Summary of Findings

Municipal Use of Coronavirus Relief Funds

January 30, 2023

CohnReznick

ADVISORY • ASSURANCE • TAX

January 30, 2023

Secretary Jeffrey Beckham
State of Connecticut, Office of Policy and Management
450 Capitol Avenue
Hartford, CT 06106

Dear Secretary Beckham:

CohnReznick LLP ("CohnReznick") was engaged by the Office of Policy and Management (referred to herein as "OPM") to provide OPM with financial advisory services including the review and assessment of 169 municipalities use of federal Coronavirus Relief Funds ("CRF") allocated by OPM. The review and assessment included, but was not limited to, the development of an audit methodology and work plan that identified municipalities determined to be high risk or exhibiting irregularities in the use of CRF and identifying any additional reporting necessary to be included in OPM's current systems in place for monitoring and reviewing CRF amounts distributed to municipalities for the final reporting period as outlined in the Statement of Work under Contract ID: 16PSX0081 that was executed on November 8, 2021.

I. Executive Summary

CohnReznick performed the procedures, as described below, and our findings are discussed in further detail within this report.

Our procedures included the analysis and testing of expenditures submitted by the municipalities under the CRF program. The testing procedures included the analysis and review of supporting documentation submitted by the municipalities, conducting interviews of municipal employees, and conducting onsite visits or teleconferences with the municipalities. The procedures performed are discussed further in subsequent sections of this report.

The nature and scope of this engagement did not require an audit of this information in accordance with Generally Accepted Auditing Standards, a review, or a compilation in accordance with Statements on Standards for Accounting and Review Services established by the American Institute of Certified Public Accountants ("AICPA).

The amounts reported by the municipalities, as well as the items tested, are summarized below:

Category	Reported Transactions	Reported Amount	Tested Transactions	Tested Amount	Percent Tested
Expenses	10,812	$16,974,934	1,387	$ 3,783,795	22%
Payroll	24,607	$28,244,947	2,472	$ 7,844,813	28%
Total	35,419	$45,219,881	3,859	$11,628,608	26%

Our procedures identified $2,244,924 of expenditures that did not meet the CRF criteria, as discussed in subsequent sections of this report.

II. Procedures Performed

OPM requested that we perform the procedures described below:

1. Review of current systems or written requirements, including documentation in place for monitoring and reviewing COVID-related pass-through grants to municipalities under the claims reporting period of July 1, 2020, through December 31, 2021, including the municipal reporting portal.

2. Recommend any changes and enhancements to OPM's monitoring systems, processes, CRF portal and additional documents or support required to be submitted by the municipalities that are to be implemented prior to the municipalities' Final CRF Submissions.

3. Perform an initial review of all 169 municipalities' categories of expenditures report, salary related expenditures report and non-personnel expenditures detail to identify abnormalities, irregularities, or high-risk municipalities.

4. Develop an audit plan, including criteria for assigning risk levels and identifying irregularities in reporting to be used for selecting municipalities subject to detailed assessments by CohnReznick.

5. Perform detailed assessments of municipalities selected for further review.

III. Summary of Findings

A. Analysis of OPM's monitoring systems and the municipal portal

CohnReznick submitted a draft report to OPM on December 23, 2021, for this phase of the assignment. CohnReznick and OPM discussed the report,

the enhancements suggested and OPM implemented changes in advance of the Final CRF Submissions by the municipalities.

B. Initial review of the municipal reporting

OPM provided CohnReznick with exports and reports of the detailed CRF expenditures, by transaction, submitted in the OPM municipal portal by each municipality. CohnReznick created a consolidated master database of the transactions uploaded by the municipalities and analyzed the information to identify municipalities for further testing. The data was summarized by category, sorted by description and analyzed to identify items requiring additional analysis. Criteria for selection included expenditure descriptions, vendor descriptions, lump-sum payment amounts, employee titles and departments for payroll submissions and discussions with OPM. The data was then sorted by total flagged amounts by municipality, and the ten municipalities with the highest amount of flagged expenditures were selected for additional testing. In addition, five other municipalities were haphazardly selected and included in the testing selections.

A summary of the municipalities identified for additional testing (the "Selected Municipalities") is listed below:

SELECTED MUNICIPALITIES	SUBMITTED CRF DISBURSEMENTS		
MUNICIPALITY	INVOICE AMOUNT	PAYROLL AMOUNT	TOTAL SUBMISSION
Bridgeport	$ 1,518,991	$ 2,989,796	$ 4,508,787
Brooklyn	$ 41,677	$ 39,256	$ 80,933
Derby	$ 182,874	$ -	$ 182,874
Hamden	$ 243,371	$ 475,759	$ 719,130
Hartford	$ 317,292	$ 3,372,000	$ 3,689,292
New Haven	$ 481,499	$ 2,640,514	$ 3,122,013
New London	$ 495,694	$ 100,848	$ 596,543
Norwalk	$ 409,743	$ 711,993	$ 1,121,736
Norwich	$ 54,597	$ 491,375	$ 545,972
Plymouth	$ 96,522	$ 18,941	$ 115,463
Stamford	$ 329,736	$ 1,158,697	$ 1,488,433
Trumbull	$ 197,862	$ 110,301	$ 308,163
Waterbury	$ 1,392,991	$ 1,141,283	$ 2,534,274
West Hartford	$ 701,978	$ -	$ 701,978
West Haven	$ 242,705	$ 735,726	$ 978,432
Total	**$ 6,707,533**	**$13,986,489**	**$20,694,022**
Total Selected Municipalities	**$16,974,934**	**$28,244,947**	**$45,219,881**
	39.5%	49.5%	45.8%

C. Assessment of Selected Municipalities reporting

CohnReznick reviewed the expenditures included in the Final CRF Submissions by each of the Selected Municipalities. CohnReznick highlighted expenditures to discuss with the municipalities and prepared a questionnaire to obtain additional information regarding the CRF Final Report. In addition, CohnReznick requested invoices, cancelled checks, and supporting documentation for the expenditures highlighted for additional inquiry.

As a result of CohnReznick's testing procedures, there are a number of items that were determined to not meet the CRF requirements, as outlined in the CRF guidelines. For our testing criteria, CohnReznick used the following general guidelines to determine if an item was flagged as a non-eligible item. The criteria listed below are examples and not an all-inclusive list:

1. Supporting invoices were not provided.
2. Items submitted for reimbursement did not represent expenditures necessary or due to the public health emergency with respect to COVID-19.
3. Invoices did not provide sufficient detail regarding the services provided, the rate or per item cost or where the support was otherwise incomplete.
4. Based upon OPM guidance, any meal or food items were flagged as non-eligible items.
5. Payroll items that did not include individual payee information or that did not provide sufficient detail to determine rate of pay, basis of pay and/or number of hours paid.
6. Payroll items for individuals where the municipality could not provide sufficient support regarding the duties or work performed by the individual included in the CRF expenditures.

A summary of the submitted amounts, adjustments for non-eligible items identified in the CohnReznick testing procedures and the net adjusted amounts, for the Selected Municipalities, is listed below:

	Submitted	Testing Adjustments	Adjusted Amount
Invoice Amount	$ 6,707,533	$ (1,007,331)	$ 5,700,202
Payroll Amount	$ 13,986,489	$ (1,083,500)	$ 12,902,989
Total	**$ 20,694,022**	**$ (2,090,831)**	**$ 18,603,191**

Our testing results, by Selected Municipality, are discussed below:

Bridgeport:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 1,518,991.00	$ (650,961.54)	$ 868,029.46
Payroll	$ 2,989,795.74	$ (31,005.52)	$ 2,958,790.22
Total	**$ 4,508,786.74**	**$ (681,967.06)**	**$ 3,826,819.68**

Expense Adjustments:

- $486,344.65 – CT MERS, expenditures for employer contribution towards fringe benefits for select departments. CohnReznick determined that the municipality did not provide sufficient support for these expenditures, and they should be excluded from the CRF reporting. The support provided for these expenditures did not reconcile to the payroll expenditures submitted by the municipality, included payroll amounts for employees not included in the payroll submission, and did not explain the computation methodology for the MERS expenditure submitted.
- $162,116.89 – CT MERS, expenditure for employer contribution towards fringe benefits for select departments. CohnReznick determined that the municipality did not provide sufficient support for these expenditures, and that they should be excluded from the CRF reporting. The municipality did not provide backup for the select departments included in this expenditure, and did not explain the computation methodology for the MERS expenditure submitted.
- $2,500.00 – Downtown Special Services District, funding for a small business pandemic relaunch grant program. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.

Payroll Adjustments:

The municipality submitted line item detail for 6,408 payroll entries totaling $2,989,795.74 from Public Safety Overtime, Public Safety Regular Pay, and Health Regular Pay categories. We selected a sample of 30 entries (10 entries from each category) for a total of $16,233.69 for testing. Our test selections identified one employee who's pay was covered by another

grant, see additional detail below. As a result, CohnReznick determined the entire payroll submission for this employee, representing 26 entries for a total of $31,005.52 should be excluded from CRF reporting. The municipality confirmed no other employees were covered by another grant.

- $31,005.52 – Bridgeport EE 1, a portion of this employee's payroll was paid through another grant but the municipality submitted the full payroll for reimbursement under the CRF program. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Brooklyn:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 41,677.00	$ (1,753.84)	$ 39,923.16
Payroll	$ 39,256.33	$ (21,239.69)	$ 18,016.64
Total	**$ 80,933.33**	**$ (22,993.53)**	**$ 57,939.80**

Expense Adjustments:

- $1,753.84 – CT-CHP, expenditure for employer contributions towards fringe benefits for an employee (see below). CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Payroll Adjustments:

The municipality submitted 42 payroll entries, for two employees, totaling $39,256.33. We selected a test sample of six selections, three per employee, for a total of $5,496.19. Based on that review, we determined payroll for one of the employees should be excluded from CRF submission.

- $21,239.69 - Brooklyn EE 1, payroll for the HR Director. The payroll was budgeted, and the municipality made the determination that the payroll should be included in CRF reporting because the employee's time was "substantially dedicated" to mitigating or responding to the COVID-19 public health emergency, and was "substantially different" work than their normal job duties. The support provided by the municipality did not identify the activities performed or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Derby:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 182,874.00	$ (74,078.02)	$ 108,795.98
Payroll	$ -	$ -	$ -
Total	**$ 182,874.00**	**$ (74,078.02)**	**$ 108,795.98**

Expense Adjustments:

- $440.00 – Flagship Networks, for outsourced IT support. The support provided did not identify the services supplied or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $153.98 – Flagship Networks, for web domain name registration and SSL security for municipal website and web portals. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $4,320.00 – Controlled Air, contract services for maintenance on an HVAC system. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $14,000.00 – Adkins Printing Company, for digital archiving of land records, which was part of a larger project started prior to COVID. This expense is not COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $119.54 – WB Mason, invoice for a laser pointer and batteries, which the municipality confirmed are items that should not have been included in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $4,565.00 – Marion Zabel & Schellenbe, combined invoices for legal services. The municipality was unable to provide a reconciliation of legal invoices to match to the amount claimed in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $50,479.50 – Diversified, for the purchase and installation of an AV system in the municipality council chambers room, which was not operational until June 2022. The municipality was unable to provide proof of payment for the work performed. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Payroll Adjustments:

- None.

Hamden:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 243,371.00	$ (25,571.10)	$ 217,799.90
Payroll	$ 475,759.00	$ (2,079.21)	$ 473,679.79
Total	**$ 719,130.00**	**$ (27,650.31)**	**$ 691,479.69**

Expense Adjustments:

- $9,325.00 – Nero Air Conditioning, expenditures to remove and replace broken exhaust fans in the locker room at the municipality-owned Laurel View Country Club to improve airflow to protect patrons and staff. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $5,800.00 – A Glass Corp, expenditures to install two doors, one at the Keefe Gym, and the other at the municipality's government center, to protect town officials and union employees from COVID-19. The municipality determined the invoice description does not meet the criteria and should be excluded. The payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $4,167.78 – Home Depot, multiple invoices for a variety of items. The municipality could not provide information on specifically how or why the items were purchased for CRF-related purposes. CohnReznick determined the payments do not meet CRF expenditure requirements and should be excluded from the CRF reporting. The municipality is working on a reconciliation.
- $3,370.00 – Rollins Printing, for 500 lawn signs to show appreciation and to thank first responders and other critical workers for their work during the pandemic. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $2,723.84 – Safeware, for the purchase of 66 PVC coated rain suits for public works employees. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $184.48 – Safeware, for the purchase of Advil, cold medicine, and antacid. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Payroll Adjustments:
The municipality submitted 846 entries for police department overtime for a total of $475,759.28. We selected a test sample of 20 entries for a total of $35,927.03.

- $2,079.21 – Hamden EE 1, the municipality was unable to provide support for this submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Hartford:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 317,292.00	$ (1,260.00)	$ 316,032.00
Payroll	$ 3,372,000.00	$ -	$ 3,372,000.00
Total	**$ 3,689,292.00**	**$ (1,260.00)**	**$ 3,688,032.00**

Expense Adjustments:

- $490.00 – Travel Inn Hotel, the municipality provides temporary housing for individuals displaced by natural disasters, fire or flooding. The municipality was unable to provide support for the cost incurred.
- $385.00 – Bliss Hospitality, the municipality provides temporary housing for individuals displaced by natural disasters, fire or flooding. The municipality was unable to provide support for the cost incurred.
- $385.00 – Bliss Hospitality, the municipality provides temporary housing for individuals displaced by natural disasters, fire or flooding. The municipality was unable to provide support for the cost incurred.

Payroll Adjustments:

- None.

New Haven:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 481,499.00	$ -	$ 481,499.00
Payroll	$ 2,640,513.57	$ (2,063.30)	$ 2,638,450.27
Total	**$ 3,122,012.57**	**$ (2,063.30)**	**$ 3,119,949.27**

Expense Adjustments:

- None.

Payroll Adjustments:
The municipality submitted police and fire department overtime and base pay as two lump-sum entries, for a total of $2,202,957.81 and $437,555.76, respectively. CohnReznick requested backup support for the lump-sum totals, and from that information, selected a test sample of nine entries for a total of $10,250.75. During our review of the test selections, we determined further review was required to better understand the calculation for three of the employees, totaling $2,063.30, with this amount determined to be excluded from CRF reporting as outlined below.

- $361.86 – New Haven EE 1, the support provided by the municipality does not support the overtime hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $159.83 – New Haven EE 2, the support provided by the municipality does not support the overtime hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $1,541.61 – New Haven EE 3, the support provided by the municipality does not support the hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

New London:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 495,694.00	$ (88,218.84)	$ 407,475.16
Payroll	$ 100,848.00	$ (528.54)	$ 100,319.46
Total	**$ 596,542.00**	**$ (88,747.38)**	**$ 507,794.62**

Expense Adjustments:
- $54,619.84 – Stryker, Power Load System and specialty stretcher, to automate the loading of a stretcher in two of the town's four ambulances, plus a six-year maintenance agreement. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $2,450.00 – Specialty Vehicles, installation cost for the Power Load System. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

- $14,980.62 – Barber Electric, upgrade of the HVAC system in one of the elementary schools which was used as a cooling center for the elderly population during the summer. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $15,603.00 – A vendor who performed a variety of duties for the town. The support provided by the municipality did not identify the activities performed or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $314.78 – Employee reimbursement for food purchased for workers at the COVID testing center. Food for volunteers is not an allowable expense. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $250.60 – Employee reimbursement for food expense for a firefighter who was quarantined. Food is not an allowable expense. In addition, there are no receipts. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Payroll Adjustments:

- $528.54 – Sum total of minor discrepancies between CRF submission and support documentation for New London EE 1 through New London EE 9. CohnReznick determined the variance amount does not meet CRF expenditure requirements and should be excluded from CRF reporting.

Norwalk:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 409,743.00	$ (63,443.60)	$ 346,299.40
Payroll	$ 711,992.57	$ (8,515.14)	$ 703,477.43
Total	**$ 1,121,735.57**	**$ (71,958.74)**	**$ 1,049,776.83**

Expense Adjustments:

- $7,184.64 – Employee overtime, a lump-sum payroll amount of $34,268.41 for employee overtime was included as an expense submission. The municipality submitted non-police and fire department overtime as expense items in lump-sum entries. These items should have been reported in payroll and should be reclassified as such. The support provided by the municipality does not support the (overtime) hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined that the payment does not meet

CRF expenditure requirements and should be excluded from CRF reporting.

- $54,125.16 – Pcard, expenditures listed under Pcard, the purchasing card, with Pcard statements as support rather than individual vendor invoices. The municipality has not provided receipts and a reconciliation by vendor. CohnReznick determined the payments do not have sufficient support, and therefore, do not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $2,133.80 – Security Specialists, no support provided. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.

Payroll Adjustments:

The municipality submitted 934 overtime entries for police department and fire department employees. We selected a test sample of 56 entries for a total of $50,821.51. Nine of the selections, or $8,515.14, did not support the municipality's CRF submission.

- $501.46 – Norwalk EE 1, the support provided by the municipality does not support the (overtime) hours worked, and does not agree to the payroll amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $501.46 – Norwalk EE 2, the support provided by the municipality does not support the (overtime) hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $1,516.41 – Norwalk EE3, the support provided by the municipality does not support the (overtime) hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $2,465.54 – Norwalk EE 4, the support provided by the municipality does not support the (overtime) hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $1,010.94 – Norwalk EE 5, the support provided by the municipality does not support the (overtime) hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $501.46 – Norwalk EE 6, the support provided by the municipality does not support the (overtime) hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment

does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

- $1,010.94 – Norwalk EE 7, the support provided by the municipality does not support the (overtime) hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $501.46 – Norwalk EE 8, the support provided by the municipality does not support the (overtime) hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $505.47 – Norwalk EE 9, the support provided by the municipality does not support the (overtime) hours worked, and does not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Norwich:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 54,597.00	$ (54,597.00)	$ -
Payroll	$ 491,374.80	$ (491,374.80)	$ -
Total	**$ 545,971.80**	**$ (545,971.80)**	**$ -**

Expense Adjustments:

- $54,597.00 – UNCAS Health District, a donation made to a non-profit, which acts as the health department for a number of towns in the area. The support provided included an income statement for UNCAS with expense items for payroll and fringe, an IT upgrade allocation, service contracts, printing cost, and grant program expense and various other expenses. The donation income on the UNCAS income statement identifies payments from the following municipalities:

Municipality	Amount Shown on Norwich Support	Amount Shown in CRF Reporting
Salem	$ 2,823.70	$ -
Griswold	$ 11,844.10	$ 11,844.10
Lisbon	$ 3,216.40	$ 3,216.40
Preston	$ 3,675.90	$ 14,900.00
Bozrah	$ 1,893.30	$ -
Franklin	$ 1,216.40	$ -
Lebanon	$ 5,295.60	$ 5,295.60
Montville	$ 18,477.80	$ 18,477.80
Sprague	$ 2,806.00	$ 2,806.00
Voluntown	$ 2,080.70	$ 2,080.70
Norwich	$ 54,597.20	$ 54,597.20
Total	**$107,927.10**	**$113,217.80**

The column to the right shows the total amount listed for each municipality in its CRF reporting. CohnReznick determined the payment for Norwich does not meet CRF expenditure requirements and should be excluded from the CRF reporting. In addition, amounts for the remaining municipalities above should also be excluded from the CRF reporting.

Payroll Adjustments:

- $491,374.80 – The municipality submitted payroll for employees in the Human Services, Youth & Family Services, Senior Center and Recreation Departments. The municipality made the determination that the payroll should be included in CRF reporting because the employees' time was "substantially dedicated" to mitigating or responding to the COVID-19 public health emergency, and was "substantially different" work than their normal job duties. The municipality was not able to identify the activities performed, nor how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Plymouth:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 96,522.00	$ (16,312.00)	$ 80,210.00
Payroll	$ 18,940.58	$ (130.26)	$ 18,810.32
Total	**$ 115,462.58**	**$ (16,442.26)**	**$ 99,020.32**

Expense Adjustments:

- $16,312.00 – Torrington Area Health District, a donation made to a non-profit, which acts as the health department for a number of towns in the area. The municipality was unable to provide a detailed expenditure listing. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting. In addition, CohnReznick identified other municipalities that included amounts to the Torrington Area Health District in their CRF reporting:

Municipality	Amount Shown in CRF Reporting
Bethlehem	$ 2,953.52
Canaan	$ 572.70
Goshen	$ 1,613.00
Litchfield	$ 5,105.20
North Canaan	$ 2,500.00
Plymouth	$ 16,312.00
Thomaston	$ 7,357.00
Torrington	$ 52,850.00
Watertown	$ 22,527.66
Total	**$111,791.08**

CohnReznick recommends that the above amounts also be excluded from the CRF reporting.

Payroll Adjustments:

The municipality submitted 53 payroll entries for a total of $18,940. We selected a test sample of 10 entries for a total of $2,789.79.

- 130.26 – Plymouth EE 1, the support provided by the municipality did not identify the activities performed or how they were Covid-related, and the municipality was not able to provide support for the dollar amount. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Stamford:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 329,736.00	$ (8,659.58)	$ 321,076.42
Payroll	$ 1,158,697.22	$ (34,780.89)	$ 1,123,916.33
Total	**$ 1,488,433.22**	**$ (43,440.47)**	**$ 1,444,992.75**

Expense Adjustments:

- $50.04 – AT&T Mobility, represents a line item described as a past due charge on the support provided. The municipality was unable to provide further support for this expenditure. CohnReznick determined that the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $6,066.14 – AT&T Mobility, invoices provided to support this expense submission were already provided as support for another expense submission, and were therefore duplicative. CohnReznick determined that the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $2,543.40 – AT&T Mobility, the municipality was unable to provide support documentation for this portion of the expense submission. CohnReznick determined that the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.

Payroll Adjustments:

The municipality submitted 690 payroll entries for a total of $1,158,697.22. We selected a test sample of 62 entries for a total of $65,464.89.

- $29,200.00 – Various employees, the municipality provided stipends to 30 employees. The support provided by the municipality did not identify the activities performed or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $1,864.94 – Stamford EE 1, the municipality was unable to provide support documentation for the amount paid to the employee. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $1,846.95 – Stamford EE 1, the municipality was unable to provide support documentation for the amount paid to the employee. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $1,869.00 – Stamford EE 2, the municipality was unable to provide support documentation for the amount paid to the employee. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.

Trumbull:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 197,862.00	$ (3,566.38)	$ 194,295.62
Payroll	$ 110,301.10	$ -	$ 110,301.10
Total	**$ 308,163.10**	**$ (3,566.38)**	**$ 304,596.72**

Expense Adjustments:

- $1,000.00 – Commercial Card Services, deposit for the rental of a truck, but no a receipt for the actual truck rental, which was less. The municipality was unable to provide additional support documentation. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $270.74 – Commercial Card Services, food for vaccine workers, which is not an allowable CRF expenditure. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $2,104.14 – An employee submitted several invoices for reimbursement for food purchased for vaccine clinic workers, which is not an allowable CRF expenditure. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $133.35 – An employee submitted an invoice for reimbursement for food purchased for vaccine clinic workers, which is not an allowable CRF expenditure. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $58.15 – An employee submitted an invoice for food purchased for vaccine clinic workers, which is not an allowable CRF expenditure. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Payroll Adjustments:

- None.

Waterbury:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 1,392,991.00	$ (1,193.52)	$ 1,391,797.48
Payroll	$ 1,141,283.00	$ (402,299.14)	$ 738,983.86
Total	**$ 2,534,274.00**	**$ (403,492.66)**	**$ 2,130,781.34**

Expense Adjustments:

- $1,193.52 – The Senior Center Director, the employee used her personal vehicle to deliver meals to homebound seniors during the pandemic. She submitted invoices for fuel and auto repair expenses which were reimbursed by the municipality. The municipality's normal procedure is to reimburse an employee through mileage for business use of a personal vehicle. As a result, CohnReznick determined that the

payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.

Payroll Adjustments:

The municipality submitted 890 payroll entries for a total of $1,141,283.00. We selected a test sample of 79 entries for a total of $58,590. During our review of the test selections, we determined further review was required to better understand the calculation of submitted payroll for a group of seven employees, which resulted in testing 141 entries for those seven employees, totaling $402,299.14, all of which has been excluded from CRF reporting.

- $55,408.49 – Waterbury EE 1, the support provided by the municipality did not identify the activities performed or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $66,404.76 – Waterbury EE 2, the support provided by the municipality did not identify the activities performed or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $61,520.48 – Waterbury EE 3, the support provided by the municipality did not identify the activities performed or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $66,404.75 – Waterbury EE 4, the support provided by the municipality did not identify the activities performed or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $69,552.82 – Waterbury EE 5, the support provided by the municipality did not identify the activities performed or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $42,674.00 – Waterbury EE 6, the support provided by the municipality did not identify the activities performed or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.
- $40,333.84 - Waterbury EE 7, the support provided by the municipality did not identify the activities performed or how they were COVID-related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from the CRF reporting.

West Hartford:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 701,978.00	$ (6,455.77)	$ 695,522.23
Payroll	$ -	$ -	$ -
Total	**$ 701,978.00**	**$ (6,455.77)**	**$ 695,522.23**

Expense Adjustments:

- $6,455.77 – Invoices from multiple vendors for various supplies, training and certification, and equipment for the West Hartford Fire Department (WHFD) bike team, including but not limited to helmets, bike shirts and shorts, pedals, tires, and bike bags. The municipality established the bike team to provide community education, reinforce social distancing and distribute personal protective equipment. CohnReznick determined the payments do not meet CRF expenditure requirements and should be excluded from the CRF reporting.

Payroll Adjustments:

- None.

West Haven:

Payroll/Expense	Submitted Amount	Adjustments	Adjusted Amount
Expense	$ 242,705.00	$ (11,249.75)	$ 231,455.25
Payroll	$ 735,726.46	$ (89,487.08)	$ 646,239.38
Total	**$ 978,431.46**	**$ (100,736.83)**	**$ 877,694.63**

Expense Adjustments:

- $4,239.00 – Reliable Fence, invoice for storm cleanup and fence repair near the beach. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $6,730.75 – Marissa Amber Bode, reimbursement for a 1099 employee who performed a variety of duties for the municipality. The support provided by the municipality did not identify the activities performed or how they were CRF related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $280.00 – Kelly Tiernan, reimbursement for a 1099 employee who performed a variety of duties for the town. The support provided by the municipality did not identify the activities performed or how they were

CRF related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.

Payroll Adjustments:

The municipality submitted 833 payroll entries for a total of $735,726.46. We selected a test sample of 25 entries for a total of $22,699.65. In addition, seven entries totaling $80,297.68 representing comp time payemnts were tested separately.

- $279.45 – West Haven EE 1, the support provided by the municipality did not support the hours worked and did not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $1,022.35 – West Haven EE 2, the support provided by the municipality did not support the hours worked and did not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $1,065.40 – West Haven EE 3, the support provided by the municipality did not support the hours worked and did not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $1,148.35 – West Haven EE 4, the support provided by the municipality did not support the hours worked and did not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $1,499.96 – West Haven EE 5, the support provided by the municipality did not support the hours worked and did not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $1,352.40 – West Haven EE 6, the support provided by the municipality did not support the hours worked and did not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $1,013.04 – West Haven EE 7, the support provided by the municipality did not support the hours worked and did not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $1,808.45 – West Haven EE 8, the support provided by the municipality did not support the hours worked and did not agree to the amounts in the CRF submission. CohnReznick determined the payment does not

meet CRF expenditure requirements and should be excluded from CRF reporting.

- $14,094.58 – West Haven EE 8, compensatory time payout. The support provided by the municipality did not identify the activities performed or how they were CRF related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $4,901.54 – West Haven EE 9, compensatory time payout. The support provided by the municipality did not support the hours worked and did not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $9,987.60 – West Haven EE 10, compensatory time payout. The support provided by the municipality did not identify the activities performed or how they were CRF related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $20,880.00 – West Haven EE 11, compensatory time payout. The support provided by the municipality did not support the hours worked and did not agree to the amounts in the CRF submission. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $10,971.60 – West Haven EE 12, compensatory time payout. The support provide by the municipality did not identify the activities performed or how they were CRF related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $11,970.36 – West Haven EE 13, compensatory time payout. The payment to this employee included hours that were earned prior to March 1, 2020, which are not a valid CRF expenditure. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.
- $7,492.00 – West Haven EE 14, compensatory time payout. The support provided by the municipality did not identify the activities performed or how they were CRF related. CohnReznick determined the payment does not meet CRF expenditure requirements and should be excluded from CRF reporting.

VI. OPM letters to municipalities

On December 19, 2022, OPM submitted letters titled “Municipal CRF Program CARES Act Auditor Findings/Corrective Action” to municipalities. CohnReznick was made aware of these letters after they were sent. As such, CohnReznick was not involved in the discussions, decision-making, or process to mail the letters to the municipalities.

In addition, we did not take the letters, or any responses to those letters from the municipalities into consideration in our report.

VII. Conclusion

Based upon the procedures performed, we determined the following:

A. With regard to $1,161,420.61 of expenditures submitted for reimbursement by the Selected Municipalities, the municipal records submitted did not support or meet the CRF expenditure criteria.

B. With regard to $1,083,503.57 of the payroll submitted for reimbursement by the Selected Municipalities, the municipal records submitted did not support or meet the CRF expenditure criteria.

A summary by Selected Municipality is listed below:

SELECTED MUNICIPALITIES	TESTING ADJUSTMENTS		
	INVOICE	PAYROLL	TOTAL ADJUSTMENTS
Bridgeport	$ 650,961.54	$ 31,005.52	$ 681,967.06
Brooklyn	$ 1,753.84	$ 21,239.69	$ 22,993.53
Derby	$ 74,078.00		$ 74,078.00
Hamden	$ 25,571.10	$ 2,079.21	$ 27,650.31
Hartford	$ 1,260.00		$ 1,260.00
New Haven		$ 2,063.30	$ 2,063.30
New London	$ 88,218.84	$ 528.54	$ 88,747.38
Norwalk	$ 63,443.60	$ 8,515.14	$ 71,958.74
Norwich	$ 54,597.00	$ 491,374.80	$ 545,971.80
Plymouth	$ 16,312.00	$ 130.26	$ 16,442.26
Stamford	$ 8,659.59	$ 34,780.89	$ 43,440.48
Trumbull	$ 3,566.38		$ 3,566.38
Waterbury	$ 1,193.52	$ 402,299.14	$ 403,492.66
West Hartford	$ 6,455.77		$ 6,455.77
West Haven	$ 11,249.75	$ 89,487.08	$ 100,736.83
UNCAS Health District adjustments	$ 58,620.60		$ 58,620.60
Torrington Area Health District adjustments	$ 95,479.08		$ 95,479.08
Total	**$1,161,420.61**	**$1,083,503.57**	**$ 2,244,924.18**

The nature and scope of this engagement did not require an audit of this information in accordance with Generally Accepted Auditing Standards, a review, or a compilation in accordance with Statements on Standards for Accounting and Review Services established by the American Institute of Certified Public Accountants ("AICPA).

This report is intended solely for the information and use of OPM and is not intended to be and should not be used by any other parties without our written consent. Any person who is not an addressee of this report or who has not executed and delivered to CohnReznick a release letter acceptable to CohnReznick, accepts and agrees that the procedures were performed for OPM's benefit, and not for the benefit and use by any other party, and shall not rely upon this report for any purpose.

Very truly yours,

Vincenzo Toppi
Partner, Dispute Resolution Services

CohnReznick

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