

**COUNTY OF TRINITY**  
**SINGLE AUDIT REPORT**  
**YEAR ENDED JUNE 30, 2017**

CliftonLarsonAllen LLP



WEALTH ADVISORY | OUTSOURCING | AUDIT, TAX, AND CONSULTING



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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**

Board of Supervisors  
County of Trinity  
Weaverville, California

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, the discretely presented component unit, each major fund, and the aggregate remaining fund information of the County of Trinity (the County), as of and for the year ended June 30, 2017, and the related notes to the financial statements, which collectively comprise the County's basic financial statements, and have issued our report thereon dated December 26, 2017. Our report includes a reference to other auditors who audited the financial statements of Waterworks District No. 1, a discretely presented component unit, as described in our report on the County of Trinity's financial statements. This report does not include the result of the other auditors' testing of internal control over financial reporting or compliance and other matters that are reported on separately by those auditors.

**Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the County as of and for the year ended June 30, 2017, in accordance with auditing standards generally accepted in the United States of America, we considered the entity's internal control over financial reporting (internal control) as a basis for designing 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 entity's internal control. Accordingly, we do not express an opinion on the effectiveness of the entity'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 entity'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, and therefore, material weaknesses or significant deficiencies

may exist that have not been identified. We did identify a deficiency in internal control, described in the accompanying Schedule of Findings and Questioned Costs, which we consider to be a material weakness. (2017-001).

**Compliance and Other Matters**

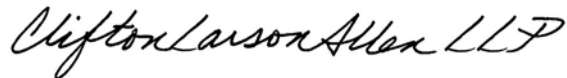
As part of obtaining reasonable assurance about whether the County’s financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material 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*.

**County’s Response to Finding**

The County’s response to the finding identified in our audit is described in the accompanying Schedule of Findings and Questioned Costs. The County’s response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

**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.



**CliftonLarsonAllen LLP**

Roseville, California  
December 26, 2017



**INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE; AND REPORT ON THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY THE UNIFORM GUIDANCE**

Board of Supervisors  
County of Trinity  
Weaverville, California

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

We have audited the County of Trinity's (the County) compliance with the types of compliance requirements described in the *U.S. Office of Management and Budget (OMB) Compliance Supplement* that could have a direct and material effect on each of the County's major federal programs for the year ended June 30, 2017. The County's major federal programs are 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 federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

***Auditor's Responsibility***

Our responsibility is to express an opinion on compliance for each of the County's major federal programs 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 (CFR) 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 County'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 each major federal program. However, our audit does not provide a legal determination of the County's compliance.

***Opinion on Each Major Federal Program***

In our opinion, the County 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, 2017.

**Report on Internal Control Over Compliance**

Management of the County 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 County's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each 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 County'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.

**Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance**

We have audited the financial statements of the governmental activities, the business-type activities, the discretely presented component unit, each major fund, and the aggregate remaining fund information of the County, as of and for the year ended June 30, 2017, and have issued our report thereon dated December 26, 2017, that contained an unmodified opinion on those financial statements. We did not audit the financial statements of Waterworks District No. 1, which represents 100% of the assets, net position, and revenue of the County's discretely presented component unit. Those statements were audited by other auditors whose report has been furnished to us, and our opinion, insofar as it relates to the amounts included for Waterworks District No. 1, is based solely on the report of the other auditors. Our audit was conducted 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 purposes of additional analysis as required by the Uniform Guidance 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 schedule of expenditure of federal awards is fairly stated in all material respects in relation to the financial statements as a whole.



**CliftonLarsonAllen LLP**

Roseville, California  
December 26, 2017

**COUNTY OF TRINITY  
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
YEAR ENDED JUNE 30, 2017**

Federal Grantor/Pass-through Grantor/Program Title	Federal CFDA Number	Pass-Through Entity Identifying Number	Federal Expenditures	Expenditures to Subrecipients
<b><u>U.S. Department of Agriculture</u></b>				
Passed through the State Department of Social Services:				
State Administrative Matching Grants for the Supplemental Nutrition Assistance Program	10.561		\$ 547,638	\$ -
Subtotal - SNAP Cluster			<u>547,638</u>	
Passed through the State Department of Health Services:				
Special Supplemental Nutrition Program for Women, Infants, and Children	10.557		<u>341,350</u>	-
Passed through State Department of Public Works:				
USDA Forest Service Partnership Agreements	10.699	16-CS-11051400-028	46,641	-
Law Enforcement Agreements	10.704	16-LE-11051360-029	21,700	-
Law Enforcement Agreements	10.704	16-LE-11051360-030	9,600	-
Law Enforcement Agreements	10.704	16-LE-11051360-029	1,904	-
Law Enforcement Agreements	10.704	16-LE-11051360-030	367	-
Subtotal - CFDA 10.704			<u>33,571</u>	-
Total U.S. Department of Agriculture			<u>\$ 969,200</u>	<u>\$ -</u>
<b><u>U.S. Department of Education</u></b>				
Passed through State Office of Education:				
Special Education Grants (IDEA)	84.027		<u>22,290</u>	-
Subtotal - IDEA Cluster			<u>22,290</u>	-
Total U.S. Department of Education			<u>\$ 22,290</u>	<u>\$ -</u>
<b><u>U.S. Department of Housing and Urban Development</u></b>				
Passed through State Department of Housing and Community Development:				
Community Development Block Grants/Entitlement Grants (outstanding loan)	14.228		<u>1,417,598</u>	-
Home Investment Partnership Program (outstanding loan)	14.239		<u>3,210,383</u>	-
Total U.S. Department of Housing and Urban Development			<u>\$ 4,627,981</u>	<u>\$ -</u>
<b><u>U.S. Department of the Interior</u></b>				
Direct Program:				
Central Valley Improvement Act Title XXXIV	15.532		<u>26,800</u>	-
Total U.S. Department of the Interior			<u>\$ 26,800</u>	<u>\$ -</u>
<b><u>U.S. Department of Justice</u></b>				
Direct Programs:				
Grants to Encourage Policies and Enforcement of Protection Orders Program	16.590	2011-WE-AX-0003	2,689	-
Domestic Cannabis Eradication Suppression Program (CEP)	16.922	2016-56	65,291	-
Domestic Cannabis Eradication Suppression Program (CEP)	16.922	2017-575	19,757	-
Subtotal - CFDA 16.922			<u>87,737</u>	-
Passed through California Emergency Management Agency:				
Crime Victim Witness Program	16.575	VW12170530	32,188	-
Crime Victim Witness Program	16.575	VW15200530	114,385	-
Subtotal - CFDA 16.575			<u>146,573</u>	-
Total U.S. Department of Justice			<u>\$ 234,310</u>	<u>\$ -</u>

See accompanying Notes to Schedule of Expenditures of Federal Awards.



**COUNTY OF TRINITY  
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (CONTINUED)  
YEAR ENDED JUNE 30, 2017**

Federal Grantor/Pass-through Grantor/Program Title	Federal CFDA Number	Pass-Through Entity Identifying Number	Federal Expenditures	Expenditures to Subrecipients
<b><u>U.S. Department of Transportation</u></b>				
Direct Programs:				
Airport Improvement Program FAA	20.106	3-06-0310-005-2016	\$ 1,495	\$ -
Airport Improvement Program FAA	20.106	3-06-0260-009-2016	1,402	-
Airport Improvement Program FAA	20.106	3-06-0260-008-2016	92	-
Subtotal CFDA - 20.106			2,989	-
Passed through the State Department of Transportation:				
Highway Planning and Construction	20.205	BRLO-5905(082)	338,062	-
Highway Planning and Construction	20.205	BRLO-5905(090)	42,161	-
Highway Planning and Construction	20.205	BRLO-5905(91)	70,187	-
Highway Planning and Construction	20.205	BRLO-5905(092)	83,237	-
Highway Planning and Construction	20.205	BRLO-5905(095)	41,936	-
Highway Planning and Construction	20.205	BRLS-5905(071)	483,288	-
Highway Planning and Construction	20.205	BRLO-5905(110)	121,918	-
Highway Planning and Construction	20.205	BRLO-5905(111)	21,634	-
Highway Planning and Construction	20.205	BRLO-5905(103)	16,301	-
Highway Planning and Construction	20.205	BP MPL-5905(104)	3,889	-
Highway Planning and Construction	20.205	BP MPL-5905(105)	3,389	-
Highway Planning and Construction	20.205	BP MPL-5905(106)	4,229	-
Highway Planning and Construction	20.205	BP MPL-5905(107)	2,368	-
Highway Planning and Construction	20.205	BRLO-5905(108)	17,588	-
Highway Planning and Construction	20.205	BRLO-5905(109)	272	-
Highway Planning and Construction	20.205	BRLO-5905(114)	18,108	-
Highway Planning and Construction	20.205	RPSTPL-5905(036)	24,708	-
Highway Planning and Construction	20.205	RPSTPL-5905(102)	321,009	-
Hazzard Elimination Safety Program	20.205	HSIPL-5905(099)	166,028	-
Hazzard Elimination Safety Program	20.205	HSIPL-5905(100)	139,016	-
Hazzard Elimination Safety Program	20.205	HSIPL-5905(101)	71,110	-
Subtotal - Highway Planning and Construction Cluster			1,990,438	-
Formula Grants for Rural Areas	20.509	64C017-00459	437,107	-
Formula Grants for Rural Areas	20.509	64C017-00358	4,127	-
Subtotal CFDA - 20.509			441,234	-
Total U.S. Department of Transportation			\$ 2,434,661	\$ -
<b><u>U.S. Department of Health and Human Services</u></b>				
Passed through the State Department of Social Services:				
Guardianship Assistance	93.090		2,278	-
Promoting Safe and Stable Families	93.556		19,724	-
Child Support Enforcement	93.563		231,793	-
Community Based Child Abuse Prevention Grants	93.590		31,515	-
Stephanie Tubbs Jones Child Welfare Services Program	93.645		83,025	-
Foster Care Title IV-E	93.658		762,275	-
Foster Care Title IV-E	93.658		451,614	-
Subtotal CFDA - 93.658			1,213,889	-
Adoption Assistance	93.659		766,434	-
Adoption Assistance	93.659		36,916	-
Subtotal CFDA - 93.659			803,350	-
Social Services Block Grant	93.667		122,192	-
Chafee Foster Care Independence Program	93.674		14,463	-

See accompanying Notes to Schedule of Expenditures of Federal Awards.

**COUNTY OF TRINITY  
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (CONTINUED)  
YEAR ENDED JUNE 30, 2017**

Federal Grantor/Pass-through Grantor/Program Title	Federal CFDA Number	Pass-Through Entity Identifying Number	Federal Expenditures	Expenditures to Subrecipients
<b><u>U.S. Department of Health and Human Services (continued)</u></b>				
Passed through the State Department of Social Services:				
Temporary Assistance for Needy Families	93.558		\$ 1,489,153	\$ -
Subtotal TANF Cluster			<u>1,489,153</u>	<u>-</u>
Passed through the State Department of Health Care Services:				
Medical Assistance Program	93.778		594,820	-
Medical Assistance Program - Foster Care	93.778		23,456	-
Medical Assistance Program	93.778		1,211,383	-
Medical Assistance Program	93.778		32,529	-
Medical Assistance Program	93.778		5,356	-
Medical Assistance Program	93.778		58,188	-
Subtotal - Medicaid Cluster			<u>1,925,732</u>	<u>-</u>
Passed through the State Department of Health Care Services (Continued):				
Children's Health Insurance Program	93.767		34,398	-
Immunization Cooperative Grants	93.268		13,732	-
Maternal and Child Health Services Block Grant to the States	93.994		73,496	-
Passed through the State Department of Public Health:				
Hospital Preparedness Program (HPP)	93.074		105,332	-
Public Health Emergency Preparedness Program	93.074		88,511	-
Subtotal - CFDA 93.074			<u>193,843</u>	<u>-</u>
Passed through the State Department of Mental Health:				
Assistance in Transition from Homelessness	93.150		16,660	-
Substance Abuse and Mental Health Services Administration (SAMSHA)	93.958		164,454	-
Passed through the State Department of Alcohol and Drug Abuse Programs:				
Block Grants for Prevention and Treatment of Substance Abuse (SAPT)	93.959		368,474	-
Total U.S. Department of Health and Human Services			<u>\$ 6,802,170</u>	<u>\$ -</u>
<b><u>U.S. Department of Homeland Security</u></b>				
Passed through the State Department of Homeland Security:				
Homeland Security Grant Program - HSGP15	97.067	2015-0078	88,533	-
Passed through the California Emergency Management Agency:				
Emergency Management Performance Grants	97.042	2016-0010	127,815	-
Total U.S. Department of Homeland Security			<u>\$ 216,348</u>	<u>\$ -</u>
<b>Total Expenditures of Federal Awards</b>			<u><b>\$ 15,333,760</b></u>	<u><b>\$ -</b></u>

See accompanying Notes to Schedule of Expenditures of Federal Awards.

**COUNTY OF TRINITY  
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
YEAR ENDED JUNE 30, 2017**

**NOTE 1 BASIS OF PRESENTATION**

The accompanying schedule of expenditures of federal awards presents the activity of all federal awards programs of the County of Trinity for the year ended June 30, 2017. The information in this schedule is presented in accordance with the requirements of Title 2 *U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)*.

**NOTE 2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

Expenditures reported on the schedule are reported on the modified accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. Therefore, some amounts presented in the schedule may differ from amounts presented in, or used in the preparation of, the financial statements.

**NOTE 3 CATALOG OF FEDERAL DOMESTIC (CFDA) NUMBERS**

The program titles and CFDA numbers were obtained from the federal or pass-through grantor or the 2017 *Catalog of Federal Domestic Assistance*. When no CFDA number had been assigned to a program, the two-digit federal agency identifier and the federal contract number were used. When there was no federal contract number, the two-digit federal agency identifier and the word "unknown" were used.

**NOTE 4 INDIRECT COST RATE**

The County did not elect to use the 10 percent de minimis indirect cost rate as covered in 2 CFR §200.414. Uniform Guidance §200.510(6) requires the County to disclose whether or not it elected to use the 10 percent de minimis cost rate that §200.414(f) allows for nonfederal entities that have never received a negotiated indirect cost rate.

**NOTE 5 LOANS WITH CONTINUING COMPLIANCE REQUIREMENTS**

Outstanding federally-funded program loans, with a continuing compliance requirement, carried balances as of June 30, 2017 as follows:

<u>CFDA No.</u>	<u>Federal Program</u>	<u>Outstanding Loans</u>	<u>Loans with Continuing Compliance Requirements</u>
14.228	Community Development Block Grant/States Program	\$ 1,146,388	\$ 1,417,598
14.239	Home Investment Partnership Program	3,255,583	3,210,383

**COUNTY OF TRINITY  
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (CONTINUED)  
YEAR ENDED JUNE 30, 2017**

**NOTE 6 PASS-THROUGH ENTITIES' IDENTIFYING NUMBER**

When federal awards were received from a pass-through entity, the schedule of expenditures of federal awards shows, if available, the identifying number assigned by the pass-through entity. When no identifying number is shown, the County determined that no identifying number is assigned for the program or the County was unable to obtain an identifying number from the pass-through entity.

**COUNTY OF TRINITY  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
YEAR ENDED JUNE 30, 2017**

***Section I – Summary of Auditors’ Results***

***Financial Statements***

1. Type of auditors’ report issued: Unmodified
2. Internal control over financial reporting:
- Material weakness(es) identified?     x     yes            no
  - Significant deficiency(ies) identified?            yes     x     none reported
3. Noncompliance material to financial statements noted?            yes     x     no

***Federal Awards***

1. Internal control over major federal programs:
- Material weakness(es) identified?            yes     x     no
  - Significant deficiency(ies) identified?            yes     x     none reported
2. Type of auditors’ report issued on compliance for major federal programs: Unmodified
3. Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?            yes     x     no

***Identification of Major Federal Programs***

CFDA Number(s)	Name of Federal Program or Cluster
93.558	Temporary Assistance for Needy Families
93.659	Adoption Assistance
14.228	Community Development Block Grants/ State’s Program

Dollar threshold used to distinguish between Type A and Type B programs: \$ 750,000

Auditee qualified as low-risk auditee?     x     yes            no

**COUNTY OF TRINITY  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)  
YEAR ENDED JUNE 30, 2017**

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***Section II – Financial Statement Findings***

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**Finding 2017-001  
Accounts Payable Completeness  
Type of Finding: Material Weakness**

Condition

While performing our audit procedures, we noted an invoice for professional services performed prior to June 30, 2017 for \$143,057 that was not accrued by the County.

Criteria

Under generally accepted accounting principles, expenditures for goods and services should be recorded to the correct period regardless of when the payment is made.

Effect

As a result of this condition, an audit adjustment of \$143,057, increasing accounts payable and operating expenses was made in the Solid Waste Fund.

Cause

The County did not accrue the invoice in its accounting system because the department did not have sufficient budget appropriations at year-end and did not request a budget amendment prior to closing the year.

Recommendation

We recommend that the County establish procedures for accruing expenses when departments do not have sufficient appropriations to cover the invoice to ensure the year-end accounts payable balance is complete.

Views of Responsible Officials

The County agrees with the finding that it did not properly accrue an expense paid in July 2017 back to June 2017. Although staff was aware it was a 2016-17 expense, they did not accrue it because there was not sufficient budget and the deadline for prior year budget amendments had passed.

Corrective Action Plan – Management Response

- 1) Staff has been trained on proper accrual rules. In all cases where an expense was incurred in the prior year, entries will be posted or accrued back, up until the point the books are turned over to the external auditors.
- 2) The Auditor's office will, in the future and on behalf of the departments, submit a final budget adjustment for all departments with over budget conditions.

Contact Information

Angela Bickle, Auditor-Controller, 530-623-1317  
County of Trinity

**COUNTY OF TRINITY  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (CONTINUED)  
YEAR ENDED JUNE 30, 2017**

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***Section III – Findings and Questioned Costs – Major Federal Programs***

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Our audit did not disclose any matters required to be reported in accordance with 2 CFR 200.516(a).