

Contract Audit Review Updates

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Division of Local Government Audit

September 17, 2025

TENNESSEE COMPTROLLER OF THE TREASURY



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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 Tennessee Division of Local Government Audit.

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Division of Local Government Audit

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



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Contract Audit Review Team

Tammy Steele
Project Assistant



- Sending out annual audit contract requests
- Managing Contract And Report System (CARS)
- Following-up on late contracts and audit reports

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**Division of
Local Government Audit**

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**TENNESSEE
COMPTROLLER
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Audit Manual Updates


**TENNESSEE
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OF THE TREASURY**

AUDIT MANUAL
STANDARDS AND PROCEDURES

JUNE 2025
*EFFECTIVE FOR AUDITS ISSUED
 AFTER JUNE 30, 2025*

AUDITING, ACCOUNTING AND REPORTING
 FOR LOCAL GOVERNMENT UNITS
 AND OTHER ORGANIZATIONS

Jason E. Mumpower
Comptroller of the Treasury


 DEPARTMENT OF AUDIT

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

Audit Manual Updates

TENNESSEE COMPTROLLER OF THE TREASURY

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The screenshot displays the 'Local Government Audit' section of the Tennessee Comptroller of the Treasury website. The header includes the state logo, navigation links (About Us, Office Functions, Boards, Find a Report, Maps, Careers, News, Contact Us), a search bar, and a 'Go to Comptroller.TN.gov' link. The main content area is titled 'Manuals' and features a grid of manual covers. On the left, a 'Resources' sidebar lists links such as 'COT Cyber Aware', 'Information Systems Best Practices', 'Accounting & Auditing Information', 'Area Contacts', 'Chart of Accounts', 'Manuals', 'Internal School Funds Manual', 'Official Statutory Bonds', 'Training Opportunities', 'Agencies Assisting Local Governments', and 'Audit Glossary'. The manual covers shown include: 'Audit Manual' (Markup Version - June 2025, PDF Version - June 2025), 'Internal Control And Compliance Manual' (PDF Version - December 2015), 'Accounting and Financial Reporting Manual for Tennessee Emergency Communications Districts', and 'Confidential Drug Funds Manual'. The Tennessee Comptroller of the Treasury logo is visible in the bottom right corner.

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Audit Manual Markup Copy Instructions

To assist users in locating this 2025 version of the *Audit Manual* updates, bookmarks were inserted into the markup copy to quickly navigate through the changes to the prior 2024 version. The markup copy also uses colored font to alert the user to these changes. Please use the markup copy as a tool to help locate the updates in the current version of the 2025 *Audit Manual* but not as a comprehensive guide to users in which the full version of the 2025 *Audit Manual* should be used.

- ❏ PREFACE
- ❏ any accompanying other information
- ❏ community corrections
- ❏ written attestation form
- ❏ report revision is required
- ❏ any accompanying other information
- ❏ Audit finding table
- ❏ Schedule of Lease Obligations
- ❏ Schedule of Lease Obligations
- ❏ Municipal energy authorities
- ❏ Additional Requirements of the Comptroller's Office
- ❏ Schedule of Lease Obligations
- ❏ Schedule of Lease Obligations
- ❏ FOR-PROFIT ORGANIZATIONS
- ❏ INTERNAL SCHOOL FUNDS
- ❏ Student activity funds



Markup Copy
AUDIT MANUAL
STANDARDS AND PROCEDURES
JUNE 2025
EFFECTIVE FOR AUDITS ISSUED
AFTER JUNE 30, 2025

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Electronic Contracting and Reporting Requirements

Guidelines and requirements for CARS are included in the Help section of the main web page for the CARS application. Selected requirements related to the types of files that may be uploaded and electronic reports are included below; however, firms and their clients are responsible for complying with all CARS requirements.

Types of Files that Must be Uploaded if Applicable

File Content	File Type
Annual Audit Report/ Annual Financial Report	PDF
Audit Conclusions – Comptroller’s Referral Letter	PDF
<u>Chart of Accounts Crosswalk</u>	<u>Excel</u>
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
<u>Written Attestation TCA 4-1-422</u>	<u>PDF</u>

Electronic Reports:

With the exception of the written attestation form required for compliance with TCA Section 4-1-422 and certain agencies that file unaudited information or that file a courtesy report with our office (See guidance in Section K), electronic reports, related management letters, ~~and~~ letters to those charged with governance, and other required files may only be filed by the audit firm.

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

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Written Attestation: Tennessee Code Annotated (TCA) Section 4-1-422

I _____
 (Name, Title) *
 certify that the _____
 (Name of Political Subdivision)
 has not sought or received a grant in intentional pursuit of a policy described under subsection (b) of Tennessee
 Code Annotated, Section 4-1-422 for the fiscal year ended _____
 (Month, Day, Year)

 (Signature) (Printed Name, Title, Date)

 (Name of Political Subdivision)

*The individual providing certification should be an executive with the organization (e.g., mayor of a municipality, chief executive officer, or member of the governing body of the political subdivision).

Tennessee Code Annotated, Title 4, State Government, Chapter 1, General Provisions, Part 4, Miscellaneous

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, 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 to, the United Nations or a subsidiary entity of the United Nations, including, but not limited to:

- (1) "Agenda 21," adopted by the United Nations in 1992 at its Conference on Environment and Development;
- (2) The 2030 Agenda for Sustainable Development, introduced at a United Nations Summit in 2015;
- (3) The United Nations' proposal to reach net zero emissions by 2050; or
- (4) Another international law or ancillary plan of action that contravenes the constitution of the United States or the constitution of this state.

(c) Since the United Nations has accredited and enlisted numerous non-governmental and intergovernmental organizations to assist in the implementation of its policies relative to Agenda 21, The 2030 Agenda for Sustainable Development, net zero goals for 2050, and its related plans and initiatives, this state and its political subdivisions shall not enter into an agreement, expend any sum of money, or provide financial aid to those non-governmental and intergovernmental organizations as described in or promoted by such plans and initiatives.



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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 > 4-1-422. 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, 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 ...

... Tenn. Code Ann. § 4-1-422 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, metropolitan government, county, utility district, school district, public building authority, and development...

... Actual damages; and (B) Punitive damages. Acts 2023, ch. 479, § 1; 2024, ch. 877, § 1. Title 4 State Government Chapter 1 General Provisions Part 4 Miscellaneous 4-1-422. Protection of private property rights in implementation of United Nations policies...

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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 21
- 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**.

TENNESSEE COMPTROLLER OF THE TREASURY



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Attach reports & files: Select **“Written Attestation TCA 4-1-422”** from the drawdown of file types.

Attach reports & files

* Select a file type ▼

* Select a file type

- * Audit Report
- Audit Conclusions – Comptroller’s Referral Letter
- Chart of Accounts Crosswalk
- Compliance Examination Report
- Federal Form 990
- Governance Letter
- Management Letter
- Miscellaneous
- Schedule of Cash Shortages and Thefts
- Separate Single Audit
- Specialty License Plate Annual Accounting
- Unaudited Financial Information
- Written Attestation TCA 4-1-422**

* ☐ By checking this box, you verify that the above de

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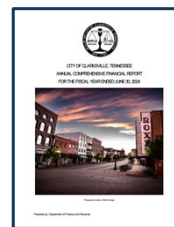
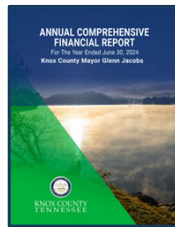
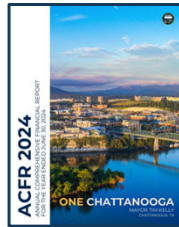
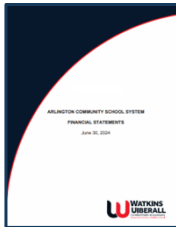
[Main Menu](#)

[Web Policies](#) | [Disclaime](#)



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



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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) in the other information section of the Independent Auditor's Report.~~

TENNESSEE COMPTROLLER OF THE TREASURY



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**Schedule of Lease Obligations, Principal, and Interest Requirements by Fiscal Year
June 30, 2024**

Year Ending, June 30,	Leases		
	Principal	Interest	Total
2025	2,459,133	270,487	2,729,620
2026	2,517,036	224,662	2,741,698
2027	1,590,631	181,973	1,772,604
2028	1,086,728	148,222	1,234,950
2029	523,643	125,805	649,448
2030	317,499	116,335	433,834
2031	332,577	108,381	440,958
2032	352,052	99,970	452,022
2033	255,936	91,968	347,904
2034	183,719	87,425	271,144
2035	180,830	83,394	264,224



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Additional Requirements of the Comptroller's Office

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. However, at a minimum, any combining and individual financial statements, detail schedules required in items 3 and 4 below, and the Schedule of Expenditures of Federal Awards and State Financial Assistance must be opined on in relation to the basic financial statements.

Municipal energy authorities should present in the Notes to the Financial Statements, all related debt disclosures for discretely presented component units that do not submit a separate audited financial report to our office.

Supplemental Information and Other Information:

1. A Schedule of Expenditures of Federal Awards and State Financial Assistance. (This schedule is required if the organization has expended any direct federal assistance or subrecipient funds, regardless of the amount expended.) Assistance in the form of loans must separately identify both the federal and state portions. In addition, the composition of the schedule should conform to the example in Appendix A.
2. 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 schedules:
 - a. 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.
 - b. Schedule of Changes in Long-Term Debt by Individual Issue. (See example schedule in Appendix A)
 - c. Schedule of Changes in Lease Obligations (See example in Appendix A)

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SECTION F

REPORTING AND AUDITING REQUIREMENTS FOR-PROFIT ORGANIZATIONS

Background

A for-profit organization is an entity whose primary goal is to generate a profit. A for-profit organization may receive state grants or federal funds under subrecipient grant contracts with the State of Tennessee.

Uniform Guidance, Part 200.501(i) indicates this subpart (F - Audit Requirements) does not apply to for-profit subrecipients. This part states that the pass-through entity is responsible for establishing requirements to ensure compliance by for-profit subrecipients. Examples to ensure compliance for federal awards may include pre-award audits, monitoring throughout the performance of the subaward, and post-award audits. The state's subaward with a for-profit subrecipient describes applicable compliance requirements for the for-profit subrecipient.

Any for-profit organization that receives grant funding from or through the State of Tennessee is required to contract for an audit through the Comptroller's Office for an audit conducted in accordance with the provisions of Government Auditing Standards in the following circumstance:

Total state and/or federal funds expended under state grant contracts and federal subrecipient grant contracts with the State of Tennessee are \$750,000 or more.

The budgeted composition of state contracts can generally be determined through a review of the Contract Summary Sheet attached to the contract. If a summary sheet is not available, the department executing the contract should be contacted to determine the funding source(s). Actual payment information should also be confirmed with the contracting department since budgeted amounts may differ from the final payments both in amount and funding composition.

Contracts that establish a recipient or subrecipient relationship or that are subject to audit take many forms. Each contract should be evaluated to determine whether it should be treated as establishing a recipient or subrecipient relationship or is otherwise subject to audit. Such contracts should include an audit provision. If there is any doubt regarding the audit requirement for a particular contract, the contracting department should be contacted.

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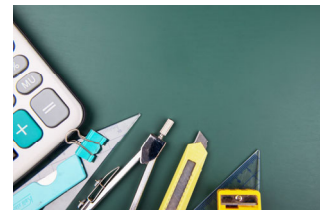
INTERNAL SCHOOL FUNDS

Background

Section 49-2-110, Tennessee Code Annotated, is titled "Student Activity Funds". However, the text of the law references activity funds and other internal school funds in several places. ~~The accounting policy manual developed in response to that law refers to "other internal school funds" and has sections which define the three (3) accounting funds that are used: general, restricted, and cafeteria funds. However, what constituted internal school funds was not explicitly stated.~~ Section 49-2-603, Tennessee Code Annotated, though explicitly only applicable to that part, has a detailed definition and description of what internal school funds are. That definition is reproduced below:

- (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 school;
 - (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 organizations;
 - (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.



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Direct Appropriation Grants

Background

A direct appropriation grant is a specific allocation of state funds authorized by the Tennessee General Assembly to entities such as local governments, nonprofit organizations, educational institutions, or specific projects. Unlike competitive grants, these grants do not require entities to apply through an open competitive process. Instead, the legislature identifies and designates the recipients and the purposes for these funds within the state's annual budget legislation.

Characteristics of Direct Appropriation Grants

- Legislative Authorization: Direct appropriations are established through legislation passed by the General Assembly and are included in the state's budget documents.
- Specificity: These appropriations are earmarked for particular entities or projects, with the intended use and recipient clearly identified in the legislative language.
- Non-Recurring Nature: Often, direct appropriations are designated for one-time expenditures, such as infrastructure projects or special initiatives, and are not intended to fund ongoing operational costs.
- Compliance Requirements: Recipients of direct appropriations must adhere to the terms set forth in the appropriation, including reporting and accountability measures as stipulated by the state.

Recipients of direct appropriation grants must sign a Letter of Agreement with the State of Tennessee, outlining the terms and conditions governing the appropriation. Reporting requirements are specified in the agreement and must be submitted to the appropriate state agency, with a copy provided to the Office of the Comptroller of the Treasury.



ROLLER OF THE TREASURY

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<div style="text-align: center;"> STATE OF TENNESSEE DEPARTMENT OF HUMAN SERVICES <small>JAMES K. POLK BUILDING 501 BRADGORD STREET NASHVILLE, TENNESSEE 37243-1403 TELEPHONE: 615-323-4700 FAX: 615-741-4188 TTY: 1-800-270-1349 www.dhs.tennessee.gov</small> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;"> <small>BILL LEE GOVERNOR</small> </div> <div style="text-align: center;"> <small>CLARENCE H. CARTER COMMISSIONER</small> </div> </div> <p style="text-align: center; margin-top: 10px;">LETTER OF AGREEMENT: DIRECT APPROPRIATION GRANT FOR NON-GOVERNMENTAL ENTITIES</p> <p>Date: _____</p> <p>To: _____</p> <p>From: Clarence H. Carter, Commissioner</p> <p><small>The State's budget for the fiscal year beginning July 1, 2022, includes a direct appropriation grant payable to your organization. This appropriation is in addition to any other funding or appropriation provided to you by the State of Tennessee. Section 55, Item 59, of the 2022 Appropriations Act reads as follows: SECTION 55. Other Additions to Budget. In addition to the amounts appropriated in Sections 1 and 4 of this act, the following amounts are appropriated, and the Commissioner of Finance and Administration is authorized to allocate the appropriations to the appropriate organizational units and to adjust federal aid and other departmental revenues and position authorizations accordingly. Fulltime (FT) and part-time (PT) position authorizations are estimated in the text of the following line items. 59. Miscellaneous Appropriations - Nashville Anti-Human Trafficking Coalition - Grant \$0 (Recurring) \$1,200,000 (Non-Recurring). SECTION 21. Direct Appropriations to Non-Governmental Entities - Provisions. Notwithstanding any provision of this act to the contrary, a direct appropriation to a non-governmental agency or entity shall not be disbursed until the recipient has filed with the head of the agency through which such disbursement is being made a plan specifying the proposed use of such funds and the benefits anticipated to be derived therefrom, and has agreed to file an interim status report to be delivered by February 1 of the use of such funds. As a prerequisite to the receipt of such direct appropriation, the recipient shall agree to provide to the agency head, within ninety (90) days of the close of the fiscal year within which such direct appropriation was received, an accounting of the actual expenditure of such funds, and benefits derived, including a notarized statement that the report is true and correct in all material respects; provided, however, that the head of the agency through which such disbursement is being made may require, in lieu of the accounting as provided above, an audited financial statement of the non-governmental agency or entity. A copy of such accounting or audit, as the case may be, also shall be filed with the office of the Comptroller of the Treasury.</small></p>	<p><small>of such accounting or audit, as the case may be, shall be filed with the Office of the Comptroller of the Treasury.</small></p> <p><small>If you choose to accept this award:</small></p> <p>1. Sign this agreement (include your taxpayer identification number and a daytime phone number) in the space provided as your acceptance of the following terms and conditions:</p> <p>a) A direct appropriation to a non-governmental agency or entity shall not be disbursed until the recipient has filed with the head of the State agency through which such disbursement is being made a plan specifying the proposed use of such funds and the benefits anticipated to be derived therefrom.</p> <p>b) In collaboration with the State agency head or their designee, the recipient agrees to establish 2-5 outcome measures and a measurement frequency over the year that includes at least a baseline, mid-point, and end-point measurement.</p> <p>c) The recipient agrees to report quarterly (Aug. 1, Nov. 1, Feb. 1, May 1, and Aug. 30) to the State agency head or their designee the following information:</p> <p style="margin-left: 20px;">a. A summary of overall progress toward outcomes (e.g., on track, behind schedule, on schedule, complete)</p> <p style="margin-left: 20px;">b. The total amount of the grant spent as of the latest available accounting documentation</p> <p style="margin-left: 20px;">c. Any available outcome data, coinciding with the agreed upon measurement frequencies</p> <p>d) As a prerequisite to the receipt of such direct appropriation, the recipient agrees to provide to the State agency head, within ninety (90) days of the close of the fiscal year within which such direct appropriation was received, an accounting of the actual expenditure of such funds including a notarized statement that the report is true and correct in all material respects; provided, however, that the head of the State agency through which such disbursement is being made may require, in lieu of the accounting as provided above, an audited financial statement of the non-governmental agency or entity. A copy of such accounting or audit, as the case may be, also shall be filed with the office of the Comptroller of the Treasury.</p> <p>e) If you fail to fulfill your obligations under this agreement, the State shall have the right to seek restitution, pursuant to the laws of the State of Tennessee, from you for payments made to you under this agreement.</p> <p>f) Your records and documents, insofar as they relate to the performance of your obligations or to payments received under this agreement, shall be maintained in a manner consistent with the accounting procedures of the Comptroller of the Treasury, pursuant to T.C.A. 4-3-304 and applicable rules and regulations thereunder.</p> <p>g) The funds received shall be placed in an interest bearing account until such time as they are needed for the purposes set out in the Appropriations Act. In the event that any portion of the funds is not expended, the unexpended portion plus any accrued interest shall be returned to the State.</p> <p>h) You must complete the attached Substitute W-9 Form and return it with this signed Letter of Agreement. You are responsible for and assume the liability for failure to provide the correct taxpayer identification number for IRS purposes.</p> <p>2. Return to the State agency head the following materials together:</p> <p style="margin-left: 20px;">a) This signed Letter of Agreement;</p> <p style="margin-left: 20px;">b) Substitute W-9 Form; and</p> <p style="margin-left: 20px;">c) A plan specifying the proposed use of such funds and the benefits anticipated to be derived therefrom.</p> <p><small>We encourage you to return these materials as soon as possible. The State is prepared to process this agreement and issue payment in a timely fashion, upon receipt of these materials.</small></p>	<p>3. You agree to provide a notarized statement and accounting report regarding actual expenditure of these funds to this State agency within 90 days of the close of the fiscal year ending June 30. An additional copy must be provided at that time to: Office of the Comptroller of the Treasury, First Floor, State Capitol, Nashville, Tennessee 37243-0200. (See paragraph 1b above for these requirements.)</p> <p><small>If you should have any questions or comments or need any assistance responding to this request, please contact Gary Wilson at Gary.Wilson@tn.gov</small></p> <p><small>Please retain a copy of this letter for your records. Payment status inquiries and accounting reports may be directed to the following staff of this department:</small></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>On behalf of <u>Nashville Anti-Human Trafficking Coalition</u>, I hereby agree to the aforementioned terms and conditions.</p> <p>Official's Signature: _____ Date: _____</p> <p>Official's Name (please print): _____ Official's Title or Position: _____</p> <p>Daytime Contact Phone Number: _____ Federal Taxpayer Identification Number: _____</p>
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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'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 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 maintenance, operations, component replacement, or repairs of existing facilities and grounds owned or operated by a local education agency or by a local government agency.



APP.B-8

24

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 comptroller of the treasury.



TENNESSEE COMPTROLLER OF THE TREASURY

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Header

City Letterhead

Hours spent working on items with the City of Anywhere 01/8/2020/01/04/2020 - 3

Extra time is spent when payroll returns, W-2's, and 1099's need to be completed - about .5 hours when completing payroll returns and about 1 hour when completing the W-2's and 1099's along with the payroll returns in January.

Hours spent on year-end between July and November - 30 to 50 hours depending on how many adjustments are needed.

What I do:

- Review all payments posted in QuickBooks (QB)
 - Verify that each payment in QB has a legitimate invoice
 - Ensure the invoice was approved for payment (City Manager or Mayor in absence of Manager)
 - Ensure the invoice was reviewed by a commission member (this is supposed to be done when they sign the checks)
 - Ensure the correct amount was paid and that it was recorded under the correct account in QB
- Review a sample of deposits in QB
 - Verify the deposit per QB agrees to the:
 - Deposit on the bank statement
 - Daily deposit form
 - Cash amount agrees to the cash receipt forms
 - Amount per the deposit slip
 - Daily receipts
- Complete all payroll tax returns, W-2's, and 1099's
- Assist in completing the annual budget and complete all budget adjustments throughout the year
- Complete year-end adjusting entries
 - Record interest on CD's
 - Calculate prepaid insurance
 - Track fixed assets and calculate annual depreciation
 - Cash & Adjustments for pensions
 - Payroll Liabilities, Payroll and Payroll Tax Expenses agree to Payroll returns; adjust if needed
 - Annual and Sick Leave Accruals
 - Receivable from State of TN
 - Receivable for Local Sales Tax
 - Receivable for Property Taxes
 - Revenue for Local Option Sales Tax agrees to Banner; adjust if needed
- I am also available by email or phone to answer questions anytime. I also work with the auditors during their audit.
- Created their Internal Control Manual and current policies. Update them as needed.

Contracted CPA, City of Anywhere

Hourly/Monthly/Annual Rate

Mayor's Signature

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¹ REQUEST FOR QUALIFICATIONS

Financial and Compliance Audit

_____ (Local government)

Summary

_____ has issued this request for qualifications from interested auditors, who are qualified under state law and regulations, for the performance of a financial and compliance audit of _____ in accordance with the requirements of the laws and/or requirements of the State of Tennessee. This audit shall be for the period beginning _____ and ending _____.

Scope


The auditor shall perform a financial and compliance audit of the financial statements of all funds and grant contracts of the local government.


Please Note:

The selection of an audit firm to provide the described scope of services will not be made on cost but will be made based on the consideration of qualifications-related factors contained in this Request for Qualifications. Optional Statement, "However, in no event shall the maximum liability of the contract resulting from this Request for Qualifications exceed <\$X.XX>".

Tentative Schedule:

#	EVENT	TIME	DATES
1.	RFQ Released to Audit Firms		
2.	Submittal for Intent to Respond by Email and Request for Clarifications.		
3.	Posting of RFQ Amendments, if necessary		
4.	RFQ Submittals Due to Local Government.		
5.	Review of Statements.		
6.	Notice to Audit Firm with Intent to Engage.		
7.	Engagement Discussions and Contract Execution.		
8.	Contract Start Date.		





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TN Department of Tourist Development

Search Tourism

Meet the Commissioner Executive Directory Tourism Newsroom Travel Trade **Statewide Partners** Visitors Calendar of Events

Tourist Development

Grants & Initiatives

Industry Newsletter

Industry Partner Login

Bulk Order Request Form

Brochure Display Policy

Brochure Submission

Hotel/Motel Tax Annual Reporting

Industry Research

About TDTD

Free Vacation Guide

Plan Your Vacation

TENNESSEE

FIFTY WAYS

SOUNDS PERFECT

YOUR NEXT VACATION IS NOW PLAYING IN TENNESSEE

FOR THE LOVE OF TENNESSEE

ABOUT TDTD

TENNESSEE

FIFTY WAYS

SOUNDS PERFECT

FREE VACATION GUIDE

PLAN YOUR VACATION

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Brochure Submission

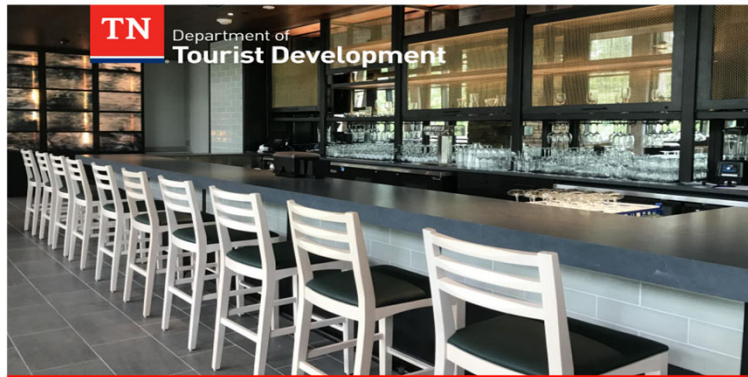
Hotel/Motel Tax Annual Reporting

Hotel/Motel Tax Annual Reporting

Pursuant to Tennessee Code Annotated § 67-4-1403(c), all municipalities that levy a hotel/motel (i.e. occupancy) tax, whether authorized by statute, private act, ordinance, or resolution, are required to submit an annual written report to the Tennessee Department of Tourist Development within ninety (90) days following the end of the municipality's fiscal year.

FY25 Annual Hotel Motel Tax Reporting Form

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Hotel/Motel Tax Annual Reporting

FY25 Process and Submission Form

Tennessee Department of Tourist Development | June 2025

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Executive Summary

Pursuant to Tennessee Code Annotated § 67-4-1403(c), all municipalities that levy a hotel/motel (i.e. occupancy) tax, whether authorized by statute, private act, ordinance, or resolution, are required to submit an annual written report to the Tennessee Department of Tourist Development within ninety (90) days following the end of the municipality's fiscal year.

Due Date

"Not later than ninety (90) days after the end of a municipality's fiscal year" - Tenn. Code Ann. § 67-4-1403

Reporting Period

Report covers revenues and expenditures from most recent fiscal year.

Purpose

To fulfill requirements of Tenn. Code Ann. § 67-4-1403. Specifically, to understand how expenditures, when applicable, have been designated and used for tourism promotion and tourism development pursuant to this part.

How to Submit the Report

Use this link below to access and complete the online form:

https://stateoftennessee.formstack.com/forms/fy25_annual_hotel_motel_tax_reporting

Please contact tddresearch@tn.gov for questions about completing this form, technical issues, or to request special accommodations.

Important Notes

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TN Tennessee State Government

FY25 Hotel/Motel Tax Collections Annual Submission Form

Pursuant to Tennessee Code Annotated (T.C.A.) § 67-4-1403(c), all municipalities (i.e. Entities) that levy a hotel/motel (i.e. occupancy) tax, whether authorized by statute, private act, ordinance, or resolution, are required to submit an annual written report to the Tennessee Department of Tourist Development within ninety (90) days following the end of the municipality's fiscal year.

The report must provide the total amount of hotel/motel occupancy tax revenue collected; and a detailed accounting of how those revenues were expended, including expenditures made by the municipality and any subordinate contractors, and how those funds were designated and used specifically for tourism promotion and tourism development.

The following form should be completed by a person knowledgeable about these collections and their usage.

Note: some fields in this form will hide/disappear based on how questions are answered.

If you have questions about completing this form, experience technical issues, or require special accommodations, please contact tdo.research@tn.gov.

* Denotes fields that are required to be filled before form will allow submission.

Entity Type *

Required field

Select One

City/Town Name *

Select One

County Name *

Select One

Does the Entity levy a Hotel/Motel (A.K.A. Occupancy Tax)? *

☐ Yes
☐ No

Does the Entity receive a distribution of Hotel/Motel (A.K.A. Occupancy Tax) taxes from another Entity? *

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Questions?



TENNESSEE COMPTROLLER OF THE TREASURY

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Internal School Funds Manual



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INTERNAL SCHOOL FUNDS MANUAL
Effective July 2025

INTERNAL SCHOOL FUNDS MANUAL
MARKUP COPY
Effective July 2025

INTERNAL SCHOOL FUNDS
FREQUENTLY ASKED QUESTIONS
JULY 2025

These documents are available on our website
<https://comptroller.tn.gov/office-functions/la/resources/manuals.html>


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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*.

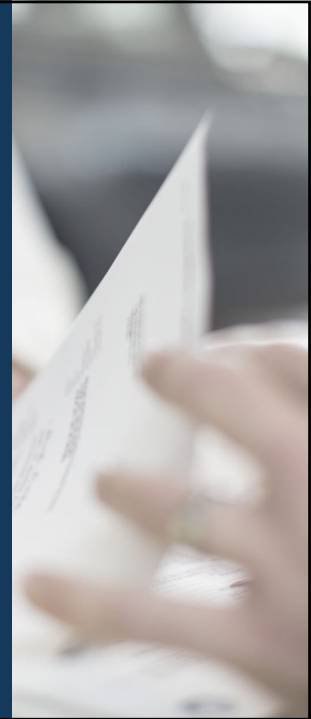
TENNESSEE COMPTROLLER OF THE TREASURY



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Audit Fee

Clarified the fee is
the responsibility
of the Board



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Internal Controls

- Removed repetitive controls
- Combined controls
- Clarified language

5. ~~Merchandise-Goods~~ received should be opened immediately, physically inspected and counted, and documented on a receiving report to verify that goods were actually received in good condition and in the quantities ordered. ~~Likewise~~ Similarly, services performed should be approved, ~~and-accepted~~, and documented on the invoice to verify the service was performed as requested.

~~6. Invoice prices should be compared to prices shown on purchase authorizations, and invoices should be checked for mathematical accuracy.~~

~~7-6.~~ Invoices should be compared to purchase authorizations and matched with receiving reports before payment is approved. Invoices should be checked for mathematical accuracy.

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Debit and Credit Card Controls

18. A listing of all issued debit and credit cards and authorized users should be maintained.
- ~~When multiple employees use one debit or credit card, a~~ separate log should be maintained for each card. This log should include columns for (1) printed name of user, (2) signature of user, (3) proof of prior written authorization, such as purchase order number, (4) date checked out, and (5) date returned, and (6) confirmation that an invoice/receipt was provided when the card was returned. The bookkeeper should initial the entry twice: at the time the card is checked out and when the card is turned in.
 - The listing of issued cards should be checked before final paychecks are issued to departing employees to ensure the debit or credit cards are turned in.
 - The debit or credit card company should be notified to remove a departing employee's name as an authorized user, and school records should be updated accordingly.
19. Actual (original) invoices/receipts that support each debit or credit card purchase should be submitted timely when the card is turned in and must have the following supporting documentation:
- Description of the school's purpose for the purchase;
 - ~~Nature~~ Cost and description of individual items purchased, if not clearly apparent from the invoice/receipt; and
 - The name of the person who made the purchase.

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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:

- Proposed fundraising activity;
 - Methodtype of fundraising activity (e.g., in-person, crowdfunding, etc.);
 - ~~purpose of the fundraising activity;~~
 3. Proposed uses of funds raised; and
 4. Expected student involvement in fundraising activity (school-wide or individual class or club).
- ~~5.~~ Refer to Appendix A – Exhibit 1 for an example Fundraiser Authorization Form.

TENNESSEE COMPTROLLER OF THE TREASURY



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Fundraising for Noneducational Purposes

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



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Cooperative Activities

Old

Proceeds

The school shares directly in a percentage of the proceeds of a cooperative activity or receives a commission. 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. If proceeds are collected by the outside group, a designated individual from the school should verify that the division of the collections was based on the written agreement and a prenumbered receipt should be issued for the school's share.

New

Accounting for Proceeds

Proceeds should be accounted for within the general fund.

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

TENNESSEE COMPTROLLER OF THE TREASURY

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Tennessee Investment in Student Achievement

- TCA Section 49-3-359
- Amounts unexpended at year-end should be transferred to TISA pooled funds

TENNESSEE COMPTROLLER OF THE TREASURY



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Exhibit 15

Typical School System
Central Middle School - Internal School Funds:
Statement of Revenues, Expenditures, and Changes in Fund Balances - Regulatory Basis
For the Year Ended June 30, 2022

Journal Entries for TISA Receivable

Fund Balances 7/1/2021 as Previously Reported	Error Correction	Fund Balances 7/1/2021 as Adjusted	Revenues	Expenditures	Other Financing Sources (Uses)	Change (Decrease)	Fund Balances 6/30/2022
					Transfers In	Transfers Out	
General Fund:							
Fundraisers			\$ 5,215	\$ 4,800			
Rental Items				8,312			4,050
Fines, Fees and Dues			185	-			
Administration			-	1,467			
Instruction			-	204			
Operation and Maintenance			-	132			
Total General Fund	\$ 10,645	\$ -	\$ 10,645	\$ 13,712	\$ 10,653	\$ 500	\$ -
Restricted Fund:							
Athletic Accounts:							
Baseball	\$ 5,982	\$ -	\$ 5,982	\$ 27,958	\$ 33,657	\$ 83	\$ -
Cheerleading	964	-	964	502	467	-	(83)
Club Accounts:							
Bea Club	172	-	172	931	458	-	-
Biology Club	137	-	137	395	381	-	-
FFA	838	-	838	733	801	-	-
Home Economics	195	-	195	203	198	-	-
Other Accounts:							
Bond	745	-	745	18,344	17,883	-	-
TISA	-	-	-	1,523	1,490	-	(33)
TISA Pooled	133	-	133	-	30	33	-
Student Council	891	-	891	2,001	1,497	-	(500)
Total Restricted	\$ 9,623	\$ -	\$ 9,623	\$ 53,760	\$ 57,885	\$ 116	\$ (816)
Total General & Restricted Funds	\$ 20,268	\$ -	\$ 20,268	\$ 67,472	\$ 68,538	\$ 616	\$ (80)

1. If expenditures must occur prior to receipt of TISA funds from the board of education, a journal entry for estimated TISA funding should be recorded:

	Debit	Credit
<i>Due from board of education</i>	\$2,600.00	
<i>Teachers' Materials and Supplies (TISA) account</i>		\$2,600.00

2a. TISA funds are subsequently received from the board of education. The amount received agreed with the amount estimated:

	Debit	Credit
<i>Cash</i>	\$2,600.00	
<i>Due from board of education</i>		\$2,600.00

2b. TISA funds are subsequently received from the board of education. The amount received was greater than the amount estimated:

	Debit	Credit
<i>Cash</i>	\$3,000.00	
<i>Due from board of education</i>		\$2,600.00
<i>Teachers' Materials and Supplies (TISA) account</i>		\$ 400.00

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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



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Electronic Business Systems

LGA.WEB@cot.tn.gov

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

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Revenues and Receipts

Overarching Collection Internal Control Policies and Procedures

1. 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.
2. Collections may never be turned over (such as leaving money on the cashier's desk) without receiving a receipt.

TENNESSEE COMPTROLLER OF THE TREASURY

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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.



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Purchasing Procedures for Bookkeeper	Old	Purchasing
<p>When the bookkeeper receives or originates a purchase requisition, the bookkeeper should review the account balance to be charged 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 \$100, or if it is an online payment or purchase, regardless of the amount, forward it to the principal for approval. After the prenumbered principal, it becomes a purchase authorization order, if one is needed for the purchase. The be filed in the outstanding purchase requisition should be given to the individual initiating the</p>	Purchasing Procedures for Bookkeeper	New
<p>When requisitions are used for purchases that than \$100, the bookkeeper should review the money is available. If sufficient money is available (or follow alternate procedures established requisition should be filed in the outstanding (unless a purchase order is needed for the vendor individual initiating the purchase request.</p>	<p>When the bookkeeper receives or originates a purchase requisition, the bookkeeper should review the account balance to be charged to determine if sufficient money is available. If sufficient money is available, the bookkeeper should sign and date the form, and follow appropriate procedures below based on the amount and type of purchase.</p> <ol style="list-style-type: none"> 1. If the purchase is an online payment or over \$100, forward the prenumbered purchase requisition form to the principal for approval. After the form is signed by the principal, it becomes a purchase authorization. 2. If the purchase is not an online payment and less than \$100, the bookkeeper should initiate the purchase (or follow alternate procedures established by the principal). 	
	<p>The original purchase requisition/purchase authorization should go to the vendor as a purchase order, if needed. One copy should be filed in the outstanding purchase requisition/purchase authorization folder, and the remaining copy should be given to the individual initiating the purchase request.</p>	

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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



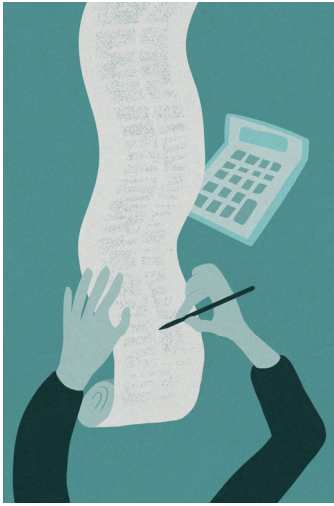
53

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.

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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 timely basis, but no later than the end of the following month, within 10 days after 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



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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 ~~never~~ 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 ~~never~~ allowable. If a deficit restricted fund account balance exists at year end, the deficit must be disclosed in the notes to the financial statements as an instance of noncompliance, if significant.

TENNESSEE COMPTROLLER OF THE TREASURY



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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, 20x2

	Central High School	Central Middle School	Central Elementary School	Total
Fund balances, July 1, 20X1, as previously reported	\$ 8,111	\$20,268	\$ 2,000	\$ 30,379
Prior period adjustment <u>Error correction</u> (Note 8 ²)	—	—	233	233
Adjusted Fund balances, July 1, 20X1, as adjusted	<u>\$ 8,111</u>	<u>\$20,268</u>	<u>\$ 2,233</u>	<u>\$ 30,612</u>

TENNESSEE COMPTROLLER OF THE TREASURY



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GASB Statement No. 100: *Accounting Changes and Error Corrections*

Prior period adjustment language is no longer used

Note 8 – ~~Prior Period Adjustment~~ Error 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~~ Revenue from Fines, Fees and Dues of \$233 was not ~~recorded~~ reported in the prior year's financial statements. ~~This caused resulting in last year's revenue, change in fund balance, and ending fund balance being to be understated by \$233 for the fiscal year ended July 1, 20X1.~~

TENNESSEE COMPTROLLER OF THE TREASURY



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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:

- New middle school - students were attending other schools within the same district **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



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Schedule of Transfers

Clarified information required to be included on the schedule:

- Transferring fund account
- Receiving fund account
- Amount
- Purpose (new)

Typical School System – Internal School Funds Schedule of Transfers – By School For The Year Ended June 30, 20x2

Central High School

<u>Transfer From</u>	<u>Transfer To</u>	<u>Amount</u>	<u>Purpose</u>
Student Council	General	\$1,488	Donation
Class of 20X2	General	1,185	Closing account
Cheerleading	Football	636	Donation
TISA	TISA Pooled	246	Moving remaining balance
	Total	\$3,555	

Central Middle School

<u>Transfer From</u>	<u>Transfer To</u>	<u>Amount</u>	<u>Purpose</u>
Student Council	General	\$500	Donation
Cheerleading	Basketball	83	Donation
TISA	TISA Pooled	33	Moving remaining balance
	Total	\$616	

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Questions?



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Contact Information

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Review Specialist

Division of Local
Government Audit

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Review Specialist

Division of Local
Government Audit

615-401-3051

sara.pope@cot.tn.gov



TENNESSEE COMPTROLLER OF THE TREASURY

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