

STATE OF MINNESOTA

Office of the State Auditor



Rebecca Otto
State Auditor

MANAGEMENT AND COMPLIANCE REPORT FOR

DAKOTA COUNTY
HASTINGS, MINNESOTA

YEAR ENDED DECEMBER 31, 2011

Description of the Office of the State Auditor

The mission of the Office of the State Auditor is to oversee local government finances for Minnesota taxpayers by helping to ensure financial integrity and accountability in local governmental financial activities.

Through financial, compliance, and special audits, the State Auditor oversees and ensures that local government funds are used for the purposes intended by law and that local governments hold themselves to the highest standards of financial accountability.

The State Auditor performs approximately 160 financial and compliance audits per year and has oversight responsibilities for over 3,300 local units of government throughout the state. The office currently maintains five divisions:

Audit Practice - conducts financial and legal compliance audits of local governments;

Government Information - collects and analyzes financial information for cities, towns, counties, and special districts;

Legal/Special Investigations - provides legal analysis and counsel to the Office and responds to outside inquiries about Minnesota local government law; as well as investigates allegations of misfeasance, malfeasance, and nonfeasance in local government;

Pension - monitors investment, financial, and actuarial reporting for approximately 730 public pension funds; and

Tax Increment Financing - promotes compliance and accountability in local governments' use of tax increment financing through financial and compliance audits.

The State Auditor serves on the State Executive Council, State Board of Investment, Land Exchange Board, Public Employees Retirement Association Board, Minnesota Housing Finance Agency, and the Rural Finance Authority Board.

Office of the State Auditor
525 Park Street, Suite 500
Saint Paul, Minnesota 55103
(651) 296-2551
state.auditor@osa.state.mn.us
www.auditor.state.mn.us

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**DAKOTA COUNTY
HASTINGS, MINNESOTA**

Year Ended December 31, 2011



Management and Compliance Report

**Audit Practice Division
Office of the State Auditor
State of Minnesota**

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**DAKOTA COUNTY
HASTINGS, MINNESOTA**

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**DAKOTA COUNTY
HASTINGS, MINNESOTA**

**SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED DECEMBER 31, 2011**

I. SUMMARY OF AUDITOR'S RESULTS

Financial Statements

Type of auditor's report issued: **Unqualified**

Internal control over financial reporting:

- Material weaknesses identified? **No**
- Significant deficiencies identified? **Yes**

Noncompliance material to the financial statements noted? **No**

Federal Awards

Internal control over major programs:

- Material weaknesses identified? **No**
- Significant deficiencies identified? **No**

Type of auditor's report issued on compliance for major programs: **Unqualified**

Any audit findings disclosed that are required to be reported in accordance with Section 510(a) of OMB Circular A-133? **No**

The major programs are:

Temporary Assistance for Needy Families (TANF) Cluster	
Temporary Assistance for Needy Families	CFDA # 93.558
Emergency Contingency Fund for TANF State Programs - ARRA	CFDA # 93.714
Child Support Enforcement	CFDA # 93.563
Adoption Assistance Cluster	
Adoption Assistance	CFDA # 93.659
Adoption Assistance - ARRA	CFDA # 93.659
Medical Assistance Program	CFDA # 93.778

The threshold for distinguishing between Types A and B programs was \$1,278,186.

Dakota County qualified as low-risk auditee? **Yes**

II. FINDINGS RELATED TO FINANCIAL STATEMENTS AUDITED IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS*

INTERNAL CONTROL

PREVIOUSLY REPORTED ITEMS NOT RESOLVED

07-1 Documenting and Monitoring Internal Controls

Criteria: County management is responsible for the County's internal control over financial reporting. This responsibility requires performing an assessment of existing controls over significant functions used to produce financial information for the Board, management, and for external financial reporting. The risk assessment is intended to determine if the internal controls that have been established by County management are still effective or if changes are needed to maintain a sound internal control structure. Changes may be necessary due to such things as organizational restructuring, updates to information systems, or changes to services being provided. The following significant internal control areas should be documented: cash and investment activities, major funding sources (taxes, intergovernmental revenues, charges for services, and miscellaneous items); expenditure/expense processing including social services expenditures; and journal entry processing.

Condition: The County has documentation on most of these areas and has begun including the documentation on its internal website. However, with the implementation of a new integrated financial and administrative system, there are changes to the operation of the internal controls. So the documentation and the risk assessments of the County's internal controls need to be updated.

Context: The County is implementing a new integrated financial and administrative system in 2012. This changes how internal controls operate. Therefore, the documentation of the controls and the risk assessment will change.

Effect: Without risk assessment and monitoring procedures, the County increases its risk of fraud. Monitoring of internal controls is necessary to determine controls are in place and operating effectively.

Cause: Due to the time required to implement the new system, the County has not yet completed this project.

Recommendation: We recommend that County management update the documentation of the significant internal controls in its integrated financial and administrative system. We also recommend that a formal plan be developed that calls for monitoring the internal control structure on a regular basis, no less than annually. The monitoring activity should also be documented to show the results of the review, any changes required, and who performed the work.

Client's Response:

On January 1, 2012, we went live with our new ERP system. Within the system, we have more internal controls built in and it will allow for better access to data. With the implementation of this ERP system we are documenting all procedures relating to transactions. This documentation is being reviewed and will be accessible once finalized.

III. FINDINGS AND QUESTIONED COSTS FOR FEDERAL AWARD PROGRAMS

None.

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REBECCA OTTO
STATE AUDITOR

STATE OF MINNESOTA OFFICE OF THE STATE AUDITOR

SUITE 500
525 PARK STREET
SAINT PAUL, MN 55103-2139

(651) 296-2551 (Voice)
(651) 296-4755 (Fax)
state.auditor@state.mn.us (E-mail)
1-800-627-3529 (Relay Service)

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 County Commissioners
Dakota County

We have audited the financial statements of the governmental activities, the business-type activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of Dakota County as of and for the year ended December 31, 2011, which collectively comprise the County's basic financial statements, and have issued our report thereon dated September 27, 2012. Our report includes a reference to other auditors. 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. Other auditors audited the financial statements of the Dakota County Community Development Agency, as described in our report on Dakota County's financial statements. This report does not include the results of the other auditor's 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

Management of Dakota County is responsible for establishing and maintaining effective internal control over financial reporting. In planning and performing our audit, we considered Dakota County'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 County's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the County's internal control over financial reporting.

A deficiency in internal control over financial reporting 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 over financial reporting such that there is a reasonable possibility that a material misstatement of the County's financial statements will not be prevented, or detected and corrected, on a timely basis.

Our consideration of internal control over financial reporting 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 financial reporting 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. However, we identified a deficiency in internal control over financial reporting, described in the Schedule of Findings and Questioned Costs as item 07-1 that we consider to be a significant deficiency in internal control over financial reporting. A significant deficiency is a deficiency, or combination of deficiencies, in internal control over financial reporting that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Dakota County's financial statements are free of 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*.

Minnesota Legal Compliance

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the provisions of the *Minnesota Legal Compliance Audit Guide for Political Subdivisions*, promulgated by the State Auditor pursuant to Minn. Stat. § 6.65. Accordingly, the audit included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

The *Minnesota Legal Compliance Audit Guide for Political Subdivisions* contains seven categories of compliance to be tested: contracting and bidding, deposits and investments, conflicts of interest, public indebtedness, claims and disbursements, tax increment financing, and miscellaneous provisions. Our study included all of the listed categories, except tax increment financing, because Dakota County does not use tax increment financing.

The results of our tests indicate that for the items tested, Dakota County complied with the material terms and conditions of applicable legal provisions.

Dakota County's written response to the internal control finding identified in our audit has been included in the Schedule of Findings and Questioned Costs. We did not audit the County's response and, accordingly, we express no opinion on it.

This report is intended solely for the information and use of the Board of County Commissioners, management, others within Dakota County, and federal awarding agencies and pass-through entities and is not intended to be, and should not be, used by anyone other than those specified parties.

/s/Rebecca Otto

REBECCA OTTO
STATE AUDITOR

September 27, 2012

/s/Greg Hierlinger

GREG HIERLINGER, CPA
DEPUTY STATE AUDITOR

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SUITE 500
525 PARK STREET
SAINT PAUL, MN 55103-2139

(651) 296-2551 (Voice)
(651) 296-4755 (Fax)
state.auditor@state.mn.us (E-mail)
1-800-627-3529 (Relay Service)

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

Board of County Commissioners
Dakota County

Compliance

We have audited Dakota County's compliance with the types of compliance requirements described in the U.S. Office of Management and Budget (OMB) *Circular A-133 Compliance Supplement* that could have a direct and material effect on each of its major federal programs for the year ended December 31, 2011. Dakota County's major federal programs are identified in the Summary of Auditor's 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 County's management. Our responsibility is to express an opinion on the County's compliance based on our audit.

Dakota County's basic financial statements include the operations of the Dakota County Community Development Agency component unit, which expended \$26,189,648 in federal awards during the year ended June 30, 2011, which are not included in the Schedule of Expenditures of Federal Awards. Our audit, described below, did not include the operations of the Community Development Agency because it had a separate single audit in accordance with OMB Circular A-133.

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 Dakota 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. Our audit does not provide a legal determination on the County's compliance with those requirements.

In our opinion, Dakota County complied, in all material respects, with the requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended December 31, 2011.

Internal Control Over Compliance

The management of Dakota County 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 County's internal control over compliance with 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 and to test and report on internal control over compliance in accordance with OMB Circular A-133, 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.

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 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.

Schedule of Expenditures of Federal Awards

We have audited the financial statements of the governmental activities, the business-type activities, the aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of Dakota County as of and for the year ended December 31, 2011, which collectively comprise the County's basic financial statements, and have issued our report thereon dated September 27, 2012. Our report was modified to include a reference to other auditors. Our audit was performed for the purpose of forming opinions on Dakota County's financial statements that collectively comprise the County's basic financial statements. The accompanying Schedule of Expenditures of Federal Awards (SEFA) is presented for purposes of additional analysis as required by OMB Circular A-133 and is not a required part of the basic financial statements. The SEFA 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 SEFA has been subjected to the auditing procedures applied in the audit of the basic 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 SEFA is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

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

/s/Rebecca Otto

REBECCA OTTO
STATE AUDITOR

/s/Greg Hierlinger

GREG HIERLINGER, CPA
DEPUTY STATE AUDITOR

September 27, 2012

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**DAKOTA COUNTY
HASTINGS, MINNESOTA**

**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
FOR THE YEAR ENDED DECEMBER 31, 2011**

Federal Grantor Pass-Through Agency Grant Program Title	Federal CFDA Number	Expenditures	Passed Through to Subrecipients
U.S. Department of Agriculture			
Direct			
Farm and Ranch Lands Protection Program	10.913	\$ 1,336,512	\$ -
Passed Through Minnesota Department of Health			
Special Supplemental Nutrition Program for Women, Infants, and Children	10.557	1,151,696	-
Passed Through Minnesota Department of Education			
Child Nutrition Cluster			
School Breakfast Program	10.553	10,545	-
National School Lunch Program	10.555	16,082	-
Passed Through Minnesota Department of Human Services			
State Administrative Matching Grants for the Supplemental Nutrition Assistance Program	10.561	<u>2,221,602</u>	<u>-</u>
Total U.S. Department of Agriculture		<u>\$ 4,736,437</u>	<u>\$ -</u>
U.S. Department of Housing and Urban Development			
Direct			
Community Development Block Grants - Entitlement Grants Cluster			
Community Development Block Grants/Entitlement Grants	14.218	\$ 1,742,462	\$ 1,742,462
Community Development Block Grant - ARRA Entitlement Grant	14.253	124,634	124,634
Supportive Housing Program	14.235	383,625	-
HOME Investment Partnerships Program	14.239	224,124	224,124
Homelessness Prevention - Rapid Re-Housing Program - ARRA	14.257	<u>146,989</u>	<u>-</u>
Total U.S. Department of Housing and Urban Development		<u>\$ 2,621,834</u>	<u>\$ 2,091,220</u>
U.S. Department of Justice			
Passed Through Minnesota Department of Public Safety			
Juvenile Accountability Block Grant	16.523	\$ 49,161	\$ -
Justice Assistance Grant Program Cluster			
Edward Byrne Memorial Justice Assistance Grant (JAG) Program/ Grants to States and Territories - ARRA	16.803	73,611	-
Direct			
Edward Byrne Memorial Formula Grant Program	16.579	69,129	-
Drug Court Discretionary Grant Program	16.585	90,109	-
State Criminal Alien Assistance Program (SCAAP)	16.606	41,143	-
Public Safety Partnership and Community Policing Grant - ARRA	16.710	15,248	-
Congressionally Recommended Awards	16.753	84,620	-
Justice Assistance Grant Program Cluster			
Edward Byrne Memorial JAG Program/Grants to Units of Local Government - ARRA	16.804	<u>55,225</u>	<u>-</u>
Total U.S. Department of Justice		<u>\$ 478,246</u>	<u>\$ -</u>

The notes to the Schedule of Expenditures of Federal Awards are an integral part of this schedule.

**DAKOTA COUNTY
HASTINGS, MINNESOTA**

**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
FOR THE YEAR ENDED DECEMBER 31, 2011
(Continued)**

Federal Grantor Pass-Through Agency Grant Program Title	Federal CFDA Number	Expenditures	Passed Through to Subrecipients
U.S. Department of Labor			
Passed Through Minnesota Department of Employment and Economic Development			
Workforce Investment Act (WIA) Cluster			
WIA Adult Program	17.258	\$ 357,457	\$ 53,628
WIA Adult Program - ARRA	17.258	15,307	-
WIA Youth Activities	17.259	508,872	407,362
WIA Dislocated Workers - ARRA	17.260	13,381	-
WIA National Emergency Grants	17.277	659,520	71,720
WIA Dislocated Worker Formula Grants	17.278	646,595	151,889
Total U.S. Department of Labor		\$ 2,201,132	\$ 684,599
U.S. Department of Transportation			
Passed Through Minnesota Department of Transportation			
Highway Planning and Construction	20.205	\$ 9,116,151	\$ -
Passed Through Minnesota Department of Public Safety			
Minimum Penalties for Repeat Offenders for Driving While Intoxicated	20.608	3,390	-
Safety Belt Performance Grant	20.609	14,500	-
Total U.S. Department of Transportation		\$ 9,134,041	\$ -
U.S. Environmental Protection Agency			
Direct			
Brownfields Assessment and Cleanup Cooperative Agreements - ARRA	66.818	\$ 91,628	\$ -
U.S. Department of Energy			
Direct			
Energy Efficiency and Conservation Block Grant Program - ARRA	81.128	\$ 294,912	\$ -
U.S. Department of Education			
Direct			
Special Education - Grants for Infants and Families	84.181	\$ 111,998	\$ -

**DAKOTA COUNTY
HASTINGS, MINNESOTA**

**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
FOR THE YEAR ENDED DECEMBER 31, 2011
(Continued)**

Federal Grantor Pass-Through Agency Grant Program Title	Federal CFDA Number	Expenditures	Passed Through to Subrecipients
U.S. Department of Health and Human Services			
Passed Through Minnesota Department of Health			
Public Health Emergency Preparedness	93.069	\$ 354,427	\$ -
Project Grants and Cooperative Agreements for Tuberculosis Control Programs	93.116	8,330	-
Immunization Cluster			
Immunization Cooperataive Agreement	93.268	14,380	-
Immunization - ARRA	93.712	15,824	-
Temporary Assistance for Needy Families Cluster			
Temporary Assistance for Needy Families (TANF)	93.558	325,356	-
Refugee and Entrant Assistance Discretionary Grants	93.576	2,000	-
Maternal and Child Health Services Block Grant to the States	93.994	281,973	-
Passed Through Minnesota Department of Human Services			
Projects for Assistance in Transition from Homelessness (PATH)	93.150	30,428	-
Promoting Safe and Stable Families	93.556	59,943	-
Temporary Assistance for Needy Families Cluster			
Temporary Assistance for Needy Families (TANF)	93.558	3,029,388	-
Emergency Contingency Fund for TANF State Program - ARRA	93.714	43,185	-
Child Support Enforcement	93.563	7,508,253	-
Community Based Child Abuse Prevention Grant	93.590	75,972	-
Child Care and Development Fund Cluster			
Child Care and Development Block Grant	93.575	197,368	-
Child Care Mandatory and Matching Funds of the Child Care and Development Fund	93.596	196,682	-
Stephanie Tubbs Jones Child Welfare Services Program	93.645	143,788	-
Foster Care Title IV-E	93.658	869,183	-
Adoption Assistance Cluster			
Adoption Assistance	93.659	713,878	-
Adoption Assistance - ARRA	93.659	30,074	-
Social Services Block Grant	93.667	1,425,339	-
Chafee Foster Care Independence Program	93.674	63,253	-
Medical Assistance Program	93.778	6,528,895	-
Block Grants for Community Mental Health Services	93.958	56,605	-
Block Grants for Prevention and Treatment of Substance Abuse	93.959	50,210	-
Total U.S. Department of Health and Human Services		\$ 22,024,734	\$ -

**DAKOTA COUNTY
HASTINGS, MINNESOTA**

**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
FOR THE YEAR ENDED DECEMBER 31, 2011
(Continued)**

Federal Grantor Pass-Through Agency Grant Program Title	Federal CFDA Number	Expenditures	Passed Through to Subrecipients
U.S. Department of Homeland Security			
Direct			
Port Security Grant Program	97.056	\$ 118,674	\$ -
Passed Through Minnesota Department of Public Safety			
Boating Safety Financial Assistance	97.012	18,370	-
Emergency Management Performance Grants	97.042	27,733	-
Pre-Disaster Mitigation	97.047	24,341	-
Homeland Security Grant Program	97.067	<u>646,097</u>	<u>-</u>
Total U.S. Department of Homeland Security		<u>\$ 835,215</u>	<u>\$ -</u>
Total Federal Awards		<u>\$ 42,530,177</u>	<u>\$ 2,775,819</u>
 VERMILLION RIVER WATERSHED DISTRICT (Component Unit)			
U.S. Environmental Protection Agency			
Passed through Minnesota Pollution Control Agency			
Nonpoint Source Implementation Grants	66.460	<u>\$ 76,022</u>	<u>\$ -</u>

**DAKOTA COUNTY
HASTINGS, MINNESOTA**

**NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
FOR THE YEAR ENDED DECEMBER 31, 2011**

1. Reporting Entity

The Schedule of Expenditures of Federal Awards presents the activities of federal award programs expended by Dakota County. The County's reporting entity is defined in Note 1 to the financial statements. Dakota County's financial statements include the operations of the Dakota County Community Development Agency (CDA) component unit, which expended \$26,189,648 in federal awards during the year ended June 30, 2011, which are not included in the schedule of expenditures of federal awards. The CDA has its own single audit.

2. Basis of Presentation

The accompanying Schedule of Expenditures of Federal Awards includes the federal grant activity of Dakota County under programs of the federal government for the year ended December 31, 2011. The information in this schedule is presented in accordance with the requirements of Office of Management and Budget (OMB) Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Because the schedule presents only a selected portion of the operations of the County, it is not intended to and does not present the financial position, changes in net assets, or cash flows of Dakota County.

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 the cost principles contained in OMB Circular A-87, *Cost Principles for State, Local and Indian Tribal Governments*, wherein certain types of expenditures are not allowable or are limited as to reimbursement. Pass-through grant numbers were not assigned by the pass-through agencies.

**DAKOTA COUNTY
HASTINGS, MINNESOTA**

4. Clusters

Clusters of programs are groupings of closely related programs that share common compliance requirements. Total expenditures by cluster are:

Child Nutrition Cluster	\$ 26,627
CDBG - Entitlement Grants Cluster	1,867,096
JAG Program Cluster	128,836
WIA Cluster	2,201,132
Immunization Cluster	30,204
Temporary Assistance for Needy Families (TANF) Cluster	3,397,929
Child Care and Development Fund Cluster	394,050
Adoption Assistance Cluster	743,952

5. Reconciliation to Schedule of Intergovernmental Revenue

Federal grant revenue per Schedule of Intergovernmental Revenue	\$ 42,834,393
Grant revenue recognized but not spent in 2011	
Help America Vote Act Requirements Payments	<u>304,216</u>
Expenditures Per Schedule of Expenditures of Federal Awards	<u>\$ 42,530,177</u>

6. American Recovery and Reinvestment Act

The American Recovery and Reinvestment Act of 2009 (ARRA) requires recipients to clearly distinguish ARRA funds from non-ARRA funding. In the schedule, ARRA funds are denoted by the addition of ARRA to the program name.