Contract Audit Review Updates

Lisa Bellar, CPA, CGFM Matt Piland, CMFO

Division of Local Government Audit

November 5, 2025

TENNESSEE COMPTROLLER OF THE TREASURY



1

Disclaimer

The opinions expressed during this presentation are our own. They do not necessarily represent the views of the Tennessee Comptroller of the Treasury, his representatives, or the Division of Local Government Audit.

TENNESSEE COMPTROLLER OF THE TREASURY



2

Contract Audit Review Team

Jean Suh, CPA, CFE, CGFM Contract Audit Review Manager



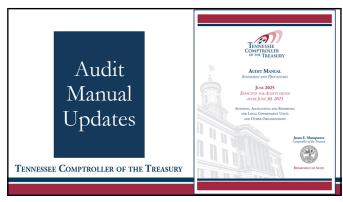
- Contract Approval
- Workpaper Review Determination
- Strategic Goal Monitoring
- Research/Consulting
- Assisting Upper Management and Reviewers

TENNESSEE COMPTROLLER OF THE TREASURY









★ Markup Version
 ★ Electronic Contracting and Reporting Requirements
 ★ UN Written Attestation
 ★ Revised Audit Reports
 ★ Direct Appropriation Grants
 ★ Reporting and Auditing Requirements for For-profit Organizations
 ★ Municipal Energy Authority Reporting Requirements
 ★ Schedule of Lease Obligations, Principal, and Interest Requirements
 ★ General Cleanup
 ★ Internal School Funds
 ★ New Legislation
 ★ Procurement Guide for Audit Services
 ★ Occupancy Tax Reporting
 ★ CMFO
 TENNESSEE COMPTROLLER OF THE TREASURY





Electronic Contracting and Reporting	equirements	
Guidelines and requirements for CARS are included in the Help the CARS application. Selected requirements related to the types electronic reports are included below; however, firms and complying with all CARS requirements. Types of Fig. that Mass bet beloaded if Application of the type of the CARS of the	of files that may be uploaded and	
File Content		
Annual Audit Report/ Annual Financial Report	File Type PDF	
Audit Conclusions – Comptroller's Referral Letter	PDF	
Chart of Accounts Crosswalk	Excel	
Compliance Examination Engagement	PDF	
Federal Form 990 (Specialty License Reporting)	PDF	
Management Letter	PDF	
Schedule of Cash Shortages and Other Thefts	PDF	
Separate Single Audit	PDF	
Specialty License Plate Annual Accounting	PDF	
Unaudited Financial Information	PDF	
Written Attestation TCA 4-1-422	PDF	
Electronic Reports: With the exception of fig. writen antendation: ICA. Section. 61-612 and certain agencies that the a country report with our effect fore; and the recognition flow my only food by the antendation of the recognition flow my only food by the Electronic and reports are pointed to are with extension in trapport, are pointed as not within a great recognition. The property of the property is a second or any in replaced with the revised one.	file unsadited information or that idiance in Section (), electronic is those charged with governance, audit firm. its upon receipt. When a record that we have the properties the upon receipt. The revised report is	TENNESSEE COMPTROLLER OF THE TREASURY

UN Written Attestation Reporting





11

10

4-1-422. Protection of private property rights in implementation of United Nations policies.

TN - Tennessee Code Annotated Tenn. Code Ann. § 4-1-422

 $Title \, 4 \, State \, Government \, > \, Chapter \, 1 \, General \, Provisions \, > \, Part \, 4 \, Miscellaneous \, > \, 4 \cdot 1 \cdot 422. \, Protection \, of private property rights in \, Chapter \, 1 \, General \, Provisions \, > \, Part \, 4 \, Miscellaneous \, > \, 4 \cdot 1 \cdot 422. \, Protection \, of private property rights in \, Chapter \, 1 \, General \, Provisions \, > \, Part \, 4 \, Miscellaneous \, > \, 4 \cdot 1 \cdot 422. \, Protection \, of private property rights in \, Chapter \, 1 \, General \, Provisions \, > \, Part \, 4 \, Miscellaneous \, > \, 4 \cdot 1 \cdot 422. \, Protection \, Operator \, Provisions \, > \, Part \, 4 \, Miscellaneous \, > \, 4 \cdot 1 \cdot 422. \, Protection \, Operator \, Provisions \, > \, Part \, 4 \, Miscellaneous \, > \, 4 \cdot 1 \cdot 422. \, Protection \, Operator \, Provisions \, > \, Part \, 4 \, Miscellaneous \, > \, 4 \cdot 1 \cdot 422. \, Protection \, Operator \, Provisions \, > \, Part \, 4 \, Miscellaneous \, > \, 4 \cdot 1 \cdot 422. \, Protection \, Operator \, Provisions \, > \, Part \, 4 \, Miscellaneous \, > \, 4 \cdot 1 \cdot 422. \, Protection \, Operator \, Provisions \, > \, Part \, 4 \, Miscellaneous \, > \, 4 \cdot 1 \cdot 422. \, Protection \, Operator \, Provision \, Provis$

(a) As used in this section, "political subdivision" means a local governmental entity, including, but not limited to, a municipality, metropolitan government, county, utility district, school district, public building authority, and development district created and existing pursuant to the laws of this state, or any instrumentality of government created by any one (1) or more of the named local governmental entities. (b) This state and its political subdivisions shall not adopt or implement policy recommendations that deliberately or inadvertently infringe or restrict private property rights without due process, as may be required by policy recommendations originating in, or traceable ...

... Tern. Code Ann. § 61-422 4-1-422. Protection of private property rights in implementation of United Nations policies. [a] As used in this section, "political subdivision" means a local governmental entity, including, but not limited to, a municipality, metropolitian government, county, utility district, school district, politic building authority, and development.

—Actual damages, and [B Punithe damages, 457, 2023, ch. 479, § 1, 17094, ch. 877, § 1, 17184 4 State Covernment Chapter 1 General Provisions Part 4 Miscellaneous §-1-422. Protection of private property rights in implementation of United Nations policies...



Purpose of TCA §4-1-422

1. Protecting State and Local Sovereignty

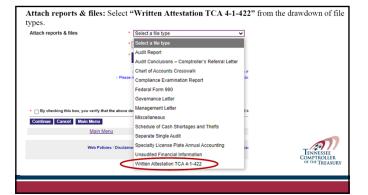
The law is rooted in concern over outside influence from international organizations, especially the United Nations, over local policy decisions. Specifically, it targets programs like:

- Agenda 2
- United Nations 2030 Agenda for Sustainable Development
- Net-zero emissions initiatives
- Any grant promoting policies described in subsection (b) of the law

The Tennessee legislature expressed a belief that these types of programs could steer local decision-making away from state-determined priorities and values.



13



14

Audit Report Revisions

Electronic <u>audit</u> reports are posted to our website upon receipt. When <u>a report</u> revision is required, the report is removed from our website. The revised report is <u>posted to our website upon receipt, revised reports are submitted, the original file is replaced with the revised one.</u>











TENNESSEE COMPTROLLER OF THE TREASURY

Direct Appropriation Grants

A specific allocation of state funds authorized by the Tennessee General Assembly.

Characteristics of Direct Appropriation Grants:

- Legislative Authorization
- Specificity
- Non-Recurring Nature
- Compliance Requirements



16

For-Profit Organizations

- New section added (Section F)
- May receive state grants or federal funds under subrecipient grant
- If these state and/or federal funds exceed the threshold, an audit contract is required

TENNESSEE COMPTROLLER OF THE TREASURY



17

Municipal Energy Authorities

Clarified additional items required by the Comptroller's Office

- · Auditor opinion on combining and individual financial statements, detailed utility schedules, and grant schedule
- Supplementary Schedules (as applicable)
 - Schedule of Expenditures of Federal and State Awards
 - Schedule of Long-Term Debt, Principal and Interest Requirements by Fiscal Year
 Schedule of Changes in Long-Term Debt by Individual Issue

 - Schedule of Changes in Lease Obligations
 Detailed schedules, if several utility services are accounted for in one fund
 - Telecommunication schedules to demonstrate compliance with state law



Schedule of Lease Obligations, Principal and Interest Requirements by Fiscal Year

- Lease principal and interest supplementary schedule no longer required
- Still include the Schedule of Changes in Lease Obligations
- The following schedules are required, if applicable. Certain schedules may exceed GASB's minimum requirements; however, the information provided is used by other state departments and is required to be presented in supplementary information and not the notes. The following are required scheduler.
- Schedule(s) of Long-Term Debt, Principal, and Interest Requirements (e.g., bonds, notes, and other long-term debt-by individual issue) by Fiscal Year.
- Schedule of Changes in Long-Term Debt by Individual Issue. (See example schedule in Appendix 4)
- c. Schedule of Changes in Lease Obligations (See example in Appendix A)
- d. Schedule of Lease Obligations, Principal, and Interest Requirements by Fiscal Year

TENNESSEE COMPTROLLER OF THE TREASURY

19

Other Information

Removed language as auditing standards clearly require this information

The auditor should address all supplementary information presented in the financial report. An opinion on whether the accompanying information is fairly stated in all material respects in relation to the basic financial statements taken as a whole is preferred for ALL supplementary information. This does not include management's corrective action plan, for which no opinion is required. Minimum requirements for opining on the supplemental information are included in Sections B through G. The auditor—should—address—any—accompanying—other—information—presented—in—the financial report (e.g., introductory-section, statistical section, and roster of-officials)

TENNESSEE COMPTROLLER OF THE TREASURY



20

Finding Titles

Audit finding titles should be clear, concise, and informative, providing an immediate understanding of the issue identified.

inancial Statement Finding	Tennessee Entity Summary Schedule of Prior Year Findings For the Fiscal Year Ended June 30, 2024 ps		
Prior Year Finding Number ⁴	Finding Title ³	Status/ Current Year Finding Number ²	
2023-001		Repeated/ 2024-001	
2023-002	Cash not Deposited Timely (original finding # 2020-004)	Corrected	
2023-003	(original finding # 2018-001)	Partially Corrected/ 2024-002	
Federal Award Findings and	Questioned Costs		
Prior Year Finding Number ⁴	Finding Title ³	Status/ Current Year Finding Number	
2023-004	Eligibility not Verified (original finding # 2022-001)	Partially Corrected/ 2024-003	
2023-005	Unallowable Costs Claimed for Reimbursemen (original finding #2019-002)	t Corrected	
Indings reported."	er findings, a note should be included such as "Th I, the schedule should be prepared in the same man		
indings are corrected.	se carried over on the prior and current year schedul		

TENNESSEE COMPTROLLER OF THE TREASURY 1 **The Genus for finding numbers (both the above forms. In i. 4 digit year, continuing (602, 001, etc.).

Internal School Funds



INTERNAL SCHOOL FUNDS

Background

Section 93-2-110. Temessee Code Annotated, in titled "Suddent Activity Fund". However, the sect of the law references activity flunds and other internal school flunds in several paleses. The secondary policy assumed developed in response to that have refere to "chieve natural school and the secondary policy assumed developed in the secondary of the secondary of the secondary secondary and the secondary of the s

(2) Internal school funds mean any and all money received and accounted for at individual schools, and specifically include, but are not limited to:

(A) Any donation or grant made to the school, a school club, or any academic arts, athletic, or social activity related to a school;

(B) Funds for cafeteria services operated at the scho

(C) Fees collected by the school;

(D) Funds transferred to the local school from the school board that are to be accounted for at the local school level;

(E) Funds raised through cooperative agreements with outside organizati (F) Rental fees charged outside entities for use of school facilities; and (G) Student activity funds;

Student activity funds and other internal school funds maintained by each school must be audited annually in accordance with Section 49-2-112. Tennessee Code Annotated.

22

New Legislation of Interest for all Local Governments and Special Purpose Governments

Effective 3/12/2025, Public Chapter 17, as enacted, broadens certain disclosure obligations of state and local governmental entities by requiring their disclosure of covenant violations and credit rating downgrades to the comptroller of the treasury or the comptroller's designee.

Effective 7/1/2025, Public Chapter 18, as enacted, specifies penalties for a municipality that fails to timely provide the comptroller of the treasury with copies of audits of the accounts and records of all departments, boards, and agencies under the municipality, jurisdiction, that receive and disburse funds. All such audits must be completed and submitted to the comptroller of the treasury no later than is (in Dombs following the end of the municipality's fixed layer.

Effective 3/28/2025, Public Chapter 44, as enacted, authorizes a certified municipal finance officer who is contracted with a municipality to provide financial oversight on behalf of the municipality to devote fewer than 16 hours per month to such duties, if the municipality seeks and receives written approval from the comptroller of the treasury.

Effective 3/28/2025, Public Chapter 98, as enacted, authorizes a local government to execute a cooperative purchasing agreement with other local, state, and federal governmental entities for purposes of purchasing materials, labor, and services used for manutenance, operations, component replacement, or repairs of existing ficilities and grounds owned or operated by a local education agency or by a local government agency.







TENNESSEE COMPTROLLER OF THE TREASURY

APP.B-8

23

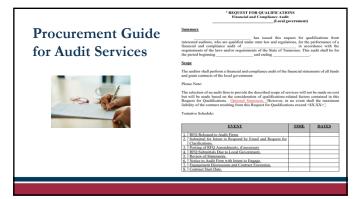
New Legislation of Interest for all Local Governments and Special Purpose Governments

Effective 7/1/2025, Public Chapter 18, as enacted, specifies penalties for a municipality that fails to timely provide the comptroller of the treasury with copies of audits of the accounts and records of all departments, boards, and agencies under the municipality's jurisdiction that receive and disburse funds. All such audits must be completed and submitted to the comptroller of the treasury no later than six (6) months following the end of the municipality's fiscal year.

Effective 3/28/2025, Public Chapter 44, as enacted, authorizes a certified municipal finance officer who is contracted with a municipality to provide financial oversight on behalf of the municipality to devote fewer than 16 hours per month to such duties, if the municipality seeks and receives written approval from the comproller of the treasury,

TENNESSEE COMPTROLLER OF THE TREASURY



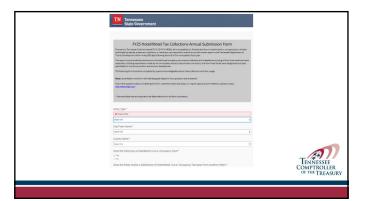


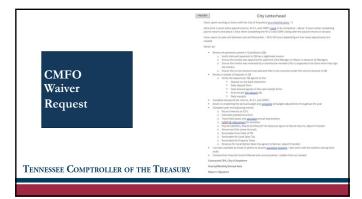
























Innovative School Districts

Innovative School Districts

The Innovative School District Act is contained in TCA Title 49, Chapter 8. This statute allows a public university that operates a training school compendium that serves any grades pre-kindergarten through twelve (pre-K-12) to operate an innovative school district. An innovative school district is considered a Local Education Agency. The governing body for the university serves as the local board of education. Internal school funds received by the district are required to be audited in accordance with TCA Section 49-2-112(a). Innovative school districts must follow the Manual.

TENNESSEE COMPTROLLER OF THE TREASURY



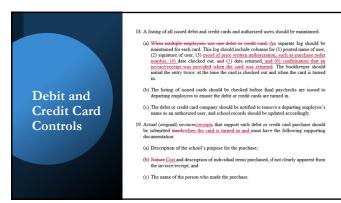
38



Internal Controls

- · Removed repetitive controls
- · Combined controls
- Clarified language

40



41

Internal Controls and Example Forms

- · Ensured terminology was consistent between the written procedures in the Manual and the example forms in Appendix A
- Added references throughout the *Manual* to any applicable Appendix A exhibit

Authorization should include the following information:

- 4. Expected student involvement in fundraising activity (school-wide or individual class or club).
- Refer to Appendix A Exhibit 1 for an example Fundraiser Authorization Form.

TENNESSEE COMPTROLLER OF THE TREASURY



Added TCA Section 49-2-134, which provides that teachers or school employees may raise funds for noneducational purposes

Policy must be established which addresses:

- · Receipt, disbursement, and accounting of all funds
- Sources from which these funds may be derived (e.g., vending, donations)
- How the funds must be used (e.g., bereavement, employee morale, etc.)

43

Removed Section 4, Title 5 – Property Acquisition and Management

- Procedures are still applicable, however, felt the section was repetitive.
- Majority of items were already covered by Capital Asset or Inventory cycles within Section 4, Title 2.
- We ensured all items were covered elsewhere in the Manual and removed the separate Title.

TENNESSEE COMPTROLLER OF THE TREASURY



44

Cooperative Activities





Proceed:

se school shares directly in a percentage of the proceeds of a cooperative activity or receives a mmission. These proceeds should be accounted for within the general fund.

Accounting for Proceeds

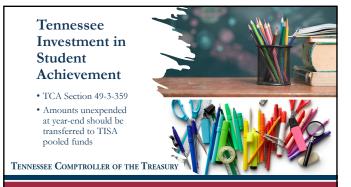
If all proceeds from the event are collected by the school, the proceeds should be receipted by the school and a distribution made to the outside group based on the prior written agreement. The proceeds are collected by the outside group, a designated individual from the school shoul verify that the division of the collections was based on the written agreement and a prenumbere receipt should be issued for the school's share.

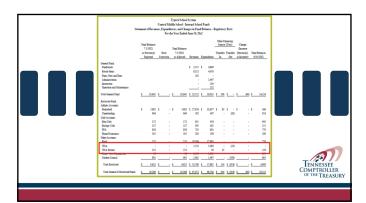
Accounting for Proceeds

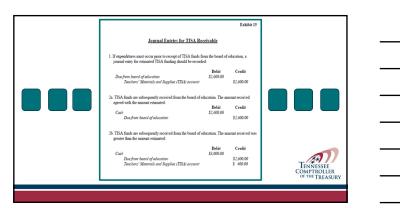
roceeds should be accounted for within the general fund

- If the school collects all proceeds, the school should receipt the proceeds and distribute the outside group's share based on the written agreement.
- If the outside group collects the proceeds, the school should verify the collection received by the school were based on the written agreement. A prenumbered receip should be issued for the school's share.

TENNESSEE COMPTROLLER OF THE TREASURY







Money Collected on Behalf of Board of Education

- Clarified accounting requirements.
- Previously only stated "must be accounted for in the school's accounting records."
- Update is clear this activity should not impact revenue or expenditure accounts. Instead, a liability account should be established.



TENNESSEE COMPTROLLER OF THE TREASURY

49

Electronic Business Systems

TCA Section 4-30-103

- Applies to new electronic technology related to disbursements or receipts
- Requires a plan to be submitted 30 days prior to implementation

TCA Section 47-10-119

- · Applies to electronic records and signatures
- Requires a statement to be filed 30 days prior to offering the services
- Requires a post-implementation review to be conducted and submitted 12 to 18 months following the initial filing

LGA.WEB@cot.tn.gov

50

Revenues and Receipts

Overarching Collection Internal Control Policies and Procedures

- Daily collections from any source may never be used for the purpose of providing change for events. When additional money is needed for the purpose of providing change for events, a check should be written to the individual responsible for the change. The change received should be recorded in the "Cash on Hand Account." The exact amount of the change should be redeposited as soon as feasible and the deposit slip marked "Redeposit." Refer to Appendix A Exhibit 12 for illustrative journal entries.
- Collections may never be turned over (such as leaving money on the cashier's desk) without receiving a receipt.

TENNESSEE COMPTROLLER OF THE TREASURY

Athletic Events

Added a reference to TCA Section 49-6-316

· A school cannot take part in an athletic event if the event's organizer does not allow students from participating schools to purchase tickets with cash – either before the event, at the event, or both.



52

Purchasing Procedures for Bookkeeper

Old

When the bookkeeper receives or originates a purchase requisition, the bookkeeper should review the account balance to be drained to determine if sufficient money is available. If sufficient money is available, the bookkeeper should sign and date the form, and, if the purchase is over \$500, or if it is an online population to predict the control of the control of the purchase and the control of the purchase and the control of the purchase requisition should be given to the individual institute. The befilled in the outstanding purchase requisition should be given to the individual institute the bookkeeper should begin and date the form and follows. The bookkeeper should begin and date the form and follows the account balance to be charged to determine if sufficient money is available. If when requisitions are used for purchases that the control of the bookkeeper should review the second balance to be charged to determine if sufficient money is available. If the purchase is an online payment or over \$100, forward the premumbered to be charged to determine the sufficient money is available. If the purchase is an online payment or over \$100, forward the premumbered to be charged to determine if sufficient money is available. If the purchase is an online payment or over \$100, forward the premumbered to be charged to the amount and type of purchase.



53

Capital Assets

- The Board of Education is responsible for purchasing all capital assets
- Capital assets should **NOT** be recorded within the internal school funds financial statements
- Capital assets should still be tracked by the individual schools for safekeeping and for insurance



TENNESSEE COMPTROLLER OF THE TREASURY

TITLE 5: REFUNDS AND TRAVEL Refunds Refunds in excess of \$10-should be disbursed by check or other approved payment method and should not be paid from a petty cash account. Refunds are reductions of revenue, rather than new expenditures.

55



Bank Reconciliations

General

Bank statements must be reconciled with the cash balances presented in the accounting records (general ledger) as of the end of each month. Bank reconciliations should be prepared on a limited basis, but no later than the end of the following month, within 10-days-offen-the bank statements are received from the bank-Canceled checks and deposit slips must be retained on file with the applicable bank statements for future reference and audit purposes and should not be filed with paid invoices or purchase authorizations. If deposit slips are not returned with the bank statement, validated duplicate deposit slips (or duplicate deposit slips with deposit receipt attached) must be retained.

TENNESSEE COMPTROLLER OF THE TREASURY



56

Deficit Fund Balances

Added disclosure requirement The general fund consists of separate revenue accounts and expenditure accounts. Total general fund expenditures (including unpaid obligations as of June 30 each year) must not exceed the beginning fund balance plus current year revenue. A deficit balance in the general fund (representing the net total of all account balances in the general fund) is nexpose allowable. If a deficit fund balance exists at year end, the deficit must be disclosed in the notes to the financial statements as an instance of noncompliance.

The restricted fund consists of accounts which include both revenues and expenditures, and each account maintains its own identity. Expenditures in each restricted fund account must not exceed the beginning balance plus current year revenue. A deficit balance in a restricted fund account is nexures with a subset of the deficit must be disclosed in the notes to the financial statements as an instance of noncombiance, if significant.

TENNESSEE COMPTROLLER OF THE TREASURY



GASB Statement No. 100: Accounting Changes and Error Corrections

"Prior period adjustment" language is NO longer used.

Typical School System – Internal School Funds Combined Statement of Revenues, Expenditures, and Changes in Fund Balances – Regulatory Basis – All Schools For the Year Ended June 30, 20v2

	Central High School	Middle School	Elementary School	Total
Fund balances, July 1, 20X1, as previously reported	\$ 8,111	\$20,268	\$ 2,000	\$ 30,379
Prior period adjustmentError correction (Note 87)			233	233
Adjusted Efund balances, July 1, 20X1, as adjusted	<u>\$.8.111</u>	\$20,268	S 2.233	\$ 30.612



58

GASB Statement No. 100: Accounting Changes and Error Corrections

"Prior period adjustment" language is NO longer used.

Note 8 - Prior Period AdjustmentError Correction

Central Elementary School's beginning fund balance was adjusted by \$233 in-order-to properly reflect fund balance at July 1, 20X1. It was discovered during the current fiscal year that Reyevenue from Fines, Fees and Dues of \$233 was not reconsider-perported in the prior year's financial statements, This caused resulting in-last year's-evenue, change in fund balance, and ending fund balance beings to be understated by \$233 for the fiscal year ended July 1, 20X1.

TENNESSEE COMPTROLLER OF THE TREASURY

59

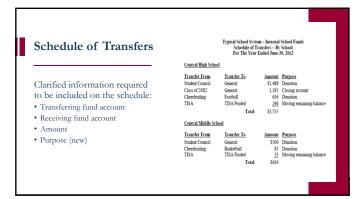
GASB Statement No. 100: Accounting Changes and Error Corrections

Be aware of possible changes in reporting entity, as these will require a note disclosure.

Example scenarios:

- \bullet New middle school students were attending other schools within the same district $\ensuremath{\,^{\text{YES}}}$
- City high school closed students will now attend County high school **NO**
- School serving grades 1-9 divided into two schools (grades 1-5 and 6-9) YES

TENNESSEE COMPTROLLER OF THE TREASURY



	Schedule of Sal	ystem – Internal Scho ary Supplements – By ear Ended June 30, 20	School		Schedule of Salary Supplements
School	Gross Amount	Source of Funds	Board Approved	Proper Withholding	Updated column
Central High School					heading to indicate "Gross" amount
D. Moody	\$ 50	Cheerleading	Yes	Yes	Gross amount
J. Hyde	340	Football	Yes	Yes	
J. Wesley	210	Football	Yes	Yes	
G. Whitfield	85	Football	Yes	Yes	
H. Taylor G. Mueller	55 80	Cheerleading Football	Yes Yes	Yes Yes	
S. Morris	80	Football	Yes	Yes	
C. Finney	100	Football	Yes	Yes	
Total	\$1,000				

Appendix A Example Forms and Journal Entries	Updated headings to be consistent across all forms Added clarification to certain forms Removed unnecessary pages Added example journal entries for TISA receivable



Matt Piland, CMFO Contract Audit Review Specialist Comptroller of the Treasury Division of Local Government Audit Matt Pland@cot.tn.gov 615.401.7889 Lisa Bellar, CPA, CGFM Senior Contract Audit Review Specialist Comptroller of the Treasury Division of Local Government Audit Lisa.Rellar@cot.tn.gov 615.401.7854 Thank You!