



April 17, 2018

Technical Proposal to Provide Professional Auditing Services to the:

## State of West Virginia

Solicitation No.: FAR1800000005 / Description: Comprehensive Annual Financial Report (CAFR) Single Audit

Prepared by:



Sean M. Walker, CPA, CFE, CGFM, CGMS, Principal

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WV PURCHASING  
DIVISION



WEALTH ADVISORY | OUTSOURCING | AUDIT, TAX, AND CONSULTING

Investment advisory services are offered through CliftonLarsonAllen Wealth Advisors, LLC, an SEC-registered investment advisor.



Purchasing Division  
 2019 Washington Street East  
 Post Office Box 50130  
 Charleston, WV 25305-0130

State of West Virginia  
 Request for Proposal  
 14 – Financial

Proc Folder: 431307

Doc Description: Addendum 1 - CAFR Single Audit

Proc Type: Central Contract - Fixed Amt

Date Issued	Solicitation Closes	Solicitation No	Version
2018-04-05	2018-04-17 13:30:00	CRFP 0209 FAR1800000005	2

**BID RECEIVING LOCATION**

BID CLERK  
 DEPARTMENT OF ADMINISTRATION  
 PURCHASING DIVISION  
 2019 WASHINGTON ST E  
 CHARLESTON  
 US

WV 25305

**VENDOR**

Vendor Name, Address and Telephone Number:

CliftonLarsonAllen LLP  
 1966 Greenspring Drive, Suite 300  
 Timonium, MD 21093  
 410-308-8081

**FOR INFORMATION CONTACT THE BUYER**

Linda B Harper  
 (304) 558-0468  
 linda.b.harper@wv.gov

Signature X

FEIN # 41-0746749

DATE April 16, 2018

All offers subject to all terms and conditions contained in this solicitation

**ADDITIONAL INFORMATION:**

Addendum # 1 issued for the following reasons:

1. To publish a copy of vendor questions with responses.
2. To publish a copy of the 2017 SOC 1 report.
3. To add the WV State Government HIPPA Business Associate Addendum to the solicitation. A signature will be required prior to award of the contract.

No other changes.

\*\*\*\*\*

**Request for Proposal (CRFP)**

The West Virginia Purchasing Division is soliciting proposals for the agency, the West Virginia Department of Administration, Finance Division to provide an audit on the Single Audit of the State of WV and the State's Comprehensive Annual Financial Report (CAFR) per the attached documentation.

Online bidding has been prohibited for this solicitation.

INVOICE TO	SHIP TO
ACCOUNTING SECTION DEPARTMENT OF ADMINISTRATION 2019 WASHINGTON ST E PO BOX 50121 CHARLESTON WV25305-0121 US	FINANCIAL ACCOUNTING AND REPORTING SECTION DEPARTMENT OF ADMINISTRATION BLDG 17 2101 WASHINGTON ST E CHARLESTON WV 25305-1510 US

Line	Comm Ln Desc	Qty	Unit Issue	Unit Price	Total Price
1	AUDIT OF STATE (CAFR) Single Audit				

Comm Code	Manufacturer	Specification	Model #
93151607			

**Extended Description :**

Vendors must fill out Cost Sheet included as an attachment. Online responses prohibited.

**SCHEDULE OF EVENTS**

Line	Event	Event Date
1	Question Deadline 4:00 PM	2018-03-30

FAR1800000005	<b>Document Phase</b> Final	<b>Document Description</b> Addendum 1 - CAFR Single Audit	<b>Page 3</b> of 3
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**ADDITIONAL TERMS AND CONDITIONS**

See attached document(s) for additional Terms and Conditions



CliftonLarsonAllen LLP  
1966 Greenspring Drive, Suite 300  
Timonium, MD 21093  
410-453-0900 | fax 410-453-0914  
CLAconnect.com

April 17, 2018

Ms. Linda B. Harper  
Department of Administration, Purchasing Division  
State of West Virginia  
2019 Washington Street East  
Charleston, WV 25305-0130

**RE: Request for Proposals (RFP) for Professional Auditing Services – Solicitation No.: FAR1800000005**

Dear Ms. Harper:

Thank you for inviting us to propose our services to you. CliftonLarsonAllen LLP (CLA) gladly welcomes the opportunity to share our approach to helping the West Virginia Department of Administration, Finance Division (“the State” or “the Agency”) meet its need for an audit of the State of West Virginia’s Comprehensive Annual Financial Report (CAFR) for the fiscal year ending June 30, 2018, in accordance with generally accepted auditing standards and a Single Audit, in accordance with Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance).

We are confident that our established experience serving governmental entities, including the Commonwealth of Pennsylvania, State of New Jersey, State of Delaware, State of Kansas, State of New Mexico, State of Vermont and State of South Carolina as well as over 2,100 other governmental entities, together with our depth of governmental resources and tailored audit workplan makes us well suited to serve the State. The following differentiators are offered for your consideration:

- **Government Expertise.** With over 60 years of experience in the state and local government industry, CLA has one of the largest governmental audit and consulting practices in the country. We bring extensive experience providing a variety of audit and consulting services to more than 2,100 governmental entities, *including 7 state audits and nearly 20 state retirement systems.*
- **Unmatched Single Audit Experience.** CLA performs more single audits annually than any other firm, *ranking #1 in the nation for the number of single audits* performed by any CPA firm. The single audit requires a specific set of skills in order to properly perform the procedures. As such, we have developed a group of professionals who specialize in providing single audit services.
- **National Firm with Specialized Government Insight and Resources.** CLA is one of the leading accounting firms in the country, employing some of the most talented and experienced state and local government professionals to give our clients the best experience possible. The State’s engagement will be led by some of our national state and local government industry leaders. Our engagement team has managed numerous State-wide engagements in addition to State agency specific engagements for State agencies and entities similar to those in the State of West Virginia. As one of the nation’s top certified public accounting and consulting firms, and one of the largest firms who specialize in the public sector, CLA has the experience and resources to meet the audit needs of the State. In addition to your experienced engagement team, the State will have access to one of the country’s largest and most knowledgeable pools of public sector resources.

- **Strong Methodology and Responsive Timeline.** In forming our overall audit approach, we have carefully reviewed the RFP and other information made available and considered our past experience performing similar work for other State governments. Our State and Local Government Services Team currently serves over 2,100 governmental organizations nationally, which ensures that our staff understands your complexities not just from a compliance standpoint, but also from an operational point of view. We have developed a work plan that takes into consideration your unique needs as a State government. The work plan also minimizes the disruption of your staff and operations, and provides a blueprint for timely delivery of your required reports.
- **Unparalleled Communication and Proactive Leadership.** The State will benefit from a high level of hands-on service from our team’s senior professionals. We can provide this level of service because, unlike other national firms, our partner-to-staff ratio is similar to smaller firms – allowing our senior level professionals to be involved and immediately available throughout the entire engagement process. Our approach ensures that all members of the engagement team will stay abreast of key issues throughout the State, and take an active role in addressing them.
- **A Focus on Providing Consistent, Dependable Service.** We differ from other national firms in that our corporate practice focuses on the needs of non-SEC clients, thus allowing us to avoid the workload compression typically experienced by firms that must meet public companies’ SEC filing deadlines. CLA is organized into industry teams, affording our clients with specialized industry-specific expertise supplemented by valuable local service and insight. Therefore, the State will enjoy the service of members of our State and Local Government Services Team who understand the issues and environment critical to governmental entities.
- **Fresh Perspective.** By engaging CLA, the State will benefit from a “fresh look” at the State’s operations, information systems, and financial and risk management policies and procedures. With an ever-changing market, CLA provides clients a deeper understanding of new industry regulations and standards that may affect your day-to-day business model. We are confident that our industry experience will bring to the State progressive ideas and fresh opportunities to meet the financial management and accountability challenges before the State.

We are confident that our technical approach, insight, and resources will result in unparalleled client service for the State. For ease of evaluation, the structure of our proposal precisely mirrors your RFP section titled, *Section Five: Vendor Proposal*.

We are eager to work with you and welcome the chance to present our proposal to the Department of Administration or entire management team. If you have any questions about our offerings, please do not hesitate to contact me via phone 410-308-8081 or email [sean.walker@CLAconnect.com](mailto:sean.walker@CLAconnect.com).

Sincerely,  
CliftonLarsonAllen LLP



Sean M. Walker, CPA, CFE, CGFM, CGMS  
Principal

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# ATTACHMENT A: VENDOR RESPONSE SHEET

## REQUEST FOR PROPOSAL Finance, DOA and RFP FAR140001

### Attachment A: Vendor Response Sheet

*Provide a response regarding the following: firm and staff qualifications and experience in completing similar projects; references; copies of any staff certifications or degrees applicable to this project; proposed staffing plan; descriptions of past projects completed entailing the location of the project, project manager name and contact information, type of project, and what the project goals and objectives were and how they were met.*

*List project goals and objectives contained in Section 4, Subsection 4:*

**Section 4, Subsection 4.1:** List audits that have been completed that demonstrate the ability to manage an audit engagement of this magnitude.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 4.2:** List proposed audit staff with degrees, qualifications, and experience also describe aspects of the engagement which may require the services of specialists or involve consultation outside the engagement

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 4.3:** List prior government experience (description of past projects completed entailing the location of the project, project manager name and contact information, type of project, and what the project goals and objectives were and how they were met) and continuing education of senior audit staff, partners, managers, and supervisors.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 4.4:** Describe specific audit work plan including; subcontractors; the firm's responsibilities under the applicable auditing standards and federal regulations; and how the firm's approach to this engagement will demonstrate that all requirements are met. Also describe specific audit work plan for any potential problems in performing all services described in this RFP including; the effects of GASB standards; the firm's approach to resolving these problems; and any special assistance that will be requested of the Agency or the State agencies.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.





## Demonstrated Ability to Manage Engagement

(RFP Section 4, Subsection 4.1)

### Firm Overview

CLA offers the credibility, reputation, and resources of a leading professional services firm — without sacrificing the small-firm touch. We bring unsurpassed levels of technical excellence, commitment, and dedication to our clients, which have made us one of the most successful CPA firms serving governmental entities. Our strong reputation for serving state and local government units provides the State the confidence in their decision to select CLA as their professional service provider. *Figure 1* provides an overview of our state and local government practice.



**Figure 1. CLA's Government Practice.** The following overview provides you with an in-depth look at our state and local government industry strengths and support available to the State.



## Governmental Experience

CLA has one of the largest governmental audit and consulting practices in the country, serving over 2,100 governmental entities nationwide. Public sector clients represent nearly a quarter of all firm-wide revenue, and each of the government services team members are thoroughly versed in the issues critical to complex governmental entities.

As a CPA firm experienced in serving state and local units of government, we are very aware of the financial and legal compliance requirements that government officials are faced with daily. This creates complexities and service issues within a unique operational and regulatory environment. Because of our experience, we have become adept at providing our clients with insights in this environment not typical of other CPA firms.

We are confident that our established experience serving governmental entities, together with our depth of governmental resources and tailored audit workplans makes us well suited to serve the State. The following is a sampling of qualities that set us apart:

- **Specialized Resources.** We specialize in serving government entities, with such services being among our firm's largest practice segments. CLA's government practice is part of the firm's public sector practice. Our public sector practice comprises a significant percentage of CLA's annual revenue. The State will benefit from the substantive attention of our most experienced professionals, many of whom are recognized as national leaders in government auditing, in an arrangement that we believe no other firm can provide.
- **Experience with State-wide audits.** State governments are complex entities that require a high degree of skill and experience to complete an effective and efficient audit for the State of West Virginia. The decentralized nature of a State's financial operations provide unique risks that CLA has vast experience in navigating and responding to. ***Your engagement team is experienced in successfully performing state-wide audits and single audits for the States of Delaware, Kansas, New Mexico and South Carolina, and the Commonwealth of Pennsylvania.*** In addition, your engagement team has extensive experience in State agency or entity specific audits which mirror agencies and entities within the State of West Virginia. A sample of such clients is included below.
- **Seamless and Integrated Engagement Teams.** In establishing our engagement teams, we give significant focus to driving quality results and strong client satisfaction. To support this focus our team draws on the proven talents of our people as the foundation of our services.
- **An Efficient and Effective Workplan.** Our staff understands the complexities associated with the operations and compliance environment of governmental organizations. We have developed our proven and efficient audit workplans to ensure that all deliverables are provided timely and within required deadlines.
- **Dedication and Commitment to the Governmental Community.** We are actively involved and/or are members of the following professional organizations:
  - American Institute of Certified Public Accountants (AICPA)
  - AICPA Single Audit Quality Task Force
  - AICPA's State and Local Government Expert Panel
  - AICPA's Government Audit Quality Center (GAQC)
  - Government Finance Officers Association (GFOA)
  - Special Review Committee for the GFOA's Certificate of Achievement for Excellence in Financial Reporting (Certificate) Program
  - AICPA's Risk Assessment Audit Committee
  - Association of Government Accountants



Our participation/membership in the aforementioned professional organizations, combined with various other technical services we subscribe to, allows use to be at the forefront of change in the government environment. We take seriously our responsibility for staying current with new accounting pronouncements, auditing standards, other professional standards and laws and regulations.

### State Government Experience

The below list provides a sampling of states and state agency/entities that CLA currently serves:

States	
Commonwealth of Pennsylvania	State of Delaware
State of Kansas	State of New Jersey ( <i>Single Audit</i> )
State of New Mexico	State of South Carolina
State of Vermont	

State Agencies and Entities		
Arizona Commerce Authority	Arizona Power Authority	Arizona School Alliance
Arizona Supreme Court, Administrative Office of the Courts	Arizona Supreme Court, Clerk of the Courts	California Department of Water Resources
California State Bar	Colorado Department of Human Services	Colorado Department of Natural Resources
Colorado Department of Human Services	Colorado Department of Labor and Employment	Colorado Division of Gaming
Colorado Educational Benefit Trust	Colorado Firefighter Heart and Circulatory Benefits Trust	Colorado Intergovernmental Risk Sharing Agency
Colorado School Districts Self Insurance	Colorado Venture Capital Authority	Colorado Water Conservation Board
Commonwealth of Pennsylvania Financing Authority	Commonwealth of Pennsylvania Office of Attorney General	Connecticut Health Plans
Delaware Department of Safety and Homeland Security	Federal Thrift Plan	Florida Department of Financial Services
Georgia Lottery Corporation	Idaho Department of Finance	Idaho Department of Lands
Indiana State Board of Education	Maryland Department of Budget and Management	Maryland Department of Health and Mental Hygiene
Maryland Department of Housing and Community Development	Maryland Health Insurance Plan	Maryland Local Government Insurance Trust
Maryland Transportation Authority	Maryland Workers' Compensation Commission	Massachusetts Bay Transportation Authority
Massachusetts Convention Center Authority	Massachusetts Department of Transportation	Massachusetts Housing Finance Agency
Massachusetts Water Resources Authority	Minnesota Municipal Money Market Fund	Minnesota State Board of Investment
Mississippi Department of Education	New Jersey Department of Transportation	New Jersey Department of Treasury
New Jersey Higher Education Student Assistance Authority	New Jersey Transit Authority	New Jersey Water Supply Authority
New Mexico Aging and Long-Term Services Dept.	New Mexico Department of Children, Youth and Families	New Mexico Department of Game and Fish
New Mexico Department of Health	New Mexico Department of Homeland Security and Emergency Management	New Mexico Department of Information Technology



New Mexico Department of Public Safety	New Mexico Department of Tourism	New Mexico Department of Transportation
New Mexico Department of Workforce Solutions	New Mexico Department of Finance and Administration	New Mexico Energy, Minerals, and Natural Resources
New Mexico Environment Department	New Mexico Gaming Control Board	New Mexico General Services Department
New Mexico Human Services Department	New Mexico Intertribal Ceremonial Office	New Mexico Lottery Authority
New Mexico Office of Superintendent of Insurance	New Mexico Office of the Attorney General	New Mexico Regulation and Licensing Department
New Mexico Spaceport Authority	New Mexico State Treasurer's Office	New Mexico Taxation and Revenue Department
New York State Education Department	North Carolina Office of the State Treasurer	Oregon Liquor Control Commission
Rhode Island - Bureau of Audits	South Carolina Public Employee Benefit Authority – Insurance Benefits	State Lottery Commission of Indiana
State of Missouri Lottery	Texas Department of Transportation	Virginia Department of Transportation
Virginia Port Authority	Washington Department of Ecology	Washington Department of Natural Resources
Washington State Auditor's Office	Wisconsin Department of Transportation	Wisconsin Investment Board
Wyoming Department of Transportation		

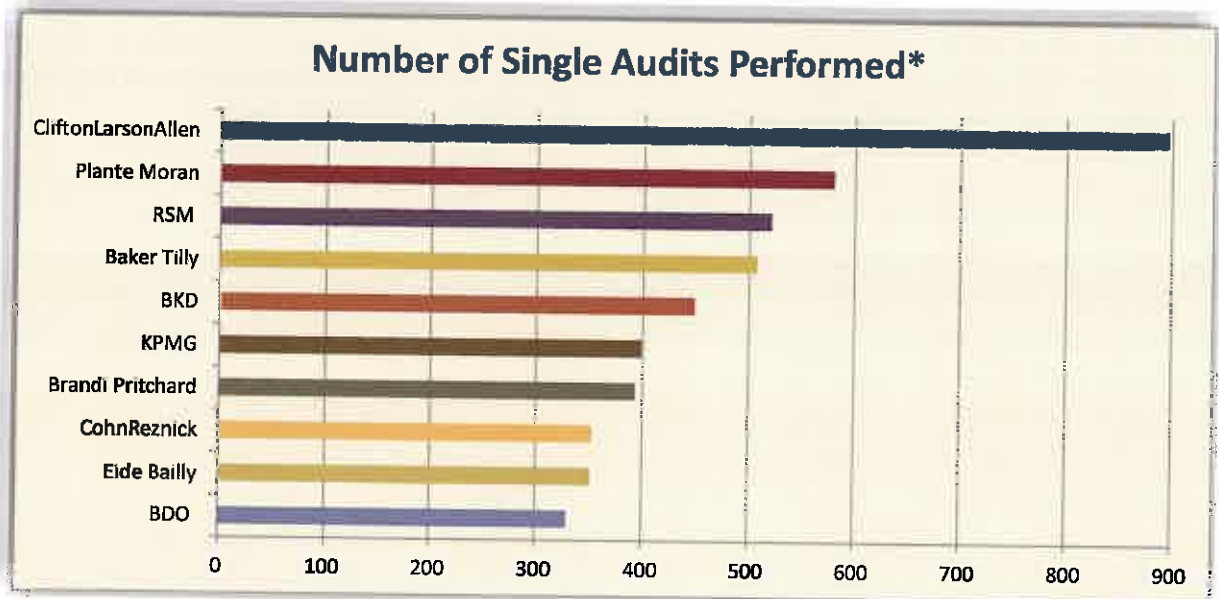
#### State Retirement Systems

Arizona State Retirement System	Colorado Public Employees Retirement Association
District of Columbia Retirement Board	Kansas Public Employees Retirement System
Maryland State Retirement Agency	Nevada Public Employees' Retirement System
New Mexico Public Employees' Retirement Association	North Dakota Retirement and Investment Offices
North Dakota Public Employees' Retirement System	Ohio Public Employees' Retirement System
Pennsylvania Municipal Retirement System	South Carolina Retirement Systems
State Retirement & Pension System of Maryland	Supplemental Retirement Income Plans of North Carolina
Washington Department of Retirement Systems	



## Single Audit Experience

CLA has become the national leader in providing audit, tax and many other financial services to government entities similar to the State. Our client portfolio of government and nonprofit organizations represents nearly half of the firm's total revenues. You will benefit from CLA's experience in this area. As outlined in the following table, **CLA performs more single audits annually than any other firm in the nation.** The chart below illustrates CLA's experience in serving organizations that receive federal funds and demonstrates our firm's dedication to serving nonprofits and governmental organizations:



\*The information for the firms above was pulled from the Federal Audit Clearinghouse for audits with fiscal year ends between January 1, 2015 – December 31, 2015.

In the current environment of increased oversight, it is more important than ever to find qualified auditors who have significant experience with federal grants specific to the State and can enhance the quality of the State's single audit. Therefore, the single audit will be performed by a team of individuals who specialize in single audits in accordance with OMB's Uniform Guidance (UG) and who will offer both knowledge and quality for the State. As part of our quality control process, the single audit will be reviewed by a firm Designated Single Audit Reviewer (DSAR). The individuals we have proposed as our engagement team for the Single Audit of State of West Virginia all have direct experience in performing single audits at a state-wide level. We understand the complexities and challenges that come with performing a state-wide audit and will incorporate these issues into our risk assessment and program testing.

The Single Audit requires a specific set of skills in order to properly perform the procedures. As such, we have developed a group of professionals who are very familiar with providing Single Audit services. In addition to the local resources, CLA has personnel throughout the firm as well as national technical personnel who are very familiar with Single Audits and as such provide resources and insights not found in many firms. In addition to the local resources, CLA has personnel throughout the firm as well as national technical personnel who specialize in Single Audits and as such provide resources and insights not found in many firms. CLA personnel were also invited to join and participated in Single Audit Task Forces formed by the AICPA to address Single Audit quality issue. Keith Novak, CPA, Quality Control Principal and Technical Reviewer to your engagement team, was on the Task Force which addressed sampling in the Single Audits and resulted in a new chapter of the AICPA audit guide "Government Audit Standards and Single Audits."



***In addition, Sean Walker, the Engagement Principal-in-Charge assigned to your engagement team, is a former member of the AICPA's Governmental Audit Quality Center Executive Board. This center promotes the importance of quality governmental audits and the value of such audits to purchasers of governmental audit services.***

Because we audit so many governmental entities, we are familiar with substantially every federal grant the State receives and will perform a high quality audit in accordance with OMB's UG. Based on our review of the State's 2015 and 2016 Single Audit reports, CLA has experience at other States or governmental clients in performing testing for a majority of the State's major programs. For example, we had over 50 clients where we audited the Medicaid program as major program and close to 100 clients where the Special Education Cluster was tested as a major program. With our depth of experience, your engagement team will be knowledgeable of the specific grant program requirements for virtually every grant program to be audited as major from day one.

In the table below, we have compared the major Type A programs of the State for the past two years to our current clients with the similar programs to which we provide services.

Program Name	WV	VT	DE	KS	MS	NM	PA	SC	Other*
21 <sup>st</sup> Century					X			X	X
Adoption Assistance	X	X	X	X		X		X	X
Affordable Care Act (ACA) Maternal, Infant, and Early Childhood Home Visiting Program			X						X
Special Programs for the Aging Cluster			X	X				X	X
Block Grants for Prevention and Treatment of Substance Abuse		X	X			X		X	X
Career and Technical Education - Basic Grants to States					X			X	X
Child Care and Development Cluster	X	X				X		X	X
Child Support Enforcement			X	X		X		X	X
Children's Health Insurance Program	X			X	X	X	X	X	
Child Nutrition Cluster	X	X	X	X	X	X		X	X
Child and Adult Food Care Program	X	X	X	X	X	X		X	X
Children Health Insurance Program		X						X	
Clean Water Capitalization Loans			X	X		X		X	X
Community Development Block Grants/ State's Programs and Non-Entitlement Grants (CDBG)		X		X		X	X	X	X
Social Service Disability Insurance Cluster	X						X	X	
Disaster Grants-Public Assistance (Presidentially Declared Disasters)	X							X	X
Capitalization Grants for Drinking Water State Revolving Funds		X	X	X		X		X	X
Employment Services Cluster						X			
English Language Acquisition State Grants									X
Foster Care - Title IV-E	X	X	X	X		X		X	X



Program Name	WV	VT	DE	KS	MS	NM	PA	SC	Other*
Hazard Mitigation Grant Program									X
Highway Planning and Construction Cluster			X	X		X			X
Highway Safety Cluster						X			X
HIV Care Formula Grants						X		X	X
Homeland Security Grant Program		X					X		X
Housing Voucher Cluster (Section 8)									X
Hurricane Sandy Community Development Block Grant Disaster Recovery Grant (CDBG-DR)									X
Hurricane Sandy Relief Cluster									X
Immunization Cooperative Agreements		X	X	X		X	X	X	
Improving Teacher Quality Title II			X					X	X
Low-Income Home Energy Assistance Program	X	X	X			X			X
Mainstream Vouchers									
Medicaid Cluster	X	X	X	X		X		X	X
Money Follows the Person Rebalancing Demonstration									
National Bioterrorism Hospital Preparedness Program			X			X		X	
National Guard Military Operations & Maintenance (O&M) Projects			X	X			X	X	
Public Health Emergency Preparedness			X			X		X	
Rehabilitation Services-Vocational Rehabilitation Grants to States	X	X		X				X	X
State Administrative Matching Grants for Supplemental Nutrition Assistance (SNAP) Cluster	X	X	X	X		X	X	X	X
Student Financial Aid Cluster	X								X
Special Supplemental Nutrition Program for Women, Infants, and Children	X	X	X	X		X	X	X	X
Social Services Block Grant	X		X	X		X		X	X
School Improvement Grants								X	X
Special Education Cluster	X	X	X		X			X	X
Temporary Assistance for Needy Families	X	X	X	X		X		X	X
Title I			X	X	X			X	X
Unemployment Insurance	X	X	X	X		X	X		
Veterans State Nursing Home Care	X								X
Workforce Investment Act National Emergency Grants	X								
Workforce Investment Cluster (WIA)	X			X		X			X

\*Includes Large Municipalities (i.e. County Governments, Housing Authorities, School Districts, and Large Cities)



The principals, managers, and staff members assigned to your audit have performed numerous single audits and have received specialized training in governmental accounting, auditing and financial reporting. In addition, they receive training on the compliance requirements of OMB's UG and the use of the related compliance supplements. These individuals stay current on all issues related to federal awards and the impact they may have on your single audit.

















### SOC Experience

Our professionals have over 25 years of experience performing SOC engagements (previously SAS70) and perform nearly one hundred SOC engagements each year. Each member of your engagement team is dedicated to CLA's SOC practice and performs SOC engagements across the country. We are efficient at identifying and mapping specific processes and controls that are already implemented at each organization we work with. We have the industry, accounting, audit, security, and technology management knowledge to assess internal controls and security measures and determine if business goals and service delivery may be at risk. We have significant experience evaluating technical infrastructure controls applicable to networks, servers, workstations, and other devices as well as application system(s) and underlying database(s) that maintain client data. We also analyze controls related to the physical environment and organization management for design and effectiveness.

### Proposed Audit Staff

(RFP Section 4, Subsection 4.2)

An experienced engagement team has been aligned to provide you with the most value for the State. The team members have performed numerous engagements of this nature and will commit the resources necessary to provide top quality service throughout the engagement. Following are our proposed management team members and their responsibility of the engagement.

Team Member	Title	Degree(s)	CAFR & Uniform Guidance Audit Experience	Relevant Industry Experience
Sean Walker, CPA, CFE, CGFM, CGMS	Principal-in-Charge / CAFR Principal	B.B.A., Accounting; M.B.A.		
William "Bill" Early, Jr., CPA	Single Audit Principal	B.S., Accounting; A.S., Business Management		
James "Jim" Kreiser, CISA, CRMA, CFSA	Information Technology Principal	B.S., Managerial Economics; B.S., Philosophy		
Keith Novak, CPA	Quality Control Review Principal	B.S., Accounting		
Cheri King, CPA	Manager – CAFR Audit	B.B.A., Finance B.S., Accounting		
Jordan Boehm, CPA	Manager – Single Audit	B.B.A., Accounting		
Joel Eshleman, CISA, CIA	Director – Information Technology	B.S., Accounting		
Philip "Phil" DeBello, CISA, CPA	Manager – Information Technology	B.B.A., Accounting		





## Responsibilities of the Engagement Team\*

### Engagement Principals

**Sean Walker** will have overall engagement responsibility including planning the engagement, developing the audit approach, supervising staff, and maintaining client contact throughout the engagement and throughout the year. Sean is responsible for total client satisfaction through the deployment of all required resources and continuous communication with management and the engagement team.

**Bill Early** will act as the lead principal for the single audit portion of the engagement. In this role, Bill will be responsible for the overall planning of the single audit and supervision of the team performing the single audit. He will perform a technical review of all single audit work performed and is responsible for the review of all single audit related reports.

### Quality Assurance Principal

**Keith Novak** will complete the quality review of all work performed and of all audit reports prior to issuance. The focus of this review is to confirm adherence to industry and firm quality control guidelines and to make sure the work performed supports the audit opinions issued.

### Information Technology

#### **Principal: James "Jim" Kreiser, CISA, CRMA, CIA IT, SOC, & Risk Management Principal**

Jim will act as the lead principal for the information technology and SOC portion of the engagement. In this role, Jim will be responsible for the overall planning of the SOC engagement and supervision of the team performing the SOC engagement. He will perform a technical review of all IT work performed and is responsible for the review of all SOC related reports

#### **Joel Eshleman, CISA, CIA, & Philip "Phil" DelBello, CISA, CPA, Information Security Manager**

Joel & Phil will assist the audit team in documenting and evaluating general computer controls and IT application controls as well as performing the SOC engagement.

### Engagement Managers

**Cheri King** will act as the lead manager on the overall engagement for the State. Specifically for the CAFR Audit, Cheri will assist Sean Walker with planning the engagement and performing complex audit areas; will perform a technical review of all work performed and is responsible for the review of CAFR and all related reports. Specifically for the Single Audit, Cheri will assist Jordan in managing certain programs in conjunction with the CAFR audit work.

**Jordan Boehm** will act as the lead manager on the engagement for the Single Audit; will assist the engagement principal with planning the engagement and performing complex audit areas; will perform a technical review of all work performed and is responsible *Uniform Guidance* compliance.

\*Detailed resumes are available in Appendix A: Engagement Team Resumes.



### Senior Associates & Staff

**Senior Associates** – We will assign senior associates to the engagement based on your needs and their experience providing services to state and local governments. Our senior associates will be responsible for the day to day activities for this engagement, including the supervision of all staff assigned.

**Additional Staff** – We will also assign additional staff to your engagement based on your needs and their experience providing services to state and local governments. These team members will be from our offices with state and local government as their industry focus at CLA.

### Additional Technical Resources\*

#### National Assurance Technical Group

##### **Heather Plitt, Technical Director**

Heather will be the technical resource for the audit team as well as State personnel. Heather's many years of serving governmental entities will be an invaluable resource to our team.

### Experienced Engagement Team

When you hire an accounting firm, you primarily hire the people. That is why we make it a practice to have senior contact people closely involved with the entire engagement. In most large firms, the engagement is secured by upper-level personnel and then passed almost entirely onto less-experienced staff. With CLA, the State will have members of our top management team actively involved throughout our work for you.

The profiles on the following pages are intended to provide highlights for each proposed key team member. As previously stated, we have included resumes for our key personnel in *Appendix A: Engagement Team Resumes*.

#### Sean Walker, CPA, CFE, CGFM, CGMS

<b>1. Role</b>	<b>Engagement Principal-in-Charge / CAFR Principal</b>
<b>2. Experience</b>	Serves as the Principal on state-wide CAFR and Single Audits, Financial Statement and single audits of state agencies, and CAFR and Single Audits of large complex local government.
<b>3. Total years experience</b>	19+
<b>3. Continuing Education</b>	Please refer to Appendix C for a detailed listing.

#### Relevant Experience

<b>4. State government (or other government entity) financial statement and compliance audit experience in the last five years</b>	<p>Below are the most relevant governmental entities that Sean currently serves.</p> <ul style="list-style-type: none"><li>• State of Delaware</li><li>• State of Kansas</li><li>• State of New Jersey</li><li>• Commonwealth of Pennsylvania</li><li>• State of Kansas, Department Of Transportation</li></ul> <p>Please refer to proposal section titled <i>References</i> for detailed contact information on the above similar clients.</p>
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William (Bill) Early, Jr., CPA

<b>1. Role</b>	<b>Engagement Principal-in-Charge / CAFR Principal</b>
<b>2. Experience</b>	Serves as the Principal on state-wide CAFR and Single Audits, Financial Statement and single audits of state agencies, and CAFR and Single Audits of large complex local government.
<b>3. Total years experience</b>	20+
<b>3. Continuing Education</b>	Please refer to Appendix C for a detailed listing.

Relevant Experience

**4. State government (or other government entity) financial statement and compliance audit experience in the last five years**

Below are the most relevant governmental entities that Bill currently serves. Additional clients served are outlined within Bill's resume.

- State of South Carolina
- State of Delaware
- Commonwealth of Pennsylvania

*Please refer to proposal section titled References for detailed contact information on the above similar clients.*

Jim Kreiser, CISA, CRMA, CIA

<b>1. Role</b>	<b>Information Technology, SOC, &amp; Risk Management Principal</b>
<b>2. Experience</b>	Serves as the IT Principal on state-wide CAFR and Single Audits, Financial Statement and single audits of state agencies, and CAFR and Single Audits of large complex local government.
<b>3. Total years experience</b>	20+
<b>4. Continuing Education</b>	Please refer to Appendix C for a detailed listing.

Relevant Experience

**4. State government (or other government entity) financial statement and compliance audit experience in the last five years**

Below are the most relevant governmental entities that Jim currently serves.

- Commonwealth of Pennsylvania
- State of New Jersey
- State of South Carolina
- State of Delaware
- State of Kansas

*Please refer to proposal section titled References for detailed contact information on the above similar clients.*



Keith Novak, CPA

**1. Role** Quality Control Review Principal

**2. Experience** Serves as the Principal on state-wide CAFR and Single Audits, Financial Statement and single audits of state agencies, and CAFR and Single Audits of large complex local government.

**3. Total years experience** 35+

**4. Continuing Education** Please refer to Appendix C for a detailed listing.

Relevant Experience

**4. State government (or other government entity) financial statement and compliance audit experience in the last five years**

Below are the most relevant governmental entities that Keith currently serves. Additional clients served are outlined within Keith's resume.

- Commonwealth of Pennsylvania
- State of South Carolina
- State of Delaware

*Please refer to proposal section titled References for detailed contact information on the above similar clients.*

Cheri King, CPA

**1. Role** Manager – CAFR Audit

**2. Experience** Serves as the Manager on state-wide CAFR and Single Audits, Financial Statement and single audits of state agencies, and CAFR and Single Audits of large complex local government.

**3. Total years experience** 15+

**4. Continuing Education** Please refer to Appendix C for a detailed listing.

Relevant Experience

**4. State government (or other government entity) financial statement and compliance audit experience in the last five years**

Below are the most relevant governmental entities that Cheri currently serves. Additional clients served are outlined within Cheri's resume.

- Commonwealth of Pennsylvania, (Engagement Manager)

*Please refer to proposal section titled References for detailed contact information on the above similar clients.*



Jordan Boehm, CPA

<b>1. Role</b>	<b>Manager – Single Audit</b>
<b>2. Experience</b>	Serves as the Manager on state-wide CAFR and Single Audits, Financial Statement and single audits of state agencies, and CAFR and Single Audits of large complex local government.
<b>3. Total years experience</b>	8+
<b>4. Continuing Education</b>	Please refer to Appendix C for a detailed listing.

Relevant Experience

<b>4. State government (or other government entity) financial statement and compliance audit experience in the last five years</b>	<p>Below are the most relevant governmental entities that Jordan currently serves. Additional clients served are outlined within Jordan's resume.</p> <ul style="list-style-type: none"><li>• State of New Jersey</li><li>• State of Wisconsin (Consulting)</li></ul> <p><i>Please refer to proposal section titled References for detailed contact information on the above similar clients.</i></p>
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Joel Eshleman, CISA, CIA

<b>1. Role</b>	<b>Director – Information Technology</b>
<b>2. Experience</b>	Serves as the IT Director on state-wide CAFR and Single Audits, Financial Statement and single audits of state agencies, and CAFR and Single Audits of large complex local government.
<b>3. Total years experience</b>	17+
<b>4. Continuing Education</b>	Please refer to Appendix C for a detailed listing.

Relevant Experience

<b>4. State government (or other government entity) financial statement and compliance audit experience in the last five years</b>	<p>Below are the most relevant governmental entities that Joel currently serves.</p> <ul style="list-style-type: none"><li>• Commonwealth of Pennsylvania</li><li>• State of New Jersey</li><li>• State of South Carolina</li><li>• State of Delaware</li><li>• State of Kansas</li></ul> <p><i>Please refer to proposal section titled References for detailed contact information on the above similar clients.</i></p>
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Phil DelBello, CISA, CPA

<b>1. Role</b>	<b>Manager – Information Technology</b>
<b>2. Experience</b>	Serves as the IT Manager on state-wide CAFR and Single Audits, Financial Statement and single audits of state agencies, and CAFR and Single Audits of large complex local government.
<b>3. Total years experience</b>	8+
<b>4. Continuing Education</b>	Please refer to Appendix C for a detailed listing.

Relevant Experience

<b>4. State government (or other government entity) financial statement and compliance audit experience in the last five years</b>	<p>Below are the most relevant governmental entities that Phil currently serves.</p> <ul style="list-style-type: none"><li>• Commonwealth of Pennsylvania</li><li>• State of New Jersey</li><li>• State of South Carolina</li><li>• State of Delaware</li><li>• State of Kansas</li></ul> <p><i>Please refer to proposal section titled References for detailed contact information on the above similar clients.</i></p>
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**Use of Subcontractor**

While we are not a small or minority-owned business, we are committed to utilizing the services of such firms whenever possible. This includes using small and/or minority-owned businesses as subcontractors, as well as vendors. For this engagement, however, we do not foresee using any subcontractors.

CLA strives to fill its professional positions with the best and most experienced accountants regardless of race or gender.



### Prior Government Experience/References

CLA offers its clients the best of two worlds — a firm with a solid background in serving states and state agencies, complemented by a team dedicated to delivering high quality audit services. We are pleased to provide you with the following references that members of your assigned engagement team has worked on, who can describe their experience in greater detail.

State of South Carolina	
<b>Address</b>	1401 Main Street, Suite 1200 Columbia, South Carolina 29201
<b>Contact Name and Phone Number</b>	George Kennedy, CPA, State Auditor / 803-253-4160
<b>Scope of Work</b>	<ul style="list-style-type: none"> <li>• Statewide CAFR audit in accordance with <i>Government Auditing Standards</i></li> <li>• Statewide Single Audit in accordance with <i>OMB Uniform Guidance</i></li> <li>• Retirement system audit (separately issued financial statements)</li> </ul>
<b>Length of Service</b>	CAFR Audit: 2004 – present Single Audit: 2012 – present
<b>Project Goals &amp; Objectives</b>	The State of South Carolina accounting process are highly decentralized and controls vary among the various departments and agencies. There are significant group audit issues since several component units and funds of the State CAFR are audited by other auditors and the financial reporting of some of the component units does not fall under the control of the Comptroller General's Office. Additionally, the State over the recent year has implemented a new accounting software system, however some state agencies and departments have not fully implemented the new system requiring additional reconciliations and audit procedures. This audit is conducted jointly with the State Auditor's Office.

State of Delaware	
<b>Address</b>	Townsend Building, Suite 1, 401 Federal Street, Dover, Delaware 19901
<b>Contact Name and Phone Number</b>	R. Thomas Wagner, Jr. CFE, CGFM, CICA, State Auditor / 302-739-5055
<b>Scope of Work</b>	<ul style="list-style-type: none"> <li>• Statewide CAFR audit in accordance with <i>Government Auditing Standards</i></li> <li>• Statewide Single Audit in accordance with <i>OMB Uniform Guidance</i></li> <li>• Service and Organization Controls (SOC) Report Type II</li> </ul>
<b>Length of Service</b>	2014 – present
<b>Project Goals &amp; Objectives</b>	The State of Delaware has a highly decentralized processes for grants management and accounting. Additionally, there are significant group audit issues since several components that are audited by other auditors and not under the control of the Secretary of Finance or Division of Accounting. As part of the group audit reliance is placed on a separate SOC Report, Type II that is performed and issued by CLA's IT Specialist.



State of Kansas	
<b>Address</b>	800 SW Jackson Street, Topeka, Kansas 66612
<b>Contact Name and Phone Number</b>	Scott Frank, Legislative Post Auditor / 785-296-5180
<b>Scope of Work</b>	<ul style="list-style-type: none"> <li>• Statewide CAFR audit in accordance with <i>Government Auditing Standards</i></li> <li>• Statewide Single Audit in accordance with <i>OMB Uniform Guidance</i></li> <li>• Retirement system audit (separately issued financial statements)</li> <li>• Agreed-Upon Procedures</li> </ul>
<b>Length of Service</b>	2013 – present
<b>Project Goals &amp; Objectives</b>	The State of Kansas has an emphasis of matter related to liquidity concerns. Additionally, they have issued significant pension obligations bonds. Both of these issues, required additional analysis and complex considerations.

Commonwealth of Pennsylvania	
<b>Address</b>	9th Floor Forum Place, 555 Walnut Street, Harrisburg, Pennsylvania 17101
<b>Contact Name and Phone Number</b>	Anna Maria Kiehl, Chief Accounting Officer / 717-787-6497
<b>Scope of Work</b>	<ul style="list-style-type: none"> <li>• Statewide CAFR audit in accordance with <i>Government Auditing Standards</i></li> <li>• Statewide Single Audit in accordance with <i>OMB Uniform Guidance</i></li> </ul>
<b>Length of Service</b>	2010 – present
<b>Project Goals &amp; Objectives</b>	The Commonwealth of Pennsylvania is a joint audit with the elected Audit General. Additionally, we have been working with them to strengthen their general controls over information technology in order to increase our reliance on information technology workflow controls.

State of New Jersey	
<b>Address</b>	33 West State Street, Trenton, NJ 08625-0221
<b>Contact Name and Phone Number</b>	Brian Phillips, Accounting Operations, OMB/609-984-1536
<b>Scope of Work</b>	<ul style="list-style-type: none"> <li>• Statewide Single Audit in accordance with <i>OMB Uniform Guidance</i></li> </ul>
<b>Length of Service</b>	2017 – present
<b>Project Goals &amp; Objectives</b>	The CAFR is audited by the State Auditor. CLA audits the Schedule of Expenditures of Federal Awards (SEFA) and all major programs.





West Virginia Higher Education System

<b>Address</b>	9th Floor Forum Place, 555 Walnut Street, Harrisburg, Pennsylvania 17101
<b>Contact Name and Phone Number</b>	Ed Magee, Vice Chancellor for Finance / 304-558-0679
<b>Scope of Work</b>	<ul style="list-style-type: none"><li>• Financial Statement Audit</li><li>• Single Audit in accordance with <i>OMB Uniform Guidance</i></li></ul>
<b>Length of Service</b>	2014 – present
<b>Project Goals &amp; Objectives</b>	Audit of the university systems financial statements.

**Letters of Recommendation**

As further evidence of our exemplary service, we have included a letter of recommendation from the West Virginia Higher Education Policy Commission and the Auditor General of the Commonwealth of Pennsylvania, on the following pages.



Michael J. Farrell, Esq.  
Chair



Paul L. Hill, Ph.D.  
Chancellor

**West Virginia Higher Education Policy Commission**

1018 Kanawha Boulevard East, Suite 700 • Charleston, West Virginia 25301

(304) 558-2100 phone • (304) 558-1011 fax

[www.wvhepc.edu](http://www.wvhepc.edu)

March 29, 2018

Michael F. Johns, CPA, Principal  
Public Sector, CliftonLarsonAllen LLP  
610 W Germantown Pike, Suite 400  
Plymouth Meeting, PA 19462

Dear Mike,

I am pleased to write this letter of recommendation letter for CliftonLarsonAllen. They have provided audit services for West Virginia higher education since 2014. It is clear from our experience with CLA that the client's needs are their top priority. They provide excellent customer service and maintain a high level of integrity. CLA understands and successfully operates in the state government and higher education sectors.

For the first time, in FY 2017, The West Virginia Higher Education fund audit was completed by its due date. This accomplishment would not have been realized without the extraordinary efforts of CLA. They deployed additional firm resources to ensure that the audit was completed on time. The FY 2014 through FY 2018 audits were not completed as originally scheduled because of circumstances beyond the control of CLA.

CliftonLarsonAllen has been an excellent partner as we strive to improve our audit and financial reporting processes in West Virginia public higher education.

Best regards,

A handwritten signature in blue ink, appearing to read "Ed Magee".

Ed Magee  
Vice Chancellor for Finance

*Leading the Way: Access, Success, Impact.*





Commonwealth of Pennsylvania  
Department of the Auditor General  
Harrisburg, PA 17120-0010  
Facebook: Pennsylvania Auditor General  
Twitter: @PAAuditorGen  
www.PaAuditor.gov

FRANCIS A. DePASQUALE  
AUDITOR GENERAL

April 10, 2018

Ms. Linda B. Harper  
Department of Administration  
Purchasing Division  
2019 Washington Street, East  
Charleston, WV, 25305

Re: CLA Letter of Recommendation for Auditing Services

Dear Ms. Harper:

I am writing to provide a recommendation for CliftonLarsonAllen LLP (CLA) in support of their desire to perform audit services for the State of West Virginia. I am a Director in the Pennsylvania Department of the Auditor General. In my role I work directly with CLA to perform joint audit services for the Commonwealth of Pennsylvania.

CLA shares joint responsibility for both statewide audit engagements with our Department, which includes the statewide audit of the CAFR and Single Audit. I have been pleased with their depth of audit knowledge, level of commitment, and availability. The CLA staff have demonstrated an ability to work well with the joint audit team and auditee personnel throughout the Commonwealth.

CLA is currently serving in the fourth year in a joint audit role with our Department. I am pleased to provide this letter as confirmation of their outstanding work.

Please feel free to contact me at 717-787-3214 or [skennedy@paauditor.gov](mailto:skennedy@paauditor.gov) if you wish to discuss further.

Sincerely,

Scott A. Kennedy, CPA  
Director, Bureau of State and Federal Audits  
Pennsylvania Department of the Auditor General



## Continuing Education

In order to maintain and expand our assurance knowledge, we consistently provide continuing education for our professionals. Each member of our professional team, including principals, attends at least 40 hours of technical training annually.

Updated information on recent changes in technical standards and regulations, as well as the firm's professional policies and procedures, is distributed to our team members on a regular basis. Individuals are required to familiarize themselves with all current changes in standards and procedures.

CLA invests in our government practice by hiring high caliber professionals and providing additional training to develop and enhance our knowledge. With seasoned professionals, we provide valuable insight into your day-to-day operations and your accounting systems and controls.

As described in *Figure 2* below, CLA professionals are specifically trained in the industry at a level beyond our competitors.



**Figure 2. Effective Continuing Professional Education.** *Our greatest strength is the talent of our staff. Our professionals provide more efficient and effective services due to the new ideas they implement from our in-depth training and continuing professional education.*

CLA's firm-wide training programs, include:

- **Learn.** Designed for new CLA associates, this five-day conference is typically attended in the first year of employment. This internally developed and presented training focuses on preparing new hires and interns to understand and perform their role in the audit process. Providing a combination of an introduction to CLA Strategy, business risk and independence with audit theory. Using hands on exercises and simulations to introduce our audit methodology, tools and software. Specific audit areas covered include audit planning, cash, fixed assets, accounts payable and financial statement preparation.
- **Experience.** Designed for the CLA associate with about one year of experience. This four-day conference is typically attended in the second year of employment. This training is similar to the "Learn" training outlined above, but at a deeper level.
- **Achieve.** Designed for the CLA associate with about two years of experience. This four-day conference is typically attended in the third year of employment. This internally developed and presented training focuses on leadership and performance management of audit engagements utilizing CLA audit methodology from the perspective of the experienced in-charge. This is a highly interactive session



covering the experienced in-charge's role and challenges in the audit process, and prepares participants to manage and perform efficient and effective audits.

- **Propel.** Designed for the CLA associate with about three years of experience. This four-day conference is typically attended in the fourth year of employment. This training focuses on project management of audit engagements from start to finish and includes exercises and case studies on improving the audit, supervision, analytical procedures and tests of controls and identifying and responding to fraud risks. This session is taught by an external instructor from 20/20 Services.

## Audit Work Plan

(RFP Section 4, Subsection 4.4)

CLA is one of the few firms that have developed its own proprietary audit programs. Most firms use canned, off-the-shelf audit programs, which limits their flexibility in determining what procedures they can and cannot perform because they must follow the audit methodology they have purchased. Our audit teams are able to customize our audit programs to address the specific risks and unique characteristics of your operations. We do not perform the exact same procedures at every governmental client. In addition, our audit programs are interactive, providing guidance to the staff while they are performing the audit procedures.

Our audit approach for year one and subsequent years will have certain consistent elements. However, we expect that the subsequent years will result in fewer audit hours based on the efficiencies gained as we become more familiar with your operations. Our audit objective extends beyond the issuing of an opinion on financial statements. We believe that a good audit yields substantial information for management, and is a valuable tool in recognizing opportunities and identifying areas that can be strengthened. An effective audit performed by our team will also provide:

- An objective look at your policies and procedures
- Valuable suggestions for improvements in your financial operations and other areas
- An analysis of trends and unusual variations from year-to-year
- Protection for current and future resources through improved internal controls
- A deterrent to embezzlement and other fraudulent activities

### Benefits of CLA's Risk-Based Approach

Our audit services are designed to protect the interests of the members, governance, and management by concentrating on high-risk areas. Risk identification is the first step of the audit process, providing the basis upon which the overall plan is developed. Our risk assessment process involves consideration of the following types of risk:

- Inherent risk - that an error in the accounting and reporting process may occur
- Control risk - that internal control systems designed to prevent/detect errors may fail
- Audit detection risk - the risk that audit procedures may fail to detect errors

### Commitment to Communication with Management

As you will see, we are committed to ongoing communication throughout the engagement. Continual communication starts during planning, continues until the completion or closeout of an engagement and throughout the remainder of the year. We believe effective communication is critical to a successful engagement. This communication includes the exchange of ideas and advice as changes are considered or implemented by the entity or the accounting profession.



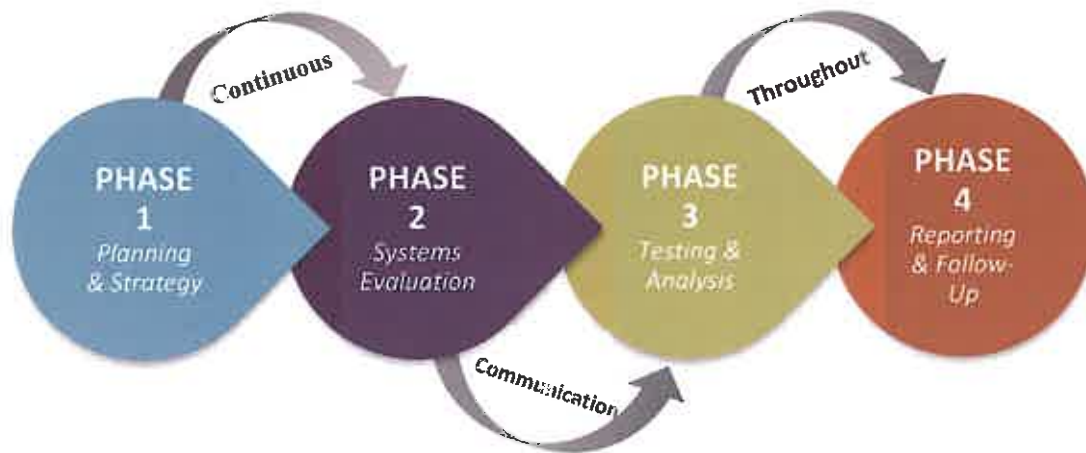
During the engagement we will hold regular status meetings with the State to ensure day-to-day operations, results, and any issues are commonly understood and addressed. The objectives of tracking and formally reporting the engagement status are to:

- Provide a consistent technique for monitoring progress against plan
- Identify any issues quickly to allow for timely corrective action
- Provide an objective rather than subjective evaluation of status
- Provide timely information on a regular basis
- Assist with obtaining buy-in of any audit recommendations on a timely basis

Our proactive measures ensure communications, both written and oral, are ongoing, relevant and routine to our engagements. Our commitment to this practice ensures open lines of communication and often prevents and/or mitigates service delivery issues. Our professionals are trained in documenting observations, recommendations, business issues and new developments as part of their daily routine.

### Financial Statement Approach

We will conduct our financial statement audit in four primary phases, as shown in *Figure 3* below:



**Figure 3. Methodology.** Our audit is performed based on a risk-based approach. We conduct our audits under the concept of “understanding the entity.” This concept is based fundamentally on the fact that the Agency is unique. By understanding the State, we gain the necessary perspective for performing an effective audit. Our audit approach places particular emphasis on the planning phase to determine maximum efficiency and effectiveness.

#### PHASE 1: PLANNING & STRATEGY

The main objective of the planning phase is to identify significant areas and design efficient audit procedures. We will accomplish our planning by following the methodology below:

- Conduct an planning meeting with the State – CLA will meet with the State audit team to discuss items including, but not limited to the following:
  - Establish the audit approach and timing of preliminary and final fieldwork, including brainstorming areas that can be tested during preliminary fieldwork
  - Establish the responsibilities of each team member and their assigned audit areas
  - Establish a staffing plan and preliminary time budget
- Conduct an entrance meeting with the State – The audit teams from CLA will meet with the State personnel to mutually agree on an outline of responsibilities and timeframes. The agenda will include but not be limited to the following:



- Establish audit approach and timing schedule,
  - Assistance to be provided by the State personnel,
  - Application of generally accepted accounting principles,
  - Concerns of the State's management,
  - Establishment of report parameters and timetables,
  - Progress reporting process, and
  - Establish principal contacts.
- Gain an understanding of the operations of the State, including any changes in its organization, management style and internal and external factors influencing the operating environment. We will utilize reference materials such as the budget and related materials, organizational charts, manuals and programs, and financial and other management information systems.
  - Identify significant accounts and accounting applications, critical audit areas, significant provisions of laws and regulations, and relevant controls over operations.
  - Determine the likelihood of effective Information Systems (IS) - related controls.
  - Perform a preliminary overall risk assessment.
  - Confirm protocol for meeting with and requesting information from relevant staff.
  - Determine a protocol for using Interactive Data Extraction and Analysis (IDEA), our data extraction and analysis software, to facilitate timely receipt and analysis of reports from management.
  - Compile an initial comprehensive list of reporting packages to be prepared by the State, and establish mutually agreed upon deadlines for receipt of the reporting package.

We will document our planning through preparation of the following:

- **State Profile.** This profile will help us gain an understanding of the State activities, organizational structure, services, management, key employees and regulatory requirements.
- **Preliminary Analytical Procedures.** These procedures will assist in planning the nature, timing and extent of auditing procedures that will be used to obtain evidential matter. They will focus on enhancing our understanding of the financial results, and will be used to identify any significant transactions and events that have occurred since the last audit date, as well as to identify any areas that may represent specific risks relevant to the audit.
- **General Risk Analysis.** This will contain our overall audit plan, including materiality calculations, fraud risk assessments, overall audit risk assessments, effects of our IS assessment, timing, staffing, client assistance, a listing of significant provisions of laws and regulations and other key planning considerations.
- **Account Risk Analysis.** This document will contain the audit plan for the financial statements, including risk assessment and the extent and nature of testing by assertion.

One of the key elements in the planning of this audit engagement will be the heavy involvement of principals and managers. We will clearly communicate any issues in a timely manner, and will be in constant contact with the State as to what we are finding and where we expect it will lead.

We will develop and update our audit programs during this phase. Utilizing the information we have gathered and the risks identified we will produce an audit program specifically tailored to the State. This program will detail by major section the nature and types of tests to be performed. We view our programs as living documents subject to change as conditions warrant. We will hold an entrance conference with the State to discuss the audit timeframes, and will meet the appropriate the State personnel at least one month prior to the start of each audit.



## PHASE 2: SYSTEMS EVALUATION

During the systems evaluation phase, we will gain an understanding of the internal control structure of the State for financial accounting and relevant operations. Next, we will identify control objectives for each type of control that is material to the financial statements, and then identify and gain an understanding of the relevant control policies and procedures that effectively achieve the control objectives. Finally, we will determine the nature, timing and extent of our control testing and perform tests of controls.

This phase of the audit will include testing of certain key internal controls:

- Over electronic data, including general and application controls reviews and various user controls
- Over financial reporting and compliance with laws and regulations

We will test controls over certain key cycles. One of our audit efficiency initiatives is to rely heavily on internal controls when appropriate and to creatively look at internal control testing to make it as efficient as possible. This means not routinely performing detailed tests of transactions using large samples. We first seek to identify key controls, and then identify possible testing through alternative methods, such as observation, interviews and re-performance. These tests serve not only to gather evidence about the existence and effectiveness of internal control for purposes of assessing control risk, but also to gather evidence about the reasonableness of an account balance.

We will also develop our internal control tests to assess the compliance with certain provisions of laws, regulations, contracts and grants for which noncompliance could have a direct and material effect on the determination of financial statement amounts. Our use of multi-purpose tests allows us to provide a more efficient audit without sacrificing quality.

Our assessment of internal controls will determine whether the State has established and maintained internal controls to provide reasonable assurance that the following objectives are met:

- Transactions are properly recorded, processed and summarized to permit the preparation of reliable financial statements and to maintain accountability over assets
- Assets are safeguarded against loss from unauthorized acquisition, use or disposition
- Transactions are executed in accordance with laws and regulations that could have a direct and material effect on the financial statements

We will finalize our audit programs during this phase.

During the internal control phase, we will also perform a review of general and application Information Systems (IS) controls for the applications that are significant to financial statements to conclude whether IS general controls are properly designed and operating effectively, and consider application controls as part of the internal control assessment in the financial statement audit. Our strategy for the IS review of the applications will involve reviewing all of the general control activities, including the computerized and manual processes. We will determine the scope of work by applying the concepts of materiality and risk assessment to effectively reduce examination inefficiencies. When planning this examination, we will gain an understanding of the State's operations by reviewing its current controls and control objectives as documented, and will also review prior years audit work and the status of corrective actions. Please refer to our IT Approach section for additional details on the specific scope.

Based on our preliminary review, we will perform an initial risk assessment of each critical element in each general control category, as well as an overall assessment of each control category. We will then proceed to assess the significant computer-related controls.





For IS-related controls that we deem to be ineffectively designed or not operating as intended, we will gather sufficient evidence to support appropriate findings and will provide recommendations to improve internal controls. For those IS controls that we deem to be effectively designed, we will perform testing to determine if they are operating as intended through a combination of procedures, including observation, inquiry, inspection and re-performance.

### PHASE 3: TESTING & ANALYSIS

The extent of our substantive testing will be based on results of our internal control tests. It has been our experience that governmental entities, like the State, often have a system of internal control that, with appropriately designed tests and correlation to account balances, can be used to limit the extent of account balance substantiation testing.

Audit sampling will be used only in those situations where it is the most effective method of testing. Before deciding to sample, we will consider all possible approaches and audit techniques. Items where, in our judgment, acceptance of some sampling risk is not justified will be examined 100 percent. These may include unusual items or items for which potential misstatements could individually equal or exceed tolerable error.

After identifying individually significant or unusual items, we will decide on the audit approach for the remaining balance of items by considering tolerable error and audit risk. This may include (1) testing a sample of the remaining balance, (2) lowering the previously determined threshold for individually significant items to increase the percent of coverage of the account balance or (3) applying analytical procedures to the remaining balance. When we elect to sample balances we will use IDEA to efficiently control and select our samples.

Our work papers during this phase will clearly document our work as outlined in our audit programs. We will also provide the State with status reports during the course of the audit fieldwork. As in all phases of the audit, we will be in communication with the State's management to ensure that all identified issues are resolved in a timely manner. We will also hold a final exit conference with the State's management to summarize the results of our fieldwork and review significant findings.

### PHASE 4: REPORTING & FOLLOW-UP

Reports to management will include oral and/or written reports issued by CLA regarding:

- Independent Auditors' Report
- Independent Auditors' 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
- Management Letter
- Written Communication to Those Charged with Governance, which includes the following areas:
  - Our responsibility under auditing standards generally accepted in the United States of America
  - Changes in significant accounting policies or their application
  - Unusual transactions
  - Management judgments and accounting estimates
  - Significant audit adjustments
  - Other information in documents containing the audited financial statements
  - Disagreements with the State
  - The State's consultations with other accountants
  - Major issues discussed with management prior to retention
  - Difficulties encountered in performing the audit
  - Fraud or illegal acts



Once the final reviews of working papers and financial statements are completed, which is a process that actually starts while the fieldwork is in process, the opinion, the financial statements and management letter will be issued.

The State agencies will be provided a draft of any comments that we propose to include in the management letter, enabling them to review the comments for accuracy prior to final release. Any items that come to our attention that are not what we consider major items may be discussed verbally with management and not included in the management letter. The management letter will include items noted during our analysis of your operations.

**Financial Statement Work Plan**

The following work plan outlines the procedures to be employed for each work segment and task. This includes the specific levels of CLA’s personnel to be used for each, general dates for performance of tasks, and the projected dates of completion.

Phase/Segment No.	Tasks to be Performed	Timeframe	Key Supervisory Personnel Assigned
Pre-Engagement	<p><b>Pre-Engagement Planning Upon Award</b></p> <ul style="list-style-type: none"> <li>• Schedule entrance conference with the State Finance Division</li> <li>• Identify applicable state and federal regulations</li> <li>• Organize and initiate audit staff and services</li> <li>• Review prior auditor workpapers</li> <li>• Review the State’s interim financials</li> <li>• Prepare list of documents, schedules, etc. for the State to provide</li> </ul>	Upon Award	<ul style="list-style-type: none"> <li>• Sean Walker, Principal</li> <li>• Bill Early, Principal</li> <li>• Cheri King, Manager</li> <li>• Jordan Boehm, Manager</li> <li>• Jim Kreiser, IT Principal</li> <li>• Joel Eshleman, IT Director</li> <li>• Senior Associates as necessary</li> </ul>
1 and 2	<p><b>Interim and Preliminary Fieldwork, including Systems Evaluation</b></p> <ul style="list-style-type: none"> <li>• Conduct entrance conferences with State agencies and departments</li> <li>• Perform IT system reviews and testing</li> <li>• Conduct interviews with key personnel throughout the State, including Agency/Department Secretaries and Commissioners</li> <li>• Request confirmations</li> <li>• Determine the areas required to be tested on-site, including test of controls and compliance testing and begin testwork at the Agencies and Departments</li> <li>• Preliminary analytical reviews, utilizing the State’s approved budget and other external data</li> <li>• Assess existing practices, procedures, and systems</li> <li>• Verify compliance with state, and federal regulations</li> </ul>	Upon Award - June	<ul style="list-style-type: none"> <li>• Sean Walker, Principal</li> <li>• Bill Early, Principal</li> <li>• Cheri King, Manager</li> <li>• Jordan Boehm, Manager</li> <li>• Jim Kreiser, IT Principal</li> <li>• Joel Eshleman, IT Director</li> <li>• Senior Associates and Staff level associates will be involved to perform testwork</li> </ul>



Phase/Segment No.	Tasks to be Performed	Timeframe	Key Supervisory Personnel Assigned
	<ul style="list-style-type: none"> <li>Review results of preliminary work and modify audit program as needed</li> <li>Perform group audit procedures</li> <li>Review actuarial reports on employer valuation for issuance of GASB 68 and GASB 75 reports</li> </ul>		
3	<p><b>Year-end Substantive Fieldwork</b></p> <ul style="list-style-type: none"> <li>Perform substantive testing over departmental activity</li> <li>Perform substantive testing over the GAAP conversion schedules and adjustments</li> <li>Complete remaining IT fieldwork at the agencies and departments</li> <li>Review component unit audits</li> <li>Schedule and hold exit conferences with the State agencies and departments</li> <li>Perform final analytical reviews</li> <li>Review workpapers, including concurring principal review</li> </ul>	August – November	<ul style="list-style-type: none"> <li>Sean Walker, Principal</li> <li>Bill Early, Principal</li> <li>Cheri King, Manager</li> <li>Jordan Boehm, Manager</li> <li>Jim Kreiser, IT Principal</li> <li>Joel Eshleman, IT Director</li> <li>Phil Del Bello, IT Manager</li> <li>Senior Associates and Staff level associates will be involved to perform testwork</li> </ul>
4	<p><b>Reporting</b></p> <ul style="list-style-type: none"> <li>Review the draft of the State's CAFR</li> <li>Prepare draft auditors' reports on financial statements and internal control and submit to State departments for review</li> <li>Prepare draft of management letter</li> <li>Meet with management and Department of Finance and Management to review and discuss drafts</li> <li>Finalize and issue management letter and required communications to those charged with governance</li> </ul>	November – December (with CAFR issuance before 12/21)	<ul style="list-style-type: none"> <li>Sean Walker, Principal</li> <li>Bill Early, Principal</li> <li>Cheri King, Manager</li> <li>Jordan Boehm, Manager</li> <li>Keith Novak, Quality Control Principal</li> </ul>



### ***Sample Sizes and the Extent Statistical Sampling is to be Used***

We extensively use statistical and non-statistical sampling during our audits of governmental entities. The sampling techniques vary depending upon the nature of the test, such as internal control reliance, substantive testing and transactional testing. Our sample sizes are directly related to the various risks (inherent and control) associated with the item being tested, confidence level to be obtained and overall materiality. Our sample sizes generally include up to 40 items for control and transactional testing. The samples for substantive testing are highly dependent upon the balance of the account being tested and the materiality of the engagement.

We plan to determine the scope of work by applying the concepts of materiality and risk assessment to effectively reduce examination inefficiencies. Our strategy for the electronic data processing (EDP) review of the applications will involve reviewing all of the general control activities, including the computerized and manual processes.

During the planning phase of the engagement, we will confirm our understanding of the State's operations by reviewing your current controls and control objectives as documented. We will also review prior years' audit work and the status of corrective actions. Based on our preliminary review, we will perform an initial risk assessment of each critical element in each general control category, as well as an overall assessment of each control category. We will also develop preliminary estimates of materiality to assist in developing our audit plan. We will then proceed to assess the significant computer-related controls.

For those controls that we deem to be ineffectively designed or not operating as intended, we will gather sufficient evidence to support appropriate findings and to provide recommendations to improve internal controls. For those controls we deem to be effectively designed, we will perform testing to determine that they are operating as intended through a combination of procedures, including observation, inquiry, inspection, and re-performance.

### ***Type and Extent of Analytical Procedures***

Preliminary analytical procedures will assist in planning the nature, timing and extent of auditing procedures that will be used to obtain evidential matter. These procedures will focus on enhancing our understanding of the financial results. These procedures are also used to identify any significant transactions and events that have occurred since the last audit date, as well as to identify any areas that may represent specific risks relevant to the audit.

In performing our substantive testing, our audit efficiency initiative provides that we first think analytically. By doing this, we can better understand the specific account balance being tested and determine if the current balance or relationship with other account balances appears reasonable. We will also employ analytical testing on smaller and/or lower risk accounts and cycles to maintain efficiency and to meet milestones.



## Single Audit Approach

In the current environment of increased oversight, it is more important than ever to find qualified auditors who have significant experience with federal grants specific to the State and can enhance the quality of the State's single audit. Therefore, the single audit will be performed by a team of individuals who specialize in single audits in accordance with OMB's UG and who will offer both knowledge and quality for the State. As part of our quality control process, the single audit will be reviewed by a firm Designated Single Audit Reviewer (DSAR). As previously noted, the individuals we have proposed as our engagement team for the Single Audit of State of West Virginia all have direct experience in performing single audits at a state-wide level. We understand the complexities and challenges that come with performing a state-wide audit and will incorporate these issues into our risk assessment and program testing.

The AICPA clarified auditing standard, AU-C 801 "Compliance Audits" requires risk-based concepts to be used in all compliance audits including those performed in accordance with Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*. Our risk-based approach incorporates this guidance.

We will conduct our single audit in three primary phases, as shown in *Figure 4, below*.



**Figure 4. Tailored Single Audit Approach.** CLA understands that each contract/grant agreement is as unique as each governmental entity. Therefore, we tailor our audit procedures to match each client's risks for the specific program or grant being audited.



## PHASE 1: RISK ASSESSMENT & PLANNING

The risk assessment and planning phase will encompass the overall planning stage of the state-wide single audit engagement. During this phase, we will work closely with the Department of Finance and Management and the State to communicate with the various state agencies/business units and departments to ensure that federal programs and all clusters of programs are properly identified and risk-rated for determination of the major programs for testing. We will also review the forms and programs utilized in the prior year to determine the extent of any changes which are required.

We will accomplish this by following the methodology below:

- Determine the threshold to distinguish between Type A and B programs, including the effect of any loans and loan programs.
- Utilizing the preliminary Schedule of Expenditure of Federal Awards, we will identify the Type A and Type B programs in accordance with UG and ARRA requirements, if applicable.
- Identify the programs tested and the findings reported for the past two fiscal years. Determine and document the program risk based on the past two Single Audits.
- Prepare and distribute Type B program questionnaires to determine risk associated with Type B programs.
- Determine the major programs to be tested for the current fiscal year based on the previous steps.
- Based on our determination of the major programs, we will obtain the current year UG compliance requirement supplement to aid in the determination of Direct and Material Compliance requirements, and customize the audit program accordingly.
- Prepare and distribute templates to management to obtain the Summary Status of Prior Year Findings.
- Determine the preferred methods of communication with the grant managers and agency personnel during the audit.

The risk assessment process has become increasingly complex over the past few years due to the new *Uniform Guidance* that was released by the *Federal OMB*. We will work closely with individual program and grant management to ensure that a proper risk assessment is executed and that the grants are tested under Uniform Guidance or the previous Circulars as applicable.

Further, in performing auditing procedures over the completeness and accuracy of the Schedule of Expenditures of Federal awards, we will perform robust analytical procedures over the SEFA, with a focus on investigating unusual variances from the prior year, from budgeted amounts, or from funding ceilings identified in the grant funding documents. This step is critical in planning to ensure that the proper risk assessments are performed and that the proper major programs are selected.

In determining the direct and material compliance requirements, we utilize the *OMB UG Compliance Supplement*, compliance matrix, Code of Federal Regulations, actual federal expenditures pattern, and grant agreements to determine if a compliance requirement is applicable and direct and material to the major program. We will determine if the requirement applies to the program at all, applies at the state level or sub recipient level or is material to the federal program.



The following are the 12 types of requirements identified in the 2017 Draft Compliance Supplement:

- Activities allowed/unallowed
- Allowable costs/cost principles
- Cash management
- Eligibility
- Equipment and real property management
- Matching, level of effort, earmarking
- Period of performance
- Procurement, suspension, and debarment
- Program income
- Reporting
- Sub recipient monitoring
- Special tests and provisions

**Compliance Requirement Risk Assessment** – for each applicable compliance requirement we assess inherent risk, detection risk, risk related to prior non-compliance, and control risk. Based on the preliminary assessment, we determine the minimum sample size for each applicable requirement.

**Identify Internal Controls** – non-federal entities receiving federal awards are required to establish and maintain internal controls designed to reasonably ensure compliance with federal laws, regulations, and program-compliance requirements. *OMB UG* requires auditors to obtain an understanding of the non-federal entity's internal control over federal programs.

For each applicable compliance requirement we will gain an understanding of and document internal controls, including IT controls, which encompasses the five components of the control structure, noted below:

- **Control Environment** – sets the tone of an organization influencing the control consciousness of its people. It is the foundation for all other components of internal control, providing discipline and structure.
- **Risk Assessment** – is the entity's identification and analysis of risks relevant to achievement of its objectives, forming a basis for determining how the risks should be managed.
- **Control Activities** – are the policies and procedures that help ensure that management's directives are carried out.
- **Information and Communication** – are the identification, capture, and exchange of information in a form and time frame that enable people to carry out their responsibilities.
- **Monitoring** – is a process that assesses the quality of internal control performance over time.

We will gain an understanding of internal controls over each applicable requirement. Based on our understanding, we will identify key manual and IT controls to be tested. If we determine that a program relies heavily on information systems, we will promptly get our IT auditors involved in the early stage to gather additional IT related documentation and testing of IT controls over these information systems. We will select IT controls and test the design and operating effectiveness of these controls. We will then select key manual controls and perform testing of the design and operating effectiveness of these controls. Testing internal controls is necessary to support a low level of control risk over each direct and material compliance requirement.



There are several critical coordination considerations in this phase of the audit:

- Obtaining an interim schedule of expenditures of federal awards to be used for planning purposes.
- Timely meetings with program management to facilitate risk assessments.
- Access to grant documentation and other communications between the state and the federal awarding agency.
- Identification of an audit liaison for each program at each agency who will be responsible for coordinating the state's resources supporting the program audit.

## PHASE 2: MAJOR PROGRAM TESTING

We will determine the programs to be audited based on the risk assessment performed in the planning phase. We will perform the audit of the programs in accordance with UG. To accomplish this, we will perform the following:

- Schedule an introductory meeting and notify appropriate program management of the major programs for the current fiscal year.
- Plan and execute the testing of the expenditures reported on the Schedule of Expenditures of Federal Awards.
- Perform tests of compliance and internal controls over compliance for each major program identified.
- Schedule progress meetings to determine that schedules are adhered to and identify issues as they arise.
- Conduct entrance and exit conference meetings with each program/grant manager and the agency management as needed.

The status meetings are critical to the successful completion of the Single Audit. This ensures that all relevant parties (the Department of Finance and Management, program/grant managers, and agency management) are consistently apprised of audit progress, including any potential audit findings. Because of our planned close communication with state personnel, we believe that any potential findings identified through the audit process will be carefully vetted prior to inclusion in a draft report. This is another critical success factor to completing the Single Audit.

Your auditor must also execute an efficient sampling plan to execute the Single Audit appropriately. CLA uses a dual purpose approach related to compliance and internal control testing, which allows for the same sample to be used in compliance and control testing. Our sample size determined dictates the amount of work necessary to support our conclusions and opinions. We use professional judgment in determining the appropriate sample size and procedures to be performed. However, we do follow the AICPA guidance on sample sizes, which generally result in sample sizes of a minimum of 25 or 40, depending on the risk assessment considerations identified. We further ensure our sample size selected is representative of the population and in selecting samples for allowable cost, for example, is stratified to allow us to analyze the extent to which samples are selected from each expense category.

There are several critical coordination considerations in this phase of the audit:

- Provision of populations to be sampled that reconcile to the general ledger.
- Timely provision of sample items selected for testing.
- Access to grant documentation and other communications between the state and the federal awarding agency.
- Timely review and approval/disapproval by the audit liaison of potential findings identified.





### PHASE 3: FINAL ASSESSMENT & REPORTING

We will re-perform the steps noted in the preliminary assessment and planning stage once the final Schedule of Expenditures of Federal Awards is received to determine if additional major programs were identified. Based on the final determination of the programs we will perform the following:

- Identify Type A and Type B programs which were not previously identified.
- Re-assess the risk and determine if we are required to audit additional programs.
- Perform compliance testing at the entity wide level related to procurement and cash management requirements.
- Perform testing to validate the status of prior year findings for those program not selected for audit
- Prepare the Schedule of Findings and Questioned Costs.
- Conduct exit conference with the Department of Finance and Management, agency management, program and grant managers, as well as representatives from the OMB.

There are several critical coordination considerations in this phase of the audit:

- Timely provision of a final SEFA to allow for finalizing major program determinations so that new programs are able to be audited within contractual deadlines.
- Attendance at exit conferences by appropriate program and agency management, so that they are apprised of audit findings that will be issued.

Timely review of final draft report by state management so that findings are vetted with adequate time to make changes to report so that it can be issued within contractual deadlines.

#### Single Audit Work Plan

The following work plan outlines the procedures to be employed for each work segment and task. This includes the specific levels of CLA's personnel to be used for each, general dates for performance of tasks, and the projected dates of completion.

Phase/Segment No.	Tasks to be Performed	Timeframe	Key Supervisory Personnel Assigned
Pre-engagement	<p><b>Pre-Engagement Planning Upon Award</b></p> <ul style="list-style-type: none"> <li>• Schedule entrance conference with state management that have involvement with overseeing the single audit</li> <li>• Perform preliminary assessment of major programs that are required for audit based on rotation or material weaknesses identified in prior year to provide</li> </ul>	Upon Award	<ul style="list-style-type: none"> <li>• Sean Walker, Principal</li> <li>• Bill Early, Principal</li> <li>• Jordan Boehm, Manager</li> <li>• Jim Kreiser, IT Principal</li> <li>• Joel Eshleman, IT Director</li> </ul>



Phase/Segment No.	Tasks to be Performed	Timeframe	Key Supervisory Personnel Assigned
1	<p><b>Interim and Preliminary Fieldwork</b></p> <ul style="list-style-type: none"> <li>• Perform IT system reviews and testing of program specific applications</li> <li>• Review applicable audit reports and correspondences from oversight agencies that may impact the single audit</li> <li>• Identify applicable local, state, and federal regulations including compliance Circulars and UG Guidance</li> <li>• Schedule and hold an entrance conference with the program coordinators and applicable agency management for those programs selected for audit</li> <li>• Obtain preliminary SEFA to perform risk assessment and determine additional major programs required to be tested</li> <li>• Prepare list of documents, schedules, etc. for the State agencies and departments to provide</li> </ul>	Upon Award – June	<ul style="list-style-type: none"> <li>• Sean Walker, Principal</li> <li>• Bill Early, Principal</li> <li>• Jordan Boehm, Manager</li> <li>• Jim Kreiser, IT Principal</li> <li>• Joel Eshleman, IT Director</li> <li>• Senior Associates and Staff level associates will be involved to perform testwork</li> </ul>
2	<p><b>Major Program Testing</b></p> <ul style="list-style-type: none"> <li>• Obtain grant agreements and contracts to determine applicable grant requirements and identify any special regulations required to be tested</li> <li>• Conduct program staff interviews to gain an understanding of processes and identify key internal controls over compliance</li> <li>• Assess existing practices, procedures, and systems</li> <li>• Obtain applicable compliance supplement for each major program being tested</li> <li>• Tailor audit program for each major program selected</li> <li>• Determine populations and applicable sample sizes</li> <li>• Perform test of controls and compliance testing in accordance with applicable Circular or Uniform Guidance</li> <li>• Perform testing of the completeness of the SEFA</li> <li>• Perform follow-up testing of prior year findings</li> <li>• Review workpapers, including concurring principal review</li> <li>• Identify and communicate findings as part of weekly status meetings</li> </ul>	July – October	<ul style="list-style-type: none"> <li>• Bill Early, Principal</li> <li>• Jordan Boehm, Manager</li> <li>• Jim Kreiser, IT Principal</li> <li>• Joel Eshleman, IT Director</li> <li>• Phil Del Bello, IT Manager</li> <li>• Senior Associates and Staff level associates will be involved to perform testwork</li> </ul>



Phase/Segment No.	Tasks to be Performed	Timeframe	Key Supervisory Personnel Assigned
	<ul style="list-style-type: none"> <li>• Hold exit conferences with program coordinators and applicable agency management for those programs selected for audit</li> </ul>		

3	<p><b>Reporting</b></p> <ul style="list-style-type: none"> <li>• Prepare draft Independent Auditor's Report on the Schedule of expenditures of Federal Awards</li> <li>• Prepare draft of Independent Auditor's Report on Compliance For Each Major Federal Program and Report on Internal Control Over Compliance Required by the Uniform Guidance</li> <li>• Prepare draft of the Schedule of Findings and Questioned Costs</li> <li>• Obtain corrective action plans for findings</li> <li>• Hold final exit meeting with the State</li> <li>• Finalize and issue all reports</li> <li>• Certification of the Data Collection Form</li> </ul>	<p>November – December, with issuance of final reports in January</p>	<ul style="list-style-type: none"> <li>• Bill Early, Principal</li> <li>• Jordan Boehm, Manager</li> <li>• Keith Novak, Quality Control Principal and Technical Reviewer</li> </ul>
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## Data Analytics

In addition to standard auditing methodology, a distinguishing aspect of CLA's audit services incorporates the power of data analytics to multiply the value of the analyses and the results we produce for our clients. Here at CLA, we have developed our own proprietary data analytic programs that are required in all of our audit engagements, called RADAR (risk Assessment, Data Analytics and Review).

### RADAR Methodology

As previously mentioned, CLA has created a unique data analytics approach and platform that puts our clients' needs first. Our **Risk Assessment, Data Analytics and Review** ("RADAR") is a specific application of general ledger data analytics that has been implemented on audit engagements beginning with year ends of December 31, 2016 and later. RADAR is an innovative approach created and used only by CLA that aims to improve and replace the preliminary analytics that are currently being performed. Our six steps of the CLA Data Analytics Methodology is as follows:

#### 1. Planning

The key driver of RADAR is the application of general ledger analytics early in the audit timeline. General ledger analytics are capable of providing valuable insights that can help identify and measure risks. These insights may also assist in designing and otherwise planning audit procedures. Generally, it is best practice to perform RADAR analytics during the greater audit planning procedures so that the results can be interpreted during the risk assessment procedures.



## 2. Expectations

Through preliminary discussions with management and governance, develop and document expectations of financial transactions and results for the year. These expectations will assist you in identifying anomalies and significant audit areas in order to appropriately assess risk.

The nature of expectations for preliminary analytical procedures revolves around expected trends and types of transactions, rather than a quantification of results. For example, in analyzing revenue transactions, expectations could address the type and size of revenue transactions or the timing of transactions. This is different than substantive analytics that could be used to predict the change in revenue and result in a conclusion about the fair presentation of revenue.

## 3. Data Acquisition

- Have conversations with the client to explain general objectives of data analytics. Explain the nature of the data request, explain the format of desired data
- Prepare the Data Request List that
  - o is addressed to the person most knowledgeable
  - o contains delivery dates
  - o references the applicable business information systems
  - o includes the requested data date range
  - o outlines the expected data elements, for General Ledger (Journal Entry) detail this generally includes:
    - Date Entered
    - Transaction Type
    - Transaction Number
    - Batch
    - Source Journal
    - Description
    - GL Account
    - Debit
    - Credit
    - Currency
    - Posting User
    - Approving User
    - Date Posted
    - Time Posted
    - Account Balance
  - o Along with the above noted data sets, the following information should be considered to adequately interpret the data files and test it for completeness:
    - Beginning and Ending Trial Balances, including accounts with \$0 balances
    - Chart of Accounts
    - Chart of Accounts Change Log
    - Data Dictionary – to describe the nature of each data field
    - File Source Listing – indicating from which systems and locations the data was extracted
- Consider the comprehensiveness of the available client data. Internal control recommendations may be identified in this step if the client is not capturing meaningful and consistent data. For example, many companies will have adequate systems in place but they may not be using all of the data elements available or certain fields may be used inconsistently.



#### 4. Technical Data Analysis

Technical analysis of the data *requires* the skillful blend of knowledge and technical capability. The analysis should follow the plan established in the planning and risk identification phases. It should also leave room to expand and contract testing as necessary using one's professional judgment.

##### **Verify Proper Import**

Immediately after importing the data into the data analysis software, the imported file should be reconciled to the source file to ensure that all records were imported and fields agree in total. This is best conducted by:

- Matching the number of records in the imported database to the number of records in the source file
- Totaling each of the numeric fields and matching them to the totals in the source file
- Checking the date range for reasonableness
- Reviewing file statistics for data errors

##### **Normalize Data and Prepare for Analysis by Adding the Following Data Fields**

After the data is imported and verified as noted above, generally it is best practice to normalize the data prior to beginning completeness testing or analysis. When analyzing general ledger data, the addition of the following data fields is often necessary and useful.

- Net Amount (Debit – Credit)
- Absolute Value of Net Amount
- Effective Year Month (“YYYY\_MM”)
- Posted Year Month (“YYYY\_MM”)
- Day of Week (Monday – Sunday)
- Days Till Posted (effective date – posted date)
- Financial Statement Class (1\_Asset, 2\_Liability, 3\_Equity, 4\_Revenue, 5\_Expense; generally joined from Chart of Accounts ; recommended to utilize CLA's account classifications from ProFX work paper Binder)
- Financial Statement Sub-class (Reserve, Contra, Other subjective accounts; generally joined from Chart of Accounts ; recommended to utilize account classifications from ProFX work paper Binder)
- Manual JE (1\_Yes, 2\_No; Understand coding for manually entered journal entries)

##### **Completeness Testing**

When testing journal entry data, reconciliation to the trial balance is an essential consideration. The trial balance, and ultimately the financial statements, should be a reflection of all the transactions for the relevant period.

For example, when a database containing all journal entries for the year is summarized by account number, the net total of all debits and credits to each account number should be equal to the:

- Balance on the trial balance for Income Statement accounts
- Difference between the prior year's ending balance and the current year's ending balance for Balance Sheet accounts

##### **Design Analytics to Assess Risk and Accomplish Objectives**

Meaningful technical analysis, in this case application of RADAR, will provide the analyzing professional and reviewing engagement team with a better understanding of the business. The additional clarity will assist the engagement team to better assess what is “normal” and, in turn, be better suited to spot anomalies, red-flags and other indications of risk. Analytics generally fall into five categories, each looking into the data set in a different way and deployed with a different purpose. When selecting the analytic to perform care should be taken to determine its primary purpose. Certain analytics are better used to identify trends while others are better used to identify anomalies. The analytic selected may also support the design of further audit procedures, for example observation of trends may indicate that a random sample of transactions is a preferred further audit procedure to confirm that the transactions are fairly stated, while other analytics may indicate a recalculation or examination



of 100% of the population may be appropriate. Either a trend or anomaly identifying data analytic may identify where a substantive data analytic is an appropriate further audit procedure.

### **Population Analytics**

Gain clarity over the population of the transactions by performing analytics that consider all transactions contained within the data set.

- Conduct a review of the numeric, date and time field statistics for reasonableness
- Numeric Stratification – often run on various intervals such as 100 thousand and 1 Million; this gives insight into where the data lies
- Stratified Journal Entry Amount – Summarize by JE ID totaling Absolute Value, Stratify result
- Summarize by ledger source to understand the how sub-ledger/feeder systems are consolidated into the general ledger
- Create rolling monthly financial statements

### **Grouping Analytics**

Summarize transactions into meaningful groups.

- Summarize by financial statement classification and by account to understand which accounts contain the majority of the transactions and dollar volume, to detect accounts with suspicious names and to identify accounts with activity which does not align with expectations.
- Summarize activity by other notable groups, such as business unit, fund, location, etc.

### **People Analytics**

Gain insight into who benefits from a transaction and who is responsible for the transaction.

- Summarize by user to understand who is responsible for posting and approving significant entries and understand the timing
  - Refine the summarization by adding elements of time and account to further understand the nature of user activity
- Identify generic user IDs such as “Admin” or “Accounting1”

### **Trending Analytics**

Provide interpretive value by showing data results over time.

- Summarize the number of transactions and dollar totals by month
  - Refine the summary by examining subsets of accounts or account classes such as revenue trending by month, expense trending by month, reserve trending by month, revenue trending by customer by month, etc.
- Group entries by posted day, posted date, and posted time and compare to understanding of normal business operations
- Understand the difference between transaction posting dates and effective dates
- Create an account receivable aging report and review for reasonableness
- Create an account payable aging report and review for reasonableness
- Identify “Closing Entries” by selecting Journal Entries where the posting date is after the closing date and the transaction date is before.



## 5. Interpret Results and Subsequent Risk Assessment

Trends and anomalies should be identified through the performance of the above referenced analytics. Accordingly, comments regarding the interpretation of those trends and anomalies should be captured. When trends are identified, they should be matched against the expectations. This insight might also help in gaining an understanding of the internal control system.

For anomalies identified, the approach to further audit procedures should be considered. For individually material anomalies, a specific further audit procedure will need to be identified.

Both trends and anomalies will provide insight into our risk assessment. The risks identified may be overall risks (for example an indication of a segregation of duties issue since most transactions are processed by one individual) or a specific risk (for example a significant increase in legal activity indicating a need to increase testing of potential contingencies). Both trends and anomalies also provide insight into specific assertion risk assessments. For example, high volume of transactions increases inherent risk. Similarly, a few large manual journal entries to an account may indicate higher inherent risk.

A high volume of transactions is also an indicator of a need for more sophisticated internal controls. Accordingly, these controls need to be identified when performing our understanding of internal controls.

## 6. Response and Document

The last process is to capture our response and ensure our procedures are properly documented.

In addition to our RADAR procedures, in our audit procedures we use other applications for the selection of random samples for testing and to extract information directly from your data files for testing and analytical analysis. With this technology, we are able to process and analyze substantial amounts of financial and non-financial data quickly and effectively. Our technology tools have been used successfully in both proactive and reactive audit engagements, across a broad range of industries.

Our analysis can be tailored and customized to each client to help analyze an array of information, including client specific and proprietary data. Key benefits of this technology include:

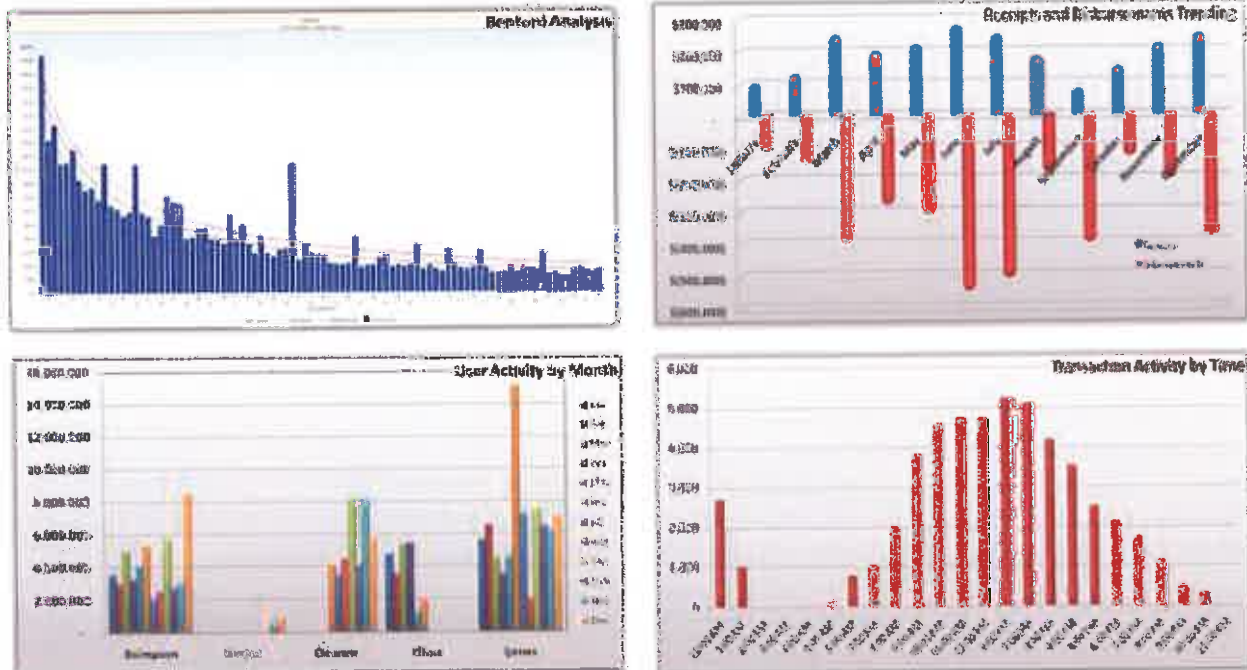
- Built-in audit functionality including powerful, audit specific commands and a self-documenting audit trail
- 100 percent data coverage, which means that certain audit procedures can be performed on entire populations, and not just samples
- Unparalleled data access allows us to access and analyze data from virtually any computing environment
- Eliminates the need to extrapolate information from errors (a common effort when manually auditing data) and allows for more precise conclusions

We are able to use data analytics to investigate and analyze issues and concerns in the following areas:

- Accounts receivable (fraud or payment misappropriation)
- Accounts payable (fraud or payment error)
- Purchase cards
- Related party transactions
- Travel and related expenses
- Manual journal entry manipulation
- Payroll



Figure 5 illustrates typical data analytics scenarios.



**Figure 5. Data Analytics.** At the end of a series of pre-determined analytics (often retrieved from multiple proprietary accounting systems) that are customized to the project at hand, we identify anomalies and potential errors in transactions. In every case, we review what appears to be inappropriate activity, including supporting documentation evidencing the transactions.

### **Approach to Drawing Samples for Purpose of Tests of Compliance**

Our approach to drawing audit samples will depend both on the assessment of control risk and determination of accounting control systems in place. For example, if we can determine that only one disbursement system is in place, we will select a sample based on the entire population. If there are several different systems with various controls in place, our approach will be to test each system and select samples for each system where we decide to rely on controls. Our sample size will vary based on the level of assessment of control risk. We utilize some form of random sample selection.

The samples for purposes of compliance testing for populations greater than 100 are drawn randomly or haphazardly from the population of transactions utilizing applicable numerical sample techniques. These techniques consider confidence level, tolerable error and attribute risk in determining sample sizes. We will use dual-purpose testing whenever possible to increase audit efficiency.

The samples for purposes of compliance testing for populations less than 250 generally range from 10-15 percent of the population or the identification and testing of individually significant transactions to obtain adequate population coverage. Samples for populations in excess of 250 range up to 60 items.





## IT Approach

We have extensive experience and a unique ability to understand how automated systems can be utilized to improve the cost-effectiveness, efficiency, and internal control environment for organizations like the State.

With the help of the State's resources, we will gather data from its various different IT operations, IT infrastructure, application owners, and stakeholders. Part of our methodology will be to specifically identify and assess key controls in IT infrastructure, operations, and processes. Through these activities, we will not just look to conduct interviews, but to also validate and verify that information and feedback communicated to us are in alignment with documented standards, policies, protocols, system documentation, etc.

Our focus will also be to evaluate and assess the IT operations in the context of the overall State objectives, mission, and strategies. We start by developing an understanding of the systems and the types of electronic and hardcopy information that is available. This includes the process and procedures for IT governance, user administration, change management, and computer operations. We then work with stakeholders to document and perform walk-throughs and interviews to identify the IT organizational structure and roles/responsibilities, internal controls and business processes. Understanding and documenting these internal controls will identify areas of potential weakness or ambiguity of process/monitoring and aid in directing where to focus further analysis and assessment. At the conclusion of our procedures we will present reports and related information in a format that best meets the needs of the State, considering use, audience, and purpose.

A detailed description of the specific IT related control activities that we assess are listed below.

Network Administration and Access Controls	
<b>Objective</b>	To determine if ongoing administration of network infrastructure is monitored by management and adequately segregated from IS personnel with other pervasive duties. Network infrastructure includes routers, switches, firewalls, intrusion detection/prevention systems.
<b>Approach</b>	CliftonLarsonAllen will review network administration and access controls, to assess the following: <ul style="list-style-type: none"> <li>• Network architecture</li> <li>• Firewall(s)</li> <li>• Intrusion detection/prevention systems</li> <li>• Anti-Virus</li> <li>• Remote Access</li> <li>• Logging/Monitoring</li> </ul> In addition, evaluate the overall security configuration management, including software patch management.
Server Administration and Access Controls	
<b>Objective</b>	Determine if access to servers within the organization is selectively restricted to protect from unauthorized use, damage, loss, or modification and to ensure server operating systems and patches are installed in a timely manner.
<b>Approach</b>	CliftonLarsonAllen will review server administration including access controls, to assess the following: <ul style="list-style-type: none"> <li>• Logical access is limited to those individuals that have a business need to access the server(s).</li> <li>• Server activity is appropriately logged and monitored on a periodic basis.</li> </ul>



### Workstation Administration and Access Controls

<b>Objective</b>	Determine if access to workstations (desktops/laptops) within the organization is selectively restricted to protect from unauthorized use, damage, loss, or modification and to ensure employees understand their responsibilities related to acceptable usage.
<b>Approach</b>	CliftonLarsonAllen will review workstation administration including access controls, to assess the following: <ul style="list-style-type: none"><li>• Logical/physical access is limited to those individuals that have a business need to utilize workstations.</li><li>• Employees are restricted from installing/downloading unauthorized software and files.</li><li>• Workstations are patched in a timely manner and anti-virus software is operating as intended to protect the workstation.</li></ul>

### Software Administration and Development Controls

<b>Objective</b>	To determine if policies and procedures relative to systems and program administration and development provide reasonable assurance that management objectives are met and that programs are adequately tested prior to implementation.
<b>Approach</b>	CliftonLarsonAllen will review the following related to application software administration and development controls: <ul style="list-style-type: none"><li>• Change Management Process</li><li>• Software Installations</li><li>• Software Upgrades</li><li>• Release Management</li></ul>

### Data/Database Security Administration and Access Controls

<b>Objective</b>	Determine if access to data files and independent databases is selectively restricted to protect from unauthorized use, damage, loss, or modification and to ensure adequate segregation of duties over the various groups of authorized users.
<b>Approach</b>	CliftonLarsonAllen will review data file and database administration including access controls, to assess the following: <ul style="list-style-type: none"><li>• Logical access is limited to those individuals that have a business need to access data files.</li><li>• Data file and database activity is appropriately logged and monitored on a periodic basis.</li><li>• Data transfers, both internal between application systems and external between the company and external vendors to determine if data is exchanged via secure connections and appropriate reconciliations occur to validate completeness.</li></ul>



### Application Security Administration and Access Controls

<b>Objective</b>	Determine if access to application software systems is selectively restricted to protect from unauthorized use, damage, loss, or modification and to ensure adequate segregation of duties over the various groups of authorized users. User rights should be established with the principle of least privilege. Personnel should be assigned system rights consistent with their assigned position responsibilities.
<b>Approach</b>	CliftonLarsonAllen will review the system security administration and access controls, to assess the following: <ul style="list-style-type: none"><li>• Logical access controls support the systems of manual internal control. Our analysis will focus on the primary data processing system.</li><li>• Review user profiles including authority and permissions for the primary data processing system.</li><li>• User rights should be established with the principle of least privilege. Personnel should be assigned system rights consistent with their assigned responsibilities.</li></ul>

### IT Systems Operational Controls

<b>Objective</b>	To determine if existing controls provide reasonable assurance that computer operations are conducted according to management's authorizations from an input, processing and output perspective.
<b>Approach</b>	CliftonLarsonAllen will focus on the operational control aspects related to the core data processing system, including start up, close, and daily logging, specifically: <ul style="list-style-type: none"><li>• All authorized data – and only authorized data – is received and processed.</li><li>• All data processing is conducted completely and accurately.</li><li>• Only authorized personnel produce, control, and distribute output.</li><li>• Daily and other periodic reconciliements are prepared on a timely basis by personnel outside the operations function.</li><li>• Proper separation of duties.</li><li>• All hardware and software problems are recorded, reported to applicable management, and resolved with management's specific authorization.</li></ul>

### Physical Environment Controls

<b>Objective</b>	To determine if controls exist that provide reasonable assurance that physical access to computer facilities is restricted to authorized personnel <i>and</i> that computer resources are protected from environmental hazards.
<b>Approach</b>	CliftonLarsonAllen will focus on the following related to physical security and environmental controls: <ul style="list-style-type: none"><li>• Access to facility/building that maintains information technology equipment or sensitive data.</li><li>• Access to areas within a facility/building that maintain information technology equipment or sensitive data.</li><li>• Environmental controls within areas that maintain information technology equipment including heat, humidity, water, electricity</li></ul> Our review will focus on preventative and detective controls that are in place as well as the on-going administration of granting, changing, and termination of physical security privileges.



### Disaster Recovery / Contingency Planning

<b>Objective</b>	To determine if back-up and recovery plans exist that provide reasonable assurance of timely resumption of computer processing following a short- or long-term interruption of service.
<b>Approach</b>	<p>CliftonLarsonAllen will review the following related to disaster recovery / contingency planning:</p> <ul style="list-style-type: none"> <li>• Daily back-up of critical systems is completed on a timely and complete basis.</li> <li>• Backup media is rotated on an acceptable frequency</li> <li>• Proper back up media is available in the event of a disruption or disaster event.</li> <li>• Written Disaster Recovery Plan &amp; tested periodically</li> <li>• Current IT and business operations within the company to determine if the infrastructure is properly supported by the disaster recovery plan.</li> </ul>

### **SOC Engagement Approach and Methodology**

Our approach for managing SOC 1 engagements is designed to comply with standards defined by the AICPA and achieve engagement objectives in an efficient manner with *minimal client impact* while retaining thoroughness and quality. Specific steps associated with performing a SOC 1 engagement are as follows:

#### Engagement Management

Task/Item	Description
<b>Project Manager</b>	CLA assumes The State will designate a Project Manager to be the liaison between CLA and the IT Division for requests and activities requiring coordination.
<b>Project Task Committee</b>	As appropriate, The State will determine who will participate in the engagement and have overall "ownership" from a strategic and day-to-day perspective. This will involve establishing a <i>Project Task Committee</i> to oversee and facilitate the project. The <i>Project Task Committee</i> may oversee and facilitate this project.
<b>Decision-Making Authority</b>	Throughout the engagement, various decisions may need to be made by The State. CLA will work with the organization to determine who must be involved in the approval process for decision-making activities.
<b>Project Plan</b>	<p>As a result of the information obtained during the engagement planning meeting, a detailed project plan that will be established to identify the following:</p> <ul style="list-style-type: none"> <li>• Specific tasks related to system description</li> <li>• Specific tasks related to controls to satisfy selected Trust Principle(s) criteria</li> <li>• Specific tasks related to documentation preparation</li> <li>• Specific tasks related to testing activities (as applicable)</li> <li>• Anticipated start/completion date for each task</li> <li>• Individual(s) responsible for completion of each task</li> </ul>

Throughout the life of the engagement, CLA will maintain the project plan with input from team members and updates made prior to scheduled status meetings.



Task/Item	Description
<b>Communication Strategy</b>	<p>CLA and The State will jointly determine the best method for communicating project-related information including but not limited to:</p> <ul style="list-style-type: none"> <li>• On-site Meetings</li> <li>• Web Sessions</li> <li>• Teleconferences</li> <li>• Email communication</li> <li>• Other</li> </ul> <p>Based on previous experience, we propose a 30 minute to one hour weekly status meeting with the Project Team during active phase(s) of the engagement that will be led by the CLA Project Manager. We will hold separate status meetings with Division management, as well as an overall project update with The State. During this time, the status of tasks on the Project Plan will be reviewed including those items that need immediate or management attention to achieve the engagement objectives and related schedule.</p>

### Engagement Planning

Task/Item	Description
<b>Project Planning Meeting</b>	The major objectives of the initial meeting will be to validate the overall goals of the engagement including definition of business objectives, related timeline and report delivery date. We will review the organization structure, and discuss any changes to the existing business and technology plans containing information that may impact the project. In addition, CLA will request the organization to identify formal and informal reporting relationships that may be useful throughout the engagement period.
<b>Engagement Scope</b>	CLA will facilitate a meeting with The State to confirm the purpose of the SOC engagement, which may require the organization to initiate discussions with The State to assign a point of contact and confirm timing.
<b>Reporting Period</b>	CLA will confirm that the reporting period has not changed from the RFP.

The approach to SOC engagements adopted by CLA segments activities into one of two phases including **Readiness Assessment** and **Attestation**. This approach is designed to comply with standards defined by the AICPA and achieve engagement objectives in an efficient manner with minimal client impact while retaining thoroughness and quality.



## Readiness Assessment

The Readiness Assessment phase provides The State with the opportunity to prepare for the attestation phase by documenting the current processes and internal controls. More specifically, the current design of administrative, technical and physical controls will be analyzed by CLA to determine if they satisfy the control objectives defined by management [suitability]. Any gaps identified by CLA will be presented to management with recommendations for remediation. This approach provides The State with the opportunity to remediate control gaps prior to the commencement of the attestation reporting date or period. Specific steps associated with Readiness include but are not limited to the following:

Task/Item	Description
<b>Organization Profile</b>	The State will be requested to confirm the following information to CLA: Organization Governance / Structure / Regulatory Requirements Clients / Industries Served / Services Offered / Types of Data Personnel Resources Application Systems / Technical Infrastructure / Physical Environment
<b>Subservice Organization Dependency</b>	The State will be requested to identify vendor (subservice organizations) relationships that are critical to the delivery of the organization's product offering(s). During this discussion it will be determined if the processes and controls performed by the subservice organization will be included or excluded from the scope of the engagement.
<b>Process Flowchart(s)</b>	CLA will meet with the designated Project Manager or Project Team within The State to obtain an understanding of the system used to support the delivery of services. Specifically, the results of this segment will be a flowchart(s) that illustrates the flow of data from an input, processing and output perspective throughout the key business processes including definition of responsibility and system dependencies.
<b>SOC1 Control Objective(s)</b>	Based on risks associated with the process flow to support service(s) delivery, control objectives will be defined by The State with assistance from CLA.
<b>Control(s) Design Assessment</b>	The State will document specific controls that have been placed in operation to achieve the defined control objectives. CLA will assess the design of those administrative, technical and physical controls via a combination of on-site and remote activities to determine if gaps exist.
<b>Control(s) Gaps</b>	The results of the Control Design Assessment will identify control(s) gaps that must be remediated prior to proceeding with the attestation engagement. When appropriate, CLA will discuss these gaps with organization management prior to finalizing the recommendation.
<b>Recommended Remediation</b>	CLA will provide recommendation(s) to remediate controls that are determined to be absent or lack adequacy in mitigating risks. These recommendations are made prior to finalizing the System Description and performing subsequent testing to confirm control design and/or compliance with design to determine effectiveness.



Task/Item	Description
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**SOC1 System Description**

Based on the results of the Process Flowcharts task and definition of control objectives, CLA will provide The State with a template that will be used to document the current system description including:

- Organization Background
- Organization Management Controls (including Vendor Risk Assessment)
- Business Process Controls
- General Computer Controls
- Physical Environment Controls
- Subservice Organizations
- Complementary User-Entity Controls

**Conclusion and Responsibility**

The conclusion of the Readiness Assessment is a description of processes and controls [System Description] that both organization management and CLA accept as an accurate depiction of The State's operational environment.

This description then becomes the basis for management's assertion and activities associated with the attestation engagement that will commence upon determination of the reporting date (Type 1) or period (Type 2).

CLA is responsible for providing an auditors' opinion on the suitability of design for the reporting period. Therefore, it is essential that the entire Readiness Assessment phase of the project be completed prior to the beginning of the desired reporting date or period.

It is important to note that this segment of the engagement can be approached either by CLA preparing the document and The State reviewing or The State preparing and CLA reviewing.

The Attestation phase of the engagement requires CLA to perform "tests of controls" to obtain evidence that the controls described have been implemented as of the start of the period and were complying with control design. Tests of controls may include: inquiry, observation, inspection and/or reperformance. CLA will document the results of testing and identify any exceptions. If exceptions are identified, organization management will be given the opportunity to respond to the exception.

Upon completion of the testing process CLA will evaluate the results and determine if exceptions will require the issuance of a *Qualified Auditors' Opinion*. The objective of an assurance engagement is to obtain an *Unqualified Auditors Opinion* which does not contain qualifying statements. Specific steps associated with Attestation include but are not limited to the following:



## Attestation

Task/Item	Description
<b>Overview</b>	The State with assistance from CLA, will confirm the reporting type has not changed since the initial engagement planning discussion(s).
<b>Management Assertion</b>	Prior to the beginning of the attestation date, management of The State asserts that, for the period covered by the report, it maintained effective controls over the system under examination to satisfy the Trust Principle(s) criteria.
<b>Engagement Planning</b>	<p><u>Controls Testing Work Program</u> CLA will develop work programs to evidence and “test” the implementation of all key controls described by the organization in support of the control objectives. Based on the documentation provided for the readiness assessment, CLA will be able to leverage many of the documents and process narratives developed. However, if there were gaps in controls we will be required to validate remediation and obtain new documentation.</p> <p><u>Engagement Schedule</u> CLA and The State will jointly establish a schedule for testing, including definition of on-site and remote testing activities to assist with staff scheduling. The testing schedule is intended to cause minimal disruption to business operations and avoid peak volume periods.</p> <p><u>Advanced Preparation</u> Prior to actual testing, CLA will identify supporting documentation that can be prepared in advance of testing to minimize the disruption of staff during the business day and make the testing process as efficient as possible.</p>
<b>Control(s) Testing</b>	Type of tests used during the testing process include: inquiry, observation, inspection, and reperformance of transactions. As previously stated, testing will focus on controls implemented to determine if the design meets or exceeds the criteria for the selected Trust Principle(s) as defined by the AICPA.
<b>Testing Results</b>	CLA will document the results of testing and identify any exceptions. If exceptions are identified, the management of The State will have the opportunity to respond to the exception.
<b>Type 2 Report</b>	Upon completion of the controls testing, we will issue our independent service auditors’ report that provides reasonable assurance that the controls described are suitably designed as of the date defined by management.

Refer to *Engagement Deliverables* below describing our anticipated protocol for issuance of the service auditor’s report.





## Engagement Deliverable(s)

Deliverable	Description
<b>Readiness Assessment Report</b>	CLA will deliver a consulting report with the draft of our process flows and narratives based on our initial walkthroughs for the readiness assessment. This report will also include a listing of specific controls <sup>50</sup> to support the control objectives and any gaps noted.
<b>DRAFT Attestation Report</b>	CLA deliver a “final-quality” Draft Report to The State for review and acceptance. The result will be a report that is used as the basis for the attestation.
<b>Representation Letter</b>	Upon review and acceptance of the report by The State, a Representation Letter will be submitted to CLA indicating all statements and information provided during the control description and testing process were accurate.
<b>Quality Technical Review</b>	Prior to formal release of the report, the Quality Technical staff within CLA will review the final Draft Report approved by the organization including all supporting engagement documentation to ensure AICPA standards compliance.
<b>FINAL Attestation Report</b>	Upon successful review and resolution of issues identified during the quality technical review process, a formal release signature will be obtained indicating the report is ready to be issued in <i>Final</i> form and will be available for client distribution.
<b>Management Letter</b>	Any non-material exceptions that are identified during the controls validation or testing processes will be communicated to The State and Division management in a Management Letter. The Management Letter is intended to identify controls that could be implemented or strengthened to improve the control environment within the organization.

## Engagement Assumptions & Effort

Task/Item	Description
<b>Assumptions</b>	<p>CLA’s operating philosophy is to provide professional services of the highest quality at a fair value. Clients should expect us to conduct our engagements effectively by using an efficient approach that emphasizes quality and minimizes costs. We also believe that arrangements should be mutually satisfactory with respect to fees and are in the best interest of both our clients and CLA.</p> <p>As a result, the fee estimate is based on the following assumptions that were used to calculate hours of effort:</p> <ul style="list-style-type: none"> <li>• Scope of reporting is based on the control objectives listed in the following table.</li> <li>• Subservice organization(s) have a SOC report that can be relied upon by CLA.</li> <li>• Relationships with other vendors will be excluded from the scope under the “carve out” method.</li> <li>• Readiness assessment and attestation work will require a minimum of one (1) on-site trip to The State’s primary facility for each phase.</li> <li>• The State will provide access to key personnel to assist with assessment of controls and performance of testing activities consistent with the agreed upon project schedule.</li> <li>• Technical testing will be performed remotely to the extent possible and practical.</li> </ul>



Task/Item	Description
<b>Estimated Effort</b>	<u>Overview</u> Effort associated with SOC engagements vary based on scope, complexity of the organization's operating environment, maturity of controls and other factors. More specifically, hours of effort associate with a SOC1 engagement are based on control activities that support the organizations control objectives.

### Example of Control Objectives

Our procedures will include an overview of entity level controls such as organizational structure, monitoring and communication controls, risk assessment activities, and human resource processes. The period of review for our engagement would be based on the requirements from user organizations. A few suggested control objectives to consider for our report/opinion are:

#### Considerations and Suggestions for Co-Development of Control Objectives

<b>Organizational Management and Risk Assessment</b>	Controls provide reasonable assurance that management identifies and assess risks and provides oversight, develops policies and standards of conduct, and a structure for carrying out internal controls.
<b>Logical and Physical Access</b>	Controls provide reasonable assurance that security measures are in place around sensitive data and logical access to programs, data, and computer resources is restricted to authorized and appropriate users.
<b>Change Management</b>	Controls provide reasonable assurance that changes to applications, operating systems, and hardware are authorized, tested, approved, and monitored.
<b>Computer Operations</b>	Controls provide reasonable assurance that systems are monitored and deviations, problems and errors are identified, tracked, recorded and resolved in a complete, accurate and timely manner.
<b>Incident Response</b>	Controls provide reasonable assurance that information security related incidents are identified, documented, escalated, and reported according to organizational policy.
<b>Backup, Recovery, and Job Scheduling</b>	Controls provide reasonable assurance that scheduled jobs and data backups are processed in a complete, accurate, and timely manner, and that backups and are available for restoration in the event of processing errors or unexpected processing interruptions.

Please note that our Control Objectives would be jointly developed based on the above outline with management. They would not, however, be limited or restricted to the parameters and suggestions listed above, as areas such as product development, cross trading, managing proprietary accounts, account performance, IRS rules, fee calculation and billing may also be included.



## Use of Computer Assisted Audit Techniques

One of CLA's advantages is access to advanced audit tools and technology. Throughout the audit we may employ the use of Computer Assisted Audit Techniques (CAATs) to increase efficiency and effectiveness. The key CAATs that we will use include:

- **Interactive Data Extraction and Analysis (IDEA)** – IDEA is a statistical data analysis tool that has the ability to import data from virtually any data source or file type, with no limitations on the size of the data files that can be examined. IDEA utilizes powerful, built-in tools designed for the performance of audits and fraud investigations, providing the ability to:



- Statistically sample, summarize, stratify and/or perform an aging of large data sets
- Compare, join, append or otherwise manipulate multiple, related populations of data
- Identify gaps or duplicates in record sequences
- Extract subsets of data using a variety of criteria or filters
- Build reports and graphs to summarize testing results

- **FX Engagement** – FX Engagement is our “paperless” audit product. This product allows us to file and save all of our audit workpapers in an electronic storage capacity; allowing our firm to save time and resources associated with maintaining and storing paper files. FX Engagement also boasts a trial balance software program, which is utilized to produce financial statements, lead schedules, and allows us to perform trend analysis utilizing our clients’ trial balances.



- **A Program Generator (APG)** – In order to provide a uniform approach to all engagements, the firm requires the use of APG, a software program custom-written for CLA. This software package allows the tailoring of procedures, based on the requirements of your engagement. We have developed a customized CLA audit program, which effectively makes our audit processes paperless and will enhance our present electronic practices.

In an audit engagement, the primary use of APG is to take a standard audit program and modify, add, and delete procedures to create a program that has been specifically tailored to meet the needs of your engagement. Once tailored, the document can be completed electronically. Specific reports in addition to the basic program are generated to accommodate planning and review of your engagement. APG is an example of a technology tool that is designed to promote audit efficiencies. This software produces an industry-specific base program that is intended to encourage more thoughtful and specific tailoring. For an engagement to be effective in dealing with the risk of errors and efficient in avoiding riskless work, the engagement team will create a plan – the program – that contains the steps necessary to accomplish the goals of your engagement. Using APG is viewed as a thinking process, not just a documentation process.

- **Client Portal** – In addition to secure file transfer, clients can take advantage of a secure document portal to easily share documents and store files. This tool provides anytime, anywhere access to uploaded tax returns, financial statements and more from anywhere you have an Internet connection. Clients and CLA professionals can share and store confidential files in a secure environment. The portal has capacity for both long-term and transient file storage and provides access to all your documents in one place.
- **LeapFILE and Secure File Transfer Protocol** – CLA is committed to keeping client and member data secure. We utilize LeapFILE, a secure file transfer protocol (SFTP) software program, to receive and send encrypted files. LeapFILE allows us to transfer files to and receive files from our clients in a secure manner and keeps files with sensitive data out of our email boxes and hard drives.



### **Risk Assessment, Data Analytics and Review**

**CLA has created a unique data analytics approach and platform that puts our clients' needs first.** Our **Risk Assessment, Data Analytics and Review** ("RADAR") is a specific application of general ledger data analytics that has been implemented on audit engagements. RADAR is an innovative approach created and used only by CLA that aims to improve and replace the preliminary analytics that are currently being performed. Our RADAR application generally entails the following procedures:

- Expectations are captured through inquiry
- Electronic transaction level data of the general ledger is obtained; if an electronic format does not exist, transaction level detail should be obtain in hard copy format
- Completeness of the general ledger is tied out to the beginning and ending trial balances
- Analytics are performed to understand overall financial activity, gain insights around trends, identify activity of significance such as significant changes in account balances, etc.
- Insights gained from analytics are utilized during the preliminary risk assessment
- Data obtained for RADAR, along with an understanding of the internal control system, are used to design the substantive test work of significant accounts.

The CLA Data Analytics Methodology outlines general data analytic planning and development of expectations; these should always be considered by the practitioner. Below, is guidance for application of RADAR provided in the context of the six steps of the CLA Data Analytics Methodology including:

1. Planning,
2. Expectations,
3. Data Acquisition,
4. Technical Data Analysis,
5. Interpret Results and Risk Assessment, and
6. Response and Document.



### **Identification of Anticipated Potential Audit Problems**

In situations where authoritative guidance on a particular transaction or accounting issue is unclear or subject to interpretation, our approach is to proactively meet with management to discuss the issue and reach a conclusion that is hopefully agreed upon by both parties. We do not have specific "firm policies" that dictate our conclusions to be reached on all complex accounting issues. Rather, each issue must be evaluated independently by our engagement team. As discussed above, we will not only meet internally, but also facilitate discussion with the State's management team in order to obtain a mutual understanding of the particular accounting issue, determine the applicable authoritative guidance that most closely relates to the issue, and strive to reach a solution agreed upon by both parties. If there still remains any ambiguity or disagreement, we can explore other resources that could possibly assist, such as subject matter professionals within the Government Accounting Standards Board staff or GFOA or perhaps other municipalities who may have dealt with similar issues.



## GASB Insight Potentially Affecting Current and Future Audits

Our significant knowledge of technical issues and GASB pronouncements will be especially beneficial to the State. The below are recent issues and pronouncements which may have a future impact on the audits and financial statement of the State. We will proactively work with the State to address the reporting and auditing impact of each pronouncement or issue in advance of the implementation date.

GASB – Recent and Pending	
Description of Statement	Potential Impact on the State
<p><b>GASB Statement No. 75, Accounting and Financial Reporting for Postemployment Benefits Other Than Pensions</b> - This statement establishes new accounting and financial reporting requirements for governments whose employees are provided with OPEB, as well as for certain non-employer governments that have a legal obligation to provide financial support for OPEB provided to the employees of other entities.</p>	<p>This statement is effective for fiscal years beginning after June 15, 2017 and will have an impact on the State similar to that of GASB 68, requiring recording of the amount of the net unfunded actuarially computed OPEB liability.</p>
<p><b>GASB Statement No. 82, Pension Issues – an amendment of GASB Statements No. 67, No. 68, and No. 73</b> - The objective of this statement is to address certain issues that have been raised with respect to Statements No. 67, <i>Financial Reporting for Pension Plans</i>, and No. 68, <i>Accounting and Financial Reporting for Pensions</i>. Specifically, this Statement addresses issues regarding (1) the presentation of payroll-related measures in required supplementary information, (2) the selection of assumptions and the treatment of deviations from the guidance in an Actuarial Standard of Practice for financial reporting purposes, and (3) the classification of payments made by employers to satisfy employee (plan member) contribution requirements.</p>	<p>The Requirements of this statement are effective for reporting periods beginning after June 15, 2017. There should be minimal impact on the State’s financial statements or disclosures, therein.</p>
<p><b>GASB Statement No. 83, Certain Asset Retirement Obligations</b> – The objective of this statement is to provide guidance in recording and disclosing liabilities related to retirement obligations for certain tangible capital assets which have been permanently removed from service.</p>	<p>The Requirements of this statement are effective for reporting periods beginning after June 15, 2018. This statement will impact disclosures in the State’s financial statements to the extent of the occurrence of these types of capital asset retirement obligations.</p>
<p><b>GASB Statement No. 84, Fiduciary Activities</b> – The objective of this Statement is to improve guidance regarding the identification of fiduciary activities for accounting and financial reporting purposes and how those activities should be reported. It provides criteria for identifying fiduciary activities, identifies four types of fiduciary funds and provides reporting guidance. The four fiduciary fund types are pension (and other employee benefit) trusts, investment trust funds, private-purpose trust funds and custodial funds.</p>	<p>The Requirements of this statement are effective for reporting periods beginning after December 15, 2018. Implementation of this statement will require a change in terminology from agency funds to custodial funds</p>



## GASB – Recent and Pending

Description of Statement	Potential Impact on the State
<p><b>GASB Statement No. 85, Omnibus</b>— The objective of this statement is to provide guidance on certain practice issues which have arisen in the past year. Specifically, it addresses certain issues related to investment classification, component unit issues, classification of real estate held by insurance entities, and certain OPEB issues.</p>	<p>The Requirements of this statement are effective for reporting periods beginning after June 15, 2017. <b>Based on our preliminary review of this Statement, we do not believe it will impact your financial statements and related disclosures.</b></p>
<p><b>GASB Statement No. 86, Certain Debt Extinguishment Issues</b> – The primary objective of this Statement is to improve consistency in accounting and financial reporting for in-substance defeasance of debt by providing guidance for transactions in which cash and other monetary assets acquired with only existing resources—resources other than the proceeds of refunding debt—are placed in an irrevocable trust for the sole purpose of extinguishing debt. This Statement also improves accounting and financial reporting for prepaid insurance on debt that is extinguished and notes to financial statements for debt that is defeased in substance.</p>	<p>The Requirements of this statement are effective for reporting periods beginning after June 15, 2017. <b>Based on our preliminary review of this Statement, we do not believe it will impact your financial statements and related disclosures.</b></p>
<p><b>GASB Statement No. 87, Leases</b> – The objective of this Statement is to better meet the information needs of financial statement users by improving accounting and financial reporting for leases by governments. This Statement increases the usefulness of governments’ financial statements by requiring recognition of certain lease assets and liabilities for leases that previously were classified as operating leases and recognized as inflows of resources or outflows of resources based on the payment provisions of the contract. It establishes a single model for lease accounting based on the foundational principle that leases are financings of the right to use an underlying asset. Under this Statement, a lessee is required to recognize a lease liability and an intangible right-to-use lease asset, and a lessor is required to recognize a lease receivable and a deferred inflow of resources, thereby enhancing the relevance and consistency of information about governments’ leasing activities.</p>	<p>The Requirements of this statement are effective for reporting periods beginning after December 15, 2019. Based on our preliminary review of this Statement, the standard would require the State to record a liability and an intangible right-to-use lease asset for all non-current (greater than 12 months) leases. There would be little or no change in existing capital leases. The impact of recording the new liabilities on the State’s legal debt margins and coverage calculations would require review and discussion with the State legal, accounting and financial advisors.</p>

As of the date of this proposal, the GASB is in the midst of due process on the following projects that may affect the financial reports of the State in the future:

Future Pronouncements and Projects	
Description of Statement	Potential Impact on the State
<p><b>Revenue and Expense Recognition</b> - The objective of this project is to develop a comprehensive application model for the recognition of revenues and expenses that arise from nonexchange, exchange, and exchange-like transactions, including guidance for exchange transactions that has not been specifically addressed in the current literature.</p>	<p>Currently in the invitation to comment stage.</p>



Future Pronouncements and Projects

Description of Statement	Potential Impact on the State
<p><b>Conceptual Framework – Recognition and Measurement Approaches</b> – This project may affect financial statements in the future. The concepts being discussed include when to recognize transactions and on what basis to measure them (historical cost, fair value, etc.) It is speculated these two phases of an eventual concepts statement will lead to an updated financial reporting model.</p>	<p>Currently in the preliminary views redeliberation stage.</p>
<p><b>Financial Reporting Model</b> - The objective of the project is to make improvements to the financial reporting model including GASB Nos. 34, 35, 37, 41, 46 and Interpretation No. 6. The improvements would be to enhance the effectiveness of the model in providing information essential for decision-making, enhance the ability to assess a government’s accounting and address certain application issues.</p>	<p>Currently in the invitation to comment redeliberation stage.</p>
<p><b>Debt Disclosures, Including Direct Borrowing – Reexamination of Statements 34, 38 &amp; 62</b> - The primary objective of this project is to define debt, including direct borrowing, to distinguish it from other long-term liabilities in applying disclosure requirements for notes to financial statements. The project also will evaluate (1) whether the disclosures in notes to financial statements related to long-term debt also should be required for short-term debt and (2) whether additional disclosures for direct borrowings are essential to a user’s understanding of the basic financial statements.</p>	<p>Currently in the exposure draft redeliberations stage.</p>
<p><b>Equity Interest Ownership Issues</b> - This project will address certain issues related to the reporting of majority equity ownership in legally separate entities. The project will consider improvements to the existing guidance in Statement No. 14, <i>The Financial Reporting Entity</i>, on the presentation of ownership interest in a legally separate entity. The project also will consider improvements to the recognition and measurement guidance for wholly-owned legally separate entities that are presented as component units.</p>	<p>Currently in the exposure draft redeliberations stage.</p>
<p><b>Capitalization of Interest Cost</b> – The objective of this project is to reconsider the accounting and financial reporting standards for capitalization of interest cost, with the goal of enhancing the relevance of capital asset information and potentially simplifying financial reporting. In particular, the guidance will be reviewed in light of the definitions of financial statement elements now established in the GASB’s conceptual framework.</p>	<p>Currently in the exposure draft redeliberations stage.</p>
<p><b>Conduit Debt – Reexamination of Interpretation 2</b> – The objective of this project is to address certain issues related to accounting and financial reporting for conduit debt obligations. The project will consider improvements to the existing guidance in Interpretation No. 2, <i>Disclosure of Conduit Debt Obligations</i>, related to: (1) diversity in current reporting that adversely affects comparability</p>	<p>Currently in the initial deliberations stage.</p>



**We tailor the audit just for you** — We begin the audit with a thorough planning and preparation phase and culminate with the timely delivery of our reports. We will work with you immediately to coordinate and schedule the engagement to minimize any potential disruptions to your business. We would envision that we immediately begin our planning process upon receipt of a signed engagement letter. We will then work with you to finalize dates that accommodate your schedules. While our audit programs provide typical approaches for given audit areas, CLA tailors and designs a client-specific, risk-based audit approach. We don't follow a "cookie cutter" approach. We use custom, industry-tailored programs, procedures, and other tools that are designed specifically to focus on the issues that are applicable to public sector.

We explain exactly what we're doing and what we've found in plain, everyday language. We translate our findings into ideas on how you can address them. We believe our services are a contributing factor to better business and administrative practices. We gain a better understanding of your organization by working closely with your staff. This involvement enables us to offer you recommendations or suggestions for improvement in your systems and procedures that are more comprehensive, better understood, and more frequently implemented.

When performing an audit, we are sensitive and understanding of the fact that we report to those charged with governance. We maintain objectivity and independence in order to be able to issue our audit opinions. We will act within our philosophy of total client service, maintain the professional relationship refined with management, and fulfill our responsibilities with the utmost professionalism.





## ATTACHMENT B: MANDATORY SPECIFICATION CHECKLIST

### REQUEST FOR PROPOSAL Finance, DOA and RFP FAR140001

#### Attachment B: Mandatory Specification Checklist

*List mandatory specifications contained in Section 4, Subsection .5:*

**Section 4, Subsection 5.1:** The firm must be independent and licensed to practice in West Virginia.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 5.2:** The principal supervisory and management staff shall be certified public accountants with the required continuing professional education within the preceding two years. Once awarded, the Agency must be informed in writing of any changes in staffing at of the supervisory level and above. Also, the Agency retains the right to approve or reject replacements based upon their qualifications, experience, or performance.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 5.3:** The firm and its staff must meet the qualifications to perform audits in accordance with the requirements of the Single Audit Act of 1996, OMB Circular A-133, and Uniform Guidance.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 5.4:** The firm must have experience auditing other State governments. The firm must submit a list of State audits performed.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 5.5:** The subcontractors, contracted for any work related to the CAFR must have experience auditing other State Agencies with preference given to WV State agencies. The subcontractor must submit a list of State audits performed.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 5.6:** All subcontractors, contracted for any work related to the Single Audit must have experience performing audits in accordance with the requirements of the Single Audit Act of 1996, OMB Circular A-133, and Uniform Guidance.



# REQUEST FOR PROPOSAL

## Finance, DOA and RFP FAR140001

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 5.7:** The firm shall submit a copy of one (1) Single Audit and CAFR report issued in the last five (5) years.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 5.8:** The firm shall submit a copy of its most recent external quality control review report.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

**Section 4, Subsection 5.9:** All requirements must also be met by joint proposers.

**Vendor Response:** Due to limited space, we have provided our response on the following pages.

By signing below, I certify that I have reviewed this Request for Proposal in its entirety; understand the requirements, terms and conditions, and other information contained herein; that I am submitting this proposal for review and consideration; that I am authorized by the bidder to execute this bid or any documents related thereto on bidder's behalf; that I am authorized to bind the bidder in a contractual relationship; and that, to the best of my knowledge, the bidder has properly registered with any State agency that may require registration.

CliftonLarsonAllen LLP  
(Company)

Sean M. Walker, CPA, CFF, CGFM, CGMS, Principal  
(Representative Name, Title)

phone: 888-778-9588 / fax: 410-453-0014  
(Contact Phone/Fax Number)

April 17, 2018  
(Date)

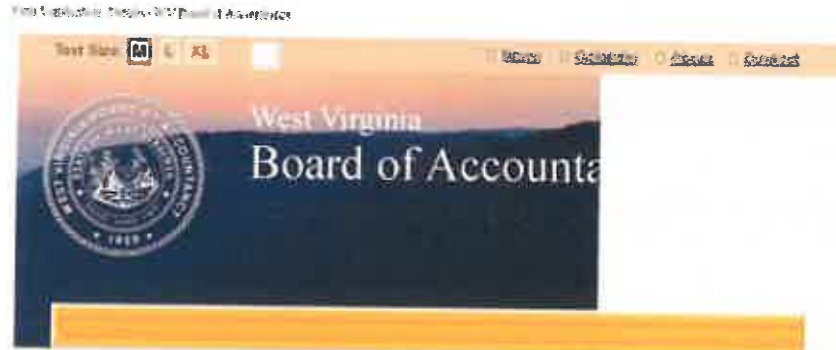


## Independence and License to Practice

(RFP Section 4, Subsection 5.1).

CLA is independent of the State as required by auditing standards generally accepted in the United States and the U.S. Government Accountability Office's *Government Auditing Standards*. Our firm-wide quality control policies and procedures foster strict compliance with these professional standards. In addition, the individuals assigned to your audit are independent of the State.

Furthermore, CLA is duly licensed to practice public accountancy in the state of West Virginia. A copy of our state license is provided below.



### Firm Verification: Details

Home | About | Verification

### Firm License Information

Firm Name	CLIFTONLARSONALLEN LLP
Address	220 S 6TH ST STE 500
City	MINNEAPOLIS
State	MN
Zip	55402
County	
Permit Number	F0367
Effective Date	07/31/2017
Current Status	Active
Expiration Date	08/30/2018

### Authorization to Perform Attest/Compilation Services

http://www.bsa.wv.gov/indoc.aspx?docid=820&id=2017-08-30-1735



## **Principal, Supervisory, and Management Staff**

*(RFP Section 4, Subsection 5.2)*

The principal, supervisory, and management staff are certified public accountants with the required continuing professional education within the preceding two years. If awarded, we understand we must inform the State of any changes in staffing at the supervisory level and above. We further understand the State retains the right to approve or reject replacements based upon their qualifications, experience or performance.

## **Single Audit Qualifications**

*(RFP Section 4, Subsection 5.3)*

CLA and all staff assigned to this engagement meet the qualifications to perform audits in accordance with the requirements of the Single Audit Act of 1996, OMB Circular A-133, and Uniform Guidance.

## **Experience Auditing State Governments**

*(RFP Section 4, Subsection 5.4)*

A complete listing of States audited by CLA has been provided in our proposal section titled, *Government Experience* on page 4.

## **Subcontractors**

*(RFP Section 4, Subsection 5.5)*

The CLA team will be assuming full responsibility for all services described in the RFP and therefore will not be using a subcontractor if awarded the contract.

## **Subcontractors Experience in Single Audit**

*(RFP Section 4, Subsection 5.6)*

The CLA team will be assuming full responsibility for all services described in the RFP and therefore will not be using a subcontractor if awarded the contract.

## **Sample Report**

*(RFP Section 4, Subsection 5.7)*

We have included a copy of a sample CAFR report and a sample Single Audit report issued in the last five years that is similar to the engagement described in this RFP in *Appendix B: Sample Reports*.



## External Quality Control Review Report

(RFP Section 4, Subsection 5.8)

The most recent peer review report we received a rating of *pass*, which is the most positive report a firm can receive. We are proud of this accomplishment and its strong evidence of our commitment to technical excellence and quality service. The full report is provided on the following page.

In addition to an external peer review, we have implemented an intensive internal quality control system to provide reasonable assurance that the firm and our personnel comply with professional standards and applicable legal and regulatory requirements. Our quality control system includes the following:

- A quality control document that dictates the quality control policies of our firm. In many cases, these policies exceed the requirements of standard setters and regulatory bodies. Firm leadership promotes and demonstrates a culture of quality that is pervasive throughout the firm's operations. To monitor our adherence to our policies and procedures, and to foster quality and accuracy in our services, internal inspections are performed annually.
- Quality control standards as prescribed by the AICPA. The engagement principal is involved in the planning, fieldwork, and post-fieldwork review. In addition, an appropriately experienced professional performs a risk-based second review of the engagement prior to issuance of the reports.
- Hiring decisions and professional development programs designed so personnel possess the competence, capabilities, and commitment to ethical principles, including independence, integrity, and objectivity, to perform our services with due professional care.
- An annual internal inspection program to monitor compliance with CLA's quality control policies. Workpapers from a representative sample of engagements are reviewed and improvements to our practices and processes are made, if necessary, based on the results of the internal inspection.
- Strict adherence to the AICPA's rules of professional conduct, which specifically require maintaining the confidentiality of client records and information. Privacy and trust are implicit in the accounting profession, and CLA strives to act in a way that will honor the public trust.
- A requirement that all single audit engagements be reviewed by a designated single audit reviewer, thereby confirming we are in compliance with the standards set forth in OMB *Uniform Guidance*.





### System Review Report

To the Principals of CliftonLarsonAllen LLP  
and the AICPA National Peer Review Committee

We have reviewed the system of quality control for the accounting and auditing practice of CliftonLarsonAllen LLP (the "firm") applicable to engagements not subject to PCAOB permanent inspection in effect for the year ended July 31, 2016. Our peer review was conducted in accordance with the Standards for Performing and Reporting on Peer Reviews established by the Peer Review Board of the American Institute of Certified Public Accountants. As a part of our peer review, we considered reviews by regulatory entities, if applicable, in determining the nature and extent of our procedures. The firm is responsible for designing a system of quality control and complying with it to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. Our responsibility is to express an opinion on the design of the system of quality control and the firm's compliance therewith based on our review. The nature, objectives, scope, limitations of, and the procedures performed in a System Review are described in the standards at [www.aicpa.org/prsummary](http://www.aicpa.org/prsummary).

As required by the standards, engagements selected for review included engagements performed under *Government Auditing Standards*, audits of employee benefit plans, audits performed under FDICIA, and examinations of service organizations (Service Organizations Control (SOC) 1 and SOC 2 engagements).

In our opinion, the system of quality control for the accounting and auditing practice of CliftonLarsonAllen LLP applicable to engagements not subject to PCAOB permanent inspection in effect for the year ended July 31, 2016, has been suitably designed and complied with to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. Firms can receive a rating of pass, pass with deficiency(ies) or fail. CliftonLarsonAllen LLP has received a peer review rating of pass.

*Cherry Bekaert LLP*

Cherry Bekaert LLP  
November 21, 2016

### Requirements Met by Joint Proposers

(RFP Section 4, Subsection 5.9)

The CLA team will be assuming full responsibility for all services described in the RFP and therefore will not be using a subcontractor if awarded the contract.



# APPENDIX

## A. Engagement Team Resumes



## Sean M. Walker, CPA, CFE, CGFM, CGMS

CliftonLarsonAllen LLP

Principal

### Profile

Sean is the Eastern Region State and Local Government leader and has been serving public sector clients since 1999. He is **one of the few practitioners within the governmental auditing field that currently serves as a principal on a state-wide financial and single audit**. Sean specializes in providing accounting, financial auditing, and consulting to large and complex governmental audit engagements. Sean is involved in the government industry on a national basis. He is a frequent speaker on government accounting, auditing, and single audits for professional associations around the country. He also serves as a consulting technical partner on CLA's clients on government accounting and auditing, including OMB Uniform Guidance.



### Technical Experience

- Audits of States and State Agencies
- Leads financial and single audits of state and local clients
- Consulting technical principal on CliftonLarsonAllen's clients on government accounting and auditing including OMB Uniform Guidance
- Designated the firm's audit quality partner for the AICPA's Government Audit Quality Center's membership

### Education/Professional Involvement

- Bachelor's of business administration in accounting from University of Wisconsin – Milwaukee
- Master's of business administration from Concordia University, Wisconsin
- Certified Public Accountant
- Certified Fraud Examiner
- Certified Government Financial Manager
- Certified Grants Management Specialist
- American Institute of Certified Public Accountants
- Maryland Association of Certified Public Accountants
- GFOA Special Review Committee for the Certificate of Achievement for Excellence in Finance Reporting Program
- National Grant Management Association
- Association of Government Accountants
- Maryland Government Finance Officers Association
- Association of Local Governmental Auditors
- Institute of Internal Auditors
- Rotary Club of Frederick, Maryland
- Board Chair, WTMD 89.7
- AICPA State and Local Government Expert Panel – Past Member
- AICPA Government Audit Quality Center Executive Committee – Past Member
- AICPA National Governmental Accounting and Auditing Conference Planning Committee – Past Member



### ***Key Relevant Clients***

- State of Delaware
- State of Kansas
- State of New Jersey
- Commonwealth of Pennsylvania
- State of Kansas, Department Of Transportation
- City of Rockville, Maryland
- Montgomery County, Maryland
- Prince George's County, Maryland
- Baltimore County, Maryland
- Howard County Housing Commission, Maryland
- City of Milwaukee, Wisconsin



## William A. Early, Jr., CPA

CliftonLarsonAllen LLP

Principal



### Profile

Bill has over 20 years of experience and is **one of the few practitioners within the governmental auditing field that currently serves as a partner on a state-wide financial and single audit.** In addition, he serves as the engagement principal and quality review principal for a wide range of large, complex governmental audit engagements. He has extensive experience specializing in government audits and assisting clients in increasing the efficiency of their operations. During his career of more than 20 years, Bill has developed a specialty for state and local government audit and accounting services. He is also well versed in OMB Uniform Guidance compliance audits, and has managed, planned, and performed single audits for a variety of governmental agencies.

Within CLA, Bill is one of the principals responsible for client relationships, work quality, and staff development. He serves on the public sector leadership team for the firm as the leader of the State and State agencies sub-niche. Bill brings innovative ideas coupled with practical experience to the firm's governmental clients so they can stay apprised of new accounting pronouncements, state laws, fiscal trends and best practices. His personal approach to client service includes frequent communication with his clients and a genuine concern for their best interests. They know that whatever the problem, Bill will be there to get them through.

Bill has assisted governmental clients in obtaining and retaining the *GFOA Certificate of Achievement for Excellence in Financial Reporting* award. He also routinely presents at the annually and quarterly conferences the Association of School Business Officials of Maryland and Washington, DC and the Maryland GFOA.

### Technical Experience

- Audits of States and State Agencies
- Assists governmental clients in obtaining and retaining the GFOA Certificate of Achievement for Excellence in Financial Reporting award
- Provides risk assessment consulting services to governmental clients
- Provides consulting services to state and local governments with regards to the implementation of accounting pronouncements and internal controls
- Assists with agreed upon procedures involving internal audit outsourcing, compliance engagements and general consulting
- Throughout his career, Bill has worked with HUD activities on numerous engagements related to housing authorities and municipalities and understands the requirements of HUD

### Education/Professional Involvement

- Bachelors of science in accounting from Salisbury State University, Salisbury, Maryland
- Associates of science in business management from Salisbury State University, Salisbury, Maryland
- Certified Public Accountant
- American Institute of Certified Public Accountants
- Maryland Association of Certified Public Accountants
- Maryland Government Finance Officers Association, Board Member
- Government Finance Officers Association

- Salisbury University Accounting Advisory, Board Member
- South Carolina Government Finance Officers Association

**Key Relevant Clients**

- State of South Carolina
- State of Delaware
- Commonwealth of Pennsylvania
- State of Mississippi Department of Education
- New Jersey Housing and Finance Mortgage Agency
- Harford County, Maryland
- New Castle County, Delaware
- City of Newark, Delaware
- Montgomery County, Maryland Public Schools
- Howard County, Maryland Public Schools



## James P. Kreiser, CISA, CRMA, CFSA

### CliftonLarsonAllen LLP

Principal, Business Risk and IT Services



#### **Profile**

Jim is a Principal in the CliftonLarsonAllen LLP (CLA) Specialized Advisory Services group. He has 20 years of professional services experience in providing consulting and advisory services. Jim spent 10 years of his experience working at a Big 4 firm in their Business Risk and Technical Risk Services groups. His experience also includes internal audit roles at CitiBank, AMP, and Capital BlueCross. Jim has held roles of Chief Risk Officer, General Auditor, and others. His focus has primarily been in the governmental sector, healthcare, and financial institutions. At CLA, Jim has focused on clients particularly on consulting, internal audit, and third-party reporting services.

#### **Technical Expertise**

Jim's experience includes managing and leading projects, which include engagements related to outsourced and co-sourced internal auditing, IT audit, third-party reviews and performance audits, enterprise risk management processes, IT security and auditing services, SSAE 16 reporting (SOC 1 and SOC2), operational improvements, process solutions and implementation for those solutions across the organization.

His primary focus for the firm is in the Public Sector Group (State and Local Government, Higher Education, and Non-Profit organizations).

His service expertise is Business Risk, IT, and Internal Audit services. Specific experience includes, but is not limited to, the following:

- Internal audit outsourcing and co-sourcing, including information technology, financial, performance audits, and operational audits.
- IT Security and Risk Consulting
  - Enterprise-wide risk assessments.
  - IIA Quality Assurance Reviews (QAR)
  - Vendor Management and Implementation Assessment
  - Compliance related activities and benchmarking
  - Presentations and Training; including speaking at various conferences/professional organizations on IT controls, Security, ERM, and third-party reporting, and risk management.

#### **Education/Professional Involvement**

- Bachelor of Science from Carnegie Mellon University
  - BS of Managerial Economics
  - BS of Philosophy
- Certified Information Systems Auditor
- Certified in Risk Management Assurance
- Certified Financial Services Auditor



## Keith F. Novak, CPA

CliftonLarsonAllen LLP

Principal



### **Profile**

Keith has over 35 years of experience and is **one of the few practitioners within the governmental auditing field that currently serves as a partner on a state-wide financial and single audit.** He is a widely known and recognized leader with extensive experience serving state and local government agencies. Keith is the supervising audit principal or concurrent review principal for some of CLA's largest state and local government clients. Keith has served state and local government clients throughout his career, and he is very familiar with the challenges and unique characteristics of the public sector.

A thought leader in the changing world of governmental accounting standards, Keith is known for his involvement with proposed new accounting pronouncements and his understanding of the principles that underlie the various accounting rules and procedures. Over the years, Keith has been closely involved with his client's efforts to understand and implement rapidly changing accounting principles.

### **Technical Experience**

Within CLA, Keith is the one of the leaders for the state and local government practice, as well as the technical leader for the Baltimore assurance practice. Due to Keith's significant contributions to the field of government financial management, he was the recipient of the AGA's 2010 Private Sector Financial Excellence Award. Keith was also invited to join and participated in the Single Audit Task Force formed by the AICPA to address single audit quality issues.

### **Education/Professional Involvement**

- Bachelor's of science in accounting from University of Maryland
- Certified Public Accountant
- American Institute of Certified Public Accountants
- Maryland Association of Certified Public Accountants
- Maryland Government Finance Officers Association – Board Member
- Government Finance Officers Association (GFOA) of the United States and Canada
- Better Business Bureau of Greater Maryland – Treasurer/Director

### **Speaking engagements**

Keith is an active speaker on governmental accounting and auditing issues throughout the Northeast and Mid-Atlantic regions. For example, he is frequently requested to speak to professional organizations including the Maryland Association of Certified Public Accountants, Maryland Government Finance Officers Association, Central PA Chapter of the AGA, and internally for CLA

### **Key Relevant Clients**

- Commonwealth of Pennsylvania
- State of South Carolina
- State of Delaware
- Baltimore County, Maryland,
- Montgomery County, Maryland
- Arlington County, Virginia



## Cheri King, CPA

CliftonLarsonAllen LLP

Engagement Director



CliftonLarsonAllen



### Profile

Cheri has more than 15 years of experience specializing in government audits and assisting clients in identifying ways to strengthen their internal controls and achieve operational efficiencies. Cheri has developed a specialty for state and local government audit, accounting and consulting services and has extensive experience with auditing boards of education. She is also well versed in single audits, and has managed, planned and performed single audits for a variety of governmental agencies.

Cheri serves as a consultant for many governmental clients in the implementation of new accounting standards to ensure standards are implemented correctly and clients obtain and retain the GFOA Certificate of Achievement for Excellence in Financial Reporting Award. Prior to joining CLA, Cheri was an internal auditor with Baltimore County, Maryland where she gained experience in reviewing and evaluating internal accounting controls and performed budget analysis of County agencies.

### Technical Experience

- State and local government
- Nonprofit entities

### Education/Professional Involvement

- Bachelors of business administration in finance from James Madison University
- Bachelors of science in accounting from the University of Maryland, College Park
- Certified Public Accountant
- American Institute of Certified Public Accountants, Member
- Maryland Association for Certified Public Accountants, Member
- Government Finance Officers Association, Member
- Maryland Government Finance Officers Association, Member

### Key Relevant Clients

- Commonwealth of Pennsylvania
- Montgomery County, Maryland
- Baltimore County, Maryland
- Frederick County, Maryland
- Howard County, Maryland Public Schools
- Montgomery County, Maryland Public Schools
- Carroll County, Maryland Public Schools
- Baltimore County, Maryland Public Schools



## Jordan Boehm, CPA

CliftonLarsonAllen LLP

Manager



### Profile

Jordan has been a member of the CLA Public Sector Team for six years with an industry focus of governmental entities. He has worked on numerous clients ranging from small rural communities, large metropolitan cities, and state governments. Jordan focuses specifically on the challenges that face governmental entities and assisting them in meeting those challenges through an array of capabilities including assurance, compilation, outsourcing, and advisory services. These services are specifically tailored to the needs of the entities to ensure that the approach is customized to achieve the best possible outcome.

### Technical Experience

- Responsible for the performance of financial statement audits, Uniform Guidance audits, State of Wisconsin Single Audits, Wisconsin State Statute 66.1105 Tax Increment District audits, preparation of comprehensive annual financial reports and other financial statements, preparation of the State of Wisconsin Public Service Commission Water and Electric Utility reports, and preparation of the State of Wisconsin Form C and Form CT.
- A member of the CLA Audit Innovation Team that assists in the maintenance and improvement of the CLA Audit Methodology.
- Technical speaker for the Wisconsin Government Finance Officers Association (WGFOA).

### Education/Professional Involvement

- Bachelor of business administration, accounting, finance, University of Wisconsin-Milwaukee
- Certified Public Accountant, Wisconsin
- American Institute of Certified Public Accountants
- Wisconsin Institute of Certified Public Accountants
- Government Finance Officers Association
- Wisconsin Government Finance Officers Association
- Nonprofit Center of Milwaukee, Finance Committee Member
- Vince Lombardi Cancer Foundation, Past Speaker and Volunteer

### Key Relevant Clients

- State of New Jersey (Single Audit)
- City of Milwaukee, Wisconsin (CAFR and Single Audit)
- State of Wisconsin (Consulting)



## Joel Eshelman, CISA, CIA

CliftonLarsonAllen LLP

IT Engagement Director



### Profile

Joel is an engagement director within the Specialty Advisory Services group and has more than 17 years of experience and is a leader of information technology audit and attestations teams serving assurance clients. His experience includes six years with CliftonLarsonAllen and five years with a Big 4 firm performing information technology, business process and control, and third-party reporting reviews. Additionally, he has extensive experience with internal control assessments within financial institutions. Joel is responsible for managing the performance and reporting of SSAE 16, previously SAS 70, in a wide range of industries; including financial institutions, government services, healthcare, data center operations, and call center hosting. Beyond his experience in third-party reporting, Joel has experience with assessing internal controls in student loan agencies, state and local government units, financial institutions, and higher education institutions.

### Technical Experience

- Led SSAE 16, previously SAS 70, engagements for Xerox, Pennsylvania Municipal Retirement System, Linebarger Goggan Blair & Sampson, Interactive Intelligence, Viverea, among others.
- Led internal controls assessments, both business process and information technology, for New Jersey Higher Education Student Assistance Authority, Pennsylvania State System of Higher Education, West Virginia Higher Education Policy Commission, Haverford College, State of Pennsylvania, and Maryland Transportation Authority.
- Assisted clients with SAP system design implementations in the government, manufacturing, and entertainment industries, specifically working with implementation of continuous control monitoring tools.
- Has significant experience in effectively coordinating and directing complex projects confirming completion with strict regard for client specifications, time and budgetary constraints and the development of numerous risk services offerings including:
  - SSAE16 (formally known as SAS70) assurance engagements
  - ERP controls assessments and utilizations
  - Developed procedures for the evaluation of information technology controls in support of a financial audit and service organization reporting
  - Served as the project manager for information technology (IT) control audits, service organization audits, business advisory projects, internal audit projects, and data analytics
  - Current state assessments, including inefficiency and process improvement identification
  - Future state design and process reengineering and implementation
  - Application of Control Objectives for Information and Related Technology (COBIT) guidelines as published by the Information Systems Audit and Control Association (ISACA)

### Education/Professional Involvement

- Bachelor of Science, Accounting, York College of Pennsylvania
- Certified Information Security Auditor (CISA)
- Certified Internal Auditor (CIA)





## Phillip (Phil) Del Bello, CISA

CliftonLarsonAllen LLP

IT Manager



### Profile

Phil is a Manager in the CliftonLarsonAllen LLP (CLA) Business Risk and IT Services group. He has over 6 years of professional services experience with assurance, consulting, and advisory engagements. His primary industry focus is CLA's Public Sector Group, which includes counties, municipalities, higher education, K-12 school systems, and non-profit organizations.

### Technical Experience

Phil is a Certified Information Systems Auditor with expertise in the areas of SSAE16 reporting (SOC1 and SOC2), IT/application control assessments, risk assessment, Enterprise Risk Management (ERM), IT compliance and gap assessments, IT general controls review, business process improvement, and consulting. Specific experience includes, but is not limited to, the following:

- Performing SSAE16 (SOC1 and SOC2) engagements for population health management systems, healthcare data interface systems, Medicaid claims processing organizations, toll processing facilities, data and image processing organizations, employee verification servicers, tax outsourcing systems, and online saving systems. He has led both SOC1 and SOC2 engagements for various sized organizations, and has a detailed understanding of the SOC reporting requirements.
- Executed all phases on IT audit engagements, which includes risk based planning techniques, evaluating business process and IT general controls, and reporting to executive management. He has completed IT audit projects related to Enterprise Resource Planning (ERP) system conversions and system upgrades, business continuity and disaster recovery planning, vulnerability assessments, virtualization, logical access and security, system and application change management, physical access and environmental controls, backup and recovery processes, and policy/compliance reviews.
- Leading IT general controls and application reviews that assist financial audits in reducing the amount of substantive testing required.

### Education/Professional Involvement

- Bachelor of Business Administration in Accounting from Loyola University Maryland
- Certified Information Systems Auditor
- Certified Public Accountant
- Information Systems Audit and Control Association (ISACA) – Baltimore Chapter Member
- Institute of Internal Auditors (IIA) – Baltimore Chapter Member



## B. Sample Reports





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# CliftonLarsonAllen

## INDEPENDENT AUDITORS' 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

The Honorable Governor and  
Honorable Members of the State Legislature  
State of XXXX

We have audited the financial statements of the governmental activities, the business-type activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the State of XXXX (the State), as of and for the year ended June 30, 2017, and the related notes to the financial statements, which collectively comprise the State's basic financial statements and have issued our report thereon dated December 22, 2017. We conducted our audit in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to the financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our report includes a reference to other auditors who audited the financial statements of certain agencies and component units of the State of XXXX, which represent the indicated percent of total assets and deferred outflows of resources, net position/ fund balance, and total revenues as described in our report on the State's financial statements and as presented in the following tables. This report does not include the results of the other auditors' testing of internal control over financial reporting or compliance and other matters that are reported on separately by those other auditors. The financial statements of the XXXX Sustainable Energy Utility, XXXX State University and the Riverfront Development Corporation of XXXX were not audited in accordance with *Government Auditing Standards* and accordingly this report does not include reporting on internal control over financial reporting or instances of reportable noncompliance associated with the XXXX Sustainable Energy Utility, XXXX State University and the Riverfront Development Corporation of XXXX.

Percentage Audited by  
Other Auditors

	Percentage Audited by Other Auditors		
	Assets and Deferred Outflows of Resources	Revenues	Net Position/ Fund Balance
Governmental Activities	0%	0%	1%
Business-type Activities	97%	94%	98%
Discretely Presented Component Units	85%	75%	90%
General Fund	2%	0%	6%
Lottery Fund	100%	100%	100%
DelDOT Fund	100%	100%	100%
Aggregate Remaining Fund Information	95%	82%	98%

### Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the State's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the



(1)



The Honorable Governor and  
Honorable Members of the State Legislature  
State of XXXX

circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the State's internal control. Accordingly, we do not express an opinion on the effectiveness of the State's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that have not been identified. However, as described in the accompanying schedule of findings and responses, we identified certain deficiencies in internal control that we consider to be material weaknesses and significant deficiencies.

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. We consider the deficiency listed at 2017-001 in the accompanying schedule of findings and responses to be a material weakness.

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. We consider the deficiencies listed as 2017-002 and 2017-003 in the accompanying schedule of findings and responses to be significant deficiencies.

#### Compliance and Other Matters

As part of obtaining reasonable assurance about whether the State'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*.

#### State of XXXX's Response to Findings

The State's responses to the findings identified in our audit are described in the accompanying schedule of findings and responses. The State's responses were not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on them.

#### 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 result of that testing, and not to provide an opinion on the effectiveness of the State'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 State's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

CliftonLarsonAllen LLP

Baltimore, Maryland  
December 22, 2017

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## CliftonLarsonAllen

### INDEPENDENT AUDITORS' 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 THE UNIFORM GUIDANCE

The Honorable Governor and  
Honorable Members of the State Legislature  
State of XXXX

#### Report on Compliance for Each Major Federal Program

We have audited the State of XXXX's (the State) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of the State's major federal programs for the year ended June 30, 2017. The State's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

The State's basic financial statements include the operations of the XXXX State Housing Authority, Diamond State Port Corporation, Riverfront Development Corporation, XXXX State University, XXXX Charter Schools and XXXX Agricultural Lands Preservation Foundation, which may have received federal awards, and which are not included in the State's schedule of expenditures of federal awards for the year ended June 30, 2017. Our audit, described below, did not include the operations of the XXXX State Housing Authority, Diamond State Port Corporation, Riverfront Development Corporation, XXXX Charter Schools, and XXXX Agricultural Lands Preservation Foundation because other auditors were engaged to perform audits (when required) in accordance with the Uniform Guidance. We were separately engaged to perform, and we have separately reported on the results of our audit of the XXXX State University in accordance with Uniform Guidance.

#### Management's Responsibility

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

#### Auditors' Responsibility

Our responsibility is to express an opinion on compliance for each of the State'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 the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance 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 State's compliance with those



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The Honorable Governor and  
 Honorable Members of the State Legislature  
 State of XXXX

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 State's compliance.

**Basis for Qualified Opinions**

As described in the accompanying schedule of findings and questions costs, the State did not comply with the requirements regarding:

Program	CFDA Number	Non-Compliance	Finding Number
Aging Cluster	93 044, 93 045, 93 053	Reporting – SF-425 Federal Financial Report	2017-008
Social Security – Disability Insurance	98 001	Special Tests and Provisions – Consultative Examinations	2017-016

Compliance with such requirements is necessary, in our opinion, for the State to comply with the requirements applicable to that program.

**Qualified Opinions**

In our opinion, except for the noncompliance described in the Basis for Qualified Opinions paragraph, the State 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 the programs for the year ended June 30, 2017.

**Unmodified Opinion on Each of the Other Major Federal Programs**

In our opinion, the State 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 other major federal programs identified in the summary of the auditors' results section of the accompanying schedule of findings and questioned costs for the year ended June 30, 2017.

**Other Matters**

The results of our auditing procedures disclosed instances of noncompliance, which are required to be reported in accordance with the Uniform Guidance and which are described in the accompanying schedule of findings and questioned costs as items 2017-004, 2017-005, 2017-006, 2017-007, 2017-009, 2017-010, 2017-011, 2017-012, 2017-013, 2017-014, 2017-015, 2017-017 and 2017-018. Our opinion on each major federal program is not modified with respect to these matters.

The State's responses to the noncompliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs. The State's responses were not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the responses.



The Honorable Governor and  
Honorable Members of the State Legislature  
State of XXXX

#### Report on Internal Control Over Compliance

Management of the State 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 State'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 the Uniform Guidance, 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 State's internal control over compliance.

Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we identified certain deficiencies in internal control over compliance that we consider to be material weaknesses and significant deficiencies.

*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. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 2017-008, 2017-016, and 2017-017 to be material weaknesses.*

*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. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 2017-004, 2017-005, 2017-008, 2017-007, 2017-009, 2017-010, 2017-011, 2017-012, 2017-013, 2017-014, 2017-015, and 2017-018 to be significant deficiencies.*

The State's responses to the internal control over compliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs. The State's responses were not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the responses.

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 the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

#### Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

We have audited the financial statements of State of XXXX as of and for the year ended June 30, 2017, and have issued our report thereon dated December 22, 2017, which contained an unmodified opinion on those financial statements. Our audit was conducted for the purpose of forming opinions on

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The Honorable Governor and  
Honorable Members of the State Legislature  
State of XXXX

the financial statements that collectively comprise the basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the basic 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 basic 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 basic financial statements or to the basic 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 basic financial statements as a whole.

CliftonLarsonAllen LLP

Baltimore, Maryland  
March 26, 2018

SAMPLE

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## INDEPENDENT AUDITORS' REPORT

The Honorable Governor and  
Honorable Members of the State Legislature  
State of XXXX

### Report on the Financial Statements

We have audited the accompanying financial statements of the governmental activities, the business-type activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the State of XXXX (the State), as of and for the year ended June 30, 2017, and the related notes to the financial statements, which collectively comprise the State's basic financial statements as listed in the table of contents.

### Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

### Auditors' Responsibility

Our responsibility is to express opinions on these financial statements based on our audit.

We did not audit the financial statements of certain agencies and component units of the State, which represent the indicated percent of total assets and deferred outflows of resources, total net position and fund balance, and total revenues as presented in the table below. Those financial statements were audited by other auditors, whose reports thereon have been furnished to us, and our opinion, insofar as it related to the amounts included for those funds and component units, is based solely on the reports of the other auditors.

	Percentage Audited by Other Auditors		
	Assets and Deferred Outflows of Resources	Revenues	Net Position/ Fund Balance
Governmental Activities	0%	0%	1%
Business-type Activities	97%	94%	96%
Discretely Presented Component Units	85%	75%	90%
General Fund	2%	0%	6%
Lottery Fund	100%	100%	100%
DeIDOT Fund	100%	100%	100%
Aggregate Remaining Fund Information	95%	82%	98%



The Honorable Governor and  
Honorable Members of the State Legislature  
State of XXXX

We conducted our audit in accordance with 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. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement. The financial statements of XXXX Sustainable Energy Utility, XXXX State University and the Riverfront Development Corporation of XXXX were not audited in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

#### **Opinions**

In our opinion, based on our audit and the reports of other auditors, the financial statements referred to above present fairly, in all material respects, the respective financial position of the governmental activities, the business-type activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the State as of June 30, 2017, and the respective changes in financial position and, where applicable, cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

#### **Other Matters**

##### **Required Supplementary Information**

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis and required supplementary information as listed in the accompanying table of contents (collectively referred to as RSI) be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We and other auditors have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.



The Honorable Governor and  
Honorable Members of the State Legislature  
State of XXXX

*Other Information*

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the State's basic financial statements. The introductory section, supplementary information and statistical section are presented for purposes of additional analysis and are not a required part of the basic financial statements.

The supplementary information, as listed in the table of contents, is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, based on our audit and the report of other auditors, the supplementary information is fairly stated, in all material respects, in relation to the basic financial statements as a whole.

The introductory section and statistical section has not been subjected to the auditing procedures applied in the audit of the basic financial statements, and accordingly, we do not express an opinion or provide any assurance on it.

*Other Reporting Required by Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated December 22, 2017, on our consideration of the State's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the result of that testing, and not to provide an opinion on the effectiveness of the State's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the State's internal control over financial reporting and compliance.

**CliftonLarsonAllen LLP**

Baltimore, Maryland  
December 22, 2017



### C. Continuing Professional Education Details



Sean Walker, CPA

Program name	Completion date	Sponsor	Total Hours
CLA Commonwealth of PA – January Training	1/23/2018	CliftonLarsonAllen LLP	1.0
CLA Commonwealth of PA – January Training	1/23/2018	CliftonLarsonAllen LLP	6.0
Owner Promise Meeting 2018	1/13/2018	CliftonLarsonAllen LLP	10.5
Assurance Quarterly Update - January 2018	1/8/2018	CliftonLarsonAllen LLP	2.0
CLA Implementing the Green Book	12/7/2017	CliftonLarsonAllen LLP	1.0
BONDS AND THE BOND MARKET	12/7/2017	CliftonLarsonAllen LLP	1.0
FRAUD AND RELATED AP SCHEMES	12/7/2017	CliftonLarsonAllen LLP	1.0
CLA GASB Update	12/7/2017	CliftonLarsonAllen LLP	1.0
Independence and Ethics 2017	11/17/2017	CliftonLarsonAllen LLP	2.0
NEW JERSEY LAW AND ETHICS WEBINAR	11/15/2017	NJCPA	4.0
Auditor's Response to the Fraud Risk Assessment	10/7/2017	Checkpoint Learning	4.0
2017 NASACT ANNUAL CONFERENCE	8/16/2017	NASACT	9.5
August 2017 Assurance Update (Webcast)	8/7/2017	CliftonLarsonAllen LLP	2.0
CLA 2017 Government Training Academy	7/21/2017	CliftonLarsonAllen LLP (NASBA #108081)	3.0
Making Connections: The 2017 Regulated Industry Conference PSG breakout	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	7.0
Making Connections: The 2017 Regulated Industry Conference General Sessions	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	6.0
Making Connections: The 2017 Regulated Industry Conference PSG breakout	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	12.0
65TH ANNUAL SPRING CONFERENCE	5/24/2017	ASSOCIATION OF SCHOOL BUSINESS OFFICIALS	6.0
2017 SPRING CONFERENCE	5/12/2017	VGFOA	3.5
CLA AGA – Dover Capital Chapter – Annual Professional Development Training	5/9/2017	CliftonLarsonAllen LLP (NASBA #108081)	1.0
May 2017 Assurance Update (Webcast)	5/8/2017	CliftonLarsonAllen LLP (NASBA #108081)	11.0
MARYLAND GFOA SPRING CONFERENCE 2017	4/28/2017	MARYLAND GFOA	3.0



Sean Walker, CPA

CLA Going Paperless With Back-Office Accounting: A Nonprofit Roundtable (Baltimore)	2/28/2017	CliftonLarsonAllen LLP (NASBA #108081)	1.5
PROFESSIONAL ETHICS: THE AICPA'S COMPREHENSIVE COURSE	2/14/2017	AICPA - NASBA #112891	6.0
CLA Commonwealth of PA Training - Audit Findings and Effective Responses	2/1/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
MARYLAND GFOA WINTER CONFERENCE 2017	1/27/2017	MARYLAND GFOA	8.0
January 2017 Assurance Update (Webcast)	1/9/2017	CliftonLarsonAllen LLP (NASBA #108081)	6.0
CLA Way Module 1	12/23/2016	CLA University	6.0
Own the Impact: Public Sector Break Out 7/14/2015	7/14/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Leadership Development Series: Part 2 (Invitation Only)	6/30/2015	CliftonLarsonAllen LLP (NASBA #108081)	0.0
MDGFOA SUMMER CONFERENCE	6/19/2015	MDGFOA	2.0
CLA Uniform Grant Guidance	6/9/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Leadership Development Series: Part 1 (Invitation Only)	5/29/2015	CliftonLarsonAllen LLP (NASBA #108081)	5.0
Risk Management and Ethics Update (Baltimore)	5/12/2015	CliftonLarsonAllen LLP (NASBA #108081)	1.0
Planning for Your 2015 Fiscal Year End Single Audits - Changes You Need to Know (Webcast)	5/8/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.5
2015 ALGA ANNUAL CONFERENCE	5/5/2015	ASSOCIATION OF LOCAL GOVERNMENT AUDITORS - NASBA #103510	2.0



Bill Early			
Program name	Completion Date	Sponsor	Total Hours
CLA Commonwealth of PA – January Training	1/23/2018	CliftonLarsonAllen LLP	3.0
MARYLAND GFOA WINTER CONFERENCE 2018	1/19/2018	MARYLAND GFOA	6.0
Owner Promise Meeting 2018	1/13/2018	CliftonLarsonAllen LLP	10.5
Assurance Quarterly Update - January 2018	1/8/2018	CliftonLarsonAllen LLP	2.0
PSG Webcast Series #6	12/6/2017	CliftonLarsonAllen LLP	2.0
GOVERNMENTAL ACCOUNTING UPDATE/GASB UPDATE	10/26/2017	MISSISSIPPI OFFICE OF THE STATE AUDITOR	9.0
Risk Management Update - October 2017	10/23/2017	CliftonLarsonAllen LLP	1.0
Assurance Update - October 2017	10/23/2017	CliftonLarsonAllen LLP	2.0
2017 NASACT ANNUAL CONFERENCE	8/16/2017	NASACT	10.5
August 2017 Assurance Update (Webcast)	8/7/2017	CliftonLarsonAllen LLP	2.0
Ethics for Vermont CPAs	8/2/2017	Checkpoint Learning	4.0
Audit: Be in the Know	8/1/2017	CliftonLarsonAllen LLP	8.0
MARYLAND GFOA ANNUAL SUMMER CONFERENCE 2017	6/23/2017	MARYLAND GFOA	13.0
Making Connections: The 2017 Regulated Industry Conference General Sessions	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	6.0
Making Connections: The 2017 Regulated Industry Conference PSG breakout	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	8.0
111TH ANNUAL CONFERENCE	5/24/2017	GFOA - NASBA #103133	7.5
CLA AGA – Dover Capital Chapter – Annual Professional Development Training	5/9/2017	CliftonLarsonAllen LLP (NASBA #108081)	3.0
May 2017 Assurance Update (Webcast)	5/8/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
PSG Webcast Series #1: FASB/GASB Update & Common Errors Found in 2nd Review (Webcast)	2/1/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
MARYLAND GFOA WINTER CONFERENCE 2017	1/27/2017	MARYLAND GFOA	3.0
January 2017 Assurance Update (Webcast)	1/9/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Coaching the CLA Way (Webcast)	11/29/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Independence and Ethics Update 2016 (Webcast)	11/18/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Risk Management Update 2016 (Webcast)	10/24/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Assurance Quarterly Update - 2016 Q4 (Webcast)	10/24/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
MARYLAND GFOA FALL CONFERENCE	10/14/2016	MARYLAND GFOA	6.0
CORE Industry Quarterly Update - 2016 Q3 (Group Internet Based)	8/11/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
PSG Webinar Series #4: GASB 72 and Common Financial Statement Mistakes (Webcast)	8/10/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Assurance Quarterly Update - 2016 Q3 (Webcast)	8/8/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Team Approach to Wealth Advisory (Baltimore)	8/1/2016	CliftonLarsonAllen LLP (NASBA #108081)	3.0



Bill Early			
Audit: Back to Basics (Baltimore)	7/25/2016	CliftonLarsonAllen LLP (NASBA #108081)	6.5
2016 ANNUAL CONFERENCE OF NATIONAL ASSOCIATION OF STATE COMPTROLLERS	3/18/2016	NASACT - NASBA #103209	12.0
Assurance Quarterly Update - 2016 Q1 Rebroadcast (Firm-Wide)	1/18/2016	CliftonLarsonAllen LLP (NASBA #108081)	1.5
A&A Update for Government Group	10/6/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
Assurance Quarterly Update - 2015 Q3 (Webcast)	8/10/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
SINGLE AUDIT TRAINING WORKSHOP	8/6/2015	DEPARTMENT OF HEALTH AND HUMAN SERVICES- OFFICE OF INSPECTOR GENERAL – NASBA #108113	17.0
Own the Impact: Plenary Sessions Tuesday 7/14/15 and Wednesday 7/15/15	7/15/2015	CliftonLarsonAllen LLP (NASBA #108081)	7.0
Own the Impact: Public Sector Break Out 7/15/15	7/15/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
Own the Impact: Public Sector Break Out 7/14/2015	7/14/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
MDGFOA SUMMER CONFERENCE	6/19/2015	MDGFOA	9.0
GFOA 109TH ANNUAL CONFERENCE INNOVATION AND RESILIENCE	6/3/2015	GOVERNMENT FINANCE OFFICERS ASSOCIATION - NASBA #103133	15.0
Risk Management and Ethics Update (Baltimore)	5/12/2015	CliftonLarsonAllen LLP (NASBA #108081)	8.0
MARYLAND GFOA SPRING CONFERENCE 2015	4/24/2015	MARYLAND GFOA	6.0
MARYLAND GFOA WINTER CONFERENCE 2015	1/30/2015	MARYLAND GFOA	4.0
Principal Advance 2015: Casting the Vision for the Next Ten Years ~ Achieving it by Living the CLA Promise	1/10/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5

James Kreiser			
Program name	Completion Date	Sponsor	Total Hours
CLA Pittsburgh Year-End A&A Update	11/14/2017	CliftonLarsonAllen LLP	3.0
CLA Pittsburgh Year-End A&A Update	11/14/2017	CliftonLarsonAllen LLP	1.0
CLA Commonwealth of Pennsylvania Accounting and Audit Update – October 2017	10/18/2017	CliftonLarsonAllen LLP	3.0
Promise Leadership Series: Session 4 "CLA Promise in Action: Putting it All Together" (Invitation Only)	9/27/2017	CliftonLarsonAllen LLP	19.0
CLA Commonwealth of PA - August Training	8/24/2017	CliftonLarsonAllen LLP	4.5
CLA Commonwealth of PA - August Training	8/24/2017	CliftonLarsonAllen LLP	3.0
CLA 2017 Government Training Academy	7/21/2017	CliftonLarsonAllen LLP (NASBA #108081)	3.0
Making Connections: The 2017 Regulated Industry Conference General Sessions	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0





## James Kreiser

Making Connections: The 2017 Regulated industry Conference PSG breakout	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	6.0
Promise Leadership Series: Session 1 – Understand and Deliver (Invitation Only)	5/10/2017	CliftonLarsonAllen LLP (NASBA #108081)	23.0
CLA Project Management Training	5/2/2017	CliftonLarsonAllen LLP (NASBA #108081)	6.0
CLA Commonwealth of PA Training - Ethics & Audit Day	3/30/2017	CliftonLarsonAllen LLP (NASBA #108081)	9.0
CLA Commonwealth of PA Training – S Day GASB Update	2/8/2017	CliftonLarsonAllen LLP (NASBA #108081)	5.0
2017 ISSG/BRS Update	1/26/2017	CliftonLarsonAllen LLP (NASBA #108081)	16.5
Independence and Ethics Update 2016 (Webcast)	11/18/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Risk Management Update 2016 (Webcast)	10/24/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
CLA CyberSecurity, Risks and Trends (Commonwealth of Pennsylvania)	9/27/2016	CliftonLarsonAllen LLP (NASBA #108081)	9.0
Assurance Quarterly Update - 2016 Q2 (Group Internet Based)	5/2/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Participant credit for instructors: CLA 3rd Annual Central Illinois Government Training Academy	3/18/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
CLA 3rd Annual Central Illinois Government Training Academy	3/18/2016	CliftonLarsonAllen LLP (NASBA #108081)	3.0
CLA 2016 National Foundation Conference - Own the Impact	2/18/2016	CliftonLarsonAllen LLP (NASBA #108081)	3.0
Specialized Advisory Services Learning - ISSG/BRS (Invitation Only)	1/6/2016	CliftonLarsonAllen LLP (NASBA #108081)	9.0
Participant Credit for Instructors: Specialized Advisory Services Learning - ISSG/BRS (Invitation Only)	1/6/2016	CliftonLarsonAllen LLP (NASBA #108081)	16.0
THIRD ANNUAL NONPROFIT EXECUTIVE SUMMIT: NONPROFIT PRIVACY AND CYBERSECURITY RISKS: NOT JUST FOR HOME DEPOT ANYMORE	11/12/2015	VENABLE LLP	7.5
ACUIA REGION 6 MEETING	10/9/2015	ASSOCIATION OF CREDIT UNION INTERNAL AUDITORS	6.0
205 NASACT ANNUAL CONFERENCE	7/21/2015	NASACT	3.0
Own the Impact: Plenary Sessions Tuesday 7/14/15 and Wednesday 7/15/15	7/15/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
Own the Impact: Public Sector Break Out 7/15/15	7/15/2015	CliftonLarsonAllen LLP (NASBA #108081)	1.5
Own the Impact: Public Sector Break Out 7/14/2015	7/14/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
CLA Focusing on the Right Risks: Nonprofit Financial Roundtable (Plymouth Meeting)	4/22/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
Principal Advance 2015: Casting the Vision for the Next Ten Years ~ Achieving it by Living the CLA Promise	1/10/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5



Cheri King

		Please use the certificate for Part 5 to document this CPE program	0.0
IDEA Module 3: Importing Data	8/7/2017	CliftonLarsonAllen LLP	2.0
August 2017 Assurance Update (Webcast)	8/7/2017	Please use the certificate for Part 5 to document this CPE program	0.0
IDEA Module 2: IDEA Navigation and Setup	8/7/2017	Please use the certificate for Part 5 to document this CPE program	0.0
IDEA Module 4: Using IDEA Functions	8/7/2017	Please use the certificate for Part 5 to document this CPE program	0.0
Audit: Be in the Know	8/1/2017	CliftonLarsonAllen LLP	7.0
Ethics - Understanding and Applying the AICPA Code of Professional Conduct	7/24/2017	Becker Professional Education	2.0
CLA 2017 Government Training Academy	7/21/2017	CliftonLarsonAllen LLP (NASBA #108081)	8.0
CLA Commonwealth of PA - July Training	7/17/2017	CliftonLarsonAllen LLP (NASBA #108081)	6.0
Making Connections: The 2017 Regulated Industry Conference General Sessions	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	6.0
Making Connections: The 2017 Regulated Industry Conference PSG breakout	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	8.0
PSG Webcast Series #3: Nonprofit Account and Financial Reporting (Webcast)	6/7/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
May 2017 Assurance Update (Webcast)	5/8/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
MARYLAND GFOA SPRING CONFERENCE 2017	4/28/2017	MARYLAND GFOA	6.0
IDEA Module 5: Testing Your Knowledge	4/19/2017	CliftonLarsonAllen LLP	7.0
PSG Webcast Series #1: FASB/GASB Update & Common Errors Found in 2nd Review (Webcast)	2/1/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
MARYLAND GFOA WINTER CONFERENCE 2017	1/27/2017	MARYLAND GFOA	6.0
January 2017 Assurance Update (Webcast)	1/9/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
2016 Single Audit Update	12/1/2016	CliftonLarsonAllen LLP (NASBA #108081)	6.0
Assurance Quarterly Update - 2016 Q4 (Webcast)	10/24/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Risk Management Update 2016 (Webcast)	10/24/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
PSG Webinar Series: Accounting Complexities Facing Local Government (Webcast)	10/12/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
A&A Update for Government Group	10/7/2016	CliftonLarsonAllen LLP (NASBA #108081)	3.0
PSG Webinar Series #4: GASB 72 and Common Financial Statement Mistakes (Webcast)	8/10/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Assurance Quarterly Update - 2016 Q3 (Webcast)	8/8/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Audit: Back to Basics (Baltimore)	7/25/2016	CliftonLarsonAllen LLP (NASBA #108081)	8.0
PSG Webinar Series: Single Audit (Group Internet Based)	6/1/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0



Cheri King			
Program name	Completion Date	Sponsor	Total Hours
PSG Virtual Conference	5/19/2016	CliftonLarsonAllen LLP (NASBA #108081)	4.0
BSFA MAY 2016 CAFR/SA KICK-OFF	5/17/2016	DEPARTMENT OF THE AUDITOR GENERAL - PA #PX000485L	2.0
MARYLAND GFOA SPRING 2016 CONFERENCE	4/29/2016	MARYLAND GFOA	6.0
PSG Webinar Series: Data Analytics (Group Internet Based)	4/6/2016	CliftonLarsonAllen LLP (NASBA #108081)	1.5
PSG Webinar Series #1 2016 - PSG Update (Webcast)	2/3/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Data Analytics and Forensic Thinking - Invitation Only (Baltimore)	10/16/2015	CliftonLarsonAllen LLP (NASBA #108081)	15.0
PSG Webinar Series: Accounting Complexities Facing Local Governments, Part II (Webcast)	10/14/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
A&A Update for Government Group	10/6/2015	CliftonLarsonAllen LLP (NASBA #108081)	6.0
Assurance Quarterly Update - 2015 Q4 (Webcast)	10/5/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Risk Management Update (Webcast)	10/5/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Assurance Quarterly Update - 2015 Q3 (Webcast)	8/10/2015	CliftonLarsonAllen LLP (NASBA #108081)	1.5
PSG Webinar Series: Good Ideas to Implement IDEA on Audit Engagements (Group Internet Based)	8/5/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Own the Impact: Plenary Sessions Tuesday 7/14/15 and Wednesday 7/15/15	7/15/2015	CliftonLarsonAllen LLP (NASBA #108081)	7.0
Own the Impact: Public Sector Break Out 7/15/15	7/15/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
Own the Impact: Public Sector Break Out 7/14/2015	7/14/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
MDGFOA SUMMER CONFERENCE	6/19/2015	MDGFOA	6.0
Alternative Investments	6/17/2015	CliftonLarsonAllen LLP	1.0
GFOA 109TH ANNUAL CONFERENCE INNOVATION AND RESILIENCE	6/3/2015	GFOA - NASBA #103133	15.5
Risk Management and Ethics Update (Baltimore)	5/12/2015	CliftonLarsonAllen LLP (NASBA #108081)	8.0
Planning for Your 2015 Fiscal Year End Single Audits - Changes You Need to Know (Group Internet Based)	5/8/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Assurance Quarterly Update - 2015 Q2 (Webcast)	5/4/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
MARYLAND GFOA WINTER CONFERENCE 2015	1/30/2015	MARYLAND GFOA	6.0

Jordan Boehm			
Program name	Completion Date	Sponsor	Total Hours
CLA-Public Sector Symposium: Succession, Information Security and Strategic Planning	1/30/2018	CliftonLarsonAllen LLP	6.0
LEAP: Learn Conference 2018	1/11/2018	CliftonLarsonAllen LLP	24.0
Audit: Be in the Know	8/30/2017	CliftonLarsonAllen LLP	7.5



Jordan Boehm

August 2017 Assurance Update (Webcast)	8/7/2017	CliftonLarsonAllen LLP	2.0
Making Connections: The 2017 Regulated Industry Conference General Sessions	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	5.0
Making Connections: The 2017 Regulated Industry Conference PSG breakout	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	8.0
CLA Roundtable: An Effective and Efficient Closing Process	5/9/2017	CliftonLarsonAllen LLP	6.0
2017 Higher Education Virtual Conference	4/28/2017	CliftonLarsonAllen LLP (NASBA #108081)	7.0
WGFOA SPRING CONFERENCE	4/21/2017	WGFOA	8.0
CLA Going Paperless With Back-Office Accounting: A Nonprofit Roundtable (Milwaukee)	3/10/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
January 2017 Assurance Update (Webcast)	1/9/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
CLA Way Module 1	12/23/2016	CLA University	0.0
WGFOA WINTER CONFERENCE	12/2/2016	WGFOA	12.0
Independence and Ethics Update 2016 (Webcast)	11/18/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Risk Management and Ethics Update (Milwaukee)	11/3/2016	CliftonLarsonAllen LLP (NASBA #108081)	8.0
CLA Risks of Occupational Fraud Roundtable (Milwaukee)	9/20/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
WGFOA FALL CONFERENCE	9/16/2016	WGFOA	12.0
Audit: Back to Basics (Milwaukee)	9/7/2016	CliftonLarsonAllen LLP (NASBA #108081)	7.5
Assurance Quarterly Update - 2016 Q3 (Group Internet Based)	8/8/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
PSG Webinar Series: Single Audit (Webcast)	6/1/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
WGFOA SPRING CONFERENCE	4/15/2016	WGFOA	9.5
WGFOA SPRING CONFERENCE: AUDITING CASH - PRESENTER	4/14/2016	WGFOA	6.0
Audits of State and Local Governments	12/22/2015	MicroMash	13.0
Not-for-Profit Accounting and Reporting: An Introduction	12/22/2015	Becker Professional Education	3.0
WGFOA WINTER CONFERENCE	12/4/2015	WGFOA	12.0
CLA Developing and Implementing Reserves: Nonprofit Roundtable (Milwaukee)	11/5/2015	CliftonLarsonAllen LLP (NASBA #108081)	9.0
CLA GASB 68 Implementation (Milwaukee)	10/28/2015	CliftonLarsonAllen LLP (NASBA #108081)	1.0
WGFOA FALL CONFERENCE	9/25/2015	WGFOA	12.0
Assurance Quarterly Update - 2015 Q3 (Webcast)	8/10/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Higher Education Virtual Conference	4/21/2015	CliftonLarsonAllen LLP (NASBA #108081)	7.5



Joel Eshleman

Program name	Completion date	Sponsor	Total Hours
Introduction to IT Security	12/6/2017	Becker Professional Education	5.0
Risk Management Update - October 2017	10/23/2017	CliftonLarsonAllen LLP	1.0
AICPA'S NEW EXAMINATION ENGAGEMENT: SOC FOR CYBERSECURITY	5/22/2017	AICPA - NASBA #112891	1.0
CLA Commonwealth of PA Training - Ethics & Audit Day	3/30/2017	CliftonLarsonAllen LLP (NASBA #108081)	6.0
2017 ISSG/BRS Update	1/26/2017	CliftonLarsonAllen LLP (NASBA #108081)	3.0
2017 ISSG/BRS Update	1/26/2017	CliftonLarsonAllen LLP (NASBA #108081)	13.5
January 2017 Assurance Update (Webcast)	1/9/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Successful PM Techniques: The Keys to Managing Risk & the Procurement Process	1/6/2017	Becker Professional Education	1.5
Successful PM Techniques: The Keys to Managing Cost & Quality	1/6/2017	Becker Professional Education	1.5
Yellow Book Performance Audits	12/28/2016	Becker Professional Education	2.5
Strategic Management: The Tools to Compete in the Era of Rapid Change, Pt. 2	12/22/2016	Becker Professional Education	3.0
Strategic Management: The Tools to Compete in the Era of Rapid Change, Pt. 1	12/22/2016	Becker Professional Education	3.0
Characteristics of an Effective Organization: Success Inside and Out	12/22/2016	Becker Professional Education	3.0
Independence Overview	12/22/2016	Becker Professional Education	1.0
Clarified Attestation Standards (Webcast)	12/13/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Coaching the CLA Way (Webcast)	11/29/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Audit: Back to Basics Virtual Conference (Part 1)	11/21/2016	CliftonLarsonAllen LLP (NASBA #108081)	4.0
Independence and Ethics Update 2016 (Webcast)	11/18/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
LATEST DEVELOPMENTS IN SOC REPORTING	11/11/2016	AICPA – NASBA # 112891	1.5
Risk Management Update 2016 (Webcast)	10/24/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Specialized Advisory Services Learning - ISSG/BRS (Invitation Only)	1/6/2016	CliftonLarsonAllen LLP (NASBA #108081)	6.0
Participant Credit for Instructors: Specialized Advisory Services Learning - ISSG/BRS (Invitation Only)	1/6/2016	CliftonLarsonAllen LLP (NASBA #108081)	8.0
Governmental Accounting Standards Board (GASB) Update	12/23/2015	Becker Professional Education	1.5
Techniques for Project Scope and Time Management	12/23/2015	Becker Professional Education	2.0
Identity Theft: How to Detect, Deter and Fix	12/23/2015	Becker Professional Education	3.5



Joel Eshleman			
Ethics, Integrity, and the AICPA Code of Professional Conduct	12/23/2015	Becker Professional Education	3.0
Independence and Ethics Update Rebroadcast (Firm-Wide)	12/14/2015	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Assurance Quarterly Update - 2015 Q4 (Webcast)	10/5/2015	CliftonLarsonAllen LLP (NASBA #108081)	6.0
Own the Impact: Financial Institutions Break Out 7/15/15	7/15/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
Own the Impact: Plenary Sessions Tuesday 7/14/15 and Wednesday 7/15/15	7/15/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
Own the Impact: Financial Institutions Break Out 7/14/15	7/14/2015	CliftonLarsonAllen LLP (NASBA #108081)	4.5
CLA Uniform Grant Guidance	6/9/2015	CliftonLarsonAllen LLP (NASBA #108081)	3.0
Risk Management and Ethics Update (Baltimore)	5/12/2015	CliftonLarsonAllen LLP (NASBA #108081)	8.0

Phil DeBello			
Program name	Completion Date	Sponsor	Total Hours
CLA Pittsburgh Year-End A&A Update	11/14/2017	CliftonLarsonAllen LLP	3.0
CLA Pittsburgh Year-End A&A Update	11/14/2017	CliftonLarsonAllen LLP	1.0
CLA Commonwealth of Pennsylvania Accounting and Audit Update – October 2017	10/18/2017	CliftonLarsonAllen LLP	3.0
Promise Leadership Series: Session 4 "CLA Promise in Action: Putting it All Together" (Invitation Only)	9/27/2017	CliftonLarsonAllen LLP	19.0
CLA Commonwealth of PA - August Training	8/24/2017	CliftonLarsonAllen LLP	4.5
CLA Commonwealth of PA - August Training	8/24/2017	CliftonLarsonAllen LLP	3.0
CLA 2017 Government Training Academy	7/21/2017	CliftonLarsonAllen LLP (NASBA #108081)	3.0
Making Connections: The 2017 Regulated Industry Conference General Sessions	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Making Connections: The 2017 Regulated Industry Conference PSG breakout	6/16/2017	CliftonLarsonAllen LLP (NASBA #108081)	6.0
Promise Leadership Series: Session 1 – Understand and Deliver (Invitation Only)	5/10/2017	CliftonLarsonAllen LLP (NASBA #108081)	23.0
CLA Project Management Training	5/2/2017	CliftonLarsonAllen LLP (NASBA #108081)	6.0
CLA Commonwealth of PA Training - Ethics & Audit Day	3/30/2017	CliftonLarsonAllen LLP (NASBA #108081)	9.0
CLA Commonwealth of PA Training – S Day GASB Update	2/8/2017	CliftonLarsonAllen LLP (NASBA #108081)	5.0
2017 ISSG/BRS Update	1/26/2017	CliftonLarsonAllen LLP (NASBA #108081)	16.5
Audit: Back to Basics Virtual Conference (Part 1)	11/21/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Independence and Ethics Update 2016 (Webcast)	11/18/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0



Phil DeBello

Risk Management Update 2016 (Webcast)	10/24/2016	CliftonLarsonAllen LLP (NASBA #108081)	9.0
5TH ANNUAL GOVERNMENT AUDIT CONFERENCE	1/29/2016	THE INSTITUTE OF INTERNAL AUDITORS NEW YORK CHAPTER	2.0
Specialized Advisory Services Learning - ISSG/BRS (Invitation Only)	1/6/2016	CliftonLarsonAllen LLP (NASBA #108081)	2.0
Participant Credit for Instructors: Specialized Advisory Services Learning - ISSG/BRS (Invitation Only)	1/6/2016	CliftonLarsonAllen LLP (NASBA #108081)	16.0

