



An Aging & Disability Resource Center

September 30, 2016

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Administrative Office

9549 Koger Blvd.

Suite 100

St. Petersburg, FL

33702

727-570-9696

Mr. Richard Woltman, Esquire  
Chief Executive Officer/President  
Bay Area Legal Services, Inc.  
1302 N. 19<sup>th</sup> Street  
Tampa, Florida 33605

Dear Mr. Woltman:

Enclosed please find the report for the Annual Fiscal Monitoring made by Susan Collacchioni of the Area Agency on Aging of Pasco-Pinellas, Inc.

The fiscal review performed was intended to determine and provide assurance that your agency is performing in accordance with the non-programmatic terms and conditions of the contract.

All monitoring standards were adequately met and as such your Agency is in full Fiscal Contractual Compliance.

Should you have any questions or comments concerning this report, please do not hesitate to contact me at: 727.570.9696 ext 266.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Isaacson", written over a horizontal line.

Michael Isaacson  
Executive Director

Cc: JP LaCasse, Chief Operating Officer  
Sonia Gamache, Chief Financial Officer



Participants: Sonia Gamache, Chief Financial Officer

Lynn Abbott, Controller

Susan Collacchioni, Contract Compliance Specialist, AAAPP

AGENCY/PROGRAM: Bay Area Legal, Inc. - OAA IIIB, IIIES, LSP

Date : **September 28, 2016**

**AREA OF REVIEW**

**PART 1. ACCOUNTING**

**A. Organizational Controls**

1. Is there an accounting policy & procedures manual?
  - a) Are they adequate to maintain separate records of the receipts and expenditures related to each grant or award.
  - b) Expenditures for each grant or award are recorded according to each of the organizations budget categories.
2. The provider is complying with the provisions of Chapter 119,F.S. to allow public access to records?
3. The provider is complying with Section 286.25, F.S. regarding sponsorship requirements?
4. The provider is complying with section 216.347, F.S. prohibiting the expenditure of contract funds to lobby the legislature, a judicial branch or a state agency?
5. The provider has properly completed the Certification Regarding Lobbying if the contract contains federal funds in excess of \$100,000?
6. The provider has properly completed the certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion if the contract contains federal funding in excess of \$25,000 **and the provider's independent auditor completed a Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion if required to audit contracts containing federal funds.**
7. *Is the Provider compliant with the 30 day processing of the contract/amendment as requested by AAAPP?*
8. *Is there a Chart of Accounts?*
9. *Does the chart of accounts provide for identifying program expenses & revenues seperately?*
10. *Is there insurance coverage for employees handling funds and signing checks?The provider has submitted a current Certificate of Insurance to the AAA verifying adequate liability insurance coverage?*
11. *Does someone periodically review insurance coverage before renewal?*
12. *Are all accounting records stored in locked area?*
13. *If applicable all approved subcontracts contain the required clauses and provisions specified in the contract between the AAA and the provider?*
14. All records are retained for a period of 6 years?
15. Are internal control processes appropriate for organizational structure & size of the agency?
16. If applicable the provider has developed a policy regarding frequency type of administrative monitoring to ensure compliance and accountability of subcontractors with state and federal requirements.
17. If applicable Administrative monitoring reports are issued to subcontractors within 45 days of the desk review or on-site visit.
18. If applicable did the provider follow up on monitoring issues with subcontractors in a timely manner and were all issues resolved?
19. If applicable were any disallowed costs or paybacks from contractors reported to the AAA?
20. Has there been a perceived real or apparent conflict of interest?
21. Are allocated funds being expended in such a manner to avoid a surplus of funds at the end of the contract?
22. If applicable are requests for advances and reimbursements approved by an appropriate official.

YES	NO	N/A	COMMENTS
X			
X			
X			
X			
X			
X			
X			
X			
X			
X			
X			
X			
X			All insurance requirements are met
X			R. Harrison, Administrator.
		X	Legal Services Corp funds only - pro bono work
X			
X			
		X	AAAPP funds used for salary/fringe only
		X	" "
		X	" "
		X	" "
		X	" "
		X	Agency does not request an advance

23. Policies that are specific to Government programs are communicated to the organizations personnel.

X		
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24. The Board of Directors approves all grant applications and is made aware of all major pledges.

X		
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Board of Directors is aware and involved

25. Has the Agency had any acquisitions or mergers? If so, give detail.

	X	
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X		
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Jan 2015 one complaint was filed, documented and investigated by responsible official. Copy in monitoring file.

26. Clients complaints are investigated by a responsible official and the AAAPP is notified of the complaint.

X		
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27. Prior to a vendor being utilized the application is reviewed by a responsible official to determine a possible conflict of interest.

X		
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28. The Board of Directors is made aware of purchases from and distributions to related parties.

X		
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29. Review Income statement w/trial balance for the same period.

X		
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30. (a) Are DOE forms 105 Receipts and Expenditures and 106 Request for Payment submitted to the AAAPP in a timely manor as required by your contract?

X		
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(b) Are contract year end Close Out Reports submitted in a timely manor?

X		
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31. Are Service Cost Reports submitted in a timely manor as required by your contract?

X		
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**AREA OF REVIEW**

YES	NO	N/A
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**B. Review and Audit**

1. Did the prior site visit yield any recommendations? If so, were they complete?

	X	
		X

2. Has there been an independent audit in the last year?

X		
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Agency received an Unmodified opinion by the the CPA firm of Reeder & Reeder, P/A

3. Did the last audit yield any findings?

	X	
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4. If there were findings, were they corrected?

		X
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**C. Property and Equipment**

YES	NO	N/A
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1. Is there a procedure for recording property and equipment?

X		
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2. Is the property ledger maintained so that any item of property can always be located and identified?

X		
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3. Property records are maintained listing a description of the property, serial number, funding source, date of purchase, unit cost, location, condition, transfer, replacement or disposition of the property and is depreciation recorded?

X		
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4. Is a complete physical inventory of all property and equipment made at least annually?

X		
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5. Are retirements and disposals properly approved and recorded?

X		
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6. Has the Board of Directors established a written capitalization policy?

X		
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7. Is the fixed asset ledger reconciled to the general ledger?

X		
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**D. Purchasing**

YES	NO	N/A
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1. Is there a procedure for purchasing?

X		
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2. Is there a competitive bidding procedure?

X		
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Yes on items over \$5,000.

3. Noncompetitive procurement and use of sole source is justified and documented reflecting that it was not feasible to contract under competitive bid procedures in accord with 287.057, F.S.

X		
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4. Are steps taken to ensure the best price for merchandise?

X		
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Yes, even when under threshold multiple vendors called for quotes.

5. Is there separation between authorizing, recording, and custody of merchandise purchases?

X		
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Yes there is an approval process based on internal controls.

6. Is immediate control established at delivery?

X		
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7. Are procedures used to ensure what is ordered is received?

X		
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**G. Billing**

1. Does the agency have internal controls in place for the billing system?
2. For contracts subject to fee assessment, the the provider maintains written fee assessment, billing and collection policies.
3. The provider maintains detailed accounting records listing all clients owing fees and the account balances?
4. Fees received are recorded in accounting records as program income.
5. Are uncollectibles written off?
6. Is there a procedure for refunding overpayments?

YES	NO	N/A
X		
		X
		X
		X
		X

OAA/LSP funding does not require fees and none are collected.

" "

" "

" "

" "

**H. Budgets**

1. Are budgets maintained and compared to actuals?
2. Are reports prepared for the Board of Directors which relate the YTD Budget to YTD Expense?

YES	NO	N/A
X		
X		

**AREA OF REVIEW**

**I. Payroll**

1. Is there a payroll procedure?
2. Are authorization of payroll, recording the payroll, and disbursing the payroll checks separate functions?
3. How many bank accounts does the agency have?
4. Are steps taken to guard against paying checks to improper or fictitious employees?
5. Are steps taken to ensure that the total dollar amount of payroll is verified and posted?
6. Are employment records kept separate from payroll?
7. Do all employees use time sheets?
8. Is the agency current with payroll taxes?
9. Time Sheet review, are specific programs listed?
10. Compare Agency Application with FTE's charged to specific programs.

YES	NO	N/A
X		
X		
X		
X		
X		
X		
X		
X		
X		
X		

**COMMENTS**

ADP payroll service.

The Agency has seven (7) bank accounts.

Payroll checks, including direct deposit notifications, are processed by payroll specialist, but handed out by Agency accounting clerk.

**J. SYSTEMS MANAGEMENT**

1. The provider maintains written policies and procedures for systems management?
2. Procedures are in place to maintain system security?
3. Provider maintains a system for routine back up of data and software to recover from losses or outages of the computer system per 44-4.070, Florida Administrative Code?
4. The provider is current on all data entry required for Client Information, Registration and Tracking System (CIRTS)?
5. The provider validates data in CIRTS?
6. The provider will enter all data into CIRTS by the required date stated in your contract
7. If the AAAPP enters data into CIRTS for the Provider, the AAAPP must receive data by the required date stated in your contract.
8. The provider maintains alternate plans for capturing and reporting data if CIRTS is down for an extended period of time?

YES	NO	N/A
X		
X		
X		
X		
X		
X		
X		

AAAPP enters CIRTS data received from Agency

AAAPP enters data

AREA OF REVIEW	YES	NO	N/A	COMMENTS
<b>PART II. PERSONNEL MANAGEMENT</b>				
<b>A. Policies &amp; Procedures</b>				
1. Is there a written Personnel Policy?	X			
2. Is it approved by the Board of Directors?	X			
3. Are copies distributed to the employees or available for review?	X			
4. A Civil Rights Compliance Questionnaire (DOEA forms 101A and B) has been properly completed and the provider is complying with all federal civil rights requirements.	X			
5. Are there policies & procedures for:				
A. provisional period before regular employment.	X			
B. grounds for dismissal/appeals	X			
C. filing of grievances.	X			
D. hours of work	X			
E. leave/holidays	X			
F. family medical leave act (for agencies with 50 employ. or more)	X			
G. insurance plans-health/life	X			
H. travel	X			
I. Retirement plans	X			
J. training/education	X			
K. leave without pay	X			
L. administrative leave (military, bereavement, etc.)	X			
M. drug free workplace	X			
N. jury duty	X			
O. performance appraisals	X			
P. compensatory time/overtime	X			
Q. American Disabilities Act	X			
R. Equal Employment Opportunity	X			
S. Level II Background Screening (must be kept separate from Personnel file.)	X			
1. Affidavit of Compliance - Employee	X			
2. Appointment Form	X			
3. Annual Affidavit of Compliance - Employer	X			
4. If applicable - verification of Sub-Contractor Affidavit's			X	Agency does not sub-contract
<b>T. U.S. Dept. of Homeland Security's E-Verify system</b>	X			
<b>U. Emergency Preparedness Plan</b>	X			
<b>B. Job Descriptions</b>				
1. Are job descriptions on file for all positions?	X			
2. Do education & exper.=job descr. for funded employees?	X			
<b>C. Reference Checks</b>				
1. Does a responsible individual in the agency verify applicants references and try to determine their integrity?	X			

AREA OF REVIEW	YES	NO	N/A	COMMENTS
<b>PART III. DONATED/IN-KIND SERVICES</b>				
<b>A. Donated/In-Kind Procedures</b>				
1. For Volunteer In-Kind services time sheets or other supporting documentation is maintained and reviewed for accuracy by a responsible official.	X			
2. For donated in-kind material items the type of item, value and valuation method is maintained.	X			
3. For space in-kind supporting documentation is maintained.	X			

**SITE VISIT FINDINGS/COMMENTS:**

Sonia and Lynn, it was a pleasure to meet you both and I hope to see you again next year.  
 I appreciate all the time that was given and the attention to details.