highlights that the accounting system produces reports in several different formats, including Excel spreadsheets, and that the spreadsheets provided to the OIG were direct outputs of the system. This appears to contradict the statement that the spreadsheets were manually prepared. We acknowledged in the draft report that an updated spreadsheet was prepared during our review, and continue to recommend that the Corporation review any

changes in costs attributed to meals to determine their effect on the costs claimed on the FSR for the review period of April 30, 2005 to March 31, 2006.

4. COA used an inconsistent allocation methodology for claiming volunteer support expenses.

We judgmentally selected the following volunteer support expense categories for testing the RSVP and FGP programs: Office Supplies; Janitorial Services; Equipment Lease; Computer Support; Maintenance; Rent; Audit; and Utilities. In an e-mail to the OIG dated February 1, 2007, the COA's finance director stated that allocation methods would change in any month where there was significant change in its operations. Also, he noted that there were as many as six revisions to the indirect expense allocation model that was used in determining cost allocations. In a follow-up e-mail dated February 7, 2007, the finance director provided the following explanations for the method of allocating costs for the selected volunteer expense categories:

- 1) Any cost where the use is known at the time of input is charged directly.
- 2) General Office Supplies are first allocated to all staff and then a portion equal to the percentage of labor for selected indirect staff is then charged to FGP and RSVP.
- 3) General Maintenance is charged to the office manager and then charged to each department based on square footage.
- 4) Computer Support is first allocated to all staff and then a portion equal to the percentage of labor for selected indirect staff is charged to FGP and RSVP.
- 5) Equipment Lease is charged by the number of units.
- 6) Audit is charged based on an estimate of the involvement.
- 7) Janitorial Services, Rent & Utilities are allocated based on square footage occupied and share of common areas.

This method for allocating costs was not documented, nor was COA able to demonstrate how the method was applied in determining the selected volunteer support cost categories claimed. Also, after a review of the cost allocation model, we determined that the model referred to the budgeted allocation of volunteer support costs and did not support the actual costs incurred or charged to the FGP/RSVP grants. In his explanation of COA's method of allocating costs, the finance director stated that, for many of the volunteer categories, cost was determined based on the percentage of labor hours. The OIG concluded that, without time and activity reports as discussed earlier, COA is unable to accurately determine the percentage of labor hours to be applied as a basis for determining allocation of any of the costs incurred.

According to 2 C.F.R. § 230 Appendix A, Section D, Allocation of Indirect Costs and Determination of Indirect Cost Rates, *Direct Allocation Method*, the direct allocation method is acceptable, provided each joint cost is prorated using a base which accurately measures the benefits provided to each award or other activity. The bases must be established in accordance with reasonable criteria, and be supported by current data.

Initially, the sampled volunteer support cost categories were charged to the match share of cost. During our review, COA provided an updated spreadsheet of actual costs for the FGP program to match the funds that were drawn down. In this update, COA changed the cost of volunteer support expenses to Federal share. During the review period, COA did not submit an updated FSR to reflect these changes.

We concluded that COA does not have a documented or consistently applied method of allocating volunteer support costs. The grantee's method does not comply with OMB Circulars.

Recommendations

We recommend that the Corporation:

- Require COA to improve and document its allocation methodology for charging volunteer support costs to the FGP and RSVP grants. Once determined, the allocation bases must be verifiable and consistently applied.
- Require that COA submit an amended FSR to reflect any changes to classification of costs incurred for the FGP grant.
- Review the allowability of the volunteer support costs as Federal share after COA submits a revised FSR.

COA's Response

COA stated that its current allocation method is consistent, and that its indirect methodology is changed on a quarterly basis during any reporting period. It further stated that the quarterly change is necessary because of additions and deletions of program functions that cause indirect cost allocation ratios to change.

Corporation Response

The Corporation's Florida State Office stated that it did not negotiate or approve COA's use of the DOEA cost allocation system. The Corporation stated that it will determine the allowability of costs and respond to our findings and recommendations in its management decision once the final report is published.

OIG Comments

We continue to recommend that the Corporation require COA to improve and document its indirect allocation methodology to ensure that the method is consistently applied. As stated in this report, COA's Finance Director admitted that the methodology was not documented, and that there had been as many as six changes to the allocation methodology during our review period of April 1, 2005 to March 31, 2006. Our recommendation is based on 2 C.F.R. § 230 Appendix A, Section D, Allocation of Indirect Costs and Determination of Indirect Cost Rates, *Direct Allocation Method*, which states the direct allocation method is

acceptable, provided each joint cost is prorated using a base which accurately measures the benefits provided to each award or other activity. The bases must be established in accordance with reasonable criteria, and be supported by current data.

We continue to note that there was no documentation to show that the indirect cost allocation method used by COA was approved by the Corporation, or that it was being consistently applied. COA did not address the recommendation concerning the change in classification of volunteer support costs; therefore, our recommendation that the Corporation require COA to submit an amended FSR to reflect any changes to cost classifications remains unchanged. In addition, we continue to recommend that the Corporation review the allowability of the volunteer support costs as Federal share after COA submits a revised FSR.

5. COA's policies and procedures did not address how funds would be drawn down from the Department of Health and Human Services' Payment Management System (PMS).

COA's finance director stated that drawdowns for the FGP and RSVP grants were conducted bi-weekly to coincide with COA's payroll. This procedure was not documented in COA's financial policies manual. The manual was last updated on March 25, 2005.

According to 2 C.F.R. § 215.21(b)(5), a recipient's financial management systems shall provide written procedures to minimize the time elapsing between the transfer of funds to the recipient from the U.S. Treasury and the issuance or redemption of checks, warrants or payments by other means for program purposes by the recipient.

Without documented policies and procedures in place, COA drawdowns may be improperly performed and may exceed its immediate cash needs.

Recommendations

We recommend that the Corporation:

- Direct COA to update its financial policies manual to document its drawdown process; and
- Verify that the policies are implemented.

COA's Response

COA acknowledged that its written procedures for conducting drawdowns were out of date and stated that the procedures have been revised to reflect its current drawdown process.

OIG Comments

Although COA concurred with the recommendation, the recommendation remains unchanged until the Corporation can verify that the financial policies manual has been

updated and the procedures are being implemented in accordance with the aforementioned laws and regulations.

6. COA's policies and procedures do not address its current practice for determining what costs are reported on the Financial Status Reports using the e-Grants system.

COA's FGP-RSVP Action Report Procedural Manual was last issued in March 2001. It references the COA's prior accounting system. COA is currently using the SAGE MIP accounting system. The manual does not provide guidance on how costs claimed on the Financial Status Reports will be reported using the Corporation's e-Grants system. Without current policies and procedures in place, COA may inaccurately report costs, preventing the Corporation from effectively monitoring the grant funds.

According to 2 C.F.R. § 215.21(b)(6), a grant recipient's financial management systems shall provide written procedures for determining the reasonableness, allocability and allowability of costs in accordance with the provisions of the applicable Federal cost principles and the terms and conditions of the award.

Recommendations

We recommend that the Corporation:

- Direct COA to update its financial policies and procedures to describe how its Financial Status Reports are developed, and
- Verify that the policies are implemented.

COA's Response

COA acknowledged that its written procedures for determining what costs are reported on its Financial Status Reports using the e-Grants system were out of date. It stated that it has revised the procedures to reflect its current method in the operating and procedural manual.

OIG Comments

Although COA concurred with the recommendation, the recommendation remains unchanged until the Corporation can verify that the operating and procedural manual has been updated and the procedures are being implemented in accordance with the aforementioned laws and regulations.

7. COA did not have adequate supporting documentation for funds claimed from its General fund that were used as match for the Senior Corps grants.

During our review, COA provided documentation that it received cash contributions from United Way Volusia-Flagler Counties for the RSVP program and from Volusia County for the FGP program. However, during the exit conference, the finance director stated that those funds did not have to be used as match for the RSVP and FGP grants. In addition, the finance director stated that an additional source of match funds for the RSVP and FGP grants is the COA's general fund. During our fieldwork, COA provided a trial balance of COA's general revenue fund as support for match funds for the RSVP and FGP grants. COA was unable to demonstrate the amount of funds taken from its general fund that were used for the RSVP and FGP grants.

According to 2 C.F.R. § 215.23, cost sharing or matching all contributions, including cash and third party in-kind, shall be accepted as part of the recipient's cost sharing or matching when such contributions meet all of the following criteria:

- Are verifiable from the recipient's records.
- Are not included as contributions for any other Federally assisted project or program.
- Are necessary and reasonable for proper and efficient accomplishment of project or program objectives.
- Are allowable under the applicable cost principles.
- Are not paid by the Federal Government under another award, except where authorized by Federal statute to be used for cost sharing or matching.
- Are provided for in the approved budget when required by the Federal awarding agency.

We could not verify that these conditions were met for the general funds claimed as match. COA has not established and maintained fiscal records to properly account for cost matching for funds taken from its general fund account. The amount of funds taken from the general fund could not be verified. Without adequate documentation, it is unknown whether claimed match was reported correctly. The match claimed is not questioned because the grant is ongoing.

Recommendations

We recommend that the Corporation:

- Require that COA properly account for match funds that are used from its general fund as it relates to the FGP and RSVP grants.
- Review all match claimed to these grants prior to closeout to ensure it is supported and allowable.

COA's Response

COA stated that the only way to verify match is to verify disbursements, not revenue. It stated that it uses a pooling of cash method to receive and disburse cash funds. The pooled cash fund disburses funds and charges each respective program function with the expenditure charge. It also stated that previous year independent auditor's financial audit reports show that COA's local funding was far in excess of the required matching funds per grant agreement for all Federal and State grants, including FGP and RSVP.

OIG Comments

Although COA states that its match exceeds the required amount, we could not verify that assertion because of a lack of general ledger detail, as discussed earlier. Our recommendation remains unchanged.

8. There was a lack of separation of duties in the finance department.

We noted that the fiscal supervisor is responsible for drawing down funds, depositing funds, processing general ledger entries and reconciling bank statements. During the exit conference, COA stated that, due to budget constraints, it was unable to hire additional accounting personnel to achieve an optimum separation of duties.

COA's financial policy manual states that financial duties and responsibilities will be segregated so that no single employee has sole control over cash receipts, disbursements, and account reconciliations. Therefore, we conclude that COA is not enforcing its internal financial policies. Also, the absence of separation of duties may result in financial transactions that are not executed consistent with COA management's intent, possibly leading to unauthorized transactions.

Recommendations

We recommend that the Corporation:

- Review the budget constraints that COA is experiencing to determine whether they affect its ability to hire additional accounting personnel.
- Ensure that COA complies with its own internal financial policies and procedures.

COA's Response

COA stated that it enforces its financial policies. It stated that, because the drawdowns are conducted electronically, the Fiscal Supervisor does not have control over the drawdown. COA also stated that this issue is addressed annually with its independent auditors.

OIG Comments

Despite addressing the separation of duties issue with its outside auditors, COA's response did not describe what actions were taken, if any, to remedy the situation. We continue to recommend that the Corporation review the budget constraints that COA is experiencing to determine its ability to hire additional accounting personnel, and verify its enforcement of its internal financial policies and procedures.

9. COA did not fulfill its FGP program responsibilities in the following areas:

- a. Documentation of volunteer orientation and in-service training.**
- b. Documentation to support annual volunteer evaluations.**
- c. Documentation of written assignment/care plans for FGP volunteers during the review period.**
- d. Documentation regarding the eligibility of the children to be served.**
- e. Memoranda of Understanding with volunteer stations did not include all required elements.**

COA did not provide documentation that volunteer orientations were conducted. It also was unable to provide adequate documentation that in-service training was held prior to December 2005. The Executive Director stated that documentation could not be found because of a change in FGP directors during our review period. The new FGP director was hired in December 2005 and has been working to bring the FGP program into compliance with Corporation regulations. According to 45 C.F.R. § 2552.23(f), *What are a sponsor's program responsibilities*, the Foster Grandparents must be provided with not less than 40 hours of orientation, of which 20 hours must be pre-service, and an average of 4 hours of monthly in-service training.

In reviewing a sample of 20 volunteer files, we found that there was no supporting documentation that three volunteers had received an annual appraisal. According to 45 C.F.R. §2552.23(h), *What are a sponsor's program responsibilities*, a sponsor should conduct an annual appraisal of volunteers' performance.

There were no written assignment/care plans developed by the volunteer stations for each child served during the review period. The current FGP director has been working with each volunteer station to develop care plans. We reviewed the current assignment/care plans and noted several instances of non-compliance in which volunteers were serving a group of children instead of providing one-on-one interaction. Some volunteers were performing office duties. In addition, we observed that there were care plans that did not identify the child being served and/or the needs of the student and the tasks that would be performed by the FGP volunteer. According to 45 CFR § 2552.72, *Is a written volunteer assignment plan required for each volunteer?*, all Foster Grandparents shall receive a written volunteer assignment plan developed by the volunteer station that:

- (1) Is approved by the sponsor and accepted by the Foster Grandparent;
- (2) Identifies the individual child(ren) to be served;

- (3) Identifies the role and activities of the Foster Grandparent and expected outcomes for the child;
- (4) Addresses the period of time each child should receive such services; and
- (5) Is used to review the status of the Foster Grandparent's services in working with the assigned child, as well as the impact of the assignment on the child's development.

COA did not ensure that program volunteers only served eligible children. It relied on the volunteer station to determine beneficiary eligibility. In addition, the volunteer stations were not required to provide any documentation or certifications to show that the volunteers were assigned to serve eligible children. The FGP director stated that there are persons over the age of 21 being served at one of the volunteer stations.

According to 45 C.F.R. § 2552.81, *What type of children are eligible to be served?* Foster Grandparents must serve only children and youth with special or exceptional needs who are less than 21 years of age. According to 45 C.F.R. § 2552.82, *Under what circumstances may a Foster Grandparent continue to serve an individual beyond his or her 21st birthday?*, only when a Foster Grandparent has been assigned to, and has developed a relationship with, a mentally retarded child, that assignment may continue beyond the individual's 21st birthday, provided that:

- (1) Such individual was receiving such services prior to attaining the chronological age of 21, and the continuation of service is in the best interest of the individual; and
- (2) The sponsor determines that it is in the best interest of both the Foster Grandparent and the individual for the assignment to continue. Such a determination will be made through mutual agreement by all parties involved in the provision of services to the individual served.

COA did not ensure that memoranda of understanding with volunteer stations indicated that the stations would not discriminate against FGP volunteers or in the operations of the program. According to 45 C.F.R. § 2552.23 (c), grantees should develop and manage a system of volunteer stations by ensuring that the placement of Foster Grandparents will be governed by a Memorandum of Understanding that states the station assures it will not discriminate against Foster Grandparents or in the operation of its program.

By not adequately fulfilling FGP program responsibilities, COA may have volunteers that are not serving children with special or exceptional needs in the manner required by program provisions. In addition, the volunteer stations may not be fully aware of the program requirements.

Recommendations

We recommend that the Corporation:

- Require COA to develop and implement policies and procedures to ensure FGP volunteer orientations, in-service training, and performance evaluations are properly conducted, documented and reviewed in accordance with the program requirements.
- Require COA to develop written volunteer assignment plans for all FGP volunteers that adhere to program requirements.
- Require COA to verify the eligibility of children served by FGP volunteers.
- Require COA to include all required elements in Memoranda of Understanding with volunteer stations.

COA's Response

COA stated that the issues listed above were never reported or brought to its attention in previous Corporation monitoring reports. COA made the assumption that the former FGP director discarded documentation. Care plans have now been requested from all sites. Sixty-seven of the 79 Grandparents' care plans have been received. COA is in the process of getting written mutual agreements that care should continue for mentally challenged individuals over the age of 21. An amendment to the Foster Grandparent Memorandum of Understanding has been sent to all sites for signature.

Corporation Response

The Corporation stated that COA has provided satisfactory documentation that demonstrates it is implementing corrective actions to fulfill its FGP programmatic responsibilities.

OIG Comments

The corrective actions, as described in COA's response, are responsive to the recommendation that it develop written volunteer assignment plans; verify eligibility of children being served in the program; and include all required elements of the MOU. However, we continue to recommend that the Corporation require COA to develop and implement formal policies and procedures to ensure that FGP volunteer orientation, in-service training, and performance evaluations are properly conducted and reviewed in accordance with the program requirements.

- 10. COA did not fulfill its RSVP program responsibilities in the following areas:**
 - a. No documentation that RSVP volunteers met the age requirement.**

- b. No documentation that RSVP volunteers agreed to serve without compensation.**
- c. No documentation provided of written assignment descriptions for each RSVP volunteer.**
- d. Incomplete RSVP enrollment forms.**

In reviewing a sample of 65 volunteer files, we could not determine if eight of the volunteers were eligible because their age could not be verified. The RSVP Director could not find files for six volunteers in the sample. While she was able to provide evidence that those six individuals were RSVP volunteers, the reports did not include the age of the volunteers. Also, two of the volunteers whose files were made available did not include their date of birth on the enrollment forms; therefore, their age could not be verified. According to 45 C.F.R. § 2553.41, *Who is eligible to be a RSVP volunteer?*, individuals enrolled in the program must be 55 years or older.

None of the 65 sampled volunteer files included documentation that volunteers agreed to serve in the RSVP program without compensation. According to 45 C.F.R. § 2553.41 (a), *Who is eligible to be an RSVP volunteer?*, an individual enrolled in the program must agree to serve without compensation.

During our review of volunteer files, COA did not provide a copy of the written assignment descriptions for each volunteer or a notation that the volunteer's assignment description was maintained at the volunteer station. During the exit conference, COA stated that, in the past, it had maintained a binder with all the volunteer stations' assignment descriptions; however, that binder was not made available during our review.

Also, after reviewing the volunteer files, we determined that COA maintained incomplete enrollment forms for volunteers. The RSVP Director acknowledged that there were incomplete enrollment forms, and stated that COA has implemented a plan to address this issue. During the exit conference, COA stated that this plan will include a thorough internal file audit to identify all incomplete enrollment and other necessary forms.

According to the Corporation's RSVP Operations Handbook, dated April 2000, Chapter 11, Sec. 46, the sponsor will develop a recordkeeping system to permit the orderly collection, storage, and retrieval of information at volunteer stations, the project's volunteers, and fiscal aspects of project operation. The handbook also states that the project shall maintain a file folder for each volunteer containing a signed enrollment form, including name, address, and telephone number, and a copy of the written assignment description for each volunteer, or a notation that the volunteer's assignment description is maintained at the volunteer station.

Without complete volunteer files, COA may not be aware that ineligible volunteers may be enrolled in the RSVP program, causing it to incur unallowable costs. Also, without adequate RSVP policies and procedures in place, volunteers may not be fully aware of their program responsibilities.

Recommendations

We recommend that the Corporation:

- Require COA to develop and implement formal policies and procedures to ensure that RSVP volunteers are aware of eligibility requirements.
- Require COA to properly document and retain required documentation in volunteer files.

COA's Response

COA stated that in previous Corporation monitoring reports, there was never any indication that the volunteer files for the RSVP were in need of change. COA has begun an internal file audit to identify all incomplete enrollment and other necessary forms, and to insure file integrity by meeting with station managers and volunteers to complete all required documentation.

Corporation Response

The Corporation stated that COA has provided satisfactory documentation that demonstrates it is implementing corrective actions to fulfill its RSVP programmatic responsibilities.

OIG Comments

The corrective actions, as described in COA's response, are responsive to the recommendation that COA properly document and retain required documentation in volunteer files. However, we continue to recommend that the Corporation require COA to develop and implement formal policies and procedures to ensure that RSVP volunteers are aware of eligibility requirements.

Overall Recommendation

Based on the numerous financial and programmatic issues discussed in this report, we recommend that the Corporation suspend grant funds to COA (45 C.F.R. § 2543.62, Enforcement), until its accounting system meets Federal grant requirements, and until COA meets all FGP and RSVP programmatic requirements.

We were not engaged to, and did not perform an examination, the objective of which would be expression of an opinion on the subject matter. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the use of the management of the Corporation and COA, and should not be used by those who have not agreed to the procedures or have not taken responsibility for the sufficiency of the procedures for their purposes. However, this report is a matter of public record and its distribution is not limited.

APPENDIX A

AGREED-UPON PROCEDURES

APPENDIX A
AGREED-UPON PROCEDURES

We relied on an accounting spreadsheet of actual costs incurred for the RSVP and FGP programs that was submitted to the Corporation by the Council on Aging of Volusia County.

We sampled the files of 20 FGP volunteers and 65 RSVP volunteers using volunteer rosters obtained from COA.

We performed the following procedures:

- Verified that the following claimed costs were allowable, allocable and in compliance with applicable laws and regulations and terms and conditions of the grants during the review period:

<i>RSVP Grant</i>	<i>FGP Grant</i>
Personnel Expenses	Personnel Expenses
Fringe Benefit Expenses	Fringe Benefit Expenses
Staff Travel	Staff Travel
Supplies	Supplies
Contractual and Consultant Services	Contractual and Consultant Services
Maintenance	Maintenance
Rent/Utilities	Rent/Utilities
Volunteer Meals	Volunteer Meals
Volunteer Insurance	Volunteer Insurance
Recognition	Recognition
	Volunteer Travel

- Verified that Financial Status Reports were supported by COA's financial records.
- Verified that volunteer files included proper documentation of program eligibility and compliance.

APPENDIX B

**COUNCIL ON AGING OF VOLUSIA COUNTY'S RESPONSE TO
AGREED-UPON PROCEDURES REPORT**



P.O. Box 671 ~ 160 N. Beach Street
Daytona Beach, FL 32115-0671
(386) 253-4700 ~ Fax (386) 253-6300
www.daytonaseniorservices.org

July 30, 2007

Mr. Ronald F. Huritz, Audit Manager
Corporation for National and Community Services
1201 New York Ave, NW Suite 830
Washington. D.C. 20525

Dear Mr. Huritz:

The Council on Aging of Volusia County, Inc. appreciates the opportunity to respond to the draft report of the Office of the Inspector General's (OIG) Agreed-Upon Procedures for the Corporation for National and Community Service Grants Awarded to our agency.

As a nonprofit organization we have and continue to sponsor several state and federal grants, which provide services for the aging population in Volusia County, Florida. We are proud to have been able to sponsor the Retired and Senior Volunteer Program (RSVP) and the Foster Grandparent Program (FGP) for over thirty years.

We have attached a response to the OIG draft report addressing the issues in question. Our agency will look forward to working cooperatively with the Corporation to address every issue noted in the report, as well as to successfully resolve all matters related to the findings in the report.

Sincerely,

Gail F. Camputaro, Executive Director

CC: Congressman Mica
Congressman Nelson
Carol Bates, Assistant Inspector General for Audit, CNCS
Suzanne Richards, State Director, Corporation for National and Community Service
Peg Rosenberry, Director of Grants Management, CNCS HQ
Richard Lemmon, President, Council on Aging of Volusia County, Inc.

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

Results from Review

RESPONSE PREAMBLE:

We address each of the potential findings below. As discussed herein, with few exceptions, Council has complied at all times with applicable administrative rules and guidelines, the chief of which has been the Monitoring Reports, Specific Instructions of the Florida State CNCS office as well as OMB Circular A-122.

Monitoring by the Florida State CNCS Office: - Attachment I

The most recent Monitoring Report dated March 15, 2004 clearly indicates that the Council has not only complied with, but also earned high marks in the administration and operation of CNCS programs. Formal monitoring is conducted every three years after each grant cycle is complete and the attached report is typical of every report received during the 30 plus year history of the Council running CNCS programs. Given these monitoring reports the Council was encouraged to continue all practices in place without change except as directed by CNCS.

As the attached CNCS report observed: *“Everyone was extremely helpful and cooperative” – “dedicated and competent staff” – “an excellent project” – “the community is very supportive of the contribution the project is making” – “well administered and in compliance with Federal, legal and regulatory requirements” – “Project is in compliance with all fiscal requirements and policies” – “Outstanding, well-organized filing system” – “very impressed with the services provided the children” – “volunteers are very comfortable in their assignments” – “I really enjoyed visiting your project”.*

There is nothing in this report suggesting any change.

Specific instructions by the State CNCS Office:

When the Grants for the April 2004 – March 2007 period were being negotiated, the State CNCS Office requested a change to the method of allocating indirect costs. The State Office would no longer accept indirect costs being charged to the “Indirect Cost” line because the Council did not have an “Indirect Cost Rate” approved by HHS. Historically, the Council charged the indirect cost line in accordance the allocation method required by its largest grantor, the Florida Department of Elder Affairs (DOEA). Their grantees must use DOEA’s approved system of allocating costs commonly referred to as the KPMG (letter attached). DOEA contends that the KPMG complies with A-122 and refers to Notice of Instruction 032803-1-I-AS. After negotiation, the State Office agreed to a method where indirect costs would be allocated to direct costs lines using an allocation system which is an integral part of the Council’s accounting system. Once the

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

eGrant applications were adjusted for the above, the grants were awarded. The same practice has been repeated for four years as documented in eGrants and all grants including the current one have been awarded. If this method is no longer acceptable we are looking forward to working with CNCS to devise an acceptable solution.

Reliance on OMB Circular A-122:

OMB Circular A-122 is a comprehensive document addressing many conditions to satisfy the needs of many different organizations. Choosing portions applicable to each situation is critical to determining if the result is in compliance. Because the Council was directed to charge indirect amounts to direct lines we wish to quote and highlight relevant portions of ATTACHMENT A including those dealing with indirect costs before addressing the OIG's conclusions and recommendations. As explained more fully below, the Council allocated costs with these quoted portions of OMB 122-A.

OMB Circular A-122

1. ***Purpose.** However, such cost sharing or matching shall not be accomplished through arbitrary limitations on individual cost elements by Federal agencies.*

3. ***Applicability.** These principles shall be used by all Federal agencies.*

ATTACHMENT A

A. 2 *Factors affecting allowability of costs.*

A. 2. a. *Be reasonable for the performance of the award*

A. 3. ***Reasonable costs.*** *A cost is reasonable if, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the costs.*

A. 3. a. *the cost is of a type generally recognized as ordinary and necessary -for the performance of the award.*

A. 4. *Allocable costs.*

A. 4. a. *A cost is allocable to a particular cost objective, such as a grant, contract, project, service, or other activity, in accordance with the relative benefits received. A cost is allocable to a Federal award if it is treated consistently with other costs incurred for the same purpose in like circumstances and if it:*

2. *can be distributed in reasonable proportion to the benefits received, or*
3. *Is necessary to the overall operation of the organization, **although a direct relationship to any particular cost objective cannot be shown.***

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

A. 6. ***Advance understandings.*** *The absence of an advance agreement on any cost element will not, in itself, affect the reasonableness or allocability of that element.*

C. ***Indirect Costs***

1. *Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified*

2. *Because of the diverse characteristics and accounting practices of non-profit organizations, it is not possible to specify the types of costs which may be classified as indirect in all situations. However, typical examples of indirect costs for many non-profit organizations may include depreciation or use allowances on buildings and equipment, the cost of operating and maintaining facilities, and general administration and general expenses, such as the salaries and expenses of executive personnel administration, and accounting.*

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

RESPONSE TO OIG'S RESULTS OF AGREED-UPON PROCEDURES:

General Response: The Council can provide great detail from its accounting system. If printed the general ledger would be many thousands of pages and very difficult to manually trace entries. OIG was invited to test the system and request specific detail to complete their work, but the OIG did not follow up. The accounting system produces reports in several different formats including comma delimited, excel spreadsheets and PDF files. The spreadsheets provided to the OIG were direct outputs of the system. See partial General Ledgers Attachments II and III.

1. Salaries of COA employees charging time to the grants were not in compliance with OMB regulations.

Response: The significant portion of the questioned costs represent “direct” program costs for personnel employed exclusively within the FGP grant program, all costs of which are supported with appropriate documentation required pursuant to the provisions of OMB Circular A-122, Attachment B, Section 8.m.(1). All other indirect charges allocated to the FGP grant program have been determined and allocated in strict compliance with the mandatory requirements of the Florida Department of Elder Affairs (DOEA) Unit Cost Template.

We concur with the OIG auditor’s “interpretation” of OMB Circular A-122, Attachment B, Section 8. m. (1) and (2) as it relates to documented personnel activity reports for personnel whose work involves two or more functions or activities, but only if all parts of the criteria stated are recognized and understood in these circumstances. The time sheets of the Foster Grandparent (FGP) director and the Retired Senior Volunteer Program Director (RSVP) were supported by the required documentation in accordance with the OMB Circular A-122. The time sheet reports for each project director were completed indicating the director’s name and in combination with their position descriptions, all of which provides sufficient evidence of which grant program should be charged for these direct personnel costs. The project directors spent 100% of their time in each of their respective programs. All related salary and fringe benefits for these individuals were recognized exclusively as direct program costs in complete accordance with the detail provided with the approved contract agreements, and all related program budgets. These direct costs represent approximately 60% of the FGP costs and 71% of the RSVP costs questioned by the OIG auditor.

The remaining 40% and 29% of the FGP and RSVP programs, respectively, included in the OIG auditor’s questioned costs is attributed to indirect salaries, wage, and related fringe benefit costs of FGP and RSVP program personnel, all costs of which we believe were allocated in accordance with conditions of OMB Circular A-122, Section 8.m.(1). This section specifically permits the allocation of

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

indirect costs under a substitute system approved by the Council's oversight agency. The purpose of the exception is to reduce the undue burden of administrated compliance for entities that provide grant administrative services for many program functions, as is the case with the Council.

The U.S. Department of Health and Human Services distributes funding to the Council through the Florida Department of Elder Affairs and Northeast Florida Area Agency on Aging, Inc. Pursuant to the oversight agency(ies) requirements, the Council is required to allocate its indirect costs in accordance with an approved indirect cost allocation plan mandated by the Florida Department of Elder Affairs. The treatment of these costs is not optional on the part of the Council. Rather, all program costs provided and budgeted in the grant agreements (and related Council proposals) were developed in accordance with, and comply with, these strict and structured requirements. Furthermore, all program costs developed pursuant to these requirements were presented to, and approved by, the grantor agencies in advance of obtaining their respective formal approvals, without question.

The specific formal indirect allocation method established by the Florida Department of Elder Affairs (formally known as the KPMG model), referred to above, and is required to be followed in allocating indirect costs to all program functions administered by the Council. This allocation rate methodology has been in effect for many years, and is updated on an annual basis by the Department of Elder Affairs to be used for budgeting and reporting by the Council

In response to the OIG auditor's findings, after implementation of the required indirect cost allocation plan by the Council in 2004, the Department of Elder Affairs instructed the Council to notify the Corporation for National and Community Service (CNCS) of its intent to utilize the specified indirect cost allocation rate plan. The Council immediately notified CNCS of the adopted indirect cost allocation plan. On February 12, 2004, CNCS notified the Council that for the initial year of the current 3 year contract, the indirect cost allocation method would not be acceptable, but furnished the Council with alternative procedures to charge the indirect cost allocation amounts to the FGP and RSVP programs. The alternative procedures allowed for the Council to charged indirect costs to the FGP and RSVP programs as direct costs using the same indirect cost allocation rate as used in the KPMG model. For years subsequent to the initial year of the respective programs, items of indirect costs would be budgeted and shown as an itemized part of the FGP and RSVP grant budget application, which was the procedure utilized by the Council. All grant budgets for FGP and RSVP were approved by CNCS for these subsequent years. The procedures to be used by the Council as described above were communicated to the Council in a written letter memorandum letter issued by the CNCS on February 12, 2004.

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

We are submitting the above information to demonstrate that the Council has complied in all material respects with OMB Circular A-122, Attachment B, as well as responding specifically and timely to detailed instructions issued by CNCS and Florida Department of Elder Affairs with respect to developing documentation necessary to support salary and wage costs, related payroll tax expense, and fringe benefits associated with the personal services charged to the FGP and RSVP program functions.

In conclusion, we respectfully request that all personnel costs included in the OIG auditors summary of questioned costs, including all direct and indirect components, be rescinded in their entirety.

2. Allocations of salaries, fringe benefits and travel expenses were based on budgeted labor hours of each COA department.

Response: The salaries, fringe benefits and travel expenses for direct employees were charged at actual, not budget. The remaining salaries, fringe benefits and travel expenses were for employees in support roles that are *“necessary to the overall operation of the organization, although a direct relationship to any particular cost objective cannot be shown”*. There is no way to determine the benefits by accounting for time, so other means were used. For example, the actual costs of payroll staff was allocated at 45% because Foster Grandparents represent 45% of the total number of individuals paid through the payroll system. The Council utilizes the MIP software accounting system relative to its accounting function. The MIP system has the indirect cost allocation rate programmed into the system to allow for automatic calculation and expense distribution to each and every program function cost center. Any payroll costs allocation can be retrieved from the system to document the specific allocated charges to each program function. Since paycheck dates do not reflect accounting periods, a test of the system would be required to trace individual employee pay amounts to the processing group, then to the transfer journal entry, then to the allocation journal entry, and finally to the program function service group in the MIP system. The OIG auditor requested and received payroll spreadsheets produced by the accounting system for all individuals partially charged to the RSVP and FGP grants. To assist the auditor the final charges to those grants were hand written on each spreadsheet which could be confirmed by testing.

Again, we respectfully request that all fringe benefits and travel costs included in the OIG auditors summary of questioned costs, including all direct and indirect components, be rescinded in their entirety.

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

3. In-kind volunteer meals were mistakenly claimed as federal share.

Response: The eGrants and PMS systems are the only places where the Federal shares of program expenses are declared. Those reports are designed to include total costs, rather than specific line item costs. The report in question (provided to the OIG auditor), was a spreadsheet report prepared outside of the accounting system. The data formatted and supplied directly to the OIG auditor was a manually prepared summary of costs, and was not an official report. In other words, the spreadsheet prepared for the OIG auditor was not a report that was submitted to CNCS for normal reporting purposes. When it was discovered that an error had been made on the initial spreadsheet prepared for the OIG auditor, a corrected spreadsheet was prepared and resubmitted to the OIG auditor. The OIG auditor did not incorporate the corrected spreadsheet in their report. As for updating the official reports, the Federal share did not change as a result of the reclassification so no adjustment was necessary. We also note that subsequent reports are handled on a grant to date basis, so any adjustments would be reflected before the final grant reports are submitted. We respectfully request that this item of questioned costs be rescinded in its entirety since nothing was charged to the Federal portion. See Attachments IV and V.

4. COA used an inconsistent allocation methodology for claiming volunteer support expenses.

Response: The Council's position is that the KPMG model used by Council during the audit period is consistent. The KPMG model is changed on a quarterly basis during any reporting period. The change is necessary due to the fact that the Council's program functions are ever changing with additions of new program functions and deletions of program functions. When changes occur to the number of program functions that indirect costs are applied to, the indirect cost allocation ratios change. This is consistent with the indirect cost allocation plan requirements.

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

5. **COA's policies and procedures did not address how funds would be drawn down from the Department of Health and Human Services' Payment Management System (PMS).**

Response: During the audit fieldwork period, we discussed with the OIG auditor, that the Council has a policy not to draw down Federal funds from the FGP and RSVP programs until after the costs have been incurred by the Council. Total expenses for the program are reduced by the required match to establish how much should be drawn down from the Federal award amount. Calculations are based on the total elapsed time for the three year grants. At that time, the Finance Director of the Council directs accounting staff as to how much and when the funds are requested. The OIG auditor correctly points out that the written procedure as shown in the Council's operating and procedural manual is out of date. The Council has revised the procedure to reflect the current procedure.

6. **COA's policies and procedures do not address its current practice for determining what costs are reported on the financial status report using the eGrants System.**

Response: The OIG auditor has correctly pointed out that the practice changed without adjustments made to the Council's written accounting and policy procedural manual. Costs are now reconciled and reported to eGrants and PMS similarly, and the Federal portion does not exceed the amount actually drawn down, except in the last quarter of the respective three year grants of FGP and RSVP, when the amount is adjusted to the actual "earned Federal portion". This method provides protections to the Council from ever having advanced Federal funds. The Council has adjusted the written operating and procedural manual.

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

7. COA did not have adequate supporting documentation for funds from its General fund that were used as match for the Senior Corps grants.

Response: The only way to verify match is to verify disbursements not revenue. As long as the disbursements equal, at least, the value of the Federal portion plus the match (which is a product of the Federal portion) the match has been met. Any disbursement above that amount is “excess” but available for match if necessary. The only proviso being “in-kind”; it cannot be assigned to the Federal portion but can be used as match or excess. The Council uses a pooling of cash method to receive and disburse cash funds. It does not maintain a separate bank account for each fund. The pooled cash fund disburses funds and charges each respective program function with the expenditure charge. The FGP and RSVP are expense reimbursement type grants, therefore any expenditure made by the overall pooled cash fund has an element of grant revenue reimbursement and the required local match, therefore expenditures made by the general funds pooled cash fund represents documentation necessary to support required matching funds. As documented from previous year financial reports, local funding is far in excess of the required matching funds per grant agreement for all Federal and State grants including FGP and RSVP. For example, in the year ended September 30, 2006 required local match for all Federal and State programs equaled \$302,000. In the same period the Council raised \$1,564,000 available for match.

8. There was a lack of separation of duties in the finance department.

Response: The Council does enforce its financial policies. The Fiscal Supervisor cannot disburse funds, nor calculates how much is to be drawn. The draw is ACH so the deposit is out of the control of the Fiscal Supervisor. The banks are reconciled within the accounting system and all ledgers are reviewed by the Finance Director monthly. The quarterly reports to PMS are created in the presence and signed by the Finance Director. All disbursements require two signatures from upper management. Most entries to the system come from sources other than the general journal. Due to budget constraints, the Council is unable to hire additional personnel to achieve optimum or complete levels of segregation of duties. To achieve this level would be impractical from a budget standpoint. To the extent possible, duties are segregated to serve as a check and balance on the employee’s integrity and to maintain the best control system possible. In addition all employees are subject to background checks and the Council carries sufficient insurance just in case there would be misappropriation of funds. The Council would like to note that we address this issue on an annual basis with our independent auditors, as the Council desires to achieve the optimum and complete levels of segregation of duties.

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

SPECIFIC RESPONSES TO FGP PROGRAMMATIC REVIEW:

9. **COA did not fulfill its program responsibilities in the following areas:**
- a. **Documentation of volunteer orientation and in-service training.**
 - b. **Documentation to support annual volunteer evaluations.**
 - c. **Documentation of written assignments/care for FGP volunteers during the review period.**
 - d. **Documentation regarding the eligibility of the children served.**
 - e. **Memorandums of Understanding with volunteer stations did not include all required elements.**

a. **Response:** The Council on Aging of Volusia County has been the sponsoring agency for the FGP Program for 37 years. Compliance monitorings have been conducted periodically during that time with every indication that we were in compliance and we were applauded for our outstanding management procedures. THESE MONITORING REPORTS NEVER INDICATED THAT IN-SERVICE TRAINING WAS NOT BEING PROVIDED FOR THE FOSTER GRANDPARENTS. We can only assume that the former director discarded the documentation. We do have documentation for all required in-service training since December, 2005.

b. **Response:** Copies of evaluations dated 12/05/05 and 12/09/05 for two of the three were found and forwarded to the OIG auditor. The third left the Program before her evaluation was done and can no longer be contacted.

c. **Response:** Again, during compliance monitorings this issue was never brought out. Care plans have now been requested from all sites. Sixty-seven of the seventy-nine Grandparents care plans have been received.

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

d. Response: This was never brought to our attention in compliance monitorings. All assignment/care plans have been reviewed and updated. The overage individuals started in the program many years ago. The Council is in the process of getting written mutual agreements that care should continue for these mentally challenged individuals.

e. Response: MOU's were inspected at compliance monitorings. This was never reported on our monitoring reports. An amendment to the Foster Grandparent Memorandum of Understanding has been sent to all sites for signature which reads:

“The Volunteer Station will not discriminate against Foster Grandparent volunteers or in the operation of its program on the basis of race, color, national origin, sex, age, political affiliation, religion, or on the basis of disability, if the volunteer is a qualified individual with a disability.”

All but one Amendment to the MOU have been signed and returned. We are waiting for Volusia County School system to channel through their Departments before it can be signed.

Agreed-Upon Procedures Review of Senior Grants Awarded to
Council on Aging of Volusia County 04/01/05-03/31/06
Council On Aging of Volusia County, Inc.
Comments Responding To OIG Draft Report – June 5, 2007

SPECIFIC RESPONSES TO RSVP PROGRAMMATIC REVIEW:

10. **COA did not fulfill its RSVP program responsibilities in the following areas:**
- a. **No documentation that RSVP volunteers met the age requirement.**
 - b. **Agreement that RSVP volunteers agreed to serve without compensation.**
 - c. **No documentation provided of written assignment descriptions for each RSVP volunteer.**
 - d. **Incomplete RSVP enrollment forms.**

Response: The Council on Aging has been the sponsoring agency for the RSVP Program for over three decades. Over the course of that great amount of time several official file and program audits were performed by CNCS monitors with no indication that the files were in need of change. Furthermore, the enrollment forms have followed the sample document in the “**RSVP Operations Handbook, April 2000**”, **Appendix 7, p. 1.**

The Council on Aging defers to the expertise of the “Corporation” for direction following these audits, as a path to improvement. When no such change is requested, program continuance is validated.


A thorough internal file audit is in process to identify all incomplete enrollment forms/other necessary file forms, to insure file integrity by comprehensively meeting with station managers and volunteers to complete all required documents. For example, all subsequent enrollment forms contain the language: *“I understand that I am not an employee of the RSVP Program, the sponsor, the volunteer station or the Federal government and agree to serve without compensation. I further agree that if I use my personal automobile I will keep in effect, automobile liability insurance equal to or greater than the minimum required by the State.”*

ADDITIONAL INFORMATION:

Subsequent to the OIG exit conference the Council has appreciated the opportunity to work with CNCS and has received instruction concerning programmatic changes.

The Council has also submitted much information including the accounting for the entire three years of the RSVP and FGP grants- Attachments IV & V. The Council is looking forward to working with CNCS to mutually resolve all issues.

Respectfully submitted...

CORPORATION
FOR NATIONAL
AND
COMMUNITY
 SERVICE

March 15, 2004

Ms. Gail F. Camputaro
Executive Director
Volusia County C.O.A.
160 N. Beach Street
Daytona Beach, Florida 32115

Dear Gail:

It was truly a pleasure to be able to meet with you and Dan Feinbaum during the Corporation's monitoring visit to the Volusia County C.O.A.'s Foster Grandparent Program on February 25-26, 2004. I sincerely appreciate your allowing time in your busy schedule to meet with me and for allowing time for me to meet with your staff. Everyone was extremely helpful and cooperative.

As you know, the Corporation for National and Community Service requires that every Senior Corps grantee be visited once every three years for the purpose of compliance monitoring. The purpose of the compliance monitoring is to assure that Corporation policies and Federal Regulations are being followed and to identify areas where the grantee may need technical assistance.

During my visit, I was able to meet with you, Dan Feinbaum, and several of your staff members. You have a very dedicated and competent staff that is managing what represents, in my opinion, an excellent project. Meetings with Advisory Council and Board members, station supervisors, and volunteers also indicate that the community is very supportive of the contribution this project is making to Volusia County. I am pleased to report that I found the project to be well administered and in compliance with federal, legal and regulatory requirements.

These are some of the highlights of the visit:

• **Program Design and Implementation:**

The FGP workplans submitted the past three years have been characterized by their identification of emerging priority needs of at-risk children and youth, programming for impact workplan designs and implementation.

• **Government and Performance and Results Act Verification:**

More than ninety per cent (90%) of the volunteers are covered by Impact statements and the most recent workplan/performance measures are well chosen to measure the critical needs of at-risk children and youth in your community.

• **Fiscal Requirements:**

Project is in compliance with all fiscal requirements and policies as shown by a review of the documenting and accounting records pertaining to the non-federal support, the annual level of expenditures for volunteer expenses, achievements of the number of volunteers in the past three years, separate maintenance of cash and in-kind cost accounts and all others.

NATIONAL SERVICE: GETTING THINGS DONE.

Senior Corps • Learn and Serve America • National Service Schools Corps



3155 McCrary Place, #115
Orlando, FL 32803-3750
(407) 848-6117 Fax (407) 848-8218
Website: www.nationalservice.org

• **Volunteers, Volunteer Stations and Assignments:**

Outstanding, well-organized filing system for all of the above. Fifty-three (53) volunteer timesheets and mileage reimbursement forms were reviewed and seventeen (17) volunteer folders were reviewed. All of them included required information such as age, income qualification & annual income qualification review, latest physical, beneficiary designee, assignment description, and signatures. Six (6) Memorandums of Understanding were reviewed and all of them were current and signed.

• **Visits with Volunteers at the Deland Elementary School & Twinkle Star Child Care Center:**

I was very impressed with the services provided to the children by the Foster Grandparents serving at the elementary school in Deland. These volunteers are very comfortable in their assignments and are making significant contributions in improving student performance in the areas of math, reading, and writing by providing one-on-one tutoring for the students. The school's principal was most cordial during our visit and expressed very sincere appreciation for the volunteers. It is very apparent that the project director has established many positive working relationships with both station supervisors and volunteers. This has resulted in very successful placements of volunteers and has directly contributed to the success of the program and the impact on the community.

Again, I really enjoyed visiting your project. We appreciate your involvement in providing guidance to Senior Corps. The Florida State Office recognizes your project's many challenges in such areas as fundraising, board development, and expansion. We also recognize that your project has consistently met established deadlines for submission of reports and for requests from the State Office. If either you or Mr. Feinbaum have any questions or require assistance, please do not hesitate to contact me at (407) 648-6117 or by Email, gkilleen@cns.gov.

Sincerely,



Gail Killeen
State Program Specialist

cc: Dan Feinbaum, FGP Director
Judi Maloy, FGP/RSVP Advisory Council Chair
Suzanne Richards, CNCS State Director

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On
Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit Transaction Description
6101	Gross Salaries & Wages					
091.141	Foster Grandparents / Federal					
3200	FGP Administration		Opening		0.00	
		0506 03 4	243	03/31/06	<u>1,832.03</u>	Allocated line for M3200
			Period Totals		<u>1,832.03</u>	<u>0.00</u>
			Subtotal		1,832.03	
6105	Holiday Pay					
091.141	Foster Grandparents / Federal					
3200	FGP Administration		Opening		0.00	
		0506 03 4	244	03/31/06	<u>268.39</u>	Allocated line for M3200
			Period Totals		<u>268.39</u>	<u>0.00</u>
			Subtotal		2,100.42	
6106	Annual Leave					
091.141	Foster Grandparents / Federal					
3200	FGP Administration		245	03/31/06	<u>113.19</u>	Allocated line for M3200
			Period Totals		<u>113.19</u>	<u>0.00</u>
			Subtotal		2,213.61	
6110	FICA Expense					
091.141	Foster Grandparents / Federal					
3200	FGP Administration		246	03/31/06	<u>193.20</u>	Allocated line for M3200
			Period Totals		<u>193.20</u>	<u>0.00</u>
			Subtotal		2,406.81	
6112	Life Insurance					

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On
Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit Transaction Description
091.141	Foster Grandparents / Federal					
3200	FGP Administration	API030806	03/01/06	03/01/06	<u>9.80</u>	2006 - MARCH PREMIUM
			Period Totals		<u>9.80</u>	<u>0.00</u>
			Subtotal		2,416.61	
6113	Health Insurance					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	API030806	396726	03/01/06	<u>316.39</u>	2006 - MARCH PREMIUM
			Period Totals		<u>316.39</u>	<u>0.00</u>
			Subtotal		2,733.00	
6114	Workers Comp					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	0506 03 4	247	03/31/06	<u>13.75</u>	Allocated line for M3200
			Period Totals		<u>13.75</u>	<u>0.00</u>
			Subtotal		2,746.75	
6115	State Unemployment Insurance					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	0506 03 4	248	03/31/06	<u>22.58</u>	Allocated line for M3200
			Period Totals		<u>22.58</u>	<u>0.00</u>
			Subtotal		2,769.33	
6116	Pension					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	0506 03 4	249	03/31/06	<u>80.52</u>	Allocated line for M3200

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On
Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit Transaction Description
			Period Totals		80.52	0.00
			Subtotal		2,849.85	
6117	Disability Insurance					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	API030106	03/01/06	03/01/06	34.05	2006 - MARCH PREMIUM
			Period Totals		34.05	0.00
			Subtotal		2,883.90	
6210	Travel - Local					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	0506 03 4	250	03/31/06	116.04	Allocated line for M3200
			Period Totals		116.04	0.00
			Subtotal		2,999.94	
6330	Telephone					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	API032906	03/19/06	03/19/06	1.49	CELLULAR PHONE USAGE
			Period Totals		1.49	0.00
			Subtotal		3,001.43	
6332	Postage					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	API030806	03/03/2006A	03/03/06	18.50	BULK MAIL PERMIT # 239
		JV1869	001	03/31/06	64.35	FGP
			Period Totals		82.85	0.00
			Subtotal		3,084.28	
			3/2006			

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On
Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit Transaction Description
6419	Supplies - Other					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	API041906-CC	03/31/06	03/31/06	<u>6.39</u>	SUPPLIES-FGP IN SVC
			Period Totals		<u>6.39</u>	<u>0.00</u>
			Subtotal		3,090.67	
6803	Service Subcontracts - Transportation					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	API041906	04-06-2621	03/31/06	<u>2,228.62</u>	MARCH 2006 BILLING
			Period Totals		<u>2,228.62</u>	<u>0.00</u>
			Subtotal		5,319.29	
6913	Professional Services - Legal					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	JV1905	001	03/31/06	<u>127.47</u>	JV1903
			Period Totals		<u>127.47</u>	<u>0.00</u>
			Subtotal		5,446.76	
6950	Meetings					
091.141	Foster Grandparents / Federal					
3200	FGP Administration	API032106-FEB	03/06/06	03/06/06	14.03	MEETING-FGP ENRLMNT
		API031506	03/13/2006A	03/13/06	550.00	FGP TRAINING/MEETING
		API041206	03/31/06	03/31/06	59.49	25.50 MEETING-FGP
		API041206	03/31/2006	03/31/06	<u>45.60</u>	MEETING-TRAINING
			Period Totals		<u>669.12</u>	<u>25.50</u>
			Subtotal		6,090.38	
			3/2006			

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On
Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit	Transaction Description
6974	Volunteer Recognition						
091.141	Foster Grandparents / Federal						
3200	FGP Administration	API041906-CC	03/31/06	03/31/06	<u>211.58</u>		TRAINING-FGP
			Period Totals		<u>211.58</u>	<u>0.00</u>	
			Subtotal		6,301.96		
6976	Volunteer Stipend - Leave						
091.141	Foster Grandparents / Federal						
3200	FGP Administration	JV1903	001	03/31/06	12,916.10		JV1903
		JV1904	001	03/31/06		12,916.10	JV1903
		JV1905	001	03/31/06	<u>12,916.10</u>		JV1903
			Period Totals		<u>25,832.20</u>	<u>12,916.10</u>	
			Subtotal		19,218.06		
7505	In Kind Meals						
091.141	Foster Grandparents / Federal						
3200	FGP Administration	JV1901	001	03/31/06	<u>7,071.75</u>		MARCH INKIND FGP
			Period Totals		<u>7,071.75</u>	<u>0.00</u>	
			Subtotal		26,289.81		
7600	In Kind Personnel Exp						
091.141	Foster Grandparents / Federal						
3200	FGP Administration	JV1901	001	03/31/06	<u>16.00</u>		MARCH INKIND FGP
			Period Totals		<u>16.00</u>	<u>0.00</u>	
			Subtotal		26,305.81		
7720	In Kind Space Exp						

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On
Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit	Transaction Description
091.141	Foster Grandparents / Federal						
3200	FGP Administration	JV1901	001	03/31/06	<u>249.89</u>		MARCH INKIND FGP
			Period Totals		<u>249.89</u>	<u>0.00</u>	
			Subtotal		<u>26,555.70</u>		
			Transaction		<u>39,497.30</u>	<u>12,941.60</u>	
			Balance Of - Council On		<u>26,555.70</u>		
Report Opening/Current					<u>0.00</u>	<u>0.00</u>	
Report Transaction					<u>39,497.30</u>	<u>12,941.60</u>	
Report Current					<u>39,497.30</u>	<u>12,941.60</u>	
Report Difference					<u>26,555.70</u>		

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On
Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit Transaction Description
6101	Gross Salaries & Wages					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Opening		32,523.41	
			Opening		0.00	
		0506 03 4	236	03/31/06	<u>3,820.16</u>	Allocated line for M3100
			Period Totals		<u>3,820.16</u>	<u>0.00</u>
			Subtotal		36,343.57	
6105	Holiday Pay					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Opening		1,200.59	
		0506 03 4	237	03/31/06	<u>49.74</u>	Allocated line for M3100
			Period Totals		<u>49.74</u>	<u>0.00</u>
			Subtotal		37,593.90	
6106	Annual Leave					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Opening		988.60	
		0506 03 4	238	03/31/06	<u>86.84</u>	Allocated line for M3100
			Period Totals		<u>86.84</u>	<u>0.00</u>
			Subtotal		38,669.34	
6110	FICA Expense					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Opening		2,568.71	
		0506 03 4	239	03/31/06	<u>289.63</u>	Allocated line for M3100
			Period Totals		<u>289.63</u>	<u>0.00</u>
			Subtotal		41,527.68	
			3/2006			

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit	Transaction Description
6112	Life Insurance						
093.143	Retired Senior Volunteer Prg / Federal						
3100	RSVP Administration		Current		71.20		
6113	Health Insurance						
093.143	Retired Senior Volunteer Prg / Federal						
3100	RSVP Administration	API030806	Opening 396726	03/01/06	2,971.34		
					<u>316.39</u>		2006 - MARCH PREMIUM
			Period Totals		<u>316.39</u>	<u>0.00</u>	
			Subtotal		44,886.61		
6114	Workers Comp						
093.143	Retired Senior Volunteer Prg / Federal						
3100	RSVP Administration	0506 03 4	Opening 240	03/31/06	150.23		
					<u>19.86</u>		Allocated line for M3100
			Period Totals		<u>19.86</u>	<u>0.00</u>	
			Subtotal		45,056.70		
6115	State Unemployment Insurance						
093.143	Retired Senior Volunteer Prg / Federal						
3100	RSVP Administration	0506 03 4	Opening 241	03/31/06	236.15		
					<u>25.53</u>		Allocated line for M3100
			Period Totals		<u>25.53</u>	<u>0.00</u>	
			Subtotal		45,318.38		
6116	Pension						
093.143	Retired Senior Volunteer Prg / Federal						
3100	RSVP Administration		Current Balance		563.82		

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On
Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit Transaction Description
6117	Disability Insurance					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Current		274.44	
6210	Travel - Local					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration	0506 03 4	Opening 242	03/31/06	557.66	
					<u>85.58</u>	Allocated line for M3100
			Period Totals		<u>85.58</u>	<u>0.00</u>
			Subtotal		46,799.88	
6211	Travel - Long Distance					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Current		212.61	
6330	Telephone					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration	API032906	Opening 03/19/06	03/19/06	306.93	
					<u>1.92</u>	CELLULAR PHONE USAGE
			Period Totals		<u>1.92</u>	<u>0.00</u>
			Subtotal		47,321.34	
6332	Postage					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration	API030806	Opening 03/03/2006A	03/03/06	336.65	
		JV1869	001	03/31/06	20.00	BULK MAIL PERMIT # 239
					<u>35.73</u>	RSVP
			Period Totals		<u>55.73</u>	<u>0.00</u>
			Subtotal		47,713.72	
			3/2006			

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit Transaction Description
6410	Printing					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Current		1,058.00	
6412	Supplies - Office					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Opening		543.21	
		API031506	329222993-	03/09/06	17.59	SUPPLIES - OFFICE
		API032206	37920	03/16/06	175.00	5000 LABELS - VIALS OF LIFE
		API041206	3.30271E+12	03/20/06	29.99	SUPPLIES - OFFICE/COMPUTER
		API040506	331512378-	03/25/06	42.59	SUPPLIES - OFFICE/COMPUTER
		API041206	3.3152E+12	03/27/06	<u>31.17</u>	SUPPLIES - OFFICE
			Period Totals		<u>296.34</u>	<u>0.00</u>
			Subtotal		49,611.27	
6413	Supplies - Computer					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Opening		656.40	
		API032906	43522	03/15/06	150.00	PENTIUM 4 COMPUTER SYS/2 MONITORS
		API041206	3.30271E+12	03/20/06	<u>40.99</u>	SUPPLIES - OFFICE/COMPUTER
			Period Totals		<u>190.99</u>	<u>0.00</u>
			Subtotal		50,458.66	
6419	Supplies - Other					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Current		535.78	
6923	Insurance - Volunteers					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Current		3,649.05	
6932	Recruiting - Drug Testing					

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit Transaction Description
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Current		46.00	
6950	Meetings					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Opening		1,300.34	
		API041206	03/31/06	03/31/06	39.25	25.50 MEETING-RSVP/FGP
		API041906-CC	03/31/06	03/31/06	<u>106.97</u>	MEETING-ADVISORY
			Period Totals		<u>146.22</u>	<u>25.50</u>
			Subtotal		56,110.55	
6951	Dues / Subscriptions					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Current		170.00	
6974	Volunteer Recognition					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration	CR1032	Opening 014	03/28/06	12,711.45	
						<u>1,240.50</u> HILTON DAYTONA BEACH - REFUND FOR OVERPAYMENT
			Period Totals		<u>0.00</u>	<u>1,240.50</u>
			Subtotal		67,751.50	
6990	Bank Service Charges					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Current		110.00	
6995	Miscellaneous Expense					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Opening		94.81	
		API032906	728410	03/02/06	75.47	FOOD ORDER - MISC
		API032106-FEB	03/06/06	03/06/06	<u>32.10</u>	FLOWERS

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On
Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit	Transaction Description
			Period Totals		<u>107.57</u>	<u>0.00</u>	
			Subtotal		68,063.88		
7505	In Kind Meals						
093.143	Retired Senior Volunteer Prg / Federal						
3100	RSVP Administration		Opening 001	03/31/06	1,306.00		
		JV1901			<u>501.75</u>		MARCH INKIND RSVP
			Period Totals		<u>501.75</u>	<u>0.00</u>	
			Subtotal		69,871.63		
7600	In Kind Personnel Exp						
093.143	Retired Senior Volunteer Prg / Federal						
3100	RSVP Administration		Opening 001	03/31/06	500.58		
		JV1901			<u>144.00</u>		MARCH INKIND RSVP
			Period Totals		<u>144.00</u>	<u>0.00</u>	
			Subtotal		70,516.21		
7700	In Kind Supplies/Other						
093.143	Retired Senior Volunteer Prg / Federal						
3100	RSVP Administration		Opening 001	03/31/06	1,707.50		
		JV1901			<u>200.00</u>		MARCH INKIND RSVP
			Period Totals		<u>200.00</u>	<u>0.00</u>	
			Subtotal		72,423.71		
7715	In Kind Recruiting Advertisements						
093.143	Retired Senior Volunteer Prg / Federal						
3100	RSVP Administration		Current		1,365.33		
7720	In Kind Space Exp						

Council on Aging of Volusia County, Inc.
Standard General Ledger
From 03/01/06 Through 03/31/06

01 - Council On
Aging

Account Code	Account Title	Session ID	Document Number	Effective Date	Debit	Credit Transaction Description
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration	JV1901	Opening 001	03/31/06	2,998.69 <u>249.89</u>	MARCH INKIND RSVP
			Period Totals		<u>249.89</u>	<u>0.00</u>
			Subtotal		77,037.62	
8000	Depreciation/Amortization					
093.143	Retired Senior Volunteer Prg / Federal					
3100	RSVP Administration		Current		<u>199.80</u>	
			Transaction		<u>6,588.14</u>	<u>1,266.00</u>
			Balance 01 - Council On		<u>77,237.42</u>	
Report Opening/Current					<u>71,915.28</u>	<u>0.00</u>
Report Transaction					<u>6,588.14</u>	<u>1,266.00</u>
Report Current					<u>78,503.42</u>	<u>1,266.00</u>
Report Difference					<u>77,237.42</u>	

Council on Aging of Volusia County, Inc.

FGP
4/1/2004 - 3/31/2007
NO MORE DRAW

	12 Months 04/04 - 03/05 Revised	12 Months 04/05 - 03/06 Revised	12 Months 04/06 - 03/07	36 Months Revised	CNCS	COA	Excess
Project Personnel Expenses							
Salaries	52,742.60	51,929.93	48,517.51	153,190.04	149,749.41	3,440.63	0.00
Total Project Personnel Expenses	52,742.60	51,929.93	48,517.51	153,190.04	149,749.41	3,440.63	0.00
Personnel Fringe Benefits							
Other	1,399.45	1,209.81	938.58	3,547.84	3,547.84	0.00	0.00
FICA	4,962.35	2,905.81	3,561.50	11,429.66	11,429.66	0.00	0.00
Health Insurance	2,761.40	4,984.04	4,649.58	12,395.02	11,719.30	675.72	0.00
Retirement	1,352.21	1,315.70	1,067.19	3,735.10	3,735.10	0.00	0.00
Life Insurance	158.95	140.04	130.90	429.89	429.89	0.00	0.00
Total Personnel Fringe Benefits	10,634.36	10,555.40	10,347.75	31,537.51	30,861.79	675.72	0.00
Project Staff Travel							
Travel Local	3,272.02	1,714.87	1,116.75	6,103.64	6,103.64	0.00	0.00
Travel Long Distance	813.96	641.96	2,556.77	4,012.69	4,012.69	0.00	0.00
Total Project Staff Travel	4,085.98	2,356.83	3,673.52	10,116.33	10,116.33	0.00	0.00
Equipment	81.08	482.91	0.00	563.99	0.00	482.91	81.08
Supplies							
Office Supplies	2,344.00	1,314.16	1,965.10	5,623.26	3,082.26	2,541.00	0.00
Computer Supplies	344.89	522.82	445.75	1,313.46	923.57	389.89	0.00
Total Supplies	2,688.89	1,836.98	2,410.85	6,936.72	4,005.83	2,930.89	0.00
Contractual & Consultants							
Janitorial Services	630.00	632.50	162.60	1,425.10	779.10	646.00	0.00
Equipment Lease	2,127.19	1,548.83	850.11	4,526.13	2,313.94	2,212.19	0.00
Computer Support	1,533.71	1,231.76	732.06	3,497.53	1,890.82	1,606.71	0.00
Legal	210.55	160.36	12.16	383.07	171.52	211.55	0.00
Audit	1,276.54	1,321.88	1,167.21	3,765.63	2,372.09	1,393.54	0.00
Other	58.48	106.44	51.61	216.53	158.05	58.48	0.00
Total Contractual & Consultants	5,836.47	5,001.77	2,975.75	13,813.99	7,685.52	6,128.47	0.00

Council on Aging of Volusia County, Inc.

FGP

4/1/2004 -3/31/2007

NO MORE DRAW

	<u>12 Months</u> 04/04 - 03/05 <u>Revised</u>	<u>12 Months</u> 04/05 - 03/06 <u>Revised</u>	<u>12 Months</u> 04/06 - 03/07	<u>36 Months</u> <u>Revised</u>	<u>CNCS</u>	<u>COA</u>	<u>Excess</u>
Other Volunteer Support Costs							
Orientation & Support Meetings	1,836.72	2,698.36	1,400.99	5,936.07	3,959.35	1,976.72	0.00
Dues & Subscriptions	582.92	226.88	120.00	929.80	334.88	594.92	0.00
Background Screening	101.22	333.88	299.84	734.94	603.72	131.22	0.00
Postage	2,242.53	2,054.15	2,088.89	6,385.57	3,934.04	2,451.53	0.00
Telephone	3,171.70	1,715.89	1,698.94	6,586.53	3,244.83	3,341.70	0.00
Maintenance	1,626.55	990.48	104.43	2,721.46	1,084.91	1,086.55	550.00
Printing & News Letter	125.85	353.40	50.71	529.96	399.11	130.85	0.00
Promotion Expense	25.54	260.00	200.00	485.54	260.00	200.00	25.54
Rent	5,025.63	5,034.61	4,910.88	14,971.12	13,143.49	1,827.63	0.00
Utilities	1,236.78	1,067.53	1,318.92	3,623.23	2,254.45	132.00	1,236.78
In Kind Personnel	529.94	71.62	0.00	601.56	0.00	71.62	529.94
In Kind Space	2,998.68	3,248.58	2,998.68	9,245.94	0.00	6,247.26	2,998.68
Liability/Property Insurance	1,663.43	1,660.04	1,647.02	4,970.49	3,142.06	1,828.43	0.00
Depreciation	199.80	199.80	149.85	549.45	0.00	149.85	399.60
Other	1,087.87	1,138.68	756.07	2,982.62	0.00	1,894.75	1,087.87
Total Other Volunteer Support Costs	22,455.16	21,053.90	17,745.22	61,254.28	32,360.84	22,065.03	6,828.41
Section I	98,524.54	93,217.72	85,670.60	277,412.86	234,779.72	35,723.65	6,909.49
Stipends	285,006.87	259,832.29	186,794.29	731,633.45	546,999.82	1,352.63	183,281.00
Other Volunteer Costs							
Meals	33,326.00	30,681.75	27,144.50	91,152.25	0.00	58,828.00	32,324.25
Volunteer Insurance	526.00	526.00	749.13	1,801.13	1,726.13	75.00	0.00
Recognition	4,077.48	6,035.41	4,019.93	14,132.82	13,232.82	900.00	0.00
Volunteer Travel	57,839.55	56,317.52	51,525.28	165,682.35	156,636.51	9,045.84	0.00
Total Other Volunteer Costs	95,769.03	93,560.68	83,438.84	272,768.55	171,595.46	68,848.84	32,324.25
Total Section II	380,775.90	353,392.97	270,233.13	1,004,402.00	718,595.28	70,201.47	215,605.25
Totals	479,300.44	446,610.69	355,903.73	1,281,814.86	953,375.00	105,925.12	222,514.74
Funding Percentages					90.00%	10.00%	

Council on Aging of Volusia County, Inc.

RSVP

4/1/2004 -3/31/2007

	12 Months 04/04 - 03/05 Revised	12 Months 04/05 - 03/06 Revised	12 Months 04/06 - 03/07	36 Months Revised	CNCS	COA	Excess
Project Personnel Expenses							
Salaries	45,880.98	50,561.07	59,508.79	155,950.84	144,950.84	11,000.00	0.00
Total Project Personnel Expenses	45,880.98	50,561.07	59,508.79	155,950.84	144,950.84	11,000.00	0.00
Personnel Fringe Benefits							
Other	1,335.28	438.05	815.35	2,588.68	2,508.68	80.00	0.00
FICA	3,733.58	3,943.89	4,387.02	12,064.49	11,587.45	477.04	0.00
Health Insurance	5,016.84	4,990.05	1,368.26	11,375.15	11,235.15	140.00	0.00
Retirement	1,362.18	876.74	231.52	2,470.44	2,445.44	25.00	0.00
Life Insurance	186.60	117.25	46.76	350.61	345.61	5.00	0.00
Total Personnel Fringe Benefits	11,634.48	10,365.98	6,848.91	28,849.37	28,122.33	727.04	0.00
Project Staff Travel							
Travel Local	783.90	661.36	968.26	2,413.52	2,113.52	300.00	0.00
Travel Long Distance	435.08	291.08	2,257.90	2,984.06	2,384.06	600.00	0.00
Total Project Staff Travel	1,218.98	952.44	3,226.16	5,397.58	4,497.58	900.00	0.00
Equipment	29.70	0.00	0.00	29.70	0.00	0.00	29.70
Supplies							
Office Supplies	1,495.02	1,907.95	1,902.09	5,305.06	0.00	5,305.06	0.00
In Kind Office Supplies	0.00	1,907.50	86.23	1,993.73	0.00	1,907.50	86.23
Computer Supplies	617.22	995.81	685.28	2,298.31	0.00	2,298.31	0.00
Total Supplies	2,112.24	4,811.26	2,673.60	9,597.10	0.00	9,510.87	86.23
Contractual & Consultants							
Janitorial Services	226.80	227.70	91.80	546.30	0.00	546.30	0.00
Equipment Lease	842.78	626.87	611.52	2,081.17	0.00	2,081.17	0.00
Computer Support	561.09	553.38	367.14	1,481.61	0.00	1,481.61	0.00
Legal	98.15	1,113.35	6.77	1,218.27	0.00	1,218.27	0.00
Audit	465.94	612.38	583.60	1,661.92	0.00	1,661.92	0.00
Other	21.07	25.12	73.93	120.12	0.00	120.12	0.00
Total Contractual & Consultants	2,215.83	3,158.80	1,734.76	7,109.39	0.00	7,109.39	0.00

Council on Aging of Volusia County, Inc.

RSVP

4/1/2004 -3/31/2007

	12 Months 04/04 - 03/05 Revised	12 Months 04/05 - 03/06 Revised	12 Months 04/06 - 03/07	36 Months Revised	CNCS	COA	Excess
Other Volunteer Support Costs							
Orientation & Support Meetings	784.37	1,462.03	343.40	2,589.80	784.37	1,805.43	0.00
Dues & Subscriptions	179.27	171.13	0.00	350.40	0.00	350.40	0.00
Background Screening	38.61	136.58	170.45	345.64	0.00	345.64	0.00
Postage	1,027.15	535.89	1,289.82	2,852.86	(0.00)	2,852.86	0.00
Telephone	2,225.61	852.40	1,178.92	4,256.93	0.00	4,256.93	0.00
Maintenance	596.03	425.63	93.64	1,115.30	0.00	1,115.30	0.00
Printing & News Letter	686.45	1,183.51	856.86	2,726.82	636.70	2,090.12	0.00
Promotion Expense	12.47	0.00	0.00	12.47	0.00	12.47	0.00
Rent	1,809.20	1,812.43	3,156.96	6,778.59	0.00	6,778.59	0.00
Utilities	498.52	384.31	820.96	1,703.79	0.00	1,703.79	0.00
In Kind Personnel	4,769.42	644.58	0.00	5,414.00	0.00	5,414.00	0.00
In Kind Recruiting/Advertising	19,003.43	1,365.33	0.00	20,368.76	0.00	4,736.42	15,632.34
In Kind Space	2,998.68	3,248.58	2,998.68	9,245.94	0.00	2,998.68	6,247.26
Liability/Property Insurance	598.87	597.66	599.02	1,795.55	0.00	1,795.55	0.00
Depreciation	199.80	199.80	149.85	549.45	0.00	0.00	549.45
Other	337.33	736.11	1,992.05	3,065.49	0.00	1,708.26	1,357.23
Total Other Volunteer Support Costs	35,765.21	13,755.97	13,650.61	63,171.79	1,421.07	37,964.44	23,786.28
Section I	98,857.42	83,605.52	87,642.83	270,105.77	178,991.82	67,211.74	23,902.21
Other Volunteer Costs							
In Kind Meals	1,548.00	1,807.75	1,931.00	5,286.75	0.00	3,355.75	1,931.00
Volunteer Insurance	3,649.05	3,649.05	4,630.67	11,928.77	8,847.88	3,080.89	0.00
Recognition	8,067.37	11,471.18	10,660.51	30,199.06	16,341.30	13,857.76	0.00
Total Other Volunteer Costs	13,264.42	16,927.98	17,222.18	47,414.58	25,189.18	20,294.40	1,931.00
Total Section II	13,264.42	16,927.98	17,222.18	47,414.58	25,189.18	20,294.40	1,931.00
Totals	112,121.84	100,533.50	104,865.01	317,520.35	204,181.00	87,506.14	25,833.21
Funding Percentages					70.00%	30.00%	

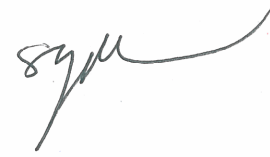
APPENDIX C

CORPORATION'S RESPONSE TO AGREED-UPON PROCEDURES REPORT

Corporation for
**NATIONAL &
COMMUNITY
SERVICE** 

To: Carol Bates, Assistant Inspector General for Audit

From: Suzanne Richards, State Program Director, Florida State Office



Cc: Tess Scannell, Director, Senior Corps
Darryl James, Southern Cluster Area Manager
Peg Rosenberry, Director, Grants Management
Rocco Gaudio, Director, Field Financial Management Center
Jerry Bridges, Chief Financial Officer
William Anderson, Deputy CFO for Finance
Andrew Kleine, Deputy CFO for Planning and Program Management
Shamika Scott, Auditor, OIG
Ron Hurtiz, Audit Manager, OIG
Gail Killeen, State Program Specialist

Date: July 31, 2007

RE: CNCS Response to OIG Draft Audit Report: Agreed –upon Procedures Review for CNCS Senior Corps Grants awarded to COA

The Corporation for National and Community Service (CNCS) has received the Draft Audit Report from the Office of Inspector General (OIG) issued on June 5, 2007 concerning the findings from the agreed-upon procedures (AUP) review of Senior Corps grants awarded to the Council on Aging of Volusia County, FL (COA). We have reviewed the findings in detail and acknowledge that the report made several recommendations to disallow costs and improve compliance with grant requirements.

Please be advised that the Florida State Office has worked with COA to take corrective actions for many of the noted programmatic findings subsequent to the issuance of the report. Presently, the Florida State Office has satisfactory documentation from COA that demonstrates the sponsor is implementing corrective actions as necessary, to fulfill its FGP and RSVP programmatic responsibilities in all 9 areas identified on pages 12-15 of the IG report. It is also important to be aware that the Florida State Office refutes COA's repeated assertion that COA and CNCS have engaged in extensive negotiations regarding the indirect cost issues and COA was given subsequent approval to apply a DOEA allocation system for budgeting direct costs in 2004 renewals. Florida State Office and Service Center Staff did not negotiate or approve use of the DOEA allocation system. This matter was documented in a letter the Florida State Office sent to COA on February 12, 2004 stating we could not approve use of this rate and instructing them to eliminate indirect costs and rebudget reasonable amounts for *allowable* direct costs



Florida State Office
3165 McCrory Place, #115 ★ Orlando, FL 32803-3750
tel: 407-648-6117 ★ email: fl@cns.gov ★ fax: 407-648-6116
Senior Corps ★ AmeriCorps ★ Learn and Serve America



7/31/2007

In conclusion, we will determine the allowability of costs and respond to all OIG findings and recommendations in our management decision when the final report is released; we will work with the Council on Aging to resolve any outstanding issues.

