

### **City of Redding**

Department of Public Works, Engineering Division Indirect Cost Rate Proposal Fiscal Years 2017-18 and 2018-19

#### **Team Members**

Cheryl L. McCormick, CPA, Chief Rebecca G. McAllister, CPA, Assistant Chief Humberto E. Cervantes, CPA, Manager David Jacob Shockey, CPA, Supervisor Muang Saeteurn

Final reports are available on our website at www.dof.ca.gov.

You can contact our office at:

California Department of Finance Office of State Audits and Evaluations 915 L Street, 6<sup>th</sup> Floor Sacramento, CA 95814 (916) 322-2985



#### 915 L STREET ■ SACRAMENTO CA ■ 95814-3706 ■ WWW.DOF.CA.GOV

Transmitted via e-mail

December 23, 2020

MarSue Morrill, Chief, Planning and Modal Office Independent Office of Audits and Investigations California Department of Transportation 1304 O Street, Suite 200 Sacramento, CA 95814

### Final Report—City of Redding, Department of Public Works Indirect Cost Rate Proposal Audit

The California Department of Finance, Office of State Audits and Evaluations, has completed its audit of the City of Redding, Department of Public Works, Engineering Division's (City) Indirect Cost Rate Proposals for fiscal years 2017-18 and 2018-19, Caltrans Audit Number P1594-0107.

The enclosed report is for your information and use. The City's response to the report finding is incorporated into this final report. The City agreed with our finding. We appreciate the City's assistance and cooperation during the engagement, and its willingness to implement corrective actions.

This report will be placed on our website. If you have any questions regarding this report, please contact Rick Cervantes, Manager, or David Shockey, Supervisor, at (916) 322-2985.

Sincerely,

Original signed by:

Cheryl L. McCormick, CPA Chief, Office of State Audits and Evaluations

cc: Nancy Shaul, Audit Manager, Planning and Modal Office, Independent Office of Audits and Investigations, California Department of Transportation

Monte Laskosky, Auditor, Planning and Modal Office, Independent Office of Audits and Investigations, California Department of Transportation

# Background, Scope and Methodology

#### **BACKGROUND**

The California Department of Transportation's (Caltrans) Local Assistance Program oversees more than \$1 billion dollars annually available to over 600 cities, counties, and regional agencies for the purpose of improving their transportation infrastructure or providing transportation services. This funding comes from various Federal and State programs specifically designed to assist the transportation needs of local agencies.<sup>1</sup>

The City of Redding, Public Works Department (City), includes all the City's transportation and engineering functions and is comprised of many divisions including the Engineering Division. The Engineering Division plans, develops, and constructs public facilities, roadways, capital improvement, and private development projects.<sup>2</sup>

At the discretion of local governmental agencies (LGA), indirect costs may be recovered when seeking reimbursement for federal-aid transportation projects and state funded projects. To recover indirect costs, LGAs annually submit an Indirect Cost Rate Proposal (ICRP), which may also include a fringe benefit rate, to Caltrans' Independent Office of Audits and Investigations (IOAI). IOAI reviews the documentation supporting the rate(s) and issues an acceptance letter allowing the LGAs to bill Caltrans and seek reimbursement of indirect costs, which IOAI may audit for compliance with Title 2 Code of Federal Regulations Part 200 (2 CFR 200) and Caltrans' Local Assistance Procedures Manual Chapter 5 (LAPM).

#### **SCOPE**

At the request the IOAI, the California Department of Finance, Office of State Audits and Evaluations, audited the City's ICRP for fiscal years 2017-18 and 2018-19.

The audit objectives were to:

- 1. Determine whether the 2017-18 and 2018-19 ICRPs are in compliance with 2 CFR 200 and the LAPM.
- 2. Recalculate the 2017-18 and 2018-19 ICRP rates if unallowable costs are identified.

In performing our audit, we considered internal controls significant to the audit objectives. See Appendix A for a list of significant internal control components and underlying principles.

<sup>&</sup>lt;sup>1</sup> Excerpts obtained from Caltrans, Division of Local Assistance website <a href="http://www.dot.ca.gov/localassistance/index.html">http://www.dot.ca.gov/localassistance/index.html</a>.

<sup>&</sup>lt;sup>2</sup> Excerpts obtained from the City of Redding's website <a href="https://www.cityofredding.org/departments/public-works">https://www.cityofredding.org/departments/public-works</a>

The City is responsible for preparing its ICRP in accordance with state and federal requirements, which includes implementing internal controls and maintaining an adequate financial management system to accumulate and segregate reasonable, allowable, and allocable costs.

#### **METHODOLOGY**

In planning the audit, we gained an understanding of the City's operations, and identified relevant ICRP requirements by interviewing Caltrans and City personnel and reviewing 2 CFR 200, the LAPM, and applicable City policies and procedures.

We conducted a risk assessment, including evaluating whether key internal controls significant to our audit objectives were properly designed, implemented, and operating effectively. Key controls evaluated focused on the separation of indirect and direct costs including labor, and the preparation of the ICRP. Our assessment included conducting interviews related to processes and testing transactions related to accounts payable, time keeping/payroll, and billing for effectiveness of existing documented processes and procedures. Deficiencies in internal control that were identified during our audit and determined to be significant within the context of our audit objectives are included in this report.

Additionally, we assessed the reliability of data from the City's financial management system, AS400, as well as Excel spreadsheets used to prepare the ICRP rates. Our assessment included reviewing information process flows, testing transactions for completeness and accuracy, and determining if costs were separately categorized by tracing to the accounting records. We determined the data were sufficiently reliable to address the audit objectives.

Based on the results of our planning, we developed specific methods for gathering evidence to obtain reasonable assurance to address the audit objectives. Our methods are detailed in the Table of Methodologies.

#### **Table of Methodologies**

Audit Objective	Methods
Objective 1: Determine whether the 2017-18 and 2018-19 ICRPs are in	Selected 2015-16 and 2016-17 significant and high-risk cost categories to verify compliance with 2 CFR 200 and the LAPM. Specifically, costs were selected from direct and indirect salaries and wages, fringe benefits, and the indirect costs pool.
compliance with 2 CFR 200 and the LAPM.	<ul> <li>Selection of direct and indirect salaries and wages, and fringe benefits was based on quantitative factors such as total amount charged to Caltrans.</li> </ul>
	<ul> <li>Selection of indirect costs pool costs were based on quantitative factors such as costs with a potential impact to the ICRP rate by 1 percent or greater.</li> </ul>
	<ul> <li>Determined if direct and indirect salaries were allowable, supported, segregated, and allocated, by interviewing staff, tracing the amounts to accounting records and payroll records, recalculating rates, and verifying fringe benefits were included in employee billable rates.</li> </ul>
	<ul> <li>Determined if indirect costs pool costs were allowable, authorized, supported, segregated, and equitably allocated, by tracing the indirect cost amounts to accounting records, allocation spreadsheets, and verified the allocation methodology.</li> </ul>
	Determined the carry forward calculations <sup>3</sup> were supported by:
	<ul> <li>Verifying the 2015-16 and 2016-17 rates were supported by the approved ICRP submissions.</li> </ul>
	<ul> <li>Verifying the 2015-16 and 2016-17 actual costs were supported by accounting records and reconciled to audited financial data.</li> </ul>
	<ul> <li>Recalculating the 2015-16 and 2016-17 recovered indirect costs, carry forward, and the 2017-18 and 2018-19 adjusted indirect costs.</li> </ul>
	Verified the indirect costs recovered by the City were billed at the IOAI approved indirect cost rate by tracing the rate used on Caltrans' billings to the rate in Caltrans' Acceptance Letter and recalculated the indirect costs billed to Caltrans.
Objective 2: Recalculate the 2017-18 and 2018-19 ICRP rates if unallowable costs are identified.	Recalculated the ICRP rates with carry forward adjustments based on 2015-16 and 2016-17 audited amounts.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

<sup>&</sup>lt;sup>3</sup> The City uses a schedule of estimated direct and indirect costs to determine the annual indirect cost rate. These estimates are reconciled to actual costs. The difference between the actual costs and the estimated costs is carried forward and is included in the calculation of a future ICRP rate. This is referred to as the carry forward calculation.

#### CONCLUSION

Based on the procedures performed and evidence gathered, we determined the City's 2017-18 and 2018-19 ICRPs are not in compliance with 2 CFR 200 and the LAPM. We identified weaknesses in the City's fiscal controls related to the preparation of the ICRPs, as noted in Finding 1. Additionally, we recommend rate changes as identified in Table 1 below.

Accepted Audited Rate Difference Rate Rate **Fiscal Year** Division (a) (b) (a)-(b)2017-18 Engineering 125.21% 113.71% 11.50% 2018-19 Engineering 119.80% 117.18% 2.62%

Table 1 - Accepted and Audited 2017-18 and 2018-19 ICRP Rates<sup>4</sup>

See Appendices B and C for the Summary of Accepted and Audited Costs and Rates for the 2017-18 and 2018-19 ICRPs.

#### FINDING AND RECOMMENDATIONS

#### Finding 1: ICRP Preparation Process Needs Improvement

The City does not appropriately prepare the carry forward calculations and ensure costs in the indirect cost pool are accurate and supported. Due to the errors identified below, the carry forward amounts for 2017-18 and 2018-19 are overstated by \$279,807 and \$66,140, respectively. As a result, the accepted rates are overstated and should be reduced as illustrated in Table 1. Specifically,

- The indirect carry forward amounts of \$(223,047) and \$(420,786) from 2013-14 and 2014-15, respectively, were not included in the 2015-16 and 2016-17 carry forward calculations. The 2013-14 and 2014-15 carry forward amounts must be included in the 2015-16 and 2016-17 carry forward calculations to determine the difference between the estimated and actual indirect costs (i.e. recovered indirect costs) used in the 2017-18 and 2018-19 ICRP rate calculations.
- Errors were identified in the 2016-17 ICRP calculation that impacted the carry forward amount used in the 2018-19 rate calculation. The City incorrectly recorded \$338,498 of Public Works Administration Reimbursement (PW Admin Reimbursement) within the direct and indirect cost pools. The correct amount is \$313,307. This resulted in an overstatement of direct costs and an understatement of indirect costs by \$25,191 (\$338,498 \$313,307). Additionally, the National Pollutant Discharge Elimination System (NPDES) Indirect Reimbursement in the amount of \$356,016 was double counted resulting in an understatement of indirect costs by this amount. The double counting resulted from an Excel formula error.

<sup>&</sup>lt;sup>4</sup> The ICRPs submitted by the City were accepted by IOAI on July 11, 2017 and October 5, 2018, respectively.

• The allocation rate of Geographic Information System (GIS) costs to the Public Works Engineering Division was not supported by an allocation methodology, resulting in unsupported indirect costs of \$56,760 in 2015-16 and \$54,390 in 2016-17. These unsupported costs impact the carry forward calculations for 2017-18 and 2018-19.

The errors and unsupported costs are a result of the City not performing second-level reviews of the ICRP rate calculations and no written policies and procedures related to the preparation of ICRP rates and GIS cost allocation.

2 CFR 200.62 states the City must maintain internal control processes to provide reasonable assurance transactions are properly accounted for, in order to demonstrate compliance with Federal requirements.

2 CFR 200, Appendix VII to Part 200-States and Local Government and Indian Tribe Indirect Cost Proposals, B. Definitions, 5, states the difference between the estimated costs and the actual, allowable costs of the period covered by the rate is carried forward as an adjustment to the rate computation of a subsequent period.

LAPM Chapter 5, Documentation of Proposal section requires all local agencies desiring to claim their indirect cost must prepare an ICRP and provide related documentation to support those costs.

ICRP Submission Certification, Attachment D, Section II D states material audit adjustments will require reimbursement from the City.

#### Recommendations:

- A. Develop and document ICRP and GIS cost allocation procedures to ensure future ICRPs and GIS cost allocations are properly supported, prepared, and reviewed.
- B. Reconcile the 2017-18 and 2018-19 billings using the audited rates in Table 1 and reimburse Caltrans for any over payments.



We considered the following internal control components and underlying principles significant to the audit objectives:

Internal Control Component	Internal Control Principle
Control Activities	<ul> <li>Management designs control activities to achieve objectives and respond to risks.</li> <li>Management designs the entity's information system and related control activities to achieve objectives.</li> <li>Management implements control activities through policies.</li> </ul>
Information and Communication	<ul> <li>Management uses quality information to achieve the entity's objectives.</li> <li>Management externally communicates necessary quality information to achieve the entity's objectives.</li> </ul>

# Summary of Accepted and Audited Costs and Rates Indirect Cost Rate Proposal City of Redding, Department of Public Works, Engineering Division 2017-18

Table B.1 - 2015	Table B.1 - 2015-16 Actual Costs (Carry Forward Year)							
Description	Accepted Audit		Audited	Finding				
Description	Amounts	Adjustments	Amounts	Number				
Direct Costs								
Direct Salaries and Wages plus								
Fringe Benefits	\$ 1,831,648	\$ 0	\$ 1,831,648					
PW Admin Reimbursement	301,979	0	301,979					
Total Indirect Cost Base <sup>5</sup>	\$ 2,133,627		\$ 2,133,627					
Indirect Costs Pool		_						
Indirect Salaries and Wages								
plus Fringe Benefits	\$ 2,372,370	\$ 0	\$ 2,372,370					
PW Admin Reimbursement	(301,979)	0	(301,979)					
Services from Other Divisions	20,815	0	20,815					
NPDES Indirect Reimbursement	(345,636)	0	(345,636)					
Vehicle Fuel	7,630	0	7,630					
Communication Expense	19,998	0	19,998					
NPDES Expense	59,456	0	59,456					
Operating Material	30,776	0	30,776					
Small Equipment/Furniture	3,113	0	3,113					
Software	9,865	0	9,865					
Books/Dues/Subscriptions	4,021	0	4,021					
Travel Expense	6,524	0	6,524					
Employee Training	9,854	0	9,854					
Computer Hardware	6,047	0	6,047					
Citywide Cost Allocation Plan	220,400	0	220,400					
Building Maintenance	112,050	0	112,050					
Information Systems	75,480	0	75,480					
Print Shop	21,720	0	21,720					
Fleet Maintenance	8,341	0	8,341					
Risk Management	61,300	0	61,300					
Records Management	13,420	0	13,420					
Communication Support	12,410	0	12,410					
GIS	56,760	(56,760)	0	1				
Volunteer Services	4,110	0	4,110					
Employer Service	28,080	0	28,080					
Mail Charges	2,033	0	2,033					
Depreciation Expense	9,842	0	9,842					
Total Indirect Costs Pool <sup>6</sup>	\$ 2,528,800	\$(56,760)	\$ 2,472,040	1				

<sup>&</sup>lt;sup>5</sup> 2015-16 Indirect Cost Base is forwarded to Table B.2 – 2015-16 Calculated Indirect Cost Recoveries.

<sup>&</sup>lt;sup>6</sup> 2015-16 Total Indirect Costs Pool is forwarded to Table B.3 – 2015-16 Carry Forward Calculation.



## Summary of Accepted and Audited Costs and Rates Indirect Cost Rate Proposal City of Redding, Department of Public Works, Engineering Division 2017-18 ~Continued~

Table B.2 – 2015-16 Calculated Indirect Cost Recoveries						
Description Accept Accept Amour			udit stments	Audited Amounts	Finding No.	
Description	Amounts	Auju	SUITETILS	Amounts	IVO.	
(A) Indirect Costs Base (from Table B.1)	\$ 2,133,627	\$	0	\$ 2,133,627		
(B) 2015-16 Indirect Cost Rate <sup>7</sup>	112.02%		0	112.02%		
(C) Calculated Indirect Cost Recoveries (A) x (B)8	\$ 2,390,090	\$	0	\$ 2,390,090		

Table B.3 - 2015-16 Carry Forward Calculation						
Description	Accepted Amounts	Audit Adjustments	Audited Amounts	Finding No.		
(D) 2015-16 Indirect Costs Pool (from Table B.1)	\$ 2,528,800	\$ (56,760)	\$ 2,472,040	1		
(E) Calculated Indirect Cost Recoveries (from table B.2)	2,390,090	0	2,390,090			
(F) 2013-14 Carry Forward <sup>9</sup>	0	(223,047)	(223,047)	1		
(G) 2015-16 Carry Forward (D) - (E) + (F) 10	\$ 138,710	\$ (279,807)	\$ (141,097)	1		

Table B.4 - 2017-18 ICRP Indirect Cost Rate						
Description	Accepted Amounts <sup>11</sup>	Audit Adjustments	Audited Amounts	Finding No.		
(H) 2017-18 Budgeted Indirect Costs	\$ 2,907,612	\$ 0	\$ 2,907,612			
(I) 2015-16 Carry Forward (from Table B.3)	138,710	(279,807)	(141,097)	1		
(J) Net 2017-18 Budgeted Indirect Cost Pool (H) + (I)	\$ 3,046,322	\$ (279,807)	\$ 2,766,515	1		
(K) 2017-18 Budgeted Direct Salaries and Wages plus Fringe Benefits (Indirect Cost Base) <sup>12</sup>	\$ 2,433,051	\$ 0	\$ 2,433,051			
(L) 2017-18 City Rate (J)/(K)	125.21%	(11.50%)	113.71%	1		

<sup>&</sup>lt;sup>7</sup> 2015-16 Indirect Cost Rate was accepted by Caltrans' IOAI on July 17, 2015.

<sup>&</sup>lt;sup>8</sup> Calculated Indirect Cost Recoveries is forwarded to Table B.3 – 2015-16 Carry Forward Calculation.

<sup>9 2013-14</sup> Carry Forward Audit Adjustment of \$(223,047) was based on the California State Controller's Office February 2017 audit report.

<sup>&</sup>lt;sup>10</sup> 2015-16 Carry Forward is forwarded to Table B4 – 2017-18 ICRP Indirect Cost Rate.

<sup>11</sup> The ICRP costs and calculated rates submitted by the City were accepted by IOAI on July 11, 2017.

<sup>&</sup>lt;sup>12</sup> Because the 2017-18 costs are budget estimates, specific costs/transactions were not tested.

# Summary of Accepted and Audited Costs Indirect Cost Rate Proposal City of Redding, Department of Public Works, Engineering Division 2018-19

Table C.1 - 2016	Table C.1 - 2016-17 Actual Costs (Carry Forward Year)							
5	Accepted Audit		Audited	Finding				
Description Description	Amounts	Adjustments	Amounts	Number				
Direct Costs	T	I I		ı				
Direct Salaries and Wages plus	ф 1 00F 070	Φ 0	ф 1 00E 070					
Fringe Benefits	\$ 1,805,970	\$ 0	\$ 1,805,970	- 1				
PW Admin Reimbursement	338,498	(25,191)	313,307	1				
Total Indirect Cost Base <sup>13</sup>	\$ 2,144,468	\$ (25,191)	\$ 2,119,277					
Indirect Costs Pool	T	T T		T				
Indirect Salaries and Wages								
plus Fringe Benefits	\$ 2,607,714	\$ 0	\$ 2,607,714					
PW Admin Reimbursement	(338,498)	25,191	(313,307)	1				
Services from Other Divisions	20,520	0	20,520					
NPDES Indirect Reimbursement	(712,032)	356,016	(356,016)	1				
Vehicle Fuel	7,606	0	7,606					
Communication Expense	21,294	0	21,294					
NPDES Expense	102,800	0	102,800					
Operating Material	26,983	0	26,983					
Small Equip/Furniture	2,758	0	2,758					
Software	10,398	0	10,398					
Books/Dues/Subscriptions	5,603	0	5,603					
Travel Expense	8,552	0	8,552					
Employee Training	6,315	0	6,315					
Computer Hardware	6,180	0	6,180					
Citywide Cost Allocation Plan	227,010	0	227,010					
Building Maintenance	94,530	0	94,530					
Information Systems	81,350	0	81,350					
Print Shop	21,870	0	21,870					
Fleet Maintenance	8,341	0	8,341					
Risk Management	64,920	0	64,920					
Records Management	13,360	0	13,360					
Communication Support	10,730	0	10,730					
GIS	54,390	(54,390)	0	1				
Volunteer Services	4,270	0	4,270					
Employer Service	26,750	0	26,750					
Mail Charges	2,510	0	2,510					
Depreciation Expense	12,602	0	12,602					
Total Indirect Costs Pool <sup>14</sup>	\$ 2,398,826	\$ 326,817	\$ 2,725,643	1				

<sup>&</sup>lt;sup>13</sup> 2016-17 Indirect Cost Base is forwarded to Table B.2 – 2016-17 Calculated Indirect Cost Recoveries.

<sup>&</sup>lt;sup>14</sup> 2016-17 Total Indirect Costs Pool is forwarded to Table B.3 – 2016-17 Carry Forward Calculation.



#### **Summary of Accepted and Audited Costs** Indirect Cost Rate Proposal City of Redding, Department of Public Works, Engineering Division 2018-19 ~Continued~

Table C.2 – 2016-17 Calculated Indirect Cost Recoveries						
Accepted Audit Audited Find Description Amounts Adjustments Amounts No						
(A) Indirect Costs Base (from Table C.1)		\$ (25,191)	\$ 2,119,277	1		
(B) 2016-17 City Indirect Cost Rate <sup>15</sup>		0	110.47%			
(C) Calculated Indirect Cost Recoveries (A) x (B) 16	\$ 2,368,994	\$ (27,829) <sup>17</sup>	\$ 2,341,165	1		

Table C.3 – 2016-17 Carry Forward Calculation					
Description	Accepted Amounts	Audit Adjustments	Audited Amounts	Finding No.	
(D) 2016-17 Indirect Costs Pool (from Table C.1)	\$ 2,398,826	\$ 326,817	\$ 2,725,643	1	
(E) Calculated Indirect Cost Recoveries (from table C.2)	2,368,994	(27,829)	2,341,165	1	
(F) 2014-15 Carry Forward <sup>18</sup>	0	(420,786)	(420,786)	1	
(G) 2015-16 Carry Forward (D) - (E) + (F) 19	\$ 29,832	\$ (66,140)	\$ (36,308)	1	

Table C.4 – 2018-19 ICRP Indirect Cost Rate						
Description	Accepted Amounts <sup>20</sup>	Audit Adjustments	Audited Amounts	Finding No.		
(H) 2018-19 Budgeted Indirect Costs	\$ 2,991,449	\$ 0	\$ 2,991,449			
(I) 2016-17 Carry Forward (from Table C.3)	29,832	(66,140)	(36,308)	1		
(J) Net 2017-18 Budgeted Indirect Cost Pool (H) + (I)	\$ 3,021,281	\$ (66,140)	\$ 2,955,141	1		
(K) 2018-19 Budgeted Direct Salaries and Wages plus Fringe Benefits (Indirect Cost Base) <sup>21</sup>	\$ 2,521,868	\$ 0	\$ 2,521,868			
(L) 2018-19 City Rate (J)/(K)	119.80%	(2.62%)	117.18%	1		

<sup>&</sup>lt;sup>15</sup> 2016-17 Indirect Cost Rate was accepted by Caltrans' IOAI on June 16, 2016.

<sup>&</sup>lt;sup>16</sup> Calculated Indirect Cost Recoveries is forwarded to Table C.3 – 2016-17 Carry Forward Calculation.

Audit Adjustment: \$(25,191) x 110.47% = \$(27,829).
 2014-15 Carry Forward was accepted by IOAI on June 16, 2016.

<sup>&</sup>lt;sup>19</sup> 2015-16 Carry Forward is forwarded to Table C.4 – 2017-18 ICRP Indirect Cost Rate.

<sup>&</sup>lt;sup>20</sup> The ICRP costs and calculated rates submitted by the City were accepted by IOAI on October 5, 2018.

<sup>&</sup>lt;sup>21</sup> Because the 2018-19 costs are budget estimates, specific costs/transactions were not tested.

### $R_{\hbox{\footnotesize esponse}}$



#### CITY OF REDDING

777 CYPRESS AVENUE, REDDING, CA 96001 P.O. Box 496071, REDDING, CA 96049-6071

### PUBLIC WORKS ENGINEERING DIVISION

530.225.4170 530.245.7024

December 14, 2020

Cheryl L. McCormick CPA
Chief, Office of State Audits and Evaluations
California Department of Finance
915 L Street
Sacramento CA 95814-3706

RE: Response to Indirect Cost Rate Proposal Audit of Caltrans Audit Number P1594-0107

Dear Ms. McCormick:

Below is the City of Redding Audit Report Response to Indirect Cost Rate Proposal Audit of Caltrans Audit Number P1594-0107

#### Finding 1 – ICRP Preparation Process Needs Improvement

The City does not appropriately prepare the carry forward calculations and ensure costs in the indirect cost pool are accurate and supported. Due to the errors identified below, the carry forward amounts for 2017-18 and 2018-19 are overstated by \$279,807 and \$66,140, respectively. As a result, the accepted rates are overstated and should be reduced as illustrated in Table 1. Specifically,

- The indirect carry forward amounts of \$(223,047) and \$(420,786) from 2013-14 and 2014-15, respectively, were not included in the 2015-16 and 2016-17 carry forward calculations. The 2013-14 and 2014-15 carry forward amounts must be included in the 2015-16 and 2016-17 carry forward calculations to determine the difference between the estimated and actual indirect costs (i.e. recovered indirect costs) used in the 2017-18 and 2018-19 ICRP rate calculations.
- Errors were identified in the 2016-17 ICRP calculation that impacted the carry forward amount used in the 2018-19 rate calculation. The City incorrectly recorded \$338,498 of Public Works Administration Reimbursement (PW Admin Reimbursement) within the direct and indirect cost pools. The correct amount is \$313,307. This resulted in an overstatement of direct costs and an understatement of indirect costs by \$25,191 (\$338,498 \$313,307). Additionally, the National Pollutant Discharge Elimination System (NPDES) Indirect Reimbursement in the amount of \$356,016 was double counted resulting in an understatement of indirect costs by this amount. The double counting resulted from an Excel formula error.

• The allocation rate of Geographic Information System (GIS) costs to the Public Works Engineering Division was not supported by an allocation methodology, resulting in unsupported indirect costs of \$56,760 in 2015-16 and \$54,390 in 2016-17. These unsupported costs impact the carry forward calculations for 2017-18 and 2018-19.

Response: Immediately following the California Department of Finance Office of State Audits and Evaluations audit, The City of Redding (City) corrected the calculation to include the carry forward calculation and re-submitted the corrected ICRP to HUD. The City also implemented procedures to ensure that the Finance department will review the Indirect Cost Rate Proposal prior to submission for approval.

If you need additional information regarding this response, please contact Sonja McKinney, Public Works Supervisor, at (530) 225-4189.

Sincerely,

**ORIGINAL SIGNED BY** 

Chuck Aukland
Director of Public Works

cc: Greg Robinette, Finance Officer, City of Redding