



## Office of Inspector General

Appalachian Regional Commission

# Audit of Grant Award to Coalfield Development Corporation Grant Number PW-20441

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Report Prepared by Castro & Co, LLC

Report Number 24-16

March 12, 2024

Appalachian Regional Commission  
Office of Inspector General  
1666 Connecticut Avenue, Suite 718  
Washington, D.C. 20009



# Office of Inspector General

Appalachian Regional Commission

March 12, 2024

TO: Brandon McBride, Executive Director

FROM: Rhonda L. Turnbow, Acting Inspector General *Rhonda Turnbow*

SUBJECT: Audit Report 24-16 – Coalfield Development Corporation

This memorandum transmits the Castro & Company, LLC report for the audit of costs charged to grant number PW-20441 per its agreement with the Appalachian Regional Commission. The objective of the audit was to determine if costs claimed were allowable, allocable, reasonable, and in conformity with the Commission's award terms and conditions and Federal financial assistance requirements. In addition, the audit determined whether the performance measures were reasonable, supported, and fairly represented to the Commission.

Castro & Company, LLC, is responsible for the attached audit report and the conclusions expressed in this report. The auditors did not issue any recommendations in the report. We do not express any opinion on the conclusions presented in the audit report. To fulfill our responsibilities, we:

- Reviewed the approach to and planning of the audit;
- Evaluated the qualifications and independence of the auditors;
- Monitored the progress of the audit at key points;
- Coordinated periodic meetings, as necessary;
- Reviewed the draft and final audit reports; and
- Coordinated the issuance of the audit report.

We thank your staff for the assistance extended to the auditors during this audit. Please contact me at 202-884-7675 if you have any questions regarding the report.



**Appalachian Regional Commission  
Performance Audit Report  
of Grant No. PW-20441**

**For the period from October 4, 2021 to May 31, 2023  
Awarded to the Coalfield Development Corporation**

**Prepared for the Appalachian Regional Commission  
Office of Inspector General**

**March 11, 2024**

**Final Report**

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## Executive Summary

Appalachian Regional Commission  
Office of Inspector General  
1666 Connecticut Avenue, NW; Suite 700  
Washington, DC 20009

Castro & Company, LLC (Castro & Co) conducted a performance audit of Grant Number PW-20441 awarded by the Appalachian Regional Commission (ARC) to the Coalfield Development Corporation (the Grantee) for the period of October 4, 2021 to May 31, 2023. The audit was conducted at the request of the ARC Office of Inspector General to assist it in its oversight of ARC grant funds.

The objectives of the performance audit were to determine whether: (1) grant funds were managed in accordance with the ARC and Federal grant requirements; (2) grant funds were expended, as provided for in the approved grant budget; (3) internal guidelines, including program (internal) controls, were adequate and operating effectively; (4) accounting and reporting requirements were implemented in accordance with accounting principles generally accepted in the United States of America (or other applicable accounting and reporting requirements); (5) matching requirements were met; and (6) the reported performance measures were fair and reasonable.

We determined that the Grantee's financial management, administrative procedures, and related internal controls were adequate to manage the ARC grant funds. There were no findings and recommendations resulting from this performance audit engagement.

We discussed the results of this performance audit with Coalfield Development Corporation's management at the conclusion of our fieldwork.

Castro & Co appreciates the cooperation and assistance received from the Grantee and ARC staff during this performance audit.

*Castro & Company, LLC*

Alexandria, VA  
March 11, 2024

## Background

The Appalachian Regional Commission (ARC) is a regional economic development agency, representing a unique partnership of Federal, state, and local governments. ARC-funded programs are used to support education and job training; health care; water and sewer systems; housing; highway construction; and other essentials of comprehensive economic development. ARC grants are made to a wide range of entities including local development districts, state ARC offices, state and local governments, educational establishments, nonprofit organizations, and for a variety of economic development projects. Castro & Company, LLC (Castro & Co) was contracted by the ARC's Office of Inspector General to perform the audit of Grant No. PW-20441 awarded to Coalfield Development Corporation (the Grantee) for the period of October 4, 2021 to May 31, 2023.

ARC awarded Grant No. PW-20441 to Coalfield Development Corporation to implement the Appalachia Freight Opportunities Reducing Waste and Revitalizing Development (FORWARD) project. The project included the following: expansion of the ReUse Corridor established by the POWER 19700-TA grant; job training for low-income and unemployed people in the identified sectors; paid work-based learning in these sectors, according to the 33-6-3 model; business development and technical assistance for entrepreneurs and social enterprises in the transportation and reuse sectors; hiring and training local people in the sustainable deconstruction and reuse/upcycling of materials from abandoned, dilapidated buildings; and research, innovation, and testing for upcycling, repair, and bio-based manufacturing business models.

The period of performance for Grant No. PW-20441 was from October 4, 2021 to October 2, 2023. Our audit covered the period of October 4, 2021 to May 31, 2023. The grant agreement provided a budget of \$1,464,309 in ARC funds and required non-ARC matching funds of \$634,070 for total project costs of \$2,098,379. The allowable percentage breakout of ARC to non-ARC funding for the project was 70% ARC funds to 30% matching funds.

We obtained the ARC Standard Form (SF) 270, *Request for Advance or Reimbursement*, for the period covering February 1, 2023 to May 31, 2023 that identified cumulative total ARC costs of \$915,088 (65%) and non-ARC matching costs of \$483,997 (35%) for a total project cost of \$1,399,085.

## Objectives, Scope, and Methodology

Castro & Co was engaged by the ARC Office of Inspector General to conduct a performance audit of Coalfield Development Corporation to determine compliance with the requirements of the ARC Grant No. PW-20441 for the period of October 4, 2021 to May 31, 2023.

The budgeted amounts for the grant are presented in Exhibit A below:

<b>Exhibit A: Schedule of Grant Budget</b>			
<b>Category</b>	<b>Federal Amount</b>	<b>Non-Federal Amount</b>	<b>Total</b>
Personnel	\$ 620,165	\$ 363,001	\$ 983,166
Benefits	\$ 93,023	\$ -	\$ 93,023
Travel	\$ 3,656	\$ -	\$ 3,656
Equipment	\$ 120,176	\$ 35,000	\$ 155,176
Supplies	\$ 18,610	\$ 50,000	\$ 68,610
Contractual	\$ 608,679	\$ 186,069	\$ 794,748
<b>Total</b>	<b>\$ 1,464,309</b>	<b>\$ 634,070</b>	<b>\$ 2,098,379</b>

The objectives of our audit were to determine whether the Grantee used grant funding from ARC in accordance with its ARC grant agreement and complied with financial management requirements, specifically to determine whether:

- Program funds were managed in accordance with the ARC and Federal grant requirements;
- Grant funds were expended as provided for in the approved grant budget;
- Internal grant guidelines, including program (internal) controls, were adequate and operating effectively;
- Accounting and reporting requirements were implemented in accordance with generally accepted accounting principles (or other applicable accounting and reporting requirements);
- Matching requirements were met; and
- Reported performance measures were fair and reasonable.

The scope of this audit includes those costs addressed in Coalfield Development Corporation’s system that specifically apply to ARC such as personnel, fringe benefits, travel, equipment, supplies, and contractual costs. We conducted this performance audit from June 2023 to March 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit was conducted using the applicable requirements contained in Title 2 U. S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance), the ARC Code, and the Grant Agreement.

To meet the audit objectives, our overall methodology included the following:

- Obtaining an understanding of the Grantee’s internal controls and documenting key controls over payroll, fringe benefits, cash disbursements, cash receipts, and procurement costs through reviews of policies and procedures, prior audit reports, organization charts, inquiry of Coalfield Development Corporation management and other available documentation, assessing control risk, and determining the extent of testing needed based on the control risk assessment;

- Considering fraud risk through a team fraud brainstorming session and inquiries of Coalfield Development Corporation management about their understanding of the risks of fraud related to grant awards, programs and controls Coalfield Development Corporation has established to mitigate specific fraud risks, and whether management is aware of any allegations of fraud or suspected fraud;
- Selecting a sample of expenditures based on materiality calculated using Government Accountability Office (GAO)/Council of the Inspectors General on Integrity and Efficiency (CIGIE) Financial Audit Manual (FAM) sections 230.01 through 230.13 and auditing, on a test basis, evidence supporting the grant funds were expended during the grant period, were properly supported, and allowable under both Federal and ARC requirements;
- Testing match costs to determine whether match requirements were met, were properly supported, and allowable under both Federal and ARC requirements;
- Conducting interviews with the Grantee to evaluate the Grantee's processes for accurately tracking and reporting on the grant performance measures.

### **Grantee's Response to Audit Results**

Our audit results were discussed with Mr. Sam Sarcone, Chief Financial Officer, Ms. Courtney Wilt, Director of Accounting, and Mr. Jacob Hannah, Chief Conservation Officer, for Coalfield Development Corporation during the exit conference on March 8, 2024. Coalfield Development Corporation concurred with our results.

### **Summary of Results**

Castro & Co's procedures determined Coalfield Development Corporation managed the grant funds in accordance with the ARC and Federal grant requirements. Grant funds were expended as provided for in the approved grant budget.

Coalfield Development Corporation's financial management, administrative procedures, and internal controls were adequate to account for the funds provided under the ARC grant. The Grantee's internal guidelines, including program (internal) controls, were adequate and operating effectively. We noted the Grantee had written policies and procedures for applicable grant activities, which we considered adequate for administering the grant. Accounting and reporting requirements were implemented in accordance with accounting principles generally accepted in the United States of America (or other applicable accounting and reporting requirements), including ARC requirements.

The Grantee reported a total of \$915,088 in ARC costs and \$483,997 in non-ARC matching costs; therefore, we determined the Grantee met the match requirements as of May 31, 2023. These matching funds were properly supported and allowable under both Federal and ARC requirements. Based on our review of the Grantee's procedures, the performance results reported to ARC were fair and reasonable.

We reviewed Single Audit reports available on the Federal Audit Clearinghouse for Coalfield Development Corporation and noted the Grantee had a Single Audit performed for the years ended December 31, 2022 and 2021. The Single Audit report for the years ended December 31, 2022 and 2021, identified a material weakness in internal control over financial reporting related to the delayed closing of the 2022 accounting records due to analysis and adjustments of accounts due to nonroutine transactions. The Single Audit report did not identify deficiencies in internal control over compliance requirements as outlined in the OMB Compliance Supplement; therefore, we determined that the prior year finding does not impact the Grantee’s financial reporting of expended grant funds to ARC.

Exhibit B below presents costs claimed by Coalfield Development Corporation and costs recommended as a result of the grant audit.

<b>Exhibit B: Schedule of Claimed and Audit Recommended Costs</b>							
<b>Category</b>	<b>Claimed</b>		<b>Questioned Cost</b>		<b>Audit Recommended</b>		<b>Total</b>
	<b>Federal</b>	<b>Non-Federal</b>	<b>Federal</b>	<b>Non-Federal</b>	<b>Federal</b>	<b>Non-Federal</b>	
Personnel	\$ 460,321	\$ 366,193	\$ -	\$ -	\$ 460,321	\$ 366,193	\$ 826,514
Benefits	\$ 74,811	\$ -	\$ -	\$ -	\$ 74,811	\$ -	\$ 74,811
Travel	\$ 3,518	\$ -	\$ -	\$ -	\$ 3,518	\$ -	\$ 3,518
Equipment	\$ 72,200	\$ -	\$ -	\$ -	\$ 72,200	\$ -	\$ 72,200
Supplies <sup>1</sup>	\$ 18,611	\$ 39,125	\$ -	\$ -	\$ 18,611	\$ 39,125	\$ 57,736
Contractual	\$ 285,627	\$ 78,679	\$ -	\$ -	\$ 285,627	\$ 78,679	\$ 364,306
<b>Total</b>	<b>\$ 915,088</b>	<b>\$ 483,997</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 915,088</b>	<b>\$ 483,997</b>	<b>\$ 1,399,085</b>

<sup>1</sup> The cost category Supplies exceeded the budget amount by \$1; however, the amount does not exceed \$209,838 or ten percent of the project’s total approved budget; therefore, prior ARC approval was not required.