

**REVIEW OF NONPROFIT, FOR-PROFIT,
AND OTHER ENTITIES
FINANCIAL REPORTING PACKAGES**

For Fiscal Years Ended October 1, 2021,
Through September 30, 2022

Pursuant to Section 215.97(12)(f), Florida Statutes



Sherrill F. Norman, CPA
Auditor General

The team leader was Dylan Hunter, and the audit was supervised by Gina Bailey, CPA.

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REVIEW OF NONPROFIT, FOR-PROFIT, AND OTHER ENTITIES FINANCIAL REPORTING PACKAGES

For Fiscal Years Ended October 1, 2021, Through September 30, 2022

SUMMARY

The Florida Single Audit Act (FSAA)¹ requires each nonstate entity that receives State financial assistance and meets the FSAA audit threshold requirements to provide for a Florida single audit. Upon completion of the audit, a financial reporting package is to be filed with the State awarding agencies and with us within 45 days after delivery of the financial reporting package to the auditee but no later than 9 months after the end of the auditee's fiscal year.² Among other things, the financial reporting package is to contain a nonstate entity's audited financial statements, schedule of expenditures of State financial assistance, independent auditor's reports, and management letter.

As of June 30, 2023, 217 nonprofit, for-profit, and other entities³ that met the FSAA audit threshold requirements had filed financial reporting packages with us for fiscal years ended October 1, 2021, through September 30, 2022. Our examination of the financial reporting package delivery and filing dates and the status of the respective audit firms' licenses found that most of the financial reporting packages were timely filed by properly licensed audit firms.

In addition, pursuant to State law,⁴ we reviewed a sample of 60 of the 217 financial reporting packages to determine compliance with applicable reporting requirements and found that the information provided was generally presented in accordance with generally accepted accounting principles, generally accepted government auditing standards (GAGAS), the FSAA, Department of Financial Services (DFS) rules,⁵ and Auditor General rules.⁶ However, we noted:

Finding 1: Contrary to State law, 18 of the 217 financial reporting packages were filed with us 6 to 264 days after the 9-month deadline, and 3 of those packages plus 13 other financial reporting packages were filed with us 51 to 394 days after delivery of the financial reporting package to the auditee.

Finding 2: The 60 sampled financial reporting packages did not always comply with applicable requirements in the FSAA, DFS rules, and Auditor General rules as:

- For 12 of the 60 applicable financial reporting packages, the auditors did not provide a management letter or a comment stating that no management letter was required.
- For 8 of the 57 applicable financial reporting packages, the auditors miscalculated and reported incorrect dollar thresholds for distinguishing Type A and Type B State projects on the schedule of findings and questioned costs.

¹ Section 215.97, Florida Statutes.

² Section 10.657(2), Rules of the Auditor General.

³ Other entities are local governmental entities other than those enumerated in Section 218.39, Florida Statutes.

⁴ Section 215.97(12)(f), Florida Statutes.

⁵ DFS Rules, Chapter 69I-5, Florida Administrative Code.

⁶ Chapter 10.550, Rules of the Auditor General for Local Government Entity Audits, and Chapter 10.650, Rules of the Auditor General for Florida Single Audit Act Audits of Nonprofit and For-Profit Organizations.

- For 8 of the 60 applicable financial reporting packages, the auditors did not provide either a summary schedule of prior audit findings or a statement that the summary schedule of prior audit findings was not necessary.
- For 7 of the 60 applicable financial reporting packages, the entities did not provide the date the audit report was delivered to the auditee.
- For 5 of the 57 applicable financial reporting packages, the auditor’s report on the financial statements did not state that the audit was made in accordance with the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States.

Finding 3: Audits of two entities were performed by two different audit firms that did not hold active or temporary licenses certified by the Florida Board of Accountancy as of the date of the auditors’ reports on the financial statements.

BACKGROUND

The Florida Single Audit Act (FSAA) requires each nonstate entity that expends a total amount of State financial assistance (SFA),⁷ equal to or in excess of the \$750,000 audit threshold,⁸ to have a Florida single audit conducted in accordance with the FSAA.

State law⁹ and Department of Financial Services (DFS) rules¹⁰ establish several requirements that independent certified public accountants (CPAs) must follow when conducting Florida single audits of nonprofit, for-profit, and other entities. To assist auditors in complying with these requirements, generally accepted government auditing standards, and applicable laws, rules, and regulations, we developed rules¹¹ and other guidelines that provide, among other things, procedural guidance for CPAs to follow. These rules and guidelines are made available on our Web site.

Upon completion of a Florida single audit, a financial reporting package is to be filed with the State awarding agency and us.¹² The financial reporting package is to be filed in accordance with Auditor General rules.¹³ Pursuant to Auditor General rules,¹⁴ each financial reporting package is to be a single document and contain, among other things, the entity’s audited financial statements, schedules, and notes thereto; the independent auditor’s report on the basic financial statements and report on internal control and compliance; a management letter with the auditor’s comments and recommendations; and

⁷ Section 215.97(2)(r), Florida Statutes, defines SFA as State resources, not including Federal financial assistance and State matching on Federal programs, provided to a nonstate entity to carry out a State project. SFA may be provided directly by State awarding agencies or indirectly by nonstate entities. SFA does not include procurement contracts used to buy goods or services from vendors and contracts to operate State-owned and contractor-operated facilities.

⁸ Section 215.97(2)(a), Florida Statutes.

⁹ Section 215.97(10) and (11), Florida Statutes.

¹⁰ DFS Rules, Chapter 69I-5, Florida Administrative Code.

¹¹ Chapters 10.550 and 10.650, Rules of the Auditor General. Chapter 10.550, Rules of the Auditor General, prescribes FSAA auditing and reporting standards for local governmental entities, including those that meet the definition in Section 215.97(2)(k), Florida Statutes, but are not local governmental entities as enumerated in Section 218.39, Florida Statutes. Such entities are referred to as “other entities” in this report. Chapter 10.650, Rules of the Auditor General, prescribes FSAA auditing and reporting standards for nonprofit and for-profit organizations.

¹² Section 215.97(8)(g), Florida Statutes.

¹³ Section 215.97(8)(h), Florida Statutes.

¹⁴ Sections 10.557(3) and 10.656(3), Rules of the Auditor General.

the auditor's reports and related financial information required pursuant to the FSAA and Auditor General rules including:

- A schedule of expenditures of SFA.
- A report that includes an opinion (or disclaimer of opinion) as to the fair presentation of the schedule of expenditures of SFA.
- A report on compliance, and on internal control over compliance, with major State project requirements.
- A schedule of findings and questioned costs.
- A summary schedule of prior audit findings, if applicable.
- A corrective action plan, if applicable.

State law¹⁵ requires us to perform ongoing reviews of a sample of financial reporting packages filed with us pursuant to the FSAA to determine compliance with the reporting requirements of the FSAA and applicable rules. As of June 30, 2023, 217 nonprofit, for-profit, and other entities that met the FSAA audit threshold had filed financial reporting packages with us for fiscal years ended October 1, 2021, through September 30, 2022.

FINDINGS AND RECOMMENDATIONS

Finding 1: Noncompliance – Financial Reporting Package Filing Requirements

Auditor General rules¹⁶ provide that financial reporting packages required to be filed pursuant to the Florida Single Audit Act (FSAA)¹⁷ are to be filed with the State awarding agencies and us within 45 days after delivery of the financial reporting package to the auditee but no later than 9 months after the end of the auditee's fiscal year. The auditee is to indicate in correspondence accompanying the financial reporting package the date the financial reporting package was delivered to the auditee.

As of June 30, 2023, 217 nonprofit, for-profit, and other entities that met the FSAA audit threshold requirements had filed financial reporting packages with us for fiscal years ended October 1, 2021, through

September 30, 2022. However, 31 of those entities did not comply with one or more of the financial reporting package filing requirements. Specifically:

- 18 entities filed financial reporting packages with us 6 to 264 days, or an average of 75 days, after 9 months had elapsed since the entity's fiscal year end. A listing of the 18 entities is included as ***EXHIBIT A*** to this report.
- 16 of the entities, including 3 entities that filed financial reporting packages after the 9-month time frame, filed financial reporting packages with us 6 to 349 days, or an average of 81 days, after 45 days had elapsed since the reports were delivered to the entities' governing bodies. A listing of the 16 entities is included as ***EXHIBIT B*** to this report.

¹⁵ Section 215.97(12)(f), Florida Statutes.

¹⁶ Sections 10.558(4) and 10.657(2), Rules of the Auditor General.

¹⁷ Section 215.97(8)(g), Florida Statutes.

Timely audits are necessary to ensure compliance with Auditor General rules and that management and those charged with governance are promptly informed of control deficiencies and noncompliance with the FSAA. Additionally, timely submitted financial reporting packages provide for timely review by the applicable State entities with oversight responsibilities.

Recommendation: Audited entities should ensure that Florida single audits are timely conducted and that financial reporting packages are timely filed in accordance with State law.

Finding 2: Financial Reporting Package Completeness

To determine the extent to which the filed financial reporting packages complied, for selected significant matters, with generally accepted accounting principles (GAAP), generally accepted government auditing standards (GAGAS), the FSAA, Department of Financial Services (DFS) rules,¹⁸ and Auditor General rules,¹⁹ we selected a sample of 60 of the 217 financial reporting packages we received as of June 30, 2023, and performed completeness reviews.

We found that most of the 60 financial reporting packages included audited financial statements, schedules, and notes thereto; the required independent auditor's reports on the basic financial statements and on internal control and compliance; and other information required by GAAP, GAGAS, the FSAA, DFS rules, and Auditor General rules. However, we also noted that:

- Auditors for 12 of the 60 applicable financial reporting packages did not provide a management letter or indicate in the schedule of findings and questioned costs that no management letter was required. The inclusion of the management letter in the financial reporting package is required by Auditor General rules²⁰ and provides useful information concerning the entity's noted deficiencies related to State financial assistance.
- Auditors for 8 of the 57 applicable financial reporting packages either did not include the threshold for distinguishing Type A and Type B State projects on the schedule of findings and questioned costs or did not calculate the thresholds in accordance with DFS rules.²¹ As the DFS risk-assessment process requires auditors to consider the threshold in determining major State projects and selecting the State projects to audit, threshold miscalculations could cause auditors to overlook high-risk State projects, reducing the audit's effectiveness and accountability over the projects.
- Auditors for 8 of the 60 applicable financial reporting packages did not provide a summary schedule of prior audit findings or indicate that the summary schedule of prior audit findings was not required. The inclusion of the summary schedule of prior audit findings in the financial reporting package is required by Auditor General rules²² and provides useful information concerning the status of findings included in prior audits relating to State financial assistance.
- For 7 of the 60 applicable financial reporting packages, the date that the financial reporting package was delivered to the auditee was not indicated as required by Auditor General rules.²³

¹⁸ DFS Rules, Chapter 69I-5, Florida Administrative Code.

¹⁹ Chapters 10.550 and 10.650, Rules of the Auditor General.

²⁰ Section 10.656(3)(e), Rules of the Auditor General.

²¹ DFS Rule 69I-5.008(2) and (3), Florida Administrative Code.

²² Section 10.656(3)(d)5., Rules of the Auditor General.

²³ Section 10.657(2), Rules of the Auditor General.

The delivery date is necessary to determine whether a report is filed with us within 45 days after delivery of the financial reporting package to the auditee in accordance with State law.²⁴

- Contrary to Auditor General rules,²⁵ 5 of the 57 applicable financial reporting packages, the auditor's report on the financial statements did not state that the audit was conducted in accordance with auditing standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States.

Recommendation: Entities and their auditors should ensure that financial reporting packages contain all the required information presented in accordance with applicable laws and rules.

Finding 3: Certified Public Accountant Licenses

Pursuant to State law²⁶ and Auditor General rules,²⁷ FSAA audits must be performed by independent certified public accountants licensed pursuant to State law.²⁸ State law requires individuals or firms that practice public accountancy within the State to hold active licenses certified by the Florida Board of Accountancy (Board). Pursuant to State law,²⁹ the Florida Department of Business and Professional Regulation (DBPR) is to license any applicant who the Board certifies is qualified to practice public accounting.

Based on information provided to us by Board staff and examination of the 217 financial reporting packages filed with us as of June 30, 2023, we determined that two of the FSAA audits were performed by two different audit firms that did not hold an active or temporary license issued by the Board as of the date of the auditor's report on the financial statements.

We informed Board staff of the two firms, which may be subject to disciplinary actions as prescribed by State law.³⁰

Recommendation: Prior to contracting for FSAA audits, entities should verify through the DBPR that audit firms hold active or temporary licenses certified by the Board.

²⁴ Section 215.97(8)(g), Florida Statutes.

²⁵ Section 10.656(3)(b), Rules of the Auditor General.

²⁶ Section 215.97(8)(f), Florida Statutes.

²⁷ Chapters 10.554(1)(c) and 10.654(1)(b), Rules of the Auditor General.

²⁸ Section 473.308, Florida Statutes.

²⁹ Section 473.308(1), Florida Statutes.

³⁰ Section 473.323, Florida Statutes.

OBJECTIVES, SCOPE, AND METHODOLOGY

Pursuant to Section 11.45, Florida Statutes, the Auditor General conducts audits of governmental entities and performs other engagements to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

The objectives of this project were to determine whether the financial reporting packages filed with us for nonprofits, for-profits, and other entities that met the Florida Single Audit Act (FSAA)³¹ threshold:

- Complied with generally accepted accounting principles, generally accepted government auditing standards (GAGAS), the FSAA, Department of Financial Services (DFS) rules,³² and Auditor General rules.³³
- Were prepared by independent certified public accountants (CPAs) properly licensed by the Florida Board of Accountancy.

The scope of this project included, for the 217 financial reporting packages filed with us as of June 30, 2023, for nonprofits, for-profits, and other entities that met the FSAA audit threshold for fiscal years ended October 1, 2021, through September 30, 2022, an examination of the financial reporting package delivery and filing dates and the status of the respective audit firms' licenses based upon Florida Board of Accountancy and Florida Department of Business and Professional Regulation records. The scope also included a review of a sample of 60 of those financial reporting packages to determine compliance with applicable reporting requirements. The results of our review of local governmental entity compliance with FSAA reporting requirements for the entities enumerated in Section 218.39, Florida Statutes, will be the subject of a separate report.

We planned and performed the review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our objectives.

Our review was necessarily limited to the contents of the financial reporting packages filed with us and did not extend to an examination of the CPAs' working papers or a determination of whether the auditors followed all applicable GAGAS in the actual conduct of the audits. Because our review was limited to the content of the financial reporting packages filed with us, our review cannot be used as the basis for determining the extent of the entities' compliance with applicable laws, rules, contractual requirements, or bond covenants. Likewise, our review would not disclose whether the auditor reported all instances of noncompliance or reportable internal control deficiencies noted during the audit, or whether certain required financial disclosures were completely omitted.

³¹ Section 215.97, Florida Statutes.

³² DFS Rules, Chapter 69I-5, Florida Administrative Code.

³³ Chapters 10.550 and 10.650, Rules of the Auditor General.

AUTHORITY

Section 215.97(12)(f), Florida Statutes, requires the Auditor General to perform ongoing reviews of a sample of financial reporting packages filed pursuant to the Florida Single Audit Act to determine compliance with the reporting requirements of the Act and applicable Department of Financial Services rules and Auditor General rules. Pursuant to the provisions of State law, I have directed that this report be prepared to present the results of our review of nonprofit, for-profit, and other entity financial reporting packages for fiscal years ended October 1, 2021, through September 30, 2022.

A handwritten signature in blue ink that reads "Sherrill F. Norman". The signature is fluid and cursive, with a large initial 'S' and 'N'.

Sherrill F. Norman, CPA
Auditor General

EXHIBIT A

NONPROFIT, FOR-PROFIT, AND OTHER ENTITIES FINANCIAL REPORTING PACKAGES FILED AFTER 9-MONTH DEADLINE

FOR FISCAL YEARS ENDED OCTOBER 1, 2021, THROUGH SEPTEMBER 30, 2022

Entity	Package Received	Number of Days Late
1 Florida East Coast Railway, L.L.C.	06/21/23	264
2 St. Johns County Council On Aging, Inc.	05/02/23	214
3 Miami Bayside Foundation, Inc. ^a	04/19/23	201
4 Bridging Freedom, Inc.	02/15/23	138
5 Florida Association of Agencies Serving the Blind, Inc.	01/30/23	122
6 The Family C.A.F.E., Inc.	06/08/23	69
7 Lauren's Kids, Inc.	11/30/22	61
8 Crosswinds Youth Services, Inc.	05/26/23	56
9 Redlands Christian Migrant Association, Inc.	05/23/23	53
10 The Children's Home Society of Florida ^a	05/19/23	49
11 Early Learning Coalition of St. Lucie County, Inc.	05/08/23	38
12 Early Learning Coalition of Brevard County, Inc.	04/27/23	27
13 Neuroscience Centers of Florida Foundation, Inc.	04/14/23	14
14 Alliance For Aging, Inc.	10/13/22	13
15 University of Central Florida Foundation, Inc. ^a	04/06/23	7
16 Bluefield Dispersed Water Management, LLC	10/06/22	6
17 Scott Dispersed Water Management, LLC	10/06/22	6
18 Senior Connection Center, Inc.	10/06/22	6
Average Number of Days Late		75

^a Report was also filed more than 45 days after delivery of the financial reporting package to the entity's governing body. See [EXHIBIT B](#).

EXHIBIT B

**NONPROFIT, FOR-PROFIT, AND OTHER ENTITIES
FINANCIAL REPORTING PACKAGES
FILED MORE THAN 45 DAYS AFTER FINANCIAL REPORTING PACKAGE
WAS DELIVERED TO THE ENTITY'S GOVERNING BODY**

FOR FISCAL YEARS ENDED OCTOBER 1, 2021, THROUGH SEPTEMBER 30, 2022

Entity	Number of Days Package	
	Filed After Delivery to Auditee	Filed Late
1 Miami Bayside Foundation, Inc. ^a	394	349
2 The Johns Hopkins Health System Corporation and Affiliates	189	144
3 University of Central Florida Foundation, Inc. ^a	167	122
4 University of Florida Foundation, Inc.	157	112
5 University of South Florida Foundation, Inc.	145	100
6 University of North Florida Foundation, Inc.	138	93
7 Embry-Riddle Aeronautical University, Inc.	137	92
8 Feeding Florida, Inc.	118	73
9 Harbor Branch Oceanographic Institution, Inc.	105	60
10 Family Resources, Inc.	91	46
11 Council on Aging of Martin County, Inc.	90	45
12 The Children's Home Society of Florida ^a	67	22
13 Seniors First, Inc.	64	19
14 Area Agency on Aging for North Florida, Inc.	54	9
15 Stetson University, Inc.	52	7
16 Step Up for Students, Inc.	51	6
Average Number of Days	126	81

^a Financial reporting package was also filed after 9-month deadline. See **EXHIBIT A**.