

City of Tulsa, Oklahoma

Compliance Report
Year Ended June 30, 2016

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RSM US LLP

**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***

Independent Auditor's Report

To the Honorable Mayor, City Council and
Audit Committee
City of Tulsa, Oklahoma
Tulsa, Oklahoma

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 aggregate discretely presented component units, each major fund, and the aggregate remaining fund information of the City of Tulsa, Oklahoma (the City), as of and for the year ended June 30, 2016, and the related notes to the financial statements, which collectively comprise the City's basic financial statements, and have issued our report thereon dated December 7, 2016. Our report includes a reference to other auditors who audited the financial statements of the Tulsa Industrial Authority, a discretely presented component unit of the City, and the Tulsa Stadium Trust, a blended component unit of the City, as described in our report on the City's financial statements. In addition, other auditors audited the Operations of the BOK Center, as managed by SMG, and the Operations of the Cox Business Center, as managed by SMG, which are included within the Arena and Convention Center major enterprise fund, as described in our report on the City's financial statements. This report does not include the results 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, we considered the City's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the City's internal control. Accordingly, we do not express an opinion on the effectiveness of the City's internal control.

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

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

Compliance and Other Matters

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

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the City'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 City's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

RSM US LLP

Kansas City, Missouri
December 7, 2016



RSM US LLP

**Report on Compliance for Each Major Federal Program,
Report on Internal Control Over Compliance, and
Report on Schedule of Expenditures of Federal Awards
Required by the Uniform Guidance**

Independent Auditor's Report

To the Honorable Mayor, City Council and
Audit Committee
City of Tulsa, Oklahoma
Tulsa, Oklahoma

Report on Compliance for Each Major Federal Program

We have audited the City of Tulsa, Oklahoma's (the City) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of the City's major federal programs for the year ended June 30, 2016. The City's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Scope

The City of Tulsa, Oklahoma's basic financial statements include the operations of the Tulsa Airports Improvement Trust (TAIT), Tulsa Development Authority (TDA) and Tulsa Industrial Authority (TIA), discretely presented component units, and Tulsa Stadium Trust (TST), a blended component unit. Our audit, described below, did not include the operations of TST or TIA because these component units engaged other auditors to perform their June 30, 2016 audits. Our audit, described below, did not include the operations of TDA because they were not required to have a separate audit in accordance with the Uniform Guidance as their federal expenditures for the year ending June 30, 2016 were less than \$750,000. Our audit, described below, did not include the operations of TAIT because they issued a separate compliance report in accordance with the Uniform Guidance for the year ended June 30, 2016.

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 City'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* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the City's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

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

Opinion on Each Major Federal Program

In our opinion, the City complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2016.

Report on Internal Control Over Compliance

Management of the City is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the City's internal control over compliance with the types of requirements that could have a direct and material effect on 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 City's internal control over compliance.

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

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

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

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, aggregate discretely presented component units, each major fund and the aggregate remaining fund information of the City as of and for the year ended June 30, 2016, and the related notes to the financial statements, which collectively comprise the City's basic financial statements. We issued our report thereon dated December 7, 2016, which contained unmodified opinions on those financial statements. Our audit report includes a reference to other auditors. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the basic financial statements.

Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the 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 basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

RSM US LLP

Kansas City, Missouri
December 7, 2016

CITY OF TULSA
Schedule of Expenditures of Federal Awards
Year Ended June 30, 2016

Federal Grantor/Pass-Through Grantor/Program Title	Federal CFDA Number	Grant Number or Pass-Through Entity Identifying Number	Current Year Expenditures	Amounts Provided to Subrecipients
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT				
Direct Programs:				
Community Development Block Grants/Entitlement Grants	14.218	B-14-MC-40-0004 B-15-MC-40-0004	\$ 4,506,095	\$ 3,426,522
Emergency Solutions Grant Program	14.231	E-14-MC-40-0001 E-15-MC-40-0004	292,742	268,692
Home Investment Partnerships Program	14.239	M-12-MC-40-0202 M-13-MC-40-0202 M-14-MC-40-0202 M-15-MC-40-0202	1,463,340	1,269,141
Housing Opportunities for Persons with AIDS	14.241	OK-H14-F002 OK-H15-F002	267,807	257,212
Total U.S. Department of Housing and Urban Development			6,529,984	5,221,567
U.S. DEPARTMENT OF THE INTERIOR				
<u>Pass-Through Oklahoma Historical Society</u>				
Historic Preservation Fund Grants-In Aid	15.904	15-608	17,657	-
Total U.S. Department of the Interior			17,657	-
U.S. DEPARTMENT OF JUSTICE				
<u>Pass-Through State District Attorney Council</u>				
Crime Victim Assistance	16.575	2015-VOCA-TULSA CI-053	26,283	-
Crime Victim Assistance/Discretionary Grants	16.582	VAWA-2014-TULSA-PD-00019	2,780	-
Crime Victim Assistance/Discretionary Grants	16.582	VAWA-2015-TULSA-PD-00033	4,425	-
Total Crime Victim Assistance/Discretionary Grants			7,205	-
Violence Against Women Formula Grants	16.588	VAWA-2014-TULSA-PD-00020	22,736	-
Violence Against Women Formula Grants	16.588	VAWA-2015-TULSA-PD-00034	3,711	-
Total Violence Against Women Formula Grants			26,447	-
Rural Domestic Violence, Dating Violence, Sexual Assault, and Stalking Assistance Program	16.589	2014-WR-AX-0021	114,265	-
Grants to Encourage Arrest Policies and Enforcement of Protection Orders Program	16.590	2014-WE-AX-0013	276,773	179,105
Public Safety Partnership and Community Policing Grants	16.710	2011-UL-WX-0026	73,501	-
Public Safety Partnership and Community Policing Grants	16.710	2012-UL-WX-0024	231,589	-
Total Public Safety Partnership and Community Policing Grants			305,090	-
Edward Byrne Memorial Justice Assistance Grant Program	16.738	2012-DJ-BX-0940	107,116	-
Edward Byrne Memorial Justice Assistance Grant Program	16.738	2013-DJ-BX-0361	39,664	-
Edward Byrne Memorial Justice Assistance Grant Program	16.738	2014-DJ-BX-0475	102,674	-
Edward Byrne Memorial Justice Assistance Grant Program	16.738	2015-DJ-BX-0886	67,127	-
Total Edward Byrne Memorial Justice Assistance Grant Program			316,581	-

CITY OF TULSA
Schedule of Expenditures of Federal Awards
Year Ended June 30, 2016

Federal Grantor/Pass-Through Grantor/Program Title	Federal CFDA Number	Grant Number or Pass-Through Entity Identifying Number	Current Year Expenditures	Amounts Provided to Subrecipients
Direct Programs:				
DNA Backlog Reduction Program	16.741	2014-DN-BX-0080	8,141	-
DNA Backlog Reduction Program	16.741	2015-DN-BX-0015	47,616	-
Total DNA Backlog Reduction Program			55,757	-
Byrne Criminal Justice Innovation Program	16.817	2014-AJ-BX-0005	57,801	-
Equitable Sharing Program	16.922	OK0720500	395,968	-
			509,526	-
 <u>Pass-Through State District Attorney Council</u>				
Paul Coverdell Forensic Sciences Improvement Grant Program	16.742	FSF14-006	8,403	-
Paul Coverdell Forensic Sciences Improvement Grant Program	16.742	FSF15-005	7,659	-
Total Paul Coverdell Forensic Sciences Improvement Grant Program			16,062	-
Total U.S. Department of Justice			1,598,232	179,105
 U.S. DEPARTMENT OF TRANSPORTATION				
Highway Planning and Construction Cluster				
<u>Pass-Through Oklahoma Department of Transportation</u>				
Highway Planning and Construction	20.205	STP-172A(335)IG	663,568	-
Highway Planning and Construction	20.205	157A(145)IG	37	-
Highway Planning and Construction	20.205	STP-172E(473)EH	540,000	-
Total Highway Planning and Construction Cluster			1,203,605	-
 Federal Transit Cluster				
Direct Programs:				
Federal Transit Capital Investment Grants	20.500	OK-34-0002-00	701,024	-
Federal Transit Formula Grants	20.507	OK-90-X095-01	108,074	-
Federal Transit Formula Grants	20.507	OK-90-X100-01	40,216	-
Federal Transit Formula Grants	20.507	OK-95-X003-00	31,957	-
Federal Transit Formula Grants	20.507	OK-90-X104-00	30,445	-
Federal Transit Formula Grants	20.507	OK-90-X109-00	32,380	-
Federal Transit Formula Grants	20.507	OK-90-X113-00	11,171	-
Federal Transit Formula Grants	20.507	OK-95-X006-00	18,510	-
Federal Transit Formula Grants	20.507	OK-95-X008-00	51,439	-
Federal Transit Formula Grants	20.507	OK-90-X117-00	1,203,161	-
Federal Transit Formula Grants	20.507	OK-90-X122-00	4,766,675	-
Bus and Bus Facilities Formula Program	20.526	OK-34-0004-00	23,428	-
Total Federal Transit Cluster			7,018,480	-
Clean Fuels	20.519	OK-04-0014-00	52,202	-
 Highway Safety Cluster				
<u>Pass-Through State of Oklahoma Highway Safety Office</u>				
State and Community Highway Safety	20.600	AL-15-03-07-08	24,117	-
State and Community Highway Safety	20.600	AL-16-03-17-09	69,867	-
Total Highway Safety Cluster			93,984	-
 <u>Pass-Through Federal Highway Administration</u>				
National Infrastructure Investments	20.933	DTFH6115G0009	693,039	-
Total U.S. Department of Transportation			9,061,310	-

CITY OF TULSA
Schedule of Expenditures of Federal Awards
Year Ended June 30, 2016

Federal Grantor/Pass-Through Grantor/Program Title	Federal CFDA Number	Grant Number or Pass- Through Entity Identifying Number	Current Year Expenditures	Amounts Provided to Subrecipients
U.S. ENVIRONMENTAL PROTECTION AGENCY				
Clean Water State Revolving Funds Cluster				
Pass-Through State of Oklahoma Water Resources Board				
Tulsa Metropolitan Utility				
Capitalization Grants for Clean Water State Revolving Funds	66.458	ORF-10-0001-CW	231,885	-
Capitalization Grants for Clean Water State Revolving Funds	66.458	ORF-11-0003-CW	246,397	-
Total Clean Water State Revolving Funds Cluster			478,282	-
Direct Programs:				
Brownfields Assessment and Cleanup Cooperative Agreements	66.818	BF-00F71001-0	28,078	-
Brownfields Assessment and Cleanup Cooperative Agreements	66.818	BF-00F70901-0	595,185	-
Total Brownfields Program			623,263	-
Total U.S. Environmental Protection Agency			1,101,545	-
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES				
Pass-Through The University of North Carolina at Chapel Hill				
Arthritis, Musculoskeletal and Skin Diseases Research	93.846	5100907	16,224	-
Total U.S. Department of Health and Human Services			16,224	-
U.S. DEPARTMENT OF HOMELAND SECURITY				
Pass-Through State of Oklahoma Office of Homeland Security				
Cooperating Technical Partners	97.045	EMT-2011-CA-0003	10,154	-
State Homeland Security Grant Program (SHSP)	97.067	640.013	22,672	-
State Homeland Security Grant Program (SHSP)	97.067	560.015	16,739	-
State Homeland Security Grant Program (SHSP)	97.067	660.032	18,750	-
State Homeland Security Grant Program (SHSP)	97.067	660.058	24,500	-
State Homeland Security Grant Program (SHSP)	97.067	660.059	24,500	-
Total State Homeland Security Grant Program			107,161	-
Pass-Through Transportation Security Administration				
National Explosives Detection Canine Team Program	97.072	HSTS02-15-H-NCP491	9,526	-
National Explosives Detection Canine Team Program	97.072	HSTS02-16-H-NCP491	266,699	-
Total National Explosives Detection Canine Team Program			276,225	-
Total U.S. Department of Homeland Security			393,540	-
Total Federal Expenditures			\$ 18,718,492	\$ 5,400,672

City of Tulsa, Oklahoma

**Notes to Schedule of Expenditures of Federal Awards
Year Ended June 30, 2016**

Note 1. Basis of Presentation

The accompanying schedule of expenditures of federal awards includes the federal grant activity of the City of Tulsa, Oklahoma (the City) and most of the City's component units for the year ended June 30, 2016. The schedule of expenditures of federal awards does not include the federal grant activity of the Tulsa Development Authority, the Tulsa Airport Improvement Trust and the Tulsa Industrial Authority, discretely presented component units of the City, and the Tulsa Stadium Trust, a blended component unit of the City. All federal awards received directly from federal agencies, as well as federal awards passed through other governmental agencies are included in the schedule. The information in this schedule is presented in accordance with the requirements of the Uniform Guidance. Therefore, some amounts presented in the schedule may differ from the amounts presented in or used in the preparation of the basic financial statements.

Note 2. Significant Accounting Policies

The accompanying schedule of federal awards is presented on the accrual basis of accounting. Expenditures of federal awards are recognized in the accounting period in which the liability is incurred. Such expenditures are reported following the cost principles contained in OMB Circular A-87, *Cost Principles for State, Local and Indian Tribal Governments*, or the cost principles contained in Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*, wherein certain types of expenditures are not allowed or are limited as to reimbursement.

Note 3. Indirect Cost Rate

The City elected not to use the 10 percent de minimis indirect cost rate allowed under the Uniform Guidance.

City of Tulsa, Oklahoma

**Summary Schedule of Prior Audit Findings
Year Ended June 30, 2016**

Number	Comment	Status	Corrective Action or Other Explanation
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Significant Deficiencies in Internal Control Related to the Financial Statement Audit

Internal Control

2015-001	The City did not have an adequate review process in place to ensure that the census data provided to the actuary of the Municipal Employees' Retirement Plan (MERP) was complete and accurate. The actuary was engaged by the City to assist in calculating the pension-related amounts and disclosures needed to implement GASB Statement No. 68, <i>Financial Reporting for Pension Plans</i> .	Corrected	
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City of Tulsa, Oklahoma

**Schedule of Findings and Questioned Costs
Year Ended June 30, 2016**

I. Summary of Auditor's Results

Financial Statements

Type of report the auditor issued on whether the financial statements audited were prepared in accordance with GAAP: Unmodified

Internal control over financial reporting:

- Material weakness(es) identified? Yes No
- Significant deficiency(ies) identified? Yes None reported
- Noncompliance material to financial statements noted? Yes No

Federal Awards

Internal control over major programs:

- Material weakness(es) identified? Yes No
- Significant deficiency(ies) identified? Yes None reported

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

- Any audit findings disclosed that are required to be reported in accordance with Section 2 CFR 200 516(a)? Yes No

Identification of major programs:

CFDA Number	Name of Federal Program or Cluster
14.218	Community Development Block Grants/Entitlement Grants
14.239	HOME
66.818	Brownfields Assessment and Cleanup Cooperative Agreements and Revolving Loan Program

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

- Auditee qualified as low-risk auditee? Yes No

(Continued)

City of Tulsa, Oklahoma

**Schedule of Findings and Questioned Costs (Continued)
Year Ended June 30, 2016**

II. Financial Statement Findings

A. Internal Control

None reported

B. Compliance Findings

None reported

III. Findings and Questioned Costs for Federal Awards

A. Internal Control

None reported

B. Instances of Noncompliance

None reported

City of Tulsa, Oklahoma

**Corrective Action Plan
Year Ended June 30, 2016**

Number	Comment	Corrective Action or Other Explanation	Contact Person	Anticipated Date of Completion
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None reported

