



North Carolina Housing Finance Agency

Schedule of Expenditures of Federal Awards
and Reports Required by *Government
Auditing Standards* and OMB Circular A-133
Year Ended June 30, 2014

North Carolina Housing Finance Agency

Schedule of Expenditures of Federal Awards and Reports Required by
Government Auditing Standards and OMB Circular A-133
Year Ended June 30, 2014

North Carolina Housing Finance Agency

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Independent Auditor's Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with *Government Auditing Standards*

Audit Committee of the Board of Directors
North Carolina Housing Finance Agency

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the North Carolina Housing Finance Agency (the "Agency"), which comprise the statement of net position as of June 30, 2014, and the related statements of revenues, expenses and changes in net position and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated September 17, 2014.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Agency's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Agency's internal control. Accordingly, we do not express an opinion on the effectiveness of the Agency's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. *A material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. *A significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.



Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Agency's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

BDO USA, LLP

September 17, 2014



Independent Auditor's Report on Compliance for Each Major Federal Program; Report on Internal Control Over Compliance; and Report on the Schedule of Expenditures of Federal Awards Required by OMB Circular A-133

Audit Committee of the Board of Directors
North Carolina Housing Finance Agency

Report on Compliance for Each Major Federal Program

We have audited the North Carolina Housing Finance Agency's (the "Agency") compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have a direct and material effect on each of the Agency's major federal programs for the year ended June 30, 2014. The Agency's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

Auditor's Responsibility

Our responsibility is to express an opinion on compliance for each of the Agency's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Agency's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

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

Opinion on Each Major Federal Program

In our opinion, the Agency complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2014.



Other Matters

The results of our auditing procedures disclosed an instance of noncompliance, which is required to be reported in accordance with OMB Circular A-133 and which is described in the accompanying schedule of findings and questioned costs as item 2014-001. Our opinion on each major federal program is not modified with respect to these matters.

The Agency's response to the noncompliance finding identified in our audit is described in the accompanying schedule of findings and questioned costs. The Agency's response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

Report on Internal Control Over Compliance

Management of the Agency is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the Agency's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Agency's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose.



Report on Schedule of Expenditures of Federal Awards Required by OMB Circular A-133

We have audited the financial statements of the Agency as of and for the year ended June 30, 2014, and have issued our report thereon dated September 17, 2014, which contained an unmodified opinion on those financial statements. Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the financial statements as a whole.

BDO USA, LLP

September 17, 2014

North Carolina Housing Finance Agency

Schedule of Expenditures of Federal Awards

Year Ended June 30, 2014

Federal Grantor / Pass-through Grantor / Program or Cluster Title	Federal CFDA Number	Grant Number	Federal Expenditures <i>(In Thousands)</i>
U.S. Department of Housing and Urban Development:			
Direct:			
Section 8 Project-Based Cluster:			
Section 8 New Construction and Substantial Rehabilitation	14.182	A-3259	\$ 1,315
Section 8 Housing Assistance Payments Program - Special Allocations	14.195	NC80-OCC0-001	147,347
Total Section 8 Project-Based Cluster			148,662
HOME Investment Partnerships Program	14.239	n/a	22,241
Rural Housing and Economic Development Grant	14.250	RH-09-NC-I-0082	155
Pass-through from North Carolina Department of Commerce-Division of Community Assistance:			
Community Development Block Grants/Entitlement Grants	14.218	08-N-1904	94
Total U.S. Department of Housing and Urban Development			171,152
U.S. Department of Treasury - Chartered by Congress:			
Direct:			
Hardest Hit Fund	n/a	n/a	100,884
Pass-through from NeighborWorks America:			
National Foreclosure Mitigation Counseling Program	21.000	PL110-161.95X1350	3,203
Making Homes Affordable	n/a	n/a	80
Total U.S. Department of Treasury - Chartered by Congress			104,167
Total Expenditures of Federal Awards			\$ 275,319

North Carolina Housing Finance Agency

Notes to the Schedule of Expenditures of Federal Awards

1. Basis of Presentation

The accompanying schedule of expenditures of federal awards (the "Schedule") includes the federal grant activity of the North Carolina Housing Finance Agency (the "Agency") under programs of the federal government for the year ended June 30, 2014. The information in this Schedule is presented in accordance with the requirements of the Office of Management and Budget ("OMB") Circular A-133, *Audits of States, Local Governments and Non-Profit Organizations*. Because the Schedule presents only a selected portion of the operations of the Agency, it is not intended to and does not present the financial position, changes in net position or cash flows of the Agency. Therefore, some amounts presented in the Schedule may differ from amounts presented in the Agency's financial statements.

All of the Agency's federal awards were in the form of cash assistance for the year ended June 30, 2014.

2. Summary of Significant Accounting Policies

Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in OMB Circular A-122, *Cost Principles for Non-Profit Organizations*, wherein certain types of expenditures are not allowable or are limited as to reimbursement. As directed by the Office of the State Auditor of North Carolina, expenditures of funds from the State of North Carolina totaling \$71,367,824 are excluded from the Schedule.

3. Administrative Expenses

The expenditures of federal awards included the following administrative fees:

Year ended June 30, 2014

Section 8 New Construction and Substantial Rehabilitation	\$	6,303
Section 8 Housing Assistance Payments Program - Special Allocations		4,324,836
HOME Investment Partnerships Program		2,389,193
Rural Housing and Economic Development Grant		19,548
Community Development Block Grants/Entitlement Grants		8,569
Hardest Hit Fund		11,628,247
National Foreclosure Mitigation Counseling Program		143,776
Making Homes Affordable		7,072
Total	\$	18,527,544

North Carolina Housing Finance Agency

Notes to the Schedule of Expenditures of Federal Awards

4. Subrecipient Payments

The expenditures of federal awards include the following payments to subrecipients:

Year ended June 30, 2014

HOME Investment Partnerships Program	\$	4,778,797
National Foreclosure Mitigation Counseling		3,058,746
Making Homes Affordable		73,033
Total	\$	7,910,576

North Carolina Housing Finance Agency

Schedule of Findings and Questioned Costs

Year Ended June 30, 2014

Part I—Summary of Auditor’s Results

Financial Statements

Type of auditor’s report issued: Unmodified

Internal control over financial reporting:

Material weakness(es) identified?	_____ Yes	_____ <u>X</u> No	
Significant deficiency(ies) identified that are not considered to be material weaknesses?	_____ Yes	_____ <u>X</u> None reported	
Noncompliance material to financial statements noted?	_____ Yes	_____ <u>X</u> No	

Federal Awards Section

Internal control over major programs:

Material weakness(es) identified?	_____ Yes	_____ <u>X</u> No	
Significant deficiency(ies) identified that are not considered to be material weaknesses?	_____ Yes	_____ <u>X</u> None reported	

Type of auditor’s report issued on compliance for major programs: Unmodified

Any audit findings disclosed that are required to be reported in accordance with section .510(a) of OMB Circular A-133?	_____ <u>X</u> Yes	_____ No	
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Identification of major programs:

CFDA Number(s)	Name of Federal Program or Cluster
14.182, 14.195	Section 8 Project-Based Cluster
14.239	HOME Investment Partnerships Program
21.000	National Foreclosure Mitigation Counseling Program

Dollar threshold used to distinguish between Type A and Type B programs: \$3,000,000

Auditee qualified as low-risk auditee?	_____ <u>X</u> Yes	_____ No	
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North Carolina Housing Finance Agency

Schedule of Findings and Questioned Costs

Year Ended June 30, 2014

Part II—Financial Statement Findings Section

This section is to identify the significant deficiencies, material weaknesses, fraud, illegal acts, violations of provisions of contracts and grant agreements, and abuse related to the financial statements for which *Government Auditing Standards* require reporting in a Circular A-133 audit.

There were no findings related to the financial statements which are required to be reported in accordance with generally accepted government auditing standards.

North Carolina Housing Finance Agency

Schedule of Findings and Questioned Costs

Year Ended June 30, 2014

Part III—Federal Award Findings and Questioned Costs Section

This section identifies the audit findings required to be reported by section .510(a) of Circular A-133 (for example, significant deficiencies, material weaknesses, and material instances of noncompliance, including questioned costs), as well as any abuse findings involving federal awards that are material to a major program. Where practical, findings should be organized by federal agency or pass-through entity.

Finding 2014-001

Federal Program Information: National Foreclosure Mitigation Counseling Program (CFDA #: 21.000)

Criteria or Specific Requirement (Including Statutory, Regulatory or Other Citation): Cash management - Intermediaries and State HFA's must disburse the majority of counseling and program related support funds received with each draw to their subgrantees, branches or affiliates within 30 days of receipt.

Condition: The Agency did not disburse funds to subrecipients within the 30 day requirement.

Questioned Costs: \$0.

Context: 1 of 5 cash receipts selected for cash management testing.

Effect: The Agency is not in compliance with certain cash management requirements.

Cause: Administrative oversight in cash management procedures.

Recommendation: We recommend that the Agency enhance its cash management process to ensure that cash disbursements to subrecipients are made within 30 days of being received by the Agency.

Views of Responsible Officials and Planned Corrective Actions: The Program Manager interpreted that the disbursement of funds should occur in 30 business days rather than 30 calendar days as the agreement with NeighborWorks was silent on this matter. Other requests from NeighborWorks had specified business days as an acceptable time period which validated her interpretation. The Agency will work to implement controls in its National Foreclosure Mitigation Counseling Program System that will send alerts to the Program Manager, Manager of Servicing and the Grant Accountant about any impending payment deadlines. The Agency will also review other grants to ensure that all payment requirements are understood.