

**CITY OF ST. JOSEPH, MISSOURI**

**SINGLE AUDIT REPORT**

**FOR THE YEAR ENDED JUNE 30, 2021**

**City of St. Joseph, Missouri  
Single Audit Report**

**For the Year Ended June 30, 2021**

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COCHRAN HEAD VICK & CO., P.C.

& Co

*Certified Public Accountants*

**Independent Auditor's Report on Schedule  
of Expenditures of Federal Awards**

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To the Honorable Mayor and  
Members of the City Council  
City of St. Joseph, Missouri

We have audited the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the City of St Joseph, Missouri (the City) as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the City's basic financial statements. We issued our report thereon dated January 14, 2022, which contained unmodified opinions on those financial statements. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

*Cochran Head Vick & Co., P.C.*

Kansas City, Missouri  
January 14, 2022

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ADDITIONAL INFORMATION

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**City of St. Joseph, Missouri**  
**Schedule of Expenditures of Federal Awards**  
**For The Year Ended June 30, 2021**

Grantor Agency	Federal CFDA Number	Grant Program Number	Current Year Expenditures	Amount Passed Through to Subrecipients
<b>U.S. Department of Agriculture:</b>				
Passed Through Missouri Department of Health and Senior Services				
State WIC Contract	10.557	ERS04520105	\$ 165,453	\$ -
State WIC Contract	10.557	ERS04521076	275,603	-
Total State WIC Contract			<u>441,056</u>	<u>-</u>
Child Nutrition Cluster:				
Summer Food Service Program for Children	10.559	ERS219-20102	1,185	-
<b>Total U.S. Department of Agriculture:</b>			<u>442,241</u>	<u>-</u>
<b>U.S. Department of Defense:</b>				
Passed Through Missouri Air National Guard				
Military Construction, National Guard-BOX CULVERT - MO ANG	12.400	W912NS-17-2-2102	1,500,324	-
<b>Total U.S. Department of Defense:</b>			<u>1,500,324</u>	<u>-</u>
<b>U.S. Department of Housing and Urban Development:</b>				
Direct Assistance/Programs:				
CDBG Entitlement Grants Cluster				
2014 Entitlement	14.218	B-14-MC-290004	245,214	-
2016 Entitlement	14.218	B-16-MC-290004	64,071	-
2017 Entitlement	14.218	B-17-MC-290004	97,214	-
2018 Entitlement	14.218	B-18-MC-290004	962	-
2019 Entitlement	14.218	B-19-MC-290004	63,551	-
2020 Entitlement	14.218	B-20-MC-290004	1,013,445	409,600
2020 Entitlement-CARES	14.218	B-20-MC-290004	127,410	-
	14.218	Program Income Funded Expenditures	<u>16,649</u>	<u>-</u>
Total CDBG Entitlement Grants Cluster			<u>1,628,516</u>	<u>409,600</u>
Home Investment Partnerships Program:				
2016 HOME Program	14.239	M-16-MC-29-0208	5,177	5,177
2017 HOME Program	14.239	M-17-MC-29-0208	68,984	68,984
2018 HOME Program	14.239	M-18-MC-29-0208	52,970	52,970
2019 HOME Program	14.239	M-19-MC-29-0208	9,491	9,491
2020 HOME Program	14.239	M-20-MC-29-0208	25,714	25,714
	14.239	Program Income Funded Expenditure	<u>69,349</u>	<u>-</u>
Total Home Investment Partnerships Program			<u>231,685</u>	<u>162,336</u>
<b>Total U.S. Department of Housing and Urban Development</b>			<u>1,860,201</u>	<u>571,936</u>
<b>U.S. Department of Justice:</b>				
Passed Through Missouri Department of Public Safety				
Coronavirus Emergency Supplemental Funding Program	16.034	2020-VD-BX-0096	26,799	-
Bulletproof Vest Partnership Program	16.607	20021335	1,373	-
Bulletproof Vest Partnership Program	16.607	21024966	5,938	-
Byrne Memorial Justice Assistance Grant	16.738	2019-DJ-BX-0604	409	-
Byrne Memorial Justice Assistance Grant	16.738	2020-DJ-BX-0520	26,650	-
<b>Total U.S. Department of Justice:</b>			<u>61,169</u>	<u>-</u>
<b>U.S. Department of Transportation:</b>				
Passed through Missouri Department of Transportation				
Airport Improvement Program-Runway MO DOT	20.106	20-012A-01	444,218	-
CARES ACT MO DOT	20.106	20-012A-01	61,492	-
Total Airport Improvement Program			<u>505,710</u>	<u>-</u>
Passed through Missouri Highways & Transportation Commission				
Highway Planning and Construction Cluster				
Urban Trial Phase 23 Phase 2	20.205	TAP 5303(101)	2,430	-
Urban Trial Maintenance	20.205	STP-5301 (119)	1,612	-
Total Highway Planning and Construction Cluster			<u>4,042</u>	<u>-</u>
FHWA - UPWP Planning (PL)	20.505	MO-81-0014	96,220	-

See accompanying Notes to Schedule of Federal Awards.

**City of St. Joseph, Missouri**  
**Schedule of Expenditures of Federal Awards**  
**For The Year Ended June 30, 2021**

Grantor Agency	Federal CFDA Number	Grant Program Number	Current Year Expenditures	Amount Passed Through to Subrecipients
<b>Enhanced Mobility of Seniors and Individuals with Disabilities</b> (Transit Services Program Cluster)				
Elwood Expanded Service	20.513	PT-0077-20 K-DOT 5310	16,115	-
Expanded Weekend Service MO 5310	20.513	MO-16-X052	103,135	-
Travel Ambassador	20.513	MO-16-X052	3,186	-
Total Missouri Highways & Transportation Commission			<u>122,436</u>	
<b>Federal Transit Authority</b>				
Federal Transit Cluster				
Federal Transit Administration Grant (Operations)	20.507	MO-2020-006-01	1,389,708	-
Cares Act - Coronavirus Aid, Relief, Economic Security Act	20.507	MO-2020-009-00	2,668,385	-
Transit Buses	20.526	MO-2019-025-00	4,706,940	-
Transit Stops with Solar Lights	20.526	MO-16-X059	79,423	-
Transit Bus Shelters	20.526	MO-2019-025-00	135,226	-
Transit Maintenance Concrete Drain	20.526	MO-2017-042-00	6,360	-
Transit Maintenance Gutters	20.526	MO-2017-042-00	6,680	-
Total Federal Transit Cluster			<u>8,992,722</u>	
<b>Passed Through Missouri Division of Highway Safety</b>				
National Highway Traffic Safety Administration	20.600	20-PT-02-045 (HMV)	4,585	-
National Highway Traffic Safety Administration	20.600	21-PT-02-044 (HMV)	2,469	-
Total Highway Safety Cluster			<u>7,054</u>	
National Highway Traffic Safety Administration	20.607	20-154-AL-047 (NWMO)	4,301	-
National Highway Traffic Safety Administration	20.607	20-154-AL-016(DWIWOLFPAK)	1,514	-
National Highway Traffic Safety Administration	20.607	20-154-AL-050 (SJ DWI)	1,351	-
National Highway Traffic Safety Administration	20.607	21-154-AL-051 (SJ DWI)	554	-
National Highway Traffic Safety Administration	20.607	20-154-AL-049 (Y ALC)	13,494	-
National Highway Traffic Safety Administration	20.607	21-154-AL-049 (Y ALC)	38,163	-
National Highway Traffic Safety Administration	20.607	21-154-AL-037 (YALMINI)	1,999	-
National Highway Traffic Safety Administration	20.607	21-154-AL-037 (HOL DWI)	677	-
National Highway Traffic Safety Administration	20.607	21-154-AL-037 (ST PATS)	1,222	-
Total Highway Traffic Safety			<u>63,275</u>	
National Highway Traffic Safety Administration	20.616	21-M2HVE-05-034 (CLICK IT)	994	-
<b>Total U.S. Department of Transportation</b>			<u>9,792,453</u>	
<b>U. S. Department of Treasury:</b>				
Passed Through Buchanan County, Missouri:				
Cares Act - Coronavirus Aid, Relief, Economic Security Act	21.019	Buchanan County (Health)	151,344	-
Cares Act - Coronavirus Aid, Relief, Economic Security Act	21.019	Buchanan County (Fire)	35,154	-
Cares Act - Coronavirus Aid, Relief, Economic Security Act	21.019	Buchanan County (IT)	136,677	-
Cares Act - Coronavirus Aid, Relief, Economic Security Act	21.019	Buchanan County (Police)	122,888	-
<b>Total U. S. Department of Treasury</b>			<u>446,063</u>	
<b>Environmental Protection Agency</b>				
Passed Through Missouri Department of Natural Resources:				
Clean Water State Revolving Fund Cluster				
Clean Water State Revolving Funds - Blacksnake Creek Stormwater	66.458	C295699-05	2,214,454	-
<b>U.S. Department of Health and Human Services:</b>				
Passed Through National Assoc. of County & City Health Officials:				
Medical Reserve Corps	93.008	MRC-17-2394	43	-
Passed Through Missouri Department of Health and Senior Services:				
Public Health Emergency Preparedness	93.069	AOC18380102	59,769	-
Public Health Emergency Preparedness Carryover	93.069	DH210048491	19,279	-
Total Public Health Emergency Preparedness			<u>79,048</u>	
Passed Through Substance Abuse/Mental Health Services:				
St. Joseph Youth Alliance Grant	93.243	ALCOHOL COMP	3,307	-
Passed Through Missouri Department of Health and Senior Services:				
Epidemiology and Laboratory Capacity Cares	93.323	DH210049217	91,110	-
Public Health Emergency Response (Crisis Cooperative)	93.354	TP922111-01	124,776	-
Child Care Cluster:				
Environmental Child Care Sanitation Inspections	93.575	ERS220-20103	4,325	-
Child Care Health Consultation	93.575	DH190013095	599	-
Child Care Health Consultation	93.575	DH190013095	1,551	-
Total Child Care and Department Block Grant			<u>6,475</u>	
Medicaid Cluster:				
Medical Assistance Program (LPHA)	93.778	MOU MOO513	7,463	-
HIV Case Management	93.917	AOC19380251	65,107	-
HIV Case Management	93.917	AOC19380251	24,937	-
HIV Case Management - Ryan White	93.917	AOC19380251	6,358	-
HIV Ending the Epidemic	93.940	DH210049608	3,682	-
HIV Prevention	93.940	AOC17380095	44,815	-
HIV Prevention	93.940	AOC17380095	16,472	-
Maternal & Child Health Services	93.994	AOC19380195	27,925	-
Maternal & Child Health Services	93.994	AOC19380195	38,643	-
<b>Total U.S. Department of Health and Human Services:</b>			<u>540,161</u>	

See accompanying Notes to Schedule of Federal Awards.

City of St. Joseph, Missouri  
Schedule of Expenditures of Federal Awards  
For The Year Ended June 30, 2021

Grantor Agency	Federal CFDA Number	Grant Program Number	Current Year Expenditures	Amount Passed Through to Subrecipients
<b>U. S. Department of Homeland Security</b>				
Passed Through State Emergency Management Agency:				
Disaster Grant - Public Assistance Grant	97.036	DR 4435 MO	188,036	-
Disaster Grant - Public Assistance Grant	97.036	DR 4451 MO	70,386	-
Total Disaster Grant			258,422	-
Emergency Management Grant	97.042	EMK-2020-EP-00004-105	52,005	-
State Homeland Security Program PSTCP Grant	97.067	EMW-2020-SS-00051-23	5,268	-
<b>Total U.S. Department of Homeland Security</b>			315,695	-
<b>Total Expenditures of Federal Awards</b>			\$ 17,172,761	\$ 571,936

See accompanying Notes to Schedule of Federal Awards.

**City of St. Joseph, Missouri**  
**Notes to the Schedule of Expenditures of Federal Awards**  
**For the Year Ended June 30, 2021**

**Note 1. Organization**

The City of St. Joseph, Missouri (the City), is the recipient of several federal awards. All federal expenditures from awards received directly from federal agencies as well as those awards that are passed through other government agencies are included on the Schedule of Expenditures of Federal Awards.

**Note 2. Basis of Presentation**

The accompanying Schedule of Expenditures of Federal Awards (the Schedule) includes the federal award activity of the City under programs of the federal government for the year ended June 30, 2021. The information in this Schedule is presented in accordance with the requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). Because the Schedule presents only a selected portion of the operations of the City, it is not intended to and does not present the financial position, changes in net position, or cash flows of the City.

**Note 3. Summary of Significant Accounting Policies**

Expenditures reported on the Schedule are reported on the modified accrual basis of accounting. Such expenditures are recognized following, as applicable, Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, wherein certain types of expenditures are not allowable or are limited as to reimbursement. Negative amounts shown on the Schedule represent adjustments or credits made in the normal course of business to amounts reported as expenditures in prior years. The City did not elect to use the 10-percent de minimis indirect cost rate as allowed under the Uniform Guidance.

**Note 4. Local Government Contributions**

Local cost sharing, as defined by Title 2 CFR Part 200, Subpart D, Section 200.306 is required by certain federal grants. The amount of cost sharing varies with each program. Only the federal share of expenditures is presented in the Schedule.

**Note 5. Additional Audits**

Grantor agencies reserve the right to conduct additional audits of the City's grant programs for economy and efficiency and program results that may result in disallowed costs to the. However, management does not believe such audits would result in any disallowed costs that would be material to the City's financial position at June 30, 2021.

**City of St. Joseph, Missouri**  
**Notes to the Schedule of Expenditures of Federal Awards**  
**For the Year Ended June 30, 2021**

**Note 6. Federal Loans Outstanding**

The City administers two revolving loan programs with federal funds. These programs, along with their respective outstanding balances at June 30, 2021, are as follows:

<b>CFDA Number</b>	<b>Program</b>	<b>Loans Outstanding at June 30, 2021</b>
14.218	Community Development Block Grant	\$ 753,377
14.239	HOME Investment Partnerships Program	1,302,929
	<b>Total</b>	<b>\$ 2,056,306</b>

The City also has outstanding loans through the Clean Water Direct Loan Program from the Missouri Department of Natural Resources, as a pass-through agency for the Environmental Protection Agency (CFDA #66.458). As of June 30, 2021, the outstanding loan payable balances were \$10,135,500 Series 2013, \$44,229,000 Series 2014, \$22,555,000 Series 2014A, \$55,402,602 Series 2017. The Clean Water Direct Loan Program does not have a continuing compliance requirement after the initial year of the loan.

**City of St. Joseph, Missouri**  
**Schedule of Findings and Questioned Costs**  
**For the Year Ended June 30, 2021**

**Section 1 - Summary of Auditor's Results**

**Financial Statements:**

Type Audit Report Issued on the Basic Financial Statements of Auditee  
Unmodified

Internal Control over Financial Reporting  
No significant deficiencies reported, no material weaknesses identified.

General Compliance  
The audit did not disclose any instances of noncompliance which would be material to the basic financial statements.

**Federal Awards:**

Internal Control over Major Programs  
No significant deficiencies reported, no material weaknesses identified.

Type Audit Report Issued on Compliance for Major Programs  
Unmodified

Audit Findings  
The audit disclosed no findings that are required to be reported under the Uniform Guidance.

Major Programs

<u>CFDA Number</u>	<u>Name of Federal Program</u>
14.218	Community Development Block Grant (CDGB Entitlement Grant Cluster)
20.507	Federal Transit Formula Grant (Federal Transit Cluster)
20.526	Buses and Bus Facility Formula Grant (Federal Transit Cluster)
21.019	Coronavirus Relief Fund

Dollar Threshold Used to Distinguish Between Type A and Type B Program  
\$750,000

Auditee Qualified as a Low-risk Auditee  
No

**City of St. Joseph, Missouri**  
**Schedule of Findings and Questioned Costs (continued)**  
**For the Year Ended June 30, 2021**

**Section 2 – Financial Statement Findings**

**Financial Statement Findings Required to be Reported in Accordance with Generally Accepted Government Auditing Standards**

None

**Section 3 – Federal Award Findings and Questioned Costs**

**Federal Award Findings Required to be Reported in Accordance with the Uniform Guidance**

None

## Summary Schedule of Prior Year Audit Findings

The City of St. Joseph, Missouri respectfully submits the following summary schedule of prior audit findings for the year ended June 30, 2020.

### Financial Statement Findings

**Reference Number:** 2020-01- Material Weakness

**Finding Summary:** Material Audit Adjustments

**Audit finding:** An effective internal control system over financial reporting provides reasonable assurance that assets are safeguarded against loss and theft, and that reliable financial statements are prepared in accordance with the appropriate accounting standards and in compliance with applicable laws and regulations. The City's current yearend closing procedures and processes resulted in account balances being materially misstated on the City's financials. As a result, material audit adjustments were necessary.

**Status:** Management reviewed and revised yearend closing procedures.

**Person Responsible for Implementation:**

Tom Mahoney, Assistant Administrative Services Director, 816-271-5526.

**Implementation Date:** Corrective action implemented.

**Reference Number:** 2020-002 - Significant Deficiency

**Finding Summary:** Journal Entries

**Audit finding:** It was noted that a journal entry was posted to the general ledger system that did not have the proper approvals before being posted.

**Status:** Management reviewed and revised journal entry approval processes.

**Person Responsible for Implementation:**

Tom Mahoney, Assistant Administrative Services Director, 816-271-5526.

**Implementation Date:** Corrective action implemented.

## **Federal Award Findings**

**Federal Agency:** U.S. Department of Transportation

**Federal Program Title:** Highway Planning and Construction Cluster

**CFDA Number:** 20.205

**Type of Finding:** Significant Deficiency in Internal Control over Compliance and Compliance

**Reference Number:** 2020-003 – Suspension and Disbarment

**Finding Summary:** Suspension and Disbarment

**Audit Finding:** The City is required to review and sign the debarment report and review SAM website. It was noted the City did not review and approve 2 vendors before they entered into a contract with them.

**Status:** The City reviewed and revised suspension and disbarment policies and procedures.

**Person Responsible for Implementation:**

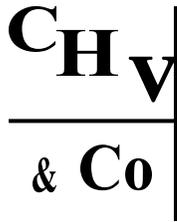
Andrew Clements, Public Works Director, 816-271-4653.

**Implementation Date:** Corrective action implemented.

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COMPLIANCE REPORTS

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**COCHRAN HEAD VICK & CO., P.C.**

*Certified Public Accountants*

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**Independent Auditor's Report On Internal Control Over Financial Reporting And  
On Compliance And Other Matters Based On An Audit Of Financial Statements  
Performed In Accordance With *Government Auditing Standards***

To the Honorable Mayor and  
Members of the City Council  
City of St. Joseph, Missouri

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the City(the City), as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the City's basic financial statements and have issued our report thereon dated January 14, 2022.

**Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the City's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the City's internal control. Accordingly, we do not express an opinion on the effectiveness of the City's internal control.

*A deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. *A material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the City's financial statements will not be prevented or detected and corrected on a timely basis. *A significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

**Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the City's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*

**Purpose of this Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

*Cochran Head Vick + Co., P.C.*

Kansas City, Missouri  
January 14, 2022



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**Independent Auditor's Report On Compliance For Each Major Program  
And On Internal Control Over Compliance Required By the Uniform Guidance**

To the Honorable Mayor and  
Members of the City Council  
City of St. Joseph, Missouri

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

We have audited the City of St. Joseph, Missouri's (the City) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on the City's major federal program for the year ended June 30, 2021. The City's major federal program is identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

***Management's Responsibility***

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

***Auditor's Responsibility***

Our responsibility is to express an opinion on compliance for the City's major federal program based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the City's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for the major federal program. However, our audit does not provide a legal determination of the City's compliance.

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

In our opinion, the City complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2021.

## Report on Internal Control Over Compliance

Management of the City is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the City's internal control over compliance with the types of requirements that could have a direct and material effect on the major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for the major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the City's internal control over compliance.

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

*Cochran Head Vick & Co., P.C.*

Kansas City, Missouri  
January 14, 2022