

CITY OF LOWELL, MASSACHUSETTS

REPORTS ON FEDERAL AWARD PROGRAMS

FISCAL YEAR ENDED JUNE 30, 2012

CITY OF LOWELL, MASSACHUSETTS
REPORTS ON FEDERAL AWARD PROGRAMS
FISCAL YEAR ENDED JUNE 30, 2012

TABLE OF CONTENTS

	PAGE
Independent Auditors' Report on Compliance and on Internal Control over Financial Reporting Based on an Audit of Financial Statements Performed in Accordance with <i>Government Auditing Standards</i>	1
Independent Auditors' Report on Compliance with Requirements Applicable to Each Major Program and Internal Control over Compliance in Accordance with OMB Circular A-133.....	3
Schedule of Expenditures of Federal Awards.....	5
Notes to Schedule of Expenditures of Federal Awards	7
Schedule of Findings and Questioned Costs.....	9



**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**

100 Quannapowitt Parkway
Suite 101
Wakefield, MA 01880
T. 781-914-1700
F. 781-914-1701
www.powersandsullivan.com

To the Honorable Mayor and City Council
City of Lowell, Massachusetts

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 Lowell, Massachusetts, as of and for the year ended June 30, 2012, (except for the Lowell Contributory Retirement System which is as of and for the year ended December 31, 2011), which collectively comprise the City of Lowell's basic financial statements and have issued our report dated November 21, 2012. We conducted our audit in accordance with 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.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered the City of Lowell's internal control over financial reporting as a basis for designing our auditing procedures 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 of Lowell's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the City's internal control over financial reporting.

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 combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis.

Our consideration of the internal control over financial reporting was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in internal control that might be deficiencies, significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses, as defined above.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the City of Lowell, Massachusetts' financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, non compliance 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*.

We noted certain other matters that were reported to management of the City of Lowell, Massachusetts in a separate letter dated November 21, 2012.

This report is intended solely for the information and use of management, the City Council, others within the entity, and federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

Powers & Sullivan, LLC

November 21, 2012



100 Quannapowitt Parkway
Suite 101
Wakefield, MA 01880
T. 781-914-1700
F. 781-914-1701
www.powersandsullivan.com

REPORT ON COMPLIANCE WITH REQUIREMENTS THAT COULD HAVE A DIRECT AND MATERIAL EFFECT ON EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE IN ACCORDANCE WITH OMB CIRCULAR A-133

To the Honorable Mayor and City Council
City of Lowell, Massachusetts

Compliance

We have audited the compliance of the City of Lowell, Massachusetts, with the types of compliance requirements described in the OMB Circular A-133 Compliance Supplement that could have a direct and material effect on each of the City of Lowell's major federal programs for the fiscal year ended June 30, 2012. The City of Lowell Massachusetts' major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts and grants applicable to each of its major federal programs is the responsibility of the City of Lowell Massachusetts' management. Our responsibility is to express an opinion on the City of Lowell, Massachusetts' compliance based on our audit.

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 OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations. Those standards and OMB Circular A-133 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. Our audit does not provide a legal determination of the City of Lowell, Massachusetts's compliance with those requirements.

In our opinion, Lowell, Massachusetts complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect of its major federal programs for the year ended June 30, 2012.

Internal Control Over Compliance

Management of the City of Lowell, Massachusetts is responsible for establishing and maintaining effective internal control over compliance with requirements of laws, regulations, contracts and grants applicable to federal programs. In planning and performing our audit, we considered the City of Lowell's internal control over compliance with the requirements that could have a direct and material effect on a major federal program in order to determine our auditing procedures for the purpose of expressing our opinion on compliance, 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.

Our consideration of the 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 deficiencies, significant deficiencies, or material weaknesses. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above.

The City of Lowell, Massachusetts' responses to the findings identified in our audit are described in the accompanying schedule of findings and questioned costs. We did not audit the City of Lowell, Massachusetts's responses and, accordingly, we express no opinion on the responses.

Schedule of Expenditures of Federal Awards

We have audited the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of the City of Lowell, Massachusetts, as of and for the year ended June 30, 2012, and have issued our report thereon dated November 21, 2012 which contained an unqualified opinion on those financial statements. Our audit was performed for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards is presented for the purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the 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 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 financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated in all material respects in relation to the financial statements as a whole.

This report is intended solely for the information and use of management of the City of Lowell, Massachusetts, federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

Powers & Sullivan, LLC

November 21, 2012

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

FOR THE FISCAL YEAR ENDED JUNE 30, 2012

<u>Federal Grantor/Program Title</u>	<u>Federal CFDA Number</u>	<u>Expenditures</u>
U.S. DEPARTMENT OF AGRICULTURE:		
<u>Passed through Massachusetts Department of Elementary & Secondary Education:</u>		
Non-Cash Assistance (Commodities): National School Lunch Program	10.555	\$ 433,443
Cash Assistance:		
School Breakfast Program	10.553	1,486,380
National School Lunch Program	10.555	3,945,667
Special Summer Food Service Program	10.559	120,317
<u>Passed through Executive Office of Labor and Workforce Development:</u>		
State Administrative Matching Grants for the Supplemental Nutrition Assistance Program	10.561	1,342
TOTAL AGRICULTURE		<u>5,987,149</u>
U.S. DEPARTMENT OF COMMERCE:		
<u>Direct Programs:</u>		
Investments for Public Works and Economic Development Facilities	11.300	1,234,434
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT:		
<u>Direct Programs:</u>		
Community Development Block Grants-Entitlement Grants	14.218	2,166,095
Emergency Shelter Grants	14.231	100,226
Supportive Housing Program	14.235	732,278
HOME Investment Partnerships Program	14.239	704,435
Housing Opportunities for Persons with AIDS	14.241	699,648
ARRA - Community Development Block Grant ARRA Entitlement Grants (CDBG-R), Recovery Act	14.253	18,000
ARRA - Neighborhood Stabilization Program, Recovery Act	14.256	93,745
ARRA - Homelessness Prevention and Rapid Re-Housing Program, Recovery Act	14.257	233,874
<u>Passed through State Office for Communities and Development:</u>		
ARRA - Lead-Based Paint Hazard Control in Privately-Owned Housing, Recovery Act	14.907	628,875
TOTAL HOUSING AND URBAN DEVELOPMENT		<u>5,377,176</u>
U.S. DEPARTMENT OF THE SECRETERY OF THE COMMONWEALTH		
<u>Direct Programs:</u>		
Historic Preservation Survey and Planning	15.904	31,500
U.S. DEPARTMENT OF JUSTICE:		
<u>Direct Programs:</u>		
Grants to Encourage Arrest Policies & Enforcement of Protection Orders	16.590	100,634
Bulletproof Vest Partnership Program	16.607	5,552
Violence Against Women Formula Grants	16.588	23,689
Edward Byrne Memorial Justice Assistance Grant Program	16.738	178,329
ARRA - Edward Byrne Memorial Competitive Grant Program	16.751	8,000
ARRA - Public Safety Partnership and Community Policing Grants, Recovery Act	16.710	722,531
ARRA - Edward Byrne Memorial Competitive Grant Program, Recovery Act	16.808	317,253
<u>Passed through the Massachusetts Executive Office of Pubic Safety:</u>		
Enforcement of Underage Drinking Laws	16.727	16,751
ARRA - Edward Byrne Memorial Justice Assistance Grant (JAG) Program / Grants To Units Of Local Government, Recovery Act	16.804	193,645
<u>Passed through the State Criminal Justice Training Council:</u>		
Highway Safety Programs - Grants Tracking System	20.604	16,235
TOTAL JUSTICE		<u>1,582,619</u>
U.S. DEPARTMENT OF LABOR:		
<u>Passed through Executive Office of Labor and Workforce Development:</u>		
ARRA - Edward Byrne Memorial Justice Assistance Grant (JAG) Program / Grants to States and Territories, Recovery Act	16.803	150,012
Employment Service/Wagner-Peyser Funded Activities	17.207	284,485
Unemployment Insurance	17.225	93,141
WIA Adult Program	17.258	531,128
ARRA - WIA Adult Program, Recovery Act	17.258	1,540
WIA Youth Activities	17.259	534,269
ARRA - WIA Youth Activities, Recovery Act	17.259	4,058
WIA Dislocated Workers	17.260	188,125
ARRA - WIA Dislocated Workers, Recovery Act	17.260	84,356
WIA Dislocated Workers	17.278	713,845
<u>Passed through the Commonwealth Corporation:</u>		
ARRA - Program of Competitive Grants for Worker Training and Placement in High Growth and Emerging Industry Sectors	17.275	115,639
<u>Passed through the Executive Office of Labor and Workforce Development:</u>		
Disabled Veterans Outreach Program	17.801	4,554
Local Veterans Employment Representative Program	17.804	5,925
TOTAL LABOR		<u>2,711,077</u>

(continued)

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

FOR THE FISCAL YEAR ENDED JUNE 30, 2012

<u>Federal Grantor/Program Title</u>	<u>Federal CFDA Number</u>	<u>Expenditures</u>
U.S. DEPARTMENT OF TRANSPORTATION:		
<u>Passed through the State National Highway</u>		
<u>Traffic Safety Administration</u>		
State and Community Highway Safety	20.600	<u>2,332</u>
NATIONAL SCIENCE FOUNDATION:		
<u>Passed through State Department of Education:</u>		
Education and Human Resources	47.076	<u>3,318</u>
U.S. ENVIRONMENTAL PROTECTION AGENCY:		
<u>Direct Programs:</u>		
Brownfields Assessment and Cleanup Cooperative Grants	66.818	317,369
<u>Pass through the Massachusetts Water Pollution Abatement Trust:</u>		
ARRA - Capitalization Grants for Clean Water State Revolving Funds, Recovery Act	66.458	<u>3,469,723</u>
TOTAL ENVIRONMENTAL PROTECTION		<u>3,787,092</u>
U.S. DEPARTMENT OF ENERGY:		
<u>Direct Programs:</u>		
ARRA - Energy Efficiency and Conservation Block Grant Program (EECBG), Recovery Act	81.128	<u>952,544</u>
U.S. DEPARTMENT OF EDUCATION:		
<u>Passed through Massachusetts Department of Elementary</u>		
<u>& Secondary Education</u>		
Adult Education State Grant Program	84.002	80,797
Title I Grants to Local Education Agencies	84.010	7,506,384
Fund for the Improvement of Education	84.215	49,120
Special Education-Grants to States	84.027	4,479,409
Vocational Education Basic Grants to States	84.048	37,177
SPED Preschool Grants	84.173	116,377
Safe and Drug-Free Schools and Communities-State Grants	84.186	1,104
Education for Homeless Children and Youth	84.196	32,447
Twenty-First Century Community Learning Centers	84.287	556,479
Even Start - Family Literacy Initiative Grants	84.314	105,282
High School Graduation Initiative	84.360	57,064
English Language Acquisition Grants	84.365	781,169
Mathematics and Science Partnerships	84.366	100
Improving Teacher Quality State Grants	84.367	1,421,585
School Improvement Grants	84.377	403,914
ARRA - Title I Grants to Local Educational Agencies, Recovery Act	84.389	164,581
ARRA - Special Education Grants to States, Recovery Act	84.391	233,599
ARRA - Special Education - Preschool Grants, Recovery Act	84.392	12,111
ARRA - State Fiscal Stabilization Fund (SFSF) - Race-to-the-Top Incentive Grants, Recovery Act	84.395	1,029,874
Education Jobs Fund	84.410	4,916,934
Learn and Serve America School and Community Based Programs	94.004	<u>2,729</u>
TOTAL EDUCATION		<u>21,988,236</u>
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES:		
<u>Direct Programs:</u>		
Massachusetts Oral Health Workforce	93.236	1,965
Centers for Disease Control and Prevention-Investigations Technical Assistance	93.283	19,521
Refugee & Entrant Assistance-Discretionary Grants	93.576	57,595
<u>Passed through Massachusetts Department</u>		
<u>of Transitional Assistance:</u>		
Temporary Assistance for Needy Families	93.558	229,076
<u>Passed through Massachusetts Department</u>		
<u>of Public Health:</u>		
Collaborative for Action, Leadership and Learning	66.035	139,799
Mass Community Transformation	93.531	52,500
Bioterrorism Hospital Preparedness	93.889	4,000
Substance Abuse Prevention and Treatment	93.959	<u>10,500</u>
TOTAL HEALTH AND HUMAN SERVICES		<u>514,956</u>
U.S. SOCIAL SECURITY ADMINISTRATION:		
<u>Passed through the Massachusetts Rehabilitation Commission:</u>		
Social Security - Disability Insurance	96.001	<u>1,030</u>
U.S. DEPARTMENT OF HOMELAND SECURITY		
<u>Passed through the Massachusetts Executive Office of</u>		
<u>Public Safety</u>		
Homeland Security Grant Program	97.067	3,500
<u>Passed through the Massachusetts</u>		
<u>Emergency Management Agency:</u>		
Public Assistance Grants	97.036	<u>377,161</u>
TOTAL HOMELAND SECURITY		<u>380,661</u>
TOTAL		<u>\$ 44,554,124</u>

(concluded)

Note 1 - Definition of Reporting Entity

The accompanying Schedule of Expenditures of Federal Awards presents the activity of all federal financial assistance programs of the City of Lowell, Massachusetts. All federal financial assistance received directly from federal agencies as well as federal financial assistance passed through other governmental agencies is included on the schedule.

Note 2 - Significant Accounting Policies

The accounting and reporting policies of the City of Lowell, Massachusetts are set forth below:

(a) Basis of Presentation - The accompanying Schedule of Expenditures of Federal Awards is presented on the cash basis of accounting. Accordingly, grant revenues are recognized when received and expenditures when paid.

(b) Cash Assistance - School Breakfast and Lunch Program - Program expenditures represent federal reimbursement for meals provided during the year.

(c) Non-Cash Assistance (Commodities) – School Lunch Program – Program expenditures represent the value of donated foods received during the fiscal year.

Note 3 - Program Clusters

In accordance with Subpart A §_105 of OMB Circular No. A-133, Audits of States, Local Governments and Non Profit Organizations, certain programs have been clustered in determining major programs. The following represents the clustered programs:

<u>Name of Cluster/Program</u>	<u>CFDA Number</u>
Child Nutrition Cluster	
School Breakfast Program	10.553
Non-Cash Contributions (Commodities)	10.555
National School Lunch Program	10.555
CDBG – Entitlement Grants Cluster	
Community Development Block Grants – Entitlement Grants	14.218
Community Development Block Grant ARRA Entitlement Grants	14.253
Special Education Cluster	
Special Education - Grants to States	84.027
Special Education - Preschool Grants	84.173
ARRA-Special Education Grants to States, Recovery Act	84.391
ARRA-Special Education - Preschool Grants, Recovery Act	84.392
Title I, Part A Cluster	
Title I Grants to Local Education Agencies	84.010
ARRA-Title I Grants to Local Education Agencies, Recovery Act	84.389

Workforce Investment Act Cluster	
Adult Program	17.258
ARRA-Adult Program, Recovery Act	17.258
Youth Activities	17.259
ARRA-Youth Activities, Recovery Act	17.259
Dislocated Workers	17.260
ARRA-Dislocated Workers, Recovery Act	17.260
Employment Service Cluster	
Employment Service	17.207
Disabled Veterans Outreach Program	17.801
Local Veterans Employment Representative Programs	17.804
State Fiscal Stabilization Fund Cluster	
ARRA-State Fiscal Stabilization Fund	84.394
ARRA-State Fiscal Stabilization Fund (SFSF) – Government Services, Recovery Act	84.397

A. Summary of Auditors’ Results

1. The auditors’ report expresses an unqualified opinion on the financial statements of the City of Lowell, Massachusetts.
2. No significant deficiencies relating to the audit of the basic financial statements are reported in the 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*.
3. No instances of noncompliance material to the basic financial statements of the City of Lowell, Massachusetts, were disclosed during the audit.
4. No significant deficiencies relating to the audit of the major federal award programs is reported in the Report on Compliance with Requirements That Could Have a Direct and Material effect on Each Major Program and on Internal Control Over Compliance in Accordance with OMB Circular A-133.
5. The auditors’ report on compliance for the major federal award programs for the City of Lowell, Massachusetts, expresses an unqualified opinion.
6. Prior year audit findings relative to the major federal award programs for the City of Lowell, Massachusetts are reported in Part D. of this Schedule.
7. The programs tested as major grants include:

<u>Program Title</u>	<u>CFDA Number</u>
Investments for Public Works and Economic Development Facilities	11.300
ARRA - Capitalization Grants for Clean Water State Revolving Funds	66.458
Title I Grants to Local Education Agencies	84.010
Special Education - Grants to States	84.027
Special Education - Preschool Grants	84.173
Improving Teacher Quality State Grants	84.367
ARRA - Title I Grants to Local Education Agencies, Recovery Act	84.389
ARRA - Special Education Grants to States, Recovery Act	84.391
ARRA - Special Education - Preschool Grants, Recovery Act	84.392
ARRA – State Fiscal Stabilization Fund (SFSF) – Race-to-the-top Incentive Grants, Recovery Act	84.395
Education Jobs Fund	84.410

8. The threshold for distinguishing Types A and B programs was \$1,336,624.
9. The City of Lowell, Massachusetts, was determined to be a high-risk auditee.

B. Findings-Financial Statements Audit

MATERIAL WEAKNESS

2011-1 Reconciliation of Treasury Cash

Condition and Criteria: A lack of timely and accurate reconciliations of cash accounts between the Treasurer’s balance and the general ledger as well as a lack of timely and accurate reconciliations between the Treasurer’s cash book and the bank balance in fiscal year 2006 through 2011. There is no system in place to ensure reconciliations are performed on a timely basis. Proper internal control procedures require cash activity and balances to be reconciled timely.

Effect: The overall effect of this situation deteriorates management’s ability to safeguard assets and monitor the City’s financial condition throughout the year.

Cause: The City has not addressed the need to complete these reconciliations timely.

Recommendation: We recommend that the Treasurer and the Auditor reconcile cash activity and balances on a monthly basis. We also recommend that the Treasurer, through the monthly reconciliation process, clearly identify and resolve in a timely fashion all reconciling items between the bank and book balances. The actual monthly reconciliation of all accounts must be completed no later than the end of the following month

Current Status: During fiscal year 2012, cash was reconciled on a monthly basis in total between the Treasurer’s balance and the general ledger balance. This material weakness is considered resolved.

C. Findings and Questioned Costs-Major Federal Award Program Audit

None

D. Prior Year Audit Findings and Questioned Costs

2011-2

Special Education – Grants to States	84.027
Special Education – Preschool Grants	84.173
ARRA - Special Education – Grants to States	84.391
ARRA – Special Education – Preschool Grants	84.392

Condition and Criteria: The City is required to submit reporting documentation for financial, as well as, student information in a timely manner. During our audit we noted that the reporting of the final financial report (FFR) was not submitted within 60 days of the grant end date.

Cause: The City did not file the final financial report, within 60 days of the grant end date.

Effect: The City is not in compliance with one Federal reporting guideline of filing the final financial report related to the Special Education Grants with in 60 days of the grant end date.

Questions costs: None

Auditors' Recommendation: We recommend the City enact policies and procedures to ensure that they are in compliance with Federal reporting guidelines of filing the final financial report with in the 60 days of the grant end date.

Current Status: All final financial reports were submitted timely during fiscal year 2012. This comment is considered resolved.

2011-3

ARRA – Capitalization Grants for Drinking Water State Revolving funds 66.468

Condition and Criteria: The Governor's Economic Recovery Mobilization Act requires 20% of the work hours on all ARRA funded public works projects with a contract award over \$1 million to be performed by apprentices in bona fide Division of Apprenticeship Training (DAT) approved apprentice training program. This requirement applies to hourly wage employees employed on the project site, workers employed by the contractor or a subcontractor on the project. The City provided documentation from contractors stating they were unable to comply with the apprentice requirement due to the high degree of skill and expected impact hiring an inexperienced member would have on their crew.

Cause: Lack of procedures in place to ensure completion of American Recovery and Reinvestment Act performance and reporting requirements.

Effect: The City is not in compliance with American Recovery and Reinvestment Act performance and reporting requirements related to compliance regarding the 20% apprenticeship rule.

Questions costs: Unknown

Auditors' Recommendation: We recommend the City enact policies and procedures to ensure that they are in compliance with the American Recovery and Reinvestment Act performance and reporting requirements.

Current Status: The grant noted here ended during fiscal year 2011. However, we noted that the City has implemented procedures to assure that any future apprenticeship requirements are closely monitored.