Connecticut Department of Economic and Community Development

Forensic Audit of Blue Hills Civic Association Subrecipients

September 1, 2026

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September 1, 2026

Ms. Daniel O'Keefe
Connecticut Department of Economic and Community Development
450 Columbus Road
Hartford, CT 06106

RE: Blue Hills Civic Association - Subrecipient Forensic Audit

Dear Mr. O'Keefe:

CliftonLarsonAllen LLP (CLA) was engaged by the Connecticut Department of Economic and Community Development (DECD) to perform a forensic services engagement related to the administration and use of legislative grant funds awarded to the Blue Hills Civic Association (BHCA) and distributed to subrecipients.

As a continuation of our prior forensic audit issued on January 20, 2026, this phase of the engagement focused on obtaining documentation directly from subrecipients and other entities identified as having received BHCA-administered grant funds. The purpose of this report is to describe the procedures performed and to present the results of our forensic analysis regarding the allowability, timing, and purpose of expenditures, as well as the sufficiency of supporting documentation.

We performed our engagement in accordance with the Statement on Standards for Forensic Services No. 1 (SSFS No. 1) of the American Institute of Certified Public Accountants (AICPA) and the Code of Professional Standards of the Association of Certified Fraud Examiners (ACFE). This report does not constitute an audit, compilation, or review, in accordance with standards of the AICPA, the objective of which would be the expression of an opinion on any specified elements, accounts, or items. Accordingly, CLA does not express such an opinion. The professional standards promulgated by the AICPA prohibit CLA from rendering an opinion as to whether there has been any fraud or other criminal activity by anyone associated with this engagement. The professional standards promulgated by the ACFE prohibit Certified Fraud Examiners (CFEs) from expressing opinions regarding the guilt or innocence of any person or party. Therefore, CLA does not render such opinions.

Fraud and irregularities by their very nature are most often hidden, and no absolute assurance can be given that all such matters have been detected. Our engagement cannot be relied on to disclose all irregularities or illegal acts, including fraud that may exist. However, to the extent such matters have come to our attention, we have included them in this report.

Respectfully submitted,

CliftonLarsonAllen LLP

Emilie Deveraux, CFE, Signing Director

Table of Contents

1. Executive Summary ... 1
2. Background ... 5
3. Scope of Work ... 6
4. Policy Framework ... 7
5. Summary of Work Performed ... 11
6. Results of Work Performed ... 15
A. Summary of Legislative Grant Structure, Requirements, and Passthrough Obligations ... 15
B. Interviews Conducted ... 17
C. Subrecipient Organizational Structure and Business Type ... 17
D. Testing Results by Subrecipient ... 20
Tier 1 ... 22
1. S.H.E.B.A. Consulting, LLC **... 22**
2. Outreach Realty Servicing **... 24**
Tier 2 ... 28
3. Upper Albany Neighborhood Collaborative **... 29**
4. The Prosperity Foundation **... 48**
5. My People Community Services, LLC **... 53**
6. Greater Hartford Alliance of Black Social Workers **... 56**
7. Berkins Family LLC **... 59**
8. Mothers United Against Violence **... 63**
9. MPact Mentoring Inc. **... 64**
10. Don's Kitchen **... 67**
11. DT Cares **... 72**
12. Powell Mental Health **... 75**
13. URISE Ventures, Inc **... 77**
14. Hartford Knights Corp **... 79**
15. Leo's Pride Dental **... 82**
16. St. Justin-Saint Michael Parish Corp **... 84**
17. St. John's Full Gospel Deliverance Church **... 86**
18. WISE Network **... 88**
Tier 3 ... 90
19. University of Hartford **... 90**
20. Connecticut Harm Reduction Alliance **... 92**
21. The West Indian Social Club of Hartford **... 96**
22. Real Art Ways, Inc. **... 97**
23. Jamaica Progressive League **... 99**

24. Greater Hartford Festival of Jazz **101**
25. West Indian Independence Celebrations Inc **103**
26. Lift Every Voice and Sing Organization **104**
27. Exclusive Linez/Sign Design & Banner LLC **106**
28. Angel of Edgewood, Inc **108**
29. Hartford Health Initiatives **109**
30. African Caribbean American Parents of Children with Disabilities (AFCAMP) **111**
31. Town of Windsor **113**
7. Conclusions 116
8. Recommendations 117
9. Professional Standards Followed by CliftonLarsonAllen 121
10. Information about CliftonLarsonAllen LLP 122
11. List of Attachments 123
12. List of Exhibits 124

1. Executive Summary

CliftonLarsonAllen LLP (CLA) performed a comprehensive forensic audit of subrecipients of the Blue Hills Civic Association (BHCA), as well as any entities that received BHCA grant funds, as a follow-up to the findings identified in the January 20, 2026 forensic audit. This additional phase of work was conducted at the request of the Connecticut Department of Economic and Community Development (DECD) to obtain and evaluate documentation directly from subrecipients and to assess the extent to which funds distributed by BHCA were used in accordance with applicable grant requirements and program objectives.

A total of 38 subrecipients were identified as part of the BHCA grant program, with aggregate awards totaling $7,723,834. The population includes all entities that received funding during the FY2024 and FY2025 legislative grant funding cycles, regardless of size, activity, or level of documentation available for testing as illustrated in Table 1 below.

Table 1: All BHCA Subrecipients

Subrecipient	Total Awarded	Selected for Testing	Reason Not Selected (if applicable)
Academic Advocacy & Consulting	$ 5,000		Award amount less than or equal to $10,000; excluded under risk-based testing criteria.
African Caribbean American Parents of Children with Disabilities (AFCAMP)	75,000	X	
Angel of Edgewood, Inc	10,000	X[1]	
Berkins Family LLC	100,000	X	
Building a Legacy Foundation	7,000		Award amount less than or equal to $10,000; excluded under risk-based testing criteria.
Connecticut Harm Reduction Alliance	200,000	X	
Don's Kitchen	75,000	X	
DT Cares	70,000	X	
Exclusive Linez/Sign Design & Banner LLC	20,000	X	
Greater Hartford Alliance of Black Social Workers	150,000	X	
Greater Hartford Festival of Jazz	25,000	X	
Hartford Health Initiatives	350,000	X	
Hartford Hurricanes	10,000		Award amount less than or equal to $10,000; excluded under risk-based testing criteria.

[1] Exception to low-dollar threshold due to risk factors

Subrecipient	Total Awarded	Selected for Testing	Reason Not Selected (if applicable)
Hartford Knights Corp	25,000	X	
Hartford Lions Soccer Academy Inc	10,000		Award amount less than or equal to $10,000; excluded under risk-based testing criteria.
Hartford Stage	21,834		Identified as a "Non-MOU Recipient" during preliminary procedures with explanation “Community Showcase 2/5/25”, and therefore excluded from the subrecipient testing population
Jamaica Progressive League	30,000	X	
Leo's Pride Dental	25,000	X	
Lift Every Voice and Sing Org.	20,000	X	
Mothers United Against Violence	100,000	X	
MPact Mentoring Inc.	100,000	X	
My People Community Services, LLC	500,000	X	
Outreach Realty Servicing	225,000	X	
Powell Mental Health	50,000	X	
Real Art Ways, Inc.	40,000	X	
S.H.E.B.A Consulting, LLC	600,000	X	
St. John's Full Gospel Deliverance Church	15,000	X	
St. Justin- Saint Michael Parish Corp	20,000	X	
The Prosperity Foundation	1,100,000	X	
The West Indian Social Club of Hartford	50,000	X	
Town of Windsor	35,000	X	
University of Hartford	425,000	X	
Upper Albany Neighborhood Collaborative	2,050,000	X	
URISE Ventures, Inc	50,000	X	
West Indian Independence Celebrations Inc	20,000	X	
Wilson-Gray YMCA	600,000		Excluded due to independence restrictions
WISE Network	15,000	X	

Subrecipient	Total Awarded	Selected for Testing	Reason Not Selected (if applicable)
YWCA Hartford Region, Inc	500,000		Excluded due to independence restrictions
Total	$ 7,723,834		

Testing coverage included 31 of 38 subrecipients (approximately 82% of the population), representing a substantial majority of total funds awarded. Subrecipients selected for testing were determined using a risk-based approach that prioritized higher-dollar awards, active funding relationships, and entities identified during preliminary procedures as having elevated risk indicators. Subrecipients not included in detailed testing met one or more of the following criteria:

- Low-Dollar Awards: Subrecipients that received funding of $10,000 or less were generally excluded, as these awards were considered lower risk and less likely to have a material impact on overall program expenditures. However, exceptions were made where additional risk factors were present. Specifically, one subrecipient below this threshold was included in testing due to ongoing grant activity or applications with DECD, which increased the assessed risk profile.

- Classification Outside Subrecipient Scope: Certain entities were identified during initial procedures as not meeting the definition of a subrecipient (e.g., entities categorized as non-MOU recipients or otherwise not subject to subrecipient monitoring requirements).

- Conflict of Interest Considerations: Certain subrecipients were excluded from testing due to independence restrictions, as they are current assurance clients of CLA and subject to audit or assurance procedures performed by CLA's assurance practice. Inclusion would impair independence and objectivity under AICPA standards. Results of those procedures are reflected in the respective organizations' audit reports.

These criteria were applied consistently across the population to focus testing procedures on subrecipients with the highest relative risk, while preserving overall coverage and visibility into the full population.

The scope of procedures included outreach to subrecipients, collection and review of financial records and supporting documentation, verification of expenditures, assessment of compliance with Memorandums of Understanding (MOUs), and evaluation of the sufficiency and reliability of reporting submitted to BHCA.

Overall, the results of subrecipient testing indicate significant variability in documentation quality, financial reporting practices, and adherence to standard grant administration requirements. While certain subrecipients provided sufficient documentation demonstrating that funds were used for activities generally aligned with program intent, a substantial number of subrecipients exhibited deficiencies, including incomplete or missing supporting documentation, expenditures incurred outside defined periods of performance, inconsistent financial reporting, and limited ability to reconcile reported expenditures to underlying financial records.

In addition, testing identified recurring structural and compliance issues that originated at the BHCA level and carried through to subrecipient activity. These issues included the absence of fully executed agreements prior to disbursement, inconsistent or nonexistent monitoring and follow-up, limited documentation requirements imposed on subrecipients, and a lack of standardized controls governing the use and reporting of grant funds.

As a result of these conditions, in many instances CLA was unable to fully substantiate the allowability, timing, or purpose of expenditures reported by subrecipients. The prevalence of unsupported or partially supported expenditures, combined with inconsistent reporting and documentation practices, reduces transparency and limits the ability to verify whether funds were used in accordance with applicable requirements. These limitations increase the risk of unallowable costs, misuse of funds, and undetected instances of fraud, waste, or abuse.

Notwithstanding these findings, certain subrecipients demonstrated strong compliance practices, including maintaining detailed financial records, providing complete supporting documentation, and aligning expenditures with approved programmatic activities. However, these instances were not consistent across the population, and overall results reflect systemic weaknesses in grant administration, documentation standards, and oversight at both the BHCA and subrecipient levels.

2. Background

DECD engaged CLA to perform a forensic audit of the BHCA, a community-based nonprofit organization that administered state-funded grants through a network of subrecipients to support community programs and initiatives in the Hartford area.

The grants reviewed as part of this engagement related to FY24 and FY25 and included funding awarded to subrecipients for activities occurring during the applicable grant periods of performance. The period under review encompassed BHCA grant awards, administration, expenditures, monitoring activities, and related subrecipient transactions associated with the FY24 and FY25 funding cycles.

The initial forensic audit, issued on January 20, 2026, evaluated BHCA's financial management practices, grant administration processes, internal controls, and oversight of subrecipients. That audit identified pervasive governance failures, significant internal control deficiencies, and weaknesses in BHCA's grant awarding, monitoring, and reporting processes, including instances where funds were disbursed without executed agreements or adequate supporting documentation.

The initial engagement was initiated following the discovery of a $300,000 wire transfer fraud incident in 2024 involving funds intended for a BHCA subrecipient. Subsequent procedures and expanded testing revealed broader concerns regarding BHCA's financial operations, including deficiencies in recordkeeping, lack of effective monitoring of subrecipients, and inconsistencies in reported grant expenditures.

Based on these findings, DECD determined that additional procedures were necessary to evaluate how BHCA grant funds were ultimately expended at the subrecipient level. As a result, DECD authorized CLA to perform a second phase of work under an expanded Statement of Work (SOW), with a specific focus on obtaining documentation directly from subrecipients and assessing compliance with grant requirements.

Under this follow-up engagement, CLA conducted targeted subrecipient testing procedures, including direct outreach to subrecipients to request financial records, grant reports, supporting documentation, evidence of funds received, and executed agreements. CLA evaluated whether expenditures were supported, whether funds were used for allowable purposes, and whether subrecipient activities were consistent with program objectives and grant terms.

The procedures performed in this phase were designed to provide additional transparency into the ultimate use of state-funded grant dollars distributed by BHCA and to determine whether the deficiencies identified in the initial forensic audit extended to subrecipient-level activity.

3. Scope of Work

The scope of work requested by DECD under the amended agreement was to conduct a follow-up forensic audit and evaluation of subrecipients of the BHCA as well as any additional entities identified as having received BHCA-administered grant funds.

This phase of work was performed as a continuation of the procedures outlined in the January 20, 2026 report, which was limited to records maintained by BHCA and did not include direct requests for production from subrecipients. Accordingly, additional procedures were performed to obtain documentation directly from subrecipients and funding recipients in order to assess how BHCA-distributed grant funds were ultimately expended.

The scope of this phase of the engagement included an assessment and evaluation of subrecipient financial activity, supporting documentation, reporting practices, and alignment with applicable grant requirements, agreements, and program objectives. The objectives of this phase of the engagement were to:

1. Obtain financial and programmatic documentation directly from subrecipients and other entities identified as recipients of BHCA-administered grant funds;
2. Assess whether expenditures reported to BHCA were supported by sufficient and appropriate documentation;
3. Evaluate whether funds were used for purposes consistent with applicable agreements, program intent, and DECD requirements;
4. Determine whether subrecipient-reported expenditures could be reconciled to underlying financial records;
5. Identify indicators of noncompliance, unsupported costs, or potential fraud, waste, or abuse; and
6. Assess the extent to which deficiencies identified in the January 2026 Report extended to subrecipient-level activity.

For purposes of this engagement, CLA performed detailed testing procedures on 31 subrecipients that received BHCA grant funding during FY24 and FY25. Procedures included obtaining and evaluating financial records, supporting documentation, grant reports, evidence of funds received, executed agreements, and other information necessary to assess the use of grant funds and compliance with applicable grant requirements. The subrecipients included within the scope of testing are identified in Attachment I.

4. Policy Framework

Grant funding awarded under the BHCA program is subject to multiple sources of authority, including applicable statutes, authorizing legislation, program guidance, and subrecipient agreements. These sources collectively establish the framework used to assess allowability, documentation sufficiency, and compliance during testing.

Applicable Framework

Evaluation of subrecipient expenditures was performed with reference to the following hierarchy:

- Statutory and Legislative Authority governing the BHCA program and appropriations;
- Programmatic Guidance and Requirements issued by DECD;
- Subrecipient Agreements and MOUs outlining permitted uses of funds and reporting expectations; and
- General Grant Compliance Principles, including requirements for documentation supporting the use of public funds.

These sources were considered collectively in evaluating whether expenditures aligned with program intent and applicable requirements.

Allowability and Use of Funds

Allowability of expenditures was assessed based on whether costs were:

- Consistent with the intended public purpose of the BHCA program;
- Aligned with the approved activities, services, or programs described in the applicable grant application, budget, or MOU;
- Supported by sufficient and appropriate documentation; and
- Incurred in accordance with applicable grant requirements and periods of performance.

For purposes of this review, public purpose refers to activities that provide a community benefit and support the programs and services contemplated by the grant award. Under the BHCA program, grant funds were intended to support community-based initiatives, including youth development, community engagement, education, workforce development, public health, violence prevention, and other activities benefiting residents and communities served by the program. Grant funds were required to be used for approved program purposes and not for prohibited activities such as religious programming, fundraising activities, lobbying, or political contributions.[2]

Where documentation was limited or unavailable, the ability to assess allowability was correspondingly limited. As such, the classifications in this report distinguish between documentation deficiencies and indicators of potential noncompliance, rather than concluding on allowability in all instances.

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[2] Based on the FY24 Legislative Grant Application submitted by BHCA and the BHCA Subrecipient Memorandum of Understanding, which describe funding as supporting community-based programs, services, and initiatives benefiting Hartford-area residents.

Considerations for For-Profit Entities

The population includes both nonprofit and for-profit entities. Legislative grant funding constitutes state financial assistance intended to support activities that serve a defined public purpose. While funds may be disbursed to for-profit entities, allowability is evaluated based on:

- Whether expenditures demonstrably serve a public purpose; and
- Whether funds were used in a manner consistent with program objectives rather than routine business operations.

Costs associated with general business operations (e.g., payroll, occupancy, administrative, or financing-related expenses) do not, in isolation, demonstrate alignment with grant objectives, absent a clear and documented linkage to approved program activities.

These considerations are applied in conjunction with applicable agreements, approved budgets, period of performance requirements, and general documentation standards governing state financial assistance.

Legislative Developments

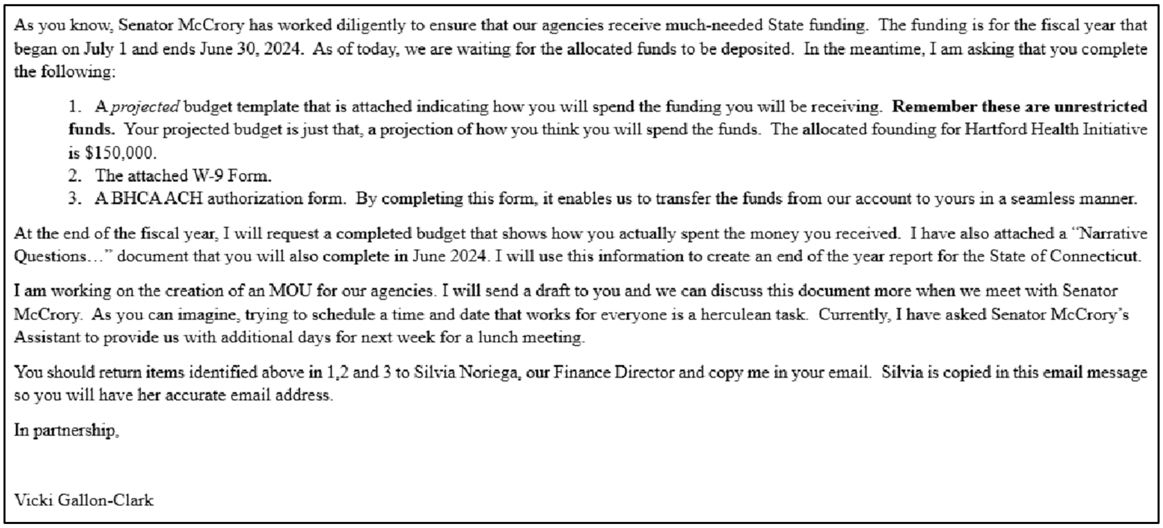
On May 19, 2026, Connecticut enacted Public Act 26-27, An Act Requiring Transparency and Additional Oversight of the Distribution of Certain Legislatively Directed Funds and Appropriations for Other Expenses (House Bill 5039), which became effective July 1, 2026. The Act established additional requirements related to the administration, oversight, reporting, transparency, and monitoring of legislatively directed funds and subrecipient relationships.

Because these legislative changes became effective after the FY24 and FY25 grant periods examined in this engagement, they were not used as criteria in evaluating subrecipient expenditures, grant administration activities, or compliance. Accordingly, the procedures performed, findings, and conclusions presented in this report are based solely on the statutory, programmatic, and contractual requirements in effect during the period under review.

Program Guidance and Communication Considerations

During testing, inconsistencies were identified between guidance communicated to subrecipients and the requirements outlined in executed MOUs. In certain instances, BHCA communications characterized the funds as “unrestricted” and focused primarily on funding availability, projected budgeted expenditures, and end-of-year reporting requirements. However, these communications did not clearly articulate the public purpose of the funding, the intended community outcomes, or the program objectives the grants were designed to support, as illustrated in Figure 1 below.

Figure 1: Example Subrecipient Award Email



As you know, Senator McCrory has worked diligently to ensure that our agencies receive much-needed State funding. The funding is for the fiscal year that began on July 1 and ends June 30, 2024. As of today, we are waiting for the allocated funds to be deposited. In the meantime, I am asking that you complete the following:

1. A *projected* budget template that is attached indicating how you will spend the funding you will be receiving. **Remember these are unrestricted funds.** Your projected budget is just that, a projection of how you think you will spend the funds. The allocated founding for Hartford Health Initiative is $150,000.
2. The attached W-9 Form.
3. A BHCA ACH authorization form. By completing this form, it enables us to transfer the funds from our account to yours in a seamless manner.

At the end of the fiscal year, I will request a completed budget that shows how you actually spent the money you received. I have also attached a "Narrative Questions…" document that you will also complete in June 2024. I will use this information to create an end of the year report for the State of Connecticut.

I am working on the creation of an MOU for our agencies. I will send a draft to you and we can discuss this document more when we meet with Senator McCrory. As you can imagine, trying to schedule a time and date that works for everyone is a herculean task. Currently, I have asked Senator McCrory's Assistant to provide us with additional days for next week for a lunch meeting.

You should return items identified above in 1,2 and 3 to Silvia Noriega, our Finance Director and copy me in your email. Silvia is copied in this email message so you will have her accurate email address.

In partnership,

Vicki Gallon-Clark

In contrast, the executed MOUs established certain administrative and compliance requirements, including adherence to approved budget narratives, restrictions on reporting expenditures under multiple funding sources, record retention requirements, and audit provisions, they provided limited discussion of the overarching public purpose of the legislative funding or how subrecipients should evaluate whether expenditures advanced the intended community objectives of the program, as illustrated in Figure 2 below.

Figure 2: MOU Wording

4. **Programmatic Elements and Deliverables**.

a) Subrecipient shall provide the services and programs as set forth in the submitted Budget Narrative attached as Appendix A.
b) Services set forth in Appendix A shall be funded for the Term. This funding shall be paid from the Legislative Grant funding received by BHCA and is based on the approval and availability of the Legislative Grant funds from DECD.
c) Grant Funds shall be expended for the project or projects as set forth in Appendix A according to the budget and within the Term unless a written request for a change is made and approved by BHCA before the end of the Term.
d) *Any expenses reported as part of this grant funding must NOT be reported under any other funding source that Subrecipient receives.*
e) Any budget variances in excess of +/-10%, or $500, whichever is less, as well as the addition or removal of any line items must be preapproved by BHCA in writing.
f) In any news release or printed material promoting programing utilizing Grant Funds, prominent credit must be given to DECD and BHCA by including the following phrase, ***"with the support of the Department of Economic and Community Development and Blue Hills Civic Association."***
g) BHCA shall conduct an interim site evaluation to determine if Subrecipient is on track relative to stated programs and expenditures.
h) In the event Subrecipient closes or substantially reduces or suspends operations, Subrecipient shall notify BHCA in writing within ten (10) business days and return any and all unexpended Grant Funds within ten (10) business days
i) At the end of the Term, Subrecipient shall return any and all unexpended Grant Funds to BHCA within ten (10) business days.
j) Within thirty (30) days after the end of the Term, Subrecipient agrees to provide to BHCA a written program evaluation narrative and financial report in the format specified by DECD, a sample of which is attached as Appendix B.

As illustrated in Figures 1 and 2, neither BHCA's communications to subrecipients nor the executed MOUs consistently articulated the public purpose of the legislative funding, the intended community outcomes, or the specific program objectives the funds were designed to advance. Although the MOUs established administrative, reporting, and compliance requirements, limited guidance was provided regarding how subrecipients should determine whether expenditures aligned with the broader public purpose of the grant program.

These differences in communicated guidance may have contributed to varying interpretations among subrecipients regarding allowable uses of funds, documentation expectations, and reporting obligations. As a result, findings related to documentation sufficiency and reported use of funds should be considered within the context of this inconsistent or unclear guidance.

However, upon execution of the MOUs, subrecipients are contractually bound to the terms and conditions set forth therein, which establish defined requirements governing the use of funds, documentation, and reporting. See **Exhibit 1** for a sample MOU.

5. Summary of Work Performed

CLA performed the following procedures to complete the subrecipient-focused forensic audit and address the objectives established by DECD:

a. Subrecipient Data Collection and Outreach

- Developed and issued standardized document request lists to subrecipients and identified funding recipients;
- Conducted direct outreach to obtain financial records, supporting documentation, and grant-related materials. Requested documentation included:
  - General ledger detail;
  - Grant financial reports (or explanations if not submitted);
  - Supporting documentation for expenditures;
  - Proof of funds received;
  - Executed agreements; and
  - Where applicable, documentation related to pass-through of funds to other recipients.
- Performed follow-up procedures to address incomplete, inconsistent, or non-responsive submissions;
- Conducted interviews with selected subrecipients to obtain an understanding of their processes, including:
  - How they became aware of the grant opportunity;
  - Any application or selection processes;
  - Communications received regarding the use of funds;
  - Expectations related to reporting and document retention; and
  - When necessary, clarification of documentation provided.

b. Documentation Review and Analysis

- Reviewed supporting documentation, including invoices, receipts, payroll records, bank statements, and contracts, where provided;
- Assessed whether reported expenditures were adequately supported by underlying documentation;
- Evaluated the completeness, consistency, and sufficiency of documentation provided; and
- Identified missing, incomplete, or inconsistent records.

c. Financial Data Collection and Reconciliation

- Collected and analyzed available financial data, including general ledger detail, trial balances, and other accounting records;
- Compared subrecipient-reported expenditures to underlying financial records where available; and
- Identified variances, inconsistencies, or unreconciled amounts.

d. Review of Subrecipient Agreements and Payment Activity

- Reviewed available MOUs, contracts, and other governing documentation;
- Assessed whether agreements were executed and in place prior to disbursement, where documentation was available; and
- Evaluated alignment between agreements and disbursement activity, including timing of payments relative to execution and period of performance.

e. Allowability and Programmatic Use of Funds

- Evaluated whether expenditures were consistent with program objectives, grant requirements, and applicable agreements;
- Assessed whether expenditures appeared reasonable based on available documentation; and
- Identified expenditures that appeared unsupported, unallowable, or inconsistent with the intended use of funds.

f. Reporting and Subrecipient Monitoring

- Reviewed financial and programmatic reports submitted to BHCA by subrecipients;
- Assessed the completeness, accuracy, and reliability of reported information; and
- Evaluated the extent of monitoring, oversight, and follow-up performed by BHCA based on available documentation.

g. Risk Assessment, Attribute Testing, and Forensic Procedures

- Tracked documentation received and outstanding by subrecipient and evaluated relative risk based on predefined criteria, including funding amounts, active grant status, and issues identified during prior procedures;
- Conducted targeted follow-up procedures, including meetings with certain subrecipients, to further assess grant usage, documentation, and identified concerns;
- Performed testing using defined attributes to evaluate financial support, reporting accuracy, agreement execution, allowability of expenditures, and completeness of documentation; and
- Performed email and document search procedures using targeted search criteria to identify relevant correspondence and supporting documentation.

The procedures performed were subject to limitations, including incomplete or unavailable documentation, variability in subrecipient record-keeping practices, and inconsistent responsiveness to document requests. As a result, in certain instances CLA was unable to fully reconcile reported expenditures or verify the allowability and purpose of costs.

Table 2 summarizes testing results for the 31 subrecipients reviewed, including tier classification, total funding, unsupported expenditures identified, and expenditures incurred outside the period of performance. The classifications reflect the relative sufficiency of documentation and ability to substantiate reported expenditures and are intended to identify opportunities to strengthen accounting, recordkeeping, and grant administration practices, rather than to characterize the organizations themselves as high-risk. Many of these organizations provide valuable services and resources to the communities they serve. See **Attachment I** for a detailed list of subrecipients by tier classification. **Attachment I** identifies the 31 subrecipients selected for testing. The remaining subrecipients were excluded based on low-dollar awards, classification outside the tested subrecipient scope, or independence considerations, as described above.

Table 2: Summary of Results

Tiered Classification	Count	Award Amount	Unsupported Expenses	Expenses Incurred after PoP[3]	Description
Tier 1	2	$ 825,000	$ 792,130	$ -	Subrecipients with the most significant documentation and recordkeeping deficiencies. Documentation was absent, substantially incomplete, or contained significant inconsistencies that materially limited CLA's ability to determine how grant funds were used, verify reported expenditures, or assess compliance with grant requirements.
Tier 2	16	4,445,000	1,681,931	1,106,641	Subrecipients with significant documentation, reporting, or recordkeeping deficiencies that limited the ability to fully substantiate reported expenditures. While records provided generally indicated grant-related activity, supporting documentation was incomplete, inconsistent, or insufficient to verify portions of reported expenditures and compliance with grant requirements.
Tier 3	13	1,300,000	367	91,430	Subrecipients that generally demonstrated the ability to substantiate reported expenditures and maintain documentation supporting the use of grant funds. While certain documentation, reporting, or period-of-performance exceptions were identified, available records were generally sufficient to support most expenditures reviewed and did not indicate significant concerns regarding the overall use of funds.
Total Tested Subrecipients	**31**	**$6,570,000**	$2,474,428	$1,198,071	

Tiered classifications are based on the sufficiency and appropriateness of documentation obtained through testing, and are intended to reflect the relative extent to which accounting, documentation, and grant administration practices could be strengthened. This assessment incorporates both quantitative factors (e.g., magnitude of unsupported expenditures relative to total awards) and qualitative considerations (e.g., consistency of documentation, responsiveness to follow-up, and alignment with program objectives). Classifications are not intended to conclude on fraud, misconduct, or legal noncompliance, and determinations

[3] Period of performance.

regarding such matters are the responsibility of the appropriate trier of fact. The classifications do not reflect the quality or value of services provided by the organizations.

The following section presents the detailed results of work performed at the subrecipient level, including an assessment of documentation sufficiency, financial reporting, and overall compliance with grant terms and program objectives.

6. Results of Work Performed

This section presents the detailed results of the procedures performed for each subrecipient included in the scope of testing. For each entity, CLA evaluated documentation provided, financial reporting practices, agreement execution, and the overall alignment of expenditures with grant requirements and program objectives. In addition, CLA reviewed the agreement between DECD and the BHCA to assess BHCA's responsibilities as a pass-through entity and grantor, including its obligations for subrecipient oversight, monitoring, and enforcement of documentation, reporting, and compliance requirements. The results reflect the sufficiency and reliability of documentation obtained, as well as any identified exceptions, inconsistencies, or limitations that impacted the ability to substantiate reported expenditures.

A. Summary of Legislative Grant Structure, Requirements, and Passthrough Obligations

Legislative Grant Framework and Recipient Responsibilities

The Connecticut General Assembly appropriates legislative grant funding administered by the DECD, which constitutes state financial assistance as defined in Connecticut General Statutes (C.G.S.) § 4-230.[4] This form of assistance is provided to eligible entities to carry out approved programs that serve a public purpose, rather than for the procurement of goods or services.

BHCA was designated as a recipient of legislative grant funding in the amount of $5,500,000 each year for both FY2024 and FY2025.[5] The legislative grant application required BHCA, through its Authorized Official, to formally certify compliance with all applicable laws, regulations, and program requirements as a condition of receiving funding.[6,7] As the direct recipient of state financial assistance, BHCA is responsible for ensuring that grant funds are used in accordance with approved applications, budgets, grant requirements, and program objectives, regardless of whether funds are expended directly by BHCA or distributed to subrecipients. Accordingly, BHCA is responsible for providing sufficient guidance and oversight to ensure subrecipient expenditures support the intended public purpose of the award and comply with applicable grant requirements. See **Exhibits 2 and 3** for these grant applications.

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[4] C.G.S. 4-230 – Defines "state financial assistance" and establishes the statutory framework governing grants provided by the State of Connecticut.

[5] State of Connecticut – Biennial Budget, FY 2024–FY 2025 – Adopted state budget enacted by the Connecticut General Assembly, which appropriates funding for legislative grants administered by state agencies, including the Department of Economic and Community Development (DECD), and establishes the funding source for legislative grant awards.

[6] Blue Hills Civic Association, Inc. – FY2024 Legislative Grant Application and Final Report – Identifies BHCA as the recipient of a $5,500,000 legislative grant award and documents the use of funds, including distribution to subrecipients and related reporting requirements.

[7] Blue Hills Civic Association, Inc. – FY2025 Legislative Grant Application – Demonstrates BHCA's continued participation in the legislative grant program and acknowledgment of compliance with applicable statutes, regulations, and reporting requirements.

Reporting Requirements for BHCA (Recipient)

As a recipient of state financial assistance, BHCA is required to submit financial and programmatic reports to DECD that document the use of funds, including detailed expenditure information, program activities, and performance outcomes. This includes the submission of final reports at grant closeout, as well as the requirement to return any unexpended or disallowed funds identified through reporting or audit procedures. BHCA must also certify that all submitted information is true, complete, and accurate, with false statements subject to penalties under C.G.S. § 53a-157b.[8] Additionally, BHCA is required to comply with the State Single Audit Act (C.G.S. §§ 4-230–4-236), including requirements related to financial reporting, internal controls, and audit compliance.[9,10]

Responsibilities of BHCA as a Pass-Through Entity

When BHCA distributes legislative grant funds to other organizations, it functions as a pass-through entity, responsible for administering subawards in accordance with state grant requirements. In this role, BHCA executes subaward agreements (e.g., MOUs) that define approved program activities, budgets, and performance expectations. BHCA is further required to ensure that subrecipient expenditures are consistent with approved purposes, within the grant period, and compliant with budget restrictions, including prohibitions on duplicate funding across multiple sources. BHCA must also monitor subrecipient performance and compliance, including conducting site visits and evaluating whether subrecipients are progressing as expected relative to program objectives and expenditures. These responsibilities are consistent with state grant management guidance, which requires pass-through entities to monitor subrecipients and ensure proper use of funds, compliance with grant terms, and accountability for public resources.

Subrecipient Reporting and Compliance Requirements

Subrecipients receiving funds from BHCA are required to provide financial and programmatic reports to BHCA documenting their use of funds and the outcomes of funded activities, in formats consistent with DECD reporting requirements. Subrecipients must also maintain accurate and complete records sufficient to support all expenditures and demonstrate compliance with applicable laws and grant terms.[11] These records must be retained for a minimum of three (3) years, or longer if an audit, investigation, or claim is pending, and must

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[8] C.G.S. § 53a-157b – Establishes penalties for false statements made in connection with applications, reports, or certifications submitted to the State.

[9] C.G.S. §§ 4-230–4-236 (State Single Audit Act) – Establishes audit, reporting, and internal control requirements for entities expending state financial assistance, including requirements for financial reporting, recordkeeping, and compliance.

[10] State of Connecticut – Guide to Grants Management (September 29, 2025) – Provides statewide guidance on grant administration, including responsibilities of recipients and pass-through entities for monitoring, reporting, and compliance with grant requirements.

[11] Memorandum of Understanding between Blue Hills Civic Association, Inc. and Subrecipients (FY24 Legislative Grant Program) – Establishes contractual requirements for subrecipients, including budget compliance, reporting obligations, record retention, audit access, and return of unexpended funds.

be made available for inspection upon request by BHCA, DECD, or other authorized state entities. These requirements are established pursuant to C.G.S. § 7-396a, which grants state auditors access to all records related to state grant expenditures, and the State Single Audit Act (C.G.S. §§ 4-230–4-236), which requires entities to maintain documentation sufficient to support financial reporting, compliance determinations, and audit verification.[12]

B. Interviews Conducted

CLA conducted interviews with selected subrecipients who received more than $100,000 in legislative grant funding from BHCA or who had active applications for grant funding with the DECD. The purpose of these interviews was to obtain an understanding of the subrecipient identification process, application and contracting procedures, and expectations related to reporting, documentation, and oversight.

Interviews indicated that the process for identifying and awarding legislative grant funds was largely informal and relationship-driven. Subrecipients reported learning of funding opportunities through direct outreach from BHCA representatives, community networks, or, in some cases, local officials, including referrals or introductions facilitated through existing relationships. BHCA served as the primary point of contact for all subsequent communication, including budget submission, execution of agreements, and fund disbursement.

Subrecipients consistently described the application and contracting process as limited in structure, with most indicating that there was no formal application or competitive solicitation process. In lieu of a formal application, recipients were typically notified of an award or potential award and asked to submit a budget or proposal outlining planned use of funds, followed by execution of a MOU in certain cases.

Communication regarding reporting, monitoring, and documentation requirements was described as inconsistent and, in many cases, unclear. While some subrecipients reported submitting final reports or budget reconciliations, there was limited evidence of clearly defined ongoing reporting requirements or standardized expectations for documentation retention across the population. Subrecipients also reported varying levels of follow-up and oversight by BHCA, ranging from periodic check-ins and informal site visits to minimal or no ongoing communication after funds were disbursed.

Overall, interviews indicated that the grant administration process lacked consistency in communication, documentation expectations, and oversight practices, resulting in varied understanding and implementation of requirements across subrecipients.

C. Subrecipient Organizational Structure and Business Type

As part of our procedures, we reviewed the organizational structure of subrecipients to understand the types of entities receiving grant funds, including whether entities were organized as tax-exempt organizations, for-profit businesses, governmental entities, or other entity types. This assessment was performed to evaluate the alignment of funding with program intent and to identify considerations relevant to allowability, accountability, and oversight.

[12] Connecticut General Statutes § 7-396a provides authority for the State's Auditors of Public Accounts to access records and conduct audits of entities receiving state grant funding.

Based on our review, subrecipients represent a mix of organizational types, including Internal Revenue Code Section 501(c)(3) nonprofit organizations, for-profit entities, religious organizations, governmental entities, and other tax-exempt classifications (e.g., Section 501(c)(7)). Organizational classifications were determined based on legal structure using information obtained from subrecipient-provided documentation and publicly available records.

Nonprofit Organizations (Section 501(C)(3))

A majority of subrecipients were organized as tax-exempt entities under Section 501(c)(3). Certain entities were described in source documentation as "public charities," which represents a sub-classification within Section 501(c)(3). For consistency, all such entities are presented as nonprofit (501(c)(3)) organizations in this report.

These organizations are generally established to carry out charitable, educational, or community-based missions, which are typically aligned with the intended purposes of legislative grant funding.

For-Profit Entities

A subset of subrecipients was identified as for-profit businesses, primarily structured as limited liability companies or other privately owned entities. In certain instances, source documentation referenced nonprofit characteristics for entities that are legally organized as limited liability companies. For purposes of this report, classification is based on legal entity form, and such entities are presented as for-profit.

The involvement of for-profit entities introduced additional considerations regarding whether grant-funded activities served an identifiable public purpose. However, as discussed above, BHCA communications and related grant documentation did not consistently articulate the public purpose of the funding or establish clear expectations regarding how recipients, including for-profit entities, were expected to demonstrate that expenditures advanced community objectives. As a result, assessing whether expenditures supported a public purpose was often dependent on documentation provided by individual subrecipients and the extent to which the connection between expenditures and community benefits could be substantiated.[13]

Religious Organizations

A limited number of subrecipients were identified as religious organizations. As with other nonprofit entities, evaluation focused on whether funds were used for activities consistent with grant objectives and supported by appropriate documentation.

Governmental and Educational Institutions

The population includes governmental and institutional entities, including municipalities and nonprofit educational institutions classified under Section 501(c)(3). These entities typically

[13] During interviews and document review, certain subrecipients described activities that appeared intended to support community development, youth engagement, workforce development, or other community-focused objectives. However, in several instances, sufficient documentation was not provided to substantiate the nature, scope, beneficiaries, or outcomes of these activities, limiting CLA's ability to assess whether expenditures advanced the intended public purpose of the funding.

maintain more formalized financial and administrative controls; however, expenditures were subject to testing for compliance with grant requirements.

Other Entity Types

Additional variation in organizational structure was observed, including organizations classified under other sections of the Internal Revenue Code (e.g., Section 501(c)(7)). These classifications may reflect differing organizational purposes and governance structures and were considered in understanding documentation practices and operational characteristics.

Summary Observation

Overall, the population of subrecipients reflects a broad range of organizational structures, from formal nonprofit institutions to privately owned businesses and community-based organizations. This diversity in entity type introduces varying levels of financial sophistication, internal controls, and documentation practices, which were considered in the design and execution of testing procedures. **Table 3** below is a list of each subrecipient and their organizational business structure and/or business type.

Table 3: Subrecipient Organizational Structure and Business Type

Subrecipient Name	Type of Organization	Notes
African Caribbean American Parents of Children with Disabilities (AFCAMP)	Nonprofit (501(c)(3))	
Angel of Edgewood, Inc	Nonprofit (501(c)(3))	
Berkins Family LLC	For-Profit Entity	
Connecticut Harm Reduction Alliance	Nonprofit (501(c)(3))	
Don's Kitchen	For-Profit Entity	
DT Cares	Nonprofit (501(c)(3))	Reported as Public Charity
Exclusive Linez/Sign Design & Banner LLC	For-Profit Entity	
Greater Hartford Alliance of Black Social Workers	Nonprofit (501(c)(3))	Reported as Public Charity
Greater Hartford Festival of Jazz	Nonprofit (501(c)(3))	
Hartford Health Initiatives	Nonprofit (501(c)(3))	
Hartford Knights Corp	Nonprofit (501(c)(3))	
Jamaica Progressive League	Nonprofit (501(c)(3))	See note (A) below
Leo's Pride Dental	For-Profit Entity	
Lift Every Voice and Sing Org.	Nonprofit (501(c)(3))	Reported as Public Charity
Mothers United Against Violence	Nonprofit (501(c)(3))	
MPact Mentoring Inc.	Nonprofit (501(c)(7))	Social/recreational classification
My People Community Services, LLC	Nonprofit (501(c)(3))	
Outreach Realty Servicing		See note (B) below
Powell Mental Health	For-Profit Entity	
Real Art Ways, Inc.	Nonprofit (501(c)(3))	
S.H.E.B.A Consulting, LLC	For-Profit Entity	See note (C) below
St. John's Full Gospel Deliverance Church	Nonprofit (Religious Organization)	
St. Justin- Saint Michael Parish Corp	Nonprofit (Religious Organization)	
The Prosperity Foundation	Nonprofit (501(c)(3))	
The West Indian Social Club of Hartford	Nonprofit (501(c)(3))	
Town of Windsor	Governmental Entity (Municipality)	

University of Hartford	Nonprofit (501(c)(3) – Educational Institution)	
Upper Albany Neighborhood Collaborative	Nonprofit (501(c)(3))	
URISE Ventures, Inc	Nonprofit (501(c)(3))	
West Indian Independence Celebrations Inc	Nonprofit (501(c)(3))	
WISE Network	Nonprofit (501(c)(3))	

Note: "Reported as Public Charity" reflects terminology provided in source documentation obtained during testing (e.g., subrecipient-provided information or tax status descriptions). For consistency, such entities are classified as nonprofit organizations under Section 501(c)(3).

(A) Jamaica Progressive League (JPL) was the contracting entity; however, funds were disbursed to and administered by a related entity, Jamaica Progressive League Community Services (JPLCS), which did not have 501(c)(3) status at the time of funding. Accordingly, while JPL is classified as a nonprofit, this structure limits traceability between the agreement, funding recipient, and recorded expenditures.

(B) Based on procedures performed, CLA was initially unable to identify Outreach Realty Servicing in publicly available Connecticut business registration records. Subsequent information provided by DECD indicated that Outreach Realty changed its name to RH Realty Services, LLC in April 2024. A review of Connecticut business filings identified a name change filing associated with RH Realty Services, LLC. Accordingly, the absence of "Outreach Realty" in the Connecticut Secretary of State database appears attributable to the entity's name change rather than an absence of registration. However, this information does not affect the documentation-related findings discussed in this report.

(C) S.H.E.B.A Consulting, LLC is classified as a for-profit entity based on its legal structure as a limited liability company. Although references to nonprofit status were noted in source documentation, no supporting evidence of tax-exempt designation was obtained during testing. Additionally, no documentation supporting reported expenditures was provided despite follow-up. As a result, both entity classification and risk assessment reflect the information available through procedures performed.

D. Testing Results by Subrecipient

To assess the allowability, accuracy, and completeness of subrecipient expenditures, we requested a standardized set of financial and programmatic documentation from each subrecipient. Each category of documentation was necessary to evaluate specific aspects of compliance and to establish a sufficient audit trail supporting the use of grant funds.

The results of documentation testing reflect the level of support provided by subrecipients during the review period. Instances of incomplete or unsupported documentation do not, in isolation, indicate that funds were used for unallowable purposes. Rather, results have been categorized to distinguish between documentation deficiencies and indicators of potential noncompliance.

1. General Ledger Detail

   General ledger records were requested to provide a complete population of transactions recorded by the subrecipient over the period of performance. These records were necessary to reconcile reported expenditures to the subrecipient's underlying accounting records, identify the nature and categorization of costs, and verify that all grant-related activity was captured and consistently recorded.

2. Grant Financial Reports Submitted to BHCA

Reported financial information was obtained to evaluate whether expenditures reported to BHCA were accurate, complete, and consistent with the subrecipient's internal records. These reports were critical for identifying variances between reported and recorded amounts and for assessing the reliability of the subrecipient's reporting processes.

3. Supporting Documentation (Invoices, Contracts, Payment Evidence, Approvals, and Performance Reports)

   Transaction-level support was requested to substantiate individual expenditures and demonstrate that costs were incurred, properly authorized, and aligned with grant purposes. This documentation was necessary to verify the existence, accuracy, and allowability of expenditures, as well as to confirm that appropriate procurement, approval, and monitoring processes were followed.

4. Payroll Records (where applicable)

   Payroll documentation was specifically requested to support personnel costs charged to the grant. These records were necessary to verify that labor costs were actually incurred, to assess the roles and activities performed, and to determine whether employee time was appropriately allocated to grant-funded activities. In the absence of sufficiently detailed payroll records, including timekeeping or allocation support, the ability to assess the allowability and reasonableness of personnel-related expenditures is significantly limited.

5. Proof of Funds Received (e.g., Bank Deposits, Remittance Advices, Award Letters)

   Evidence of funds received was necessary to confirm that amounts recorded by subrecipients agreed to payments issued by BHCA. This documentation supported completeness and accuracy testing by establishing that funds were received in the amounts reported and were available for the intended purposes.

6. Executed MOU and Amendments

   Executed agreements were obtained to verify the terms and conditions governing the subrecipient's use of funds, including approved funding amounts, period of performance, and allowable activities. These documents were necessary to assess whether expenditures were incurred in accordance with grant requirements and within the authorized timeframe.

7. Pass-through Documentation (if applicable)

   Where subrecipients further distributed grant funds, documentation was requested to evaluate whether such pass-through arrangements were properly documented, approved, and monitored. This information was necessary to assess compliance with requirements applicable to pass-through entities and to ensure transparency and accountability over the subsequent use of funds.

Collectively, these documentation categories were necessary to enable a comprehensive evaluation of financial activity, support the verification of reported expenditures, and assess compliance with grant provisions and subrecipient monitoring expectations.

Attachment II summarizes the documentation requested and received by subrecipient. Where documentation was incomplete, CLA performed follow-up procedures where practicable; however, results are based on documentation received during the review period.

The following presents the results of testing performed at the subrecipient level. A summary of these results can be found in **Attachment III**. Results are organized by subrecipient tiered classification, grouping entities based on documentation sufficiency and ability to substantiate reported expenditures. This approach distinguishes the entities' relative level of support needed to strengthen accounting, recordkeeping, and grant administration practices and provides a clear, consistent framework for evaluating subrecipient performance.

Tier 1

Subrecipients classified as Tier 1 exhibited the most significant opportunities to strengthen accounting, recordkeeping, and grant administration practices. Testing identified substantial documentation limitations, missing supporting records, or material inconsistencies that restricted the ability to verify reported expenditures. As a result, additional review and enhanced oversight may be beneficial to support stronger financial management and documentation practices. The Tier 1 classification reflects the extent of documentation and recordkeeping challenges identified during testing and is not intended to imply fraud, misconduct, or legal noncompliance. These subrecipients warrant further review due to the nature and extent of identified issues.

1. S.H.E.B.A. Consulting, LLC

i. Organization Overview

S.H.E.B.A. Consulting LLC (SHEBA) is a Connecticut-registered entity formed on March 1, 2022, with an active status. The MOU for the subject grant was executed under this entity name. A review of publicly available records identified several related entities with common leadership, including Society of Human Engagement and Business Alignment, LLC (formed May 4, 2018), Society of Human Engagement and Business Alignment Resource Center, Inc. (formed January 25, 2022; currently listed as active but overdue), and SHEBA Capital Inc. (formed May 1, 2024). Additionally, "Society of Human Engagement and Business Center" is listed as a 501(c)(3) organization with a Form 990 filed for Tax Year 2024. All identified entities list Sonserae Cicero as principal. The SHEBA website describes the organization as "a minority and women-owned full HR support service for entrepreneurs and candidates seeking job placement." However, because SHEBA declined to participate in the review and did not provide requested documentation or information, CLA was unable to independently confirm the nature of the organization's operations, activities, or whether its actual use of BHCA funds was consistent with the purpose described on its website.[14]

ii. Grant Award, MOU, and Payment Timeline

FY24 BHCA Grant Award Amount: $600,000
FY24 Date of MOU: October 6, 2023
FY24 Date Executed / Submitted via Email on: April 7, 2024
FY24 Date of Payment: October 18, 2023

The $600,000 reflects funds directly awarded to SHEBA under the BHCA program and excludes the additional approximately $630,000 received as pass-through funding from Upper Albany Neighborhood Collaborative (UANC), another BHCA subrecipient which is discussed in more detail below.

In total, SHEBA received approximately $1.2 million in BHCA-related funding through both direct and pass-through sources. No documentation supporting the use of these funds was provided by SHEBA despite follow-up, limiting the ability to substantiate reported expenditures.

iii. Use of Funds

No documentation was provided by SHEBA to support the use of BHCA grant funds. As a result, the full $600,000 is considered unsupported. The timing of expenditures relative to the period of performance could not be determined due to lack of documentation.

iv. Reporting and Documentation

No interview was conducted, as SHEBA declined to participate in the review. In response to document requests, legal counsel for Ms. Cicero indicated that, based on publicly available information suggesting a potential ongoing federal investigation into related matters, SHEBA would not provide any documents or information absent a legal obligation to do so.[15] See **Exhibit 4** for the email response from Ms. Cicero's legal counsel.

As a result, no supporting documentation, financial records, or reporting materials were made available for review.

v. Conclusion

SHEBA did not provide any documentation or participate in the review process. Therefore, the entirety of the $600,000 in BHCA grant funding is unsupported. Additionally, due to the absence of records, the allowability, timing, and purpose of expenditures could not be

[14] https://shebatrailblazer.com/

[15] The MOUs signed by SHEBA contain a clause stating "all fiscal records pertaining to the project shall be maintained for a period of not less than three (3) years. Such records shall be made available to the state and its auditors upon request."

assessed. The refusal to provide documentation, combined with the existence of multiple related entities under common control and additional funding received through another BHCA subrecipient, limits transparency and prevents verification of compliance with grant requirements.

2. Outreach Realty Servicing

i. Organization Overview

A review of publicly available information indicated that the company website associated with Outreach Realty, "outreachrealtyservices.com," was not active and appeared to be listed for sale at the time of review. Although an initial search of the Connecticut Secretary of State business filings database did not identify "Outreach Realty," subsequent information provided by DECD indicated that the entity changed its name to RH Realty Services, LLC in April 2024. A review of Connecticut business filings identified the name change filing under RH Realty Services, LLC. Accordingly, CLA was able to confirm the existence of the business entity through the successor name. However, the address listed on the MOU (900 Chapel Street, 10, New Haven, CT 06510) appeared to correspond to a residential apartment building rather than a commercial office location.

CLA did not perform a formal interview with Outreach Realty due to delays in receiving responses to initial requests. However, CLA held a short phone call with Roberta Hoskie, President, on April 3, 2026 to discuss the document requests. As a result of this discussion, certain supporting documentation was provided, including check copies, bank statements, financial data, and revised final expenditure reports.

ii. Grant Award, MOU, and Payment Timeline

FY24 BHCA Grant Award Amount: $150,000
FY24 Date of MOU: October 6, 2023
FY24 Date Executed / Submitted via Email on: November 12, 2024
FY24 Date of Payment: October 12, 2023

FY25 BHCA Grant Award Amount: $75,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Submitted via Email on: October 30, 2024
FY25 Date of Payment: October 7, 2024

iii. Use of Funds

Outreach Realty reported utilizing grant funds across multiple budget categories, including salaries, rent/occupancy, travel, technology, marketing, telecommunications, non-employee contracted services, and other general business expenses. In the final narrative report for fiscal year 2024, submitted to BHCA on July 27, 2024, Roberta Hoskie indicated that grant funding supported the organization’s homeownership program, including assisting families in preparing for homeownership, sustaining operations, and supporting staffing through one full-time position and multiple part-time or contracted roles.

However, a detailed review of the general ledger and supporting documentation did not provide evidence to substantiate these reported uses of funds. Expenditures were heavily concentrated in ongoing operating and administrative costs, with limited documentation demonstrating a direct connection to the program activities or outcomes described in the narrative report.

The general ledger detail indicates that funds were utilized for a broad range of transaction types, including:

Compensation and Staff Benefits ($83,059.21)

A significant portion of expenditures relates to compensation paid to Roberta Hoskie, including frequent transactions labeled “Compensation – Roberta H.” across both fiscal periods. In addition to direct compensation, the general ledger reflects “Staff Benefits” expenses, which include payments to vendors such as Edge Fitness (membership fees), Pearl Vision (optical services), CVS (pharmacy-related purchases), Mondovi Dental (dental services), and internal medicine providers. These payments represent a substantial portion of total spending, with $30,135 of the expenses supported by internal withdrawal forms rather than payroll records or independent third-party documentation.

Insurance and Bank Fees ($15,967.87)

The general ledger reflects recurring payments for insurance premiums (e.g., Mass Mutual, The General), as well as financial-related services such as credit monitoring platforms, loan/financing payments (e.g., GM Financial), and bank-related charges including overdraft fees, wire fees, and monthly service fees. No supporting documentation was provided to substantiate these expenses.

Technology and Subscription Services ($12,766.90)

Numerous recurring charges were identified for software and digital services, including QuickBooks, GoDaddy, Dropbox, Google applications, Zoom, MLS membership systems, Calendly, JotForm, and other online platforms. These expenses appear consistent with general business operations but were not clearly linked to specific grant-funded program activities. No supporting documentation was provided to substantiate these expenses.

Telecommunications ($9,107.60)

Payments were made to telecommunications providers such as Comcast, T-Mobile, and MagicJack for phone and internet services. While these are typical business expenses, they reflect general operational support rather than targeted programmatic costs. No supporting documentation was provided to substantiate these expenses.

Occupancy and Housing-Related Costs ($29,985.61)

Expenditures included payments to entities such as greater New Haven organizations, Select Portfolio Services, and other housing-related vendors. Some of these transactions appear to relate to rent, mortgage servicing, or occupancy-type expenses. However, the documentation did not consistently distinguish between business space costs and potential personal housing-related expenses, and $1,600 of office space/rental expenses was supported by withdrawal forms without documentation indicating the purpose of the payments.

Travel and Repairs and Maintenance ($19,976.77)

The general ledger includes frequent charges for fuel (e.g., Exxon, Shell, Sunoco, BP), parking (e.g., City of New Haven, garages), vehicle-related payments (GM Financial, Jaguar-Land Rover), tolls, and hotel stays (e.g., Hampton Inn, Hotels.com). While some travel-related costs may be reasonable, the volume, frequency, and nature of these transactions, combined with limited supporting documentation, make it difficult to determine whether they were exclusively for business or program purposes. No supporting documentation was provided to substantiate these expenses.

Meals and Retail Purchases ($15,428.96)

A substantial number of transactions were categorized under “business meals” and “business expenses” and include charges from restaurants and fast-food establishments (e.g., Chipotle, Starbucks, Dunkin, Taco Bell, Wendy’s, Burger King), as well as retail purchases from vendors such as Walmart, Walgreens, Dollar Tree, and Staples. These transactions are numerous, relatively small, and recurring in nature. The available documentation does not demonstrate how these expenses are directly related to program delivery, raising concerns that some may represent personal or mixed-use expenditures. Additionally, a withdrawal form was provided to support a $517.50 payment to Tradeline Supply.

Marketing ($5,674.78)

Marketing-related expenses included recurring payments to platforms such as Eventbrite, SimpleTexting, Canva, Podia, and similar services. While these may support outreach activities, the connection to specific measurable program outcomes was not clearly documented, and a $100 expense for a “Social media sponsored ad” was supported by a withdrawal form without documentation describing the nature or purpose of the expense.

Non-Employee Activity ($37,405.74)

The general ledger reflects payments categorized as non-employee services and transfers, including payments via Zelle, Payoneer, and other platforms, as well as ATM withdrawals and other cash-related transactions. In several cases, counterparties were individuals or entities without clear contractual documentation. The lack of invoices, agreements, or detailed descriptions limits the ability to determine the nature and allowability of these payments. No supporting documentation was provided to substantiate these expenses.

Other Expenses ($1,275.23)

Expenses grouped under categories such as “Leadership Conference,” “Postage Expenses,” and “Office Supplies” included a mix of items such as postage (USPS), subscription services, merchant fees, bank charges, and general retail purchases. These categories appear to aggregate a wide range of unrelated transactions, reducing transparency and obscuring the specific purpose of expenditures. No supporting documentation was provided to substantiate these expenses.

Based on the GL descriptions and transaction patterns, several types of expenses raise concerns regarding potential personal use or, at minimum, mixed-use expenditures that were not clearly segregated from grant activities, such as:

- Frequent restaurant and fast-food charges without documentation of business purpose or attendees;
- Retail purchases (e.g., Walmart, Walgreens, Dollar Tree) lacking itemized receipts or program linkage;
- Vehicle-related costs, including fuel, parking, and financing payments, without mileage logs or documentation supporting business use;
- Insurance payments that may relate to personal policies rather than solely business operations;
- ATM withdrawals, Zelle transfers, and other cash-like transactions without supporting documentation or clearly defined services rendered; and
- Housing or occupancy-related payments where it is unclear whether expenditures relate to business premises or personal living arrangements.

These patterns suggest that a portion of the expenditures may represent general personal or lifestyle-related spending, or at minimum, costs that were not sufficiently documented to demonstrate exclusive use for grant purposes.

iv. Reporting and Documentation

CLA noted significant inconsistencies between amounts reported to BHCA, the revised reports prepared by management, and the underlying general ledger activity. In several categories, reported amounts exceeded budgeted amounts, while in other categories expenditures were reflected in the general ledger but not reported to BHCA. The revised reports also included changes that did not consistently align either with the original reports or the detailed transaction data. These discrepancies limited CLA's ability to reconcile reported grant usage to actual expenditures. See **Exhibit 5 – Budgets and Reports**.

Supporting documentation was limited. Although general ledger detail was provided showing approximately $149,015 in fiscal year 2024 expenses and approximately $85,938 in fiscal year 2025 expenses, only $32,352.50 of check support (i.e., withdrawal forms) was provided. Much of that support consisted of internal withdrawal forms, and in many cases payments, particularly those related to salaries and non-employee services, could not be substantiated through independent third-party documentation.

Additional documents provided included the BHCA ACH authorization form, the original 2024 grant report dated July 27, 2024, the fiscal year 2024 signed MOU, the fiscal year 2024 and fiscal year 2025 funding emails, a spreadsheet titled "BHCA DECD Homeownership Funding

Impact Quantified over 10 years," and general ledger detail. However, the documentation provided did not support the reported expenditures or permit complete validation of allowability under the grant.

v. Conclusion

Outreach Realty Servicing received a total of $225,000 in BHCA grant funding across fiscal years 2024 and 2025. Based on the procedures performed, CLA determined that while the organization reported using funds to support a homeownership program and related staffing and operational activities, the available financial records did not substantiate these representations.

A significant portion of expenditures, totaling approximately $234,953 across both fiscal years based on general ledger activity, consisted primarily of ongoing administrative, operational, and discretionary costs. These included compensation, occupancy, travel, meals, retail purchases, and other general business expenses, many of which lacked a clear and documented connection to programmatic activities or grant objectives. In multiple instances, expenditure patterns, vendors, and transaction descriptions raised concerns regarding potential personal or mixed-use spending that was not clearly segregated from grant-funded activities.

Supporting documentation was limited and insufficient. Although general ledger detail was provided, only $32,352.50 of support, primarily in the form of internal withdrawal forms, was available to substantiate transactions. Payments related to key categories, including compensation and non-employee services, were not supported by payroll records, contracts, invoices, or other independent third-party documentation. As a result, $192,130 of expenditures could not be validated for allowability or business purpose.

Additionally, CLA identified significant inconsistencies between reported expenditures, revised reports, and underlying financial records. These discrepancies limited the ability to reconcile grant activity and further reduced confidence in the accuracy and completeness of reported fund usage.

Overall, based on the documentation provided, CLA identified approximately $192,130 in unsupported expenditures. The combination of limited supporting documentation, inconsistent reporting, lack of clear programmatic linkage, and indicators of potential personal or mixed-use spending restricted CLA's ability to verify that grant funds were used in accordance with program requirements.

Tier 2

Subrecipients classified as Tier 2 were unable to provide sufficient documentation to substantiate reported use of funds. While procedures performed did not identify definitive indicators of misuse, the absence or insufficiency of supporting records limits the ability to verify compliance with program requirements. These classifications reflect documentation deficiencies rather than conclusions regarding unallowable expenditures.

3. Upper Albany Neighborhood Collaborative

i. Organization Overview

Upper Albany Neighborhood Collaborative (UANC) received BHCA grant funding for fiscal years 2024 and 2025. According to publicly available information on the organization's website, UANC is a nonprofit organization founded in 1990 through funding from the Ford Foundation.[16] The organization's mission is to empower residents of the Upper Albany community through initiatives including block clubs, job and economic development programs, educational programming, youth council activities, and other community-based efforts. The website further indicates that UANC provides a range of community services and outreach initiatives, such as Volunteer Income Tax Assistance (VITA) preparation, back-to-school backpack distributions, Thanksgiving meals, holiday assistance programs, community awareness events, and general community assistance. Based on a review of publicly available IRS records, UANC is recognized as a tax-exempt entity under Section 501(c)(3) of the Internal Revenue Code, with a Form 990 most recently filed for the 2024 tax year.

CLA conducted an interview with Mary Young, Program Director, on March 30, 2026 to gain an understanding of the organization and its role in administering BHCA grant funding. The interview indicated that the grant process was informal, with no competitive application process and limited transparency in funding determinations. Subrecipient selection and funding decisions were influenced primarily by existing relationships and external referrals, including involvement from legislators. Oversight and reporting requirements were limited, and documentation and payment practices varied across subrecipients. Overall, the grant administration approach relied heavily on informal practices and trust rather than standardized controls.

ii. Grant Award, MOU, and Payment Timeline

FY24 BHCA Grant Award Amount: $550,000
FY24 Date of MOU: October 6, 2023
FY24 Date Executed / Submitted via Email on: March, 2024[17]
FY24 Date of Payment: October 18, 2023

FY25 BHCA Grant Award Amount: $1,500,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Submitted via Email on: November 19, 2024
FY25 Date of Payment: October 8, 2024

i. Use of Funds

UANC reported that grant funds were used to support a mix of programmatic activities, contracted services, and administrative costs related to youth-focused programming and community outreach initiatives. Disbursements were primarily made to third-party program

[16] http://www.uanchartford.org/

[17] CLA was unable to find the exact date the fiscal year 2024 MOU was signed.

operators, individual contractors, and for direct programmatic and operational expenses. UANC's approach to administering and utilizing the funds varied by fiscal year; therefore, CLA has outlined the use of funds by fiscal year, including a description of the processes applied in each period.

Fiscal Year 2024

During FY24, UANC employed a largely reimbursement-based approach, whereby subrecipients or event organizers requested funding and were reimbursed for expenses incurred or, in certain cases, payments were made directly to vendors. Requests for funding were often initiated through informal channels, including direct outreach or referrals, and in some cases did not require a formal application, budget, or executed MOU.

As described by UANC, FY24 represented a transition year in which the organization expanded its use of funds to include a broader range of community outreach activities, particularly toward the end of the grant period. This expansion was driven in part by increased funding and direction to deploy remaining funds into community-based initiatives. As a result, additional awards were made late in the grant cycle, often based on requests received by phone or email, and supporting documentation requirements varied depending on the nature and size of the award.

For traditional program funding, payments were generally made on a reimbursement basis or directly to vendors, with supporting documentation such as receipts or invoices provided where available. For outreach-related expenditures, documentation requirements were less standardized, and in some cases, receipts or formal agreements were not consistently obtained.

Funds were used broadly for:

- Program delivery through subrecipient organizations and community initiatives;
- Contracted personnel and stipends for program management;
- Program supplies, events, and participant-related costs; and
- Administrative and operational expenses, including certain direct-paid services.

UANC also noted that unspent funds from certain programs were reallocated to other programs or outreach efforts, particularly later in the grant year, without formal amendments to prior agreements.

Total unsupported costs identified in fiscal year 2024 were $141,337.65, as outlined below:

Non-employee Contracted Services-Programmatic ($90,000)

Total unsupported non-employee contracted service costs were approximately $90,000. While the total amount aligns to the budget and agrees to the general ledger detail, UANC indicated that, aside from check copies and a check cover document, no additional supporting documentation exists. However, check copies were not provided for review.

These costs appear to relate to compensation for program personnel, specifically $60,000 attributed to Mary Young, Program Director, and $30,000 attributed to Dorothy Biggs, Program Manager. However, CLA was unable to determine whether these costs were appropriately charged to the BHCA grant due to the absence of supporting documentation, including employment or consulting agreements, payroll records or timesheets, and evidence of allocation to grant-related activities.

Other Contracted Services ($23,136.07)

Total contracted service costs were approximately $362,000, which agrees to the general ledger detail and final report; however, this amount exceeded the budgeted total of $356,000. Of the $362,000 reported, $23,136.07 was unsupported, as UANC either did not obtain supporting documentation from its subrecipients or was unable to locate documentation to provide to CLA for review.

These contracted service costs represent a significant portion of overall grant expenditures and include funding distributed across multiple subprograms. Specifically, $310,446.53 was allocated to 20 subprograms through MOUs, and $51,553.47 was associated with 21 community outreach programs. Given the volume and significance of these transactions, CLA has documented these expenditures in further detail in the section titled "UANC 2024 Other Contracted Services" and Table 4 below.

Occupancy Costs ($20,608.99)

Total occupancy costs reported were $20,608.99, which agrees to both the final report and the approved budget. CLA reviewed QuickBooks detail supporting the composition of these costs, which included allocations and expenses for rent ($13,200), liability insurance ($1,002.24), sponsorship and advertising for the 100 Women of Color event ($1,000), phone and internet services ($4,749.37), copier contract ($312), and website fees ($345.38).

While these amounts fully reconcile to the reported total, no supporting documentation (e.g., invoices, receipts, or proof of payment) was provided for review. As a result, CLA was unable to independently verify the validity, grant purpose, or reasonableness of these expenditures.

Marketing, Publicity, and Advertising ($2,375)

Total marketing, publicity, and advertising costs identified in the general ledger detail amounted to approximately $3,374.89. These expenditures primarily consisted of sponsorships and event-related costs, including contributions to the Dr. Martin Luther King Jr. Annual Gala ($1,071.00), a BHCA Gala sponsorship ($734.64), sponsorship dinners supporting a cooking class ($200.00), and a volunteer holiday event ($128.67). Additional expenses included office-related marketing supplies, such as ink and toner purchases totaling $240.58.

While the general ledger provides detailed descriptions of these transactions, supporting documentation (e.g., invoices, receipts, or proof of payment) was not provided for $2,375 of these expenses. As a result, CLA was unable to independently verify the validity, grant purpose, or reasonableness of these expenditures.

Supplies and Materials ($236.32)

Total supplies and materials costs identified in the general ledger detail amounted to approximately $1,508.16. These expenditures included a mix of office equipment and supplies, such as a button maker machine ($201.67), a sit/stand desk and printer cartridges ($112.47), printer ink purchases across multiple transactions ($203.48), batteries and charging equipment ($42.27), and office setup supplies following a holiday reopening ($295.56). Additional costs included branded t-shirts for logo printing ($123.84), check and envelope orders ($526.03), and minor technology-related expenses associated with QuickBooks Online, training, and Zoom services ($2.84).

While the general ledger provides detailed descriptions of these transactions, supporting documentation (e.g., invoices, receipts, or proof of payment) was not provided for $236.32 of these expenses. As a result, CLA was unable to independently verify the validity, grant purpose, or reasonableness of these expenditures.

Telecommunications and Postage ($969)

Total telecommunications costs identified in the general ledger detail amounted to approximately $969. These expenditures consisted of postage ($289), Zoom license fees supporting various programs ($510.16), and an additional Zoom-related charge ($170.05), which was noted as being reallocated to administrative and general expenses.

While the general ledger provides detailed descriptions of these transactions, supporting documentation (e.g., invoices, receipts, or proof of payment) was not provided for $289 of these expenses. As a result, CLA was unable to independently verify the validity, grant purpose, or reasonableness of these expenditures.

Travel and Meetings ($1,039)

Total travel and meetings costs identified in the general ledger detail amounted to approximately $1,038.95. These expenditures consisted of appreciation event-related costs, including general event expenses ($600.97) and a venue-related charge associated with the appreciation event ($437.98).

While the general ledger provides descriptions of these transactions, no supporting documentation (e.g., invoices, receipts, or proof of payment) was provided for review. As a result, CLA was unable to independently verify the validity, grant purpose, or reasonableness of these expenditures.

To further clarify the nature and composition of these expenditures, the sections that follow provide a more detailed analysis of UANC's 2024 contracted service activity. Given that contracted services represent a significant portion of total grant expenditures, particularly those distributed through subrecipient MOUs and community outreach programs, CLA has performed additional review procedures over these transactions. The following section expands on the flow of funds, documentation obtained and support available for these subawards and related expenditures.

Other ($2,973.26)

In addition to the budgeted expenses listed above, an additional $2,973.26 was spent on unbudgeted expenses such as overbudget spending for the Christmas outreach program

($128.67), a table at a gala ($1,071), an appreciation event at Fire by Forge ($437.98, which included $75.15 for alcohol), and an Amazon.com order for gift cards an appreciation gifts ($600.97). While supporting documentation was provided for these expenditures, they were not included in the approved budget narrative and no evidence of required preapproval for budget variances was identified. Accordingly, these expenditures could not be substantiated as consistent with program requirements.

UANC 2024 Other Contracted Services

Table 4 below summarizes UANC's 2024 sub-programs and community outreach events, including the program type, amount awarded, amount paid, whether a signed MOU and activity report were provided, and any unsupported expenses identified by CLA. Sub-programs generally reflect more structured initiatives that required advance documentation (including MOUs and budgets) and post-program reporting, while sub-events represent more informal or one-time funding requests that were not subject to the same documentation requirements. In total, the table reflects $362,000 in reported and paid contracted service activity, of which $23,136.07 was identified as unsupported. The unsupported costs were concentrated in certain sub-programs and sub-events which will be explained in more detail below.

Table 4: UANC 2024 Sub-Program and Event Summary

Program Name	Program Type	Amount Awarded	Amount Paid	Signed MOU	Activity Report Provided	Unsupported Expenses
Advocacy to Legacy	Sub-program	$ 13,250.00	$ 13,250.00	Y	Y	1,664.00
Bloomfield Jr Warhawks	Sub-program	11,806.41	11,806.41	Y	Y	-
Cooking Etiquette & Life Skills	Sub-program	9,000.00	9,000.00	Y	Y	-
Creative Arts Project with Ms. E	Sub-program	12,000.00	12,000.00	Y	Y	-
CT Double Dutch	Sub-program	20,000.00	20,000.00	Y	N	-
DMG Balerz Basketball Pgm	Sub-program	16,000.00	16,000.00	Y	N	605.00
GHPA Youth Basketball	Sub-program	18,000.00	18,000.00	Y	Y	24.44
Hartford Hurricanes	Sub-program	30,000.00	30,000.00	Y	Y	-
Hoopwave	Sub-program	32,000.00	32,000.00	Y	Y	-
MHSA Athletic Pgm	Sub-program	14,000.00	14,000.00	Y	N	-
North End Little League	Sub-program	12,354.67	12,354.67	Y	N	-
Numc Youth Initiatives	Sub-program	15,000.00	15,000.00	Y	Y	198.87
Rich Dae Entrepreneurship, Life Skills and Fitness Program (Double Dutch)	Sub-program	16,062.19	16,062.19	Y	Y	-
Sheba Internship Program*	Sub-program	14,765.40	14,765.40	Y	N	11,680.60
Scribes Literary Pgm	Sub-program	13,250.00	13,250.00	Y	Y	-
Tower Garden Pgm	Sub-program	13,250.00	13,250.00	N	Y	-
Uplift - Contractual	Sub-program	27,500.00	27,500.00	Y	Y	1,854.28
Uplift - Non Contractual	Sub-program	13,737.19	13,737.19	Y	Y	-
Wilson Branch Tutoring	Sub-program	1,470.67	1,470.67	Y	Y	-
Yale Gender Pediatric Pgm	Sub-program	7,000.00	7,000.00	Y	Y	-
Act Up Theater	Sub-event	5,000.00	5,000.00	N/A	N/A	-
Back to School Event	Sub-event	1,433.00	1,433.00	N/A	N/A	-
Benjamin Foster - Commeration Event 11-19-	Sub-event	6,901.50	6,901.50	N/A	N/A	-
Call of Duty Event	Sub-event	2,500.00	2,500.00	N/A	N/A	-
Capital Pro-Am - Higgins	Sub-event	5,000.00	5,000.00	N/A	N/A	-
Carmen Arace Middle School Play	Sub-event	650.00	650.00	N/A	N/A	-
Christmas Assistance Distribution	Sub-event	4,490.70	4,490.70	N/A	N/A	140.70
Coach Ken Smith - Windsor	Sub-event	2,500.00	2,500.00	N/A	N/A	2,500.00
Footlights FriendZworldMusic	Sub-event	5,000.00	5,000.00	N/A	N/A	3,000.00
Maternal Health Equity	Sub-event	1,200.00	1,200.00	N/A	N/A	1,200.00
Mt Olive Youth Group	Sub-event	2,500.00	2,500.00	N/A	N/A	-
National Night Out (NNO)	Sub-event	1,104.49	1,104.49	N/A	N/A	-
Oliver Benoit Foundation Company	Sub-event	4,970.66	4,970.66	N/A	N/A	-
P. Williams Scholarship Fund	Sub-event	1,000.00	1,000.00	N/A	N/A	-
Senior Holiday Event - Adams	Sub-event	479.11	479.11	N/A	N/A	-
Son's of Thunder - Event Admin	Sub-event	1,603.40	1,603.40	N/A	N/A	-
Senior Holiday Event - Seritella	Sub-event	300.00	300.00	N/A	N/A	100.00
T-Shirts Exclusive Lines	Sub-event	1,500.00	1,500.00	N/A	N/A	-
Turkey Distribution - Thanksgiving	Sub-event	1,535.41	1,535.41	N/A	N/A	85.68
Valentines Day Event	Sub-event	600.00	600.00	N/A	N/A	82.50
Wellness Book Event - Austin	Sub-event	1,285.20	1,285.20	N/A	N/A	-
		$ 362,000.00	$ 362,000.00			$ 23,136.07

CLA reviewed UANC's 2024 sub-program and community outreach event activity to identify programs and events with unsupported costs, missing documentation, or other documentation-related issues. The summary below focuses on those programs and events where unsupported expenses were identified and provides additional context regarding the purpose of each program, the amount awarded and paid, the portion supported versus unsupported, and the specific documentation or reconciliation issues noted during CLA's review.

Advocacy to Legacy

Advocacy to Legacy is a youth program focused on teaching participants how government functions and how public policy affects their lives, while building skills in research, decision-making, and communication. For this program, total reimbursements were $13,250, of which $11,586 was supported and $1,664 was unsupported. The unsupported costs arose primarily from duplicate reimbursements where receipts submitted in March 2024 were resubmitted and reimbursed again in May 2024 before being reversed. Additionally, expenditures did not align with the approved budget categories, as budget-to-actual amounts by classification did not reconcile on a one-to-one basis.

DMG Ballerz Basketball Program

The DMG Ballerz Basketball Program is a year-round youth athletics program designed to develop basketball skills while promoting mentorship, teamwork, and participation in competitive tournaments. The program received $16,000 in reimbursements, of which $15,395 was supported and $605 was unsupported due to missing receipts that were reportedly lost. Additionally, the program received an additional $6,000 beyond the original $10,000 budget without submission of an updated budget, indicating a lack of formal budget controls over expanded funding.

GHPA Youth Basketball

GHPA Youth Basketball is an outdoor summer league and training program providing youth with access to organized basketball activities, mentorship, and instruction from experienced athletes. Approximately $17,975.56 was reimbursed, with $17,951 supported and $24.44 unsupported due to missing receipts. Similar to other programs, the original $12,000 budget was exceeded by an additional $6,000 awarded without an updated budget submission, resulting in discrepancies between budget and actual spending.

NUMC Youth Initiatives

NUMC Youth Initiatives encompasses a range of youth-focused activities, including music programs (such as steel pan orchestra), dance, choir, educational workshops, and community engagement efforts. Of the $14,801.13 reimbursed, $14,602.26 was supported and $198.87 was unsupported. The unsupported portion resulted from a duplicate receipt that was submitted and reimbursed twice within the same reimbursement request. Additionally, expenditures did not reconcile to the approved budget categories on a line-by-line basis.

Rich Dae Entrepreneurship, Life Skills and Fitness Program

The Rich Dae program provides youth with entrepreneurship training, life skills education, and physical fitness activities, including double-dutch programming. Total reimbursements were $16,662.19; however, supported versus unsupported amounts were not specifically quantified in the summary. Key issues identified include that the program exceeded its original $10,000 budget without a formally updated budget to support the increased funding level. As a result, budget-to-actual expenditures did not reconcile across classifications, indicating gaps in financial oversight.

SHEBA Internship Program

The SHEBA Internship Program is a youth summer program focused on developing skills in technology, gaming, film, arts, and entrepreneurship through hands-on internship experiences. Of the $14,765.40 reimbursed, $3,084 was supported and $11,680.60 was unsupported. The unsupported costs were driven by insufficient payroll documentation, as only the first payroll period was substantiated with payroll records, while the remaining payroll was supported solely by a spreadsheet without underlying payroll data. This lack of verifiable documentation represents a significant internal control weakness over payroll expenditures.

Tower Garden Program

The Tower Garden Program teaches youth about aeroponic gardening and sustainable food production through hands-on learning experiences. Total reimbursements were $13,250; however, supported versus unsupported costs were not specifically quantified. A key issue identified was the absence of a signed MOU, which limits the ability to validate the terms of the award and allowable costs. Additionally, budget-to-actual expenditures did not reconcile by classification, indicating inconsistencies in how costs were recorded and reported.

Uplift – Contractual

The Uplift – Contractual program supports personnel responsible for administering and managing the Uplift Youth Entrepreneurial Program, which provides youth with entrepreneurial training and development opportunities. Total reimbursements (per general ledger) were $41,237.19, of which $39,382.91 was supported and $1,854.28 was unsupported. Unsupported costs resulted from missing payment support, including checks that were not provided, as well as reliance on informal documentation such as emails and check requests instead of formal invoices or contracts. Budget-to-actual expenditures also did not reconcile across classifications.

Christmas Assistance Distribution – Subevent

The Christmas Assistance Distribution event (award: $4,490.70) provided $50 Walmart gift cards to community members to support holiday food and gift purchases. While receipts supported the purchase of 70 gift cards totaling $3,500, additional volunteer stipends labeled “Christmas Appreciation” were not fully supported. As a result, $140.70 in expenses was unsupported due to insufficient documentation for certain stipend payments.

Coach Ken Smith – Windsor – Subevent

The Coach Ken Smith – Windsor event (award: $2,500.00) supported an athletic program initiative to promote breast and prostate cancer awareness through the purchase of pink uniforms and promotional materials. Although the purpose of the funding was documented through email correspondence, no receipts or supporting documentation were requested or retained to substantiate how funds were spent. Consequently, the full $2,500.00 was deemed unsupported.

Footlights FriendZWorldMusic – Subevent

The Footlights FriendZWorldMusic event (award: $5,000.00) supported a youth performing arts program aimed at developing artistic skills and career pathways. Documentation was provided for a portion of storage-related expenses; however, no invoices or receipts were provided for rehearsal space costs of $500 per month over a six-month period. Due to this lack of support for facility rental expenses, $3,000.00 was identified as unsupported.

Maternal Health Equity – Subevent

The Maternal Health Equity event (award: $1,200.00) funded a marketing campaign focused on raising awareness of maternal health among Black women, including education on breastfeeding and available healthcare resources. Although the payment to Hartford Hospital was verified, no additional documentation was provided to support how the funds were utilized for the campaign. Therefore, the entire $1,200.00 was considered unsupported.

Senior Holiday Event – Seritella – Subevent

The Senior Holiday Event – Seritella (award: $300.00) funded a holiday celebration for seniors, primarily covering food and event-related costs. While some receipts were provided, several lacked sufficient detail such as dates or clear descriptions, and stipends paid to individuals assisting with the event were not supported by documentation. As a result, $100.00 was determined to be unsupported.

Turkey Distribution – Thanksgiving – Subevent

The Turkey Distribution – Thanksgiving event (award: $1,535.41) provided turkeys and related food items to the community through a local food pantry partnership. Most expenses, including food, gas, and stipends, were supported with receipts; however, one U-Haul-related expense recorded in the bank statement did not have a corresponding receipt. This resulted in $85.68 of unsupported costs.

Valentines Day Event – Subevent

The Valentines Day Event (award: $600.00) supported a community event titled "A Day of Love and Marriage," which included entertainment and refreshments. Partial documentation was provided, including a Cash App payment supporting DJ services; however, no receipt was retained for a portion of funds reportedly used to purchase cupcakes from a local vendor. Accordingly, $82.50 in costs were unsupported due to missing documentation.

Across programs, unsupported costs most frequently resulted from missing or duplicate receipts, inadequate documentation (including handwritten notes and spreadsheets in place of formal records), and expenditures exceeding approved budgets without updated documentation. Additionally, a consistent theme was the lack of alignment between budgeted and actual expenditures by classification, indicating broader issues with financial tracking and compliance.

Fiscal Year 2025

During FY25, UANC primarily utilized a reimbursement-based funding model, under which subrecipients and event organizers submitted requests for reimbursement of incurred expenses or, in certain instances, UANC made payments directly to vendors. Requests for funding were often initiated through informal channels, including direct outreach, phone calls, or referrals, and did not consistently require a formal application, detailed budget, or fully executed MOU.

FY25 represented a period of transition and process development for UANC, as the organization expanded both the volume and diversity of funded programs while beginning to formalize its administrative and documentation practices. During this period, UANC implemented additional procedures, including the introduction of standardized payment request forms and a transition to electronic record-keeping. However, these documentation requirements were not applied consistently across all programs, particularly for smaller awards and community outreach activities where urgency or informal request processes were cited.

UANC implemented a revised process for submitting and processing payment requests intended to improve efficiency, accuracy, and documentation. Under the updated approach, programs are now required to submit a detailed summary of all receipts and invoices with each payment request, representing a shift from prior practices where UANC prepared payment summaries internally using check stubs. This change places responsibility on programs to maintain organized records of submitted expenses to support verification, clarification, and audit procedures.

In addition, UANC transitioned to a fully electronic record-keeping system and discontinued the use of paper files. All supporting documentation, including receipts, invoices, and payment records, is now maintained digitally. This change is intended to streamline payment processing, reduce follow-up inquiries related to discrepancies, improve accessibility of records, and reduce the risk of lost or illegible documentation.

For traditional program funding, payments were generally supported by invoices, receipts, or summary documentation; however, for certain outreach-related expenditures and programmatic costs, documentation was often incomplete or limited to internally prepared summaries without underlying third-party support.

Funds were used broadly for:

- Program delivery through subrecipient organizations and community-based initiatives;
- Contracted personnel and stipends for program management and administration;
- Program supplies, participant support, and event-related costs;
- Administrative and operational expenses, including occupancy and direct-paid services; and
- Community outreach and one-time events in response to identified community needs.

UANC also indicated that unspent or excess funds from certain programs were reallocated to other programs or outreach efforts, particularly later in the grant period. In several instances, these reallocations occurred without formal amendments to original agreements or updated budget documentation.

Total unsupported costs identified in fiscal year 2025 were $894,197.38, as outlined below:

Non-employee Contracted Services – Programmatic ($111,000)

Total unsupported non-employee contracted service costs were approximately $111,000. While the total amount aligns to the budget and agrees to the general ledger, UANC indicated that, aside from PRS Report summaries, Cancelled Checks, and the MOU's Contractor Agreements, no additional supporting documentation exists. However, this documented support was not provided.

These costs appear to relate to compensation for program personnel, specifically $60,000 attributed to Mary Young, Program Director, and $30,000 attributed to Dorothy Biggs, Program Manager and $21,000 for Kiya Young, Assistant Program Manager. While the amounts appear consistent with reasonable compensation for these roles, CLA was unable to determine whether these costs were properly attributable to the BHCA grant, such as supporting documentation such as executed employment or consulting agreements, payroll records or timesheets, and documentation demonstrating allocation of personnel costs to grant-funded activities was not provided for review.

Other Contracted Services ($688,484.87)

Total contracted service costs represented a significant portion of overall grant expenditures, with approximately $1.29 million reported. Of this amount, $688,484.87 was unsupported due to missing or insufficient documentation, including lack of invoices, receipts, or activity reports from subrecipients. These expenditures were distributed across numerous subprograms and community outreach initiatives, many of which exhibited inconsistencies in documentation, budget alignment, and reporting completeness. Given the volume and significance of these transactions, CLA has documented these expenditures in further detail in the section titled "UANC 2025 Other Contracted Services" and Table 5 below.

Occupancy Costs ($18,003.20)

Total occupancy costs reported were $18,003.20, which is less than the budgeted amount of $20,000. CLA reviewed QuickBooks detail supporting the composition of these costs, which included allocations and expenses for rent ($12,100), business owners policy ($892.80), cellphones ($267.27), phone and internet services ($4,573.08), and Zoom Renewal Fees ($170.05).

While these amounts appear on the approved budget, no supporting documentation (e.g., invoices, receipts, or proof of payment) was provided for review. As a result, CLA was unable to independently verify the validity, grant purpose, or reasonableness of these expenditures.

Supplies and Materials ($5,918.12)

Total supplies and materials costs identified in the general ledger detail amounted to approximately $8,209.18. These expenditures included a mix of office equipment and supplies, such as phone services ($421.05), Staples supplies ($151.84), Receipt Reading Equipment ($941.96), QuickBooks class ($269.00), checks, envelopes, and 1099 Kits ($640.84), Amazon office supplies ($311.59), and other misc. supplies ($5,472.90).

While the general ledger provides detailed descriptions of these transactions, supporting documentation (e.g., invoices, receipts, or proof of payment) was not provided for $5,918.12 of these expenses. As a result, CLA was unable to independently verify the validity, grant purpose, or reasonableness of these expenditures.

Telecommunications ($309.79)

Total telecommunications costs identified in the general ledger detail amounted to $309.79 for website fees.

While the general ledger provides descriptions of these transactions, no supporting documentation (e.g., invoices, receipts, or proof of payment) was provided for review. As a result, CLA was unable to independently verify the validity, grant purpose, or reasonableness of these expenditures.

Program Consulting and Audit ($70,000)

Other unsupported costs included approximately $70,000 related to program consulting and audit/tax preparation services, which tied directly to the approved budget and general ledger detail. While UANC indicated that supporting documentation existed, it was not provided for review.

Other Expenses ($131.40)

Total postage and shipping costs were approximately $94.90 for USPS Stamps. Total travel and meeting costs were approximately $36.50 for a Volunteer discussion luncheon.

While the general ledger provides descriptions of these transactions, no supporting documentation (e.g., invoices, receipts, or proof of payment) was provided for review. As a result, CLA was unable to independently verify the validity, grant purpose, or reasonableness of these expenditures.

To further clarify the nature and composition of these expenditures, the sections that follow provide a more detailed analysis of UANC's 2025 contracted service activity. Given that contracted services represent a significant portion of total grant expenditures, particularly those distributed through subrecipient MOUs and community outreach programs. CLA has performed additional review procedures over these transactions. The following section expands on the flow of funds, documentation obtained and support available for these subawards and related expenditures.

UANC 2025 Other Contracted Services

Table 5 below summarizes UANC's 2025 sub-programs and community outreach events, including the program type, amount awarded, amount paid, whether a signed MOU and activity report were provided, and any unsupported expenses identified by CLA. Sub-programs generally reflect more structured initiatives that required advance documentation (including MOUs and budgets) and post-program reporting, while sub-events represent more informal or one-time funding requests that were not subject to the same documentation requirements. In total, the table reflects $1,291,997 in reported and paid contracted service activity, of which $688,485 was identified as unsupported. The unsupported costs were concentrated in certain sub-programs and sub-events which will be explained in more detail below. Additionally, CLA noted that $5,203 in expenses were incurred outside the period of performance.

Table 5: UANC 2025 Sub-Program and Events

Program Name	Program Type	Amount Awarded	Amount Paid	Signed MOU	Descripton of Services Provided	Activity Report Provided	Unsupported Expenses	Expenses After PoP
095 Windsor Junior Warriors	Sub-program	$ 12,000.00	$ 12,000.00	Y	Y	N	$ -	$ -
ActUp Event	Sub-program	12,400.00	12,400.00	N	N	N	6,642.56	3,627.50
ActUp Theater	Sub-program	15,000.00	15,000.00	Y	Y	N	-	-
Advocacy to Legacy	Sub-program	14,000.00	14,000.00	Y	Y	Y	100.00	-
AKA Youth Leadership Pgm	Sub-program	5,000.00	5,000.00	Y	Y	Y	1,525.99	-
When Black Men Lead	Sub-program	19,348.27	19,348.27	Y	Y	N	-	-
Chess Program	Sub-program	15,696.36	15,696.36	Y	Y	Y	-	-
Cooking Etiquette & Life Skills	Sub-program	12,000.00	12,000.00	Y	Y	Y	13.02	76.04
Crafts with Ms. Ed	Sub-program	14,000.00	14,000.00	Y	Y	Y	1,000.00	-
CT Double Dutch	Sub-program	20,000.00	20,000.00	Y	Y	Y	58.44	-
Diligence Training	Sub-program	15,000.00	15,000.00	Y	Y	N	-	-
DMG Balerz Basketball Pgm	Sub-program	18,999.99	18,999.99	Y	Y	Y	-	-
Dream Chaser Academy	Sub-program	15,555.26	15,555.26	Y	Y	Y	-	-
Gardners House	Sub-program	10,000.00	10,000.00	Y	Y	Y	-	-
GHPA Youth Basketball	Sub-program	14,000.00	14,000.00	Y	Y	Y	-	-
Greater New England Alliance	Sub-program	7,500.00	7,500.00	Y	Y	Y	-	-
Hart Wellness Collaborative	Sub-program	15,000.00	15,000.00	Y	Y	Y	-	-
Hartford Hurricanes	Sub-program	37,165.70	37,165.70	Y	Y	N	-	-
Hartford Lions Soccer Academy	Sub-program	10,000.00	10,000.00	Y	Y	N	-	-
Hartford North End Little League	Sub-program	8,346.43	8,346.43	Y	Y	N	3,126.97	-
Hartford's Proud	Sub-program	10,000.00	10,000.00	Y	Y	Y	-	-
Hoopwave	Sub-program	27,165.00	27,165.00	Y	Y	Y	30.61	-
Lady Canes	Sub-program	15,000.00	15,000.00	Y	Y	N	-	-
Mpact _ Basketball Training	Sub-program	100,000.00	85,719.04	Y	Y	Y	34,719.04	1,500.04
MPact - Community Day	Sub-program		14,280.96	Y	Y	Y	124.48	-
New England Brothahood	Sub-program	15,092.62	15,092.62	Y	Y	Y	-	-
Numc Youth Initiatives	Sub-program	20,000.00	20,000.00	Y	Y	Y	-	-
Rich Dae Entrepreneurship, Life Skills and Fitness Program (Double Dutch)	Sub-program	14,000.00	14,000.00	Y	Y	Y	8.00	-
Scribes Literary Pgm	Sub-program	14,000.00	14,000.00	Y	Y	Y	12.76	-
Sheba Internship Program	Sub-program	630,000.00	30,000.00	N	Y	Y	30,000.00	-
Sheba Resource Center	Sub-program		600,000.00	Y	Y	Y	600,000.00	-
Tower Garden Pgm	Sub-program	15,000.00	15,000.00	Y	Y	Y	-	-
Uplift	Sub-program	38,927.47	38,927.47	Y	Y	Y	4,300.00	-
Yale Gender Pediatric Pgm	Sub-program	7,000.00	7,000.00	Y	Y	Y	-	-
African American Parade	Sub-event	5,000.00	5,000.00		Not Applicable		5,000.00	-
Boots on the Ground - SHEBA	Sub-event	5,000.00	5,000.00		Not Applicable		-	-
Capital Pro-Am - Higgins	Sub-event	5,000.00	5,000.00		Not Applicable		-	-
Christmas Assistance Distribution	Sub-event	5,555.86	5,555.86		Not Applicable		-	-
Coaches for Cancer Awareness	Sub-event	500.00	500.00		Not Applicable		500.00	-
Community Marriage Event	Sub-event	500.00	500.00		Not Applicable		500.00	-
Cotillion	Sub-event	3,816.81	3,816.81		Not Applicable		-	-
Dressing For Excellence	Sub-event	4,221.85	4,221.85		Not Applicable		-	-
Freedom Feast Juneteenth Event	Sub-event	500.00	500.00		Not Applicable		-	-
Hartford Lions Soccer	Sub-event	500.00	500.00		Not Applicable		-	-
Hartford Relays	Sub-event	5,000.00	5,000.00		Not Applicable		823.00	-
KLA Rue Building the Ancestors	Sub-event	4,914.01	4,564.01		Not Applicable		-	-
MLK Soccer League	Sub-event	5,037.50	5,037.50		Not Applicable		-	-
Northern CT Black Nurse Assoc. Inc	Sub-event	5,000.00	5,000.00		Not Applicable		-	-
Oliver Benoit Foundation Company	Sub-event	5,356.30	5,356.30		Not Applicable		-	-
Our Communities Our Stories	Sub-event	15,000.00	15,000.00		Not Applicable		-	-
Senior Holiday Event - Adams	Sub-event	1,900.00	1,900.00		Not Applicable		-	-
Tau Iota Youth Program	Sub-event	5,000.00	5,000.00		Not Applicable		-	-
Thanksgiving Community Event	Sub-event	7,251.50	7,251.50		Not Applicable		-	-
Wilson Branch Tutoring	Sub-event	5,000.00	5,000.00		Not Applicable		-	-
Windsor Basketball Club	Sub-event	5,095.50	5,095.50		Not Applicable		-	-
		$ 1,292,346.43	**$ 1,291,996.43**				**$ 688,484.87**	**$ 5,203.58**

CLA reviewed UANC's 2025 sub-program and community outreach event activity to identify programs and events with unsupported costs, missing documentation, or other documentation-related issues. The summary below focuses on those programs and events where unsupported expenses were identified and provides additional context regarding the purpose of each program, the amount awarded and paid, the portion supported versus unsupported, and the specific documentation or reconciliation issues noted during CLA's review.

ActUp Event

The ActUp Event program supported a community-based theater production designed to engage youth and provide a public showcase. Mary Young indicated that the Act Up Event was not considered a formal program but instead fell under Outreach activities. According to her explanation, Outreach events are funded on an as-needed basis, whereby UANC assesses available funding and, if approved, issues a funding acknowledgment email to the requesting organization. In this instance, CLA cited an email from programs.uanc@gmail.com to actuptheatre@gmail.com awarding $12,400 in support of the community event production; however, no MOU or formal budget documentation was provided to support the award.

A review of supporting documentation identified multiple deficiencies and costs either unsupported or incurred outside the period of performance. Specifically, $3,627.50 related to a space rental agreement covering February through May 2024, which falls outside the allowable period. An additional $3,350 in salary expenses was supported only by a summary spreadsheet listing dates and individuals, with no accompanying payroll records or proof of payment. Further, $1,752.12 in food and snack expenses was supported solely by a listing of Instacart purchases without underlying invoices, receipts, or payment verification, and $1,540.25 in costs for costumes, props, and supplies similarly lacked adequate supporting documentation. In total, unsupported expenses amounted to $6,642.56, and an additional $3,627.50 was incurred outside the period of performance.

Advocacy to Legacy

The Advocacy to Legacy program provided youth with advocacy training focused on civic engagement, research, and communication skills. Total expenditures were approximately $14,000, with $13,900 supported and $100 unsupported. The unsupported amount is related to a missing receipt for a payment. Minor discrepancies were also noted between the approved budget and recorded expenditures.

AKA Youth Leadership Program

The AKA Youth Leadership Program was designed to develop leadership and community service skills among youth through workshops and mentorship. Of approximately $5,000 in expenditures, $3,474 were supported and $1,526 were unsupported. Unsupported costs were largely attributable to inadequate documentation, including screenshots of online shopping carts that did not demonstrate completed purchases, as well as some missing or improperly recorded receipts.

Cooking Etiquette & Life Skills

The Cooking Etiquette & Life Skills program provided hands-on instruction in food preparation and social etiquette. Total expenditures were approximately $12,000, of which $11,911.94 were supported and $13.02 were unsupported, and an additional $76.04 was incurred outside the period of performance. Unsupported costs were minimal and related to minor receipt errors and expenditures incurred outside of the allowable program period.

Crafts with Ms. Ed

This program promoted creativity and cultural engagement through youth arts and crafts activities. Total expenditures were approximately $14,000, with $13,000 supported and $1,000 unsupported. The unsupported amount related to compensation expenses exceeding the approved MOU budget, resulting in costs deemed outside the authorized funding scope.

CT Double Dutch

CT Double Dutch provided youth programming focused on physical activity, teamwork, and confidence-building through jump rope activities. Total expenditures were approximately $20,000, with $19,941.56 supported and $58.44 unsupported. Unsupported costs were limited to a small number of food-related expenses lacking sufficient documentation.

Hartford North End Little League

This program offered youth baseball programming, including skill development and tournament participation. Of approximately $8,346.43 in allocated costs, $5,219.46 were supported and $3,126.97 were unsupported. Unsupported expenses were largely due to illegible or missing documentation, as well as certain costs incurred outside the applicable program period.

Hoopwave

Hoopwave provided a holistic youth basketball and mentorship program emphasizing physical, mental, and community development. Total expenditures were approximately $27,165, with $27,134.39 supported and $30.61 unsupported. The unsupported portion related to a single missing receipt. Minor inconsistencies between budget classifications and actual expenditures were also noted.

MPact Basketball Training & Camp

MPact Mentoring Inc. provides youth-focused programming through initiatives including Basketball Skill Development Training, a Student Entrepreneur Pitch Competition, and MPact Community Day. The basketball training and camp program is designed to serve youth ages 11–18 through structured skill development using NBA-informed training models, while also incorporating mentorship, leadership development, and character-building components delivered by experienced coaches and program staff.

For this program, UANC management, through PDW with Ms. Young, indicated that while invoices were provided describing services performed, such as leadership, program coordination, mentoring curriculum development, and coaching, there were challenges in obtaining documentation in the required format as subrecipients adjusted to updated reporting expectations. Specifically, documentation such as descriptions of services, proposed budgets, and PRS forms needed to be broken out by program rather than aggregated, resulting in an initial learning curve. MPact served as a subrecipient of BHCA in fiscal year 2024, receiving approximately $100,000 in funding, and this program was later transitioned to UANC for oversight in FY25.

CLA's review identified significant deficiencies in documentation and compliance with grant requirements. Total unsupported expenses for the basketball training and camp program were $34,719.04, with an additional $1,500.04 incurred outside the period of performance. A substantial portion of unsupported costs consisted of $29,719 in salary expenses that were not included in the approved program budget of $49,720 and were supported primarily by MPact-generated invoices listing payees and services without adequate supporting documentation such as contracts, detailed payroll records, or proof of payment. In addition, $5,000.04 of equipment and supply purchases lacked supporting receipts or invoices, of which $1,500.04 appears to have been incurred after the period of performance based on PRS documentation dated June 30, 2024. Overall, the documentation provided was insufficient to support the allowability, allocability, and timing of these expenditures under the grant requirements.

MPact Community Day

MPact Mentoring Inc. provides youth-focused programming through initiatives including Basketball Skill Development Training, a Student Entrepreneur Pitch Competition, and MPact Community Day. MPact Community Day is an annual event designed to celebrate youth, sports, and community engagement while connecting families to local resources. The event is intended to bring together youth, families, community organizations, and professionals to support mentorship, networking, and broader community involvement.

For the MPact Community Day program, CLA's review of supporting documentation identified minor instances of unsupported costs, totaling $124.48. Specifically, $99.45 related to a U-Haul rental incurred in March 2025 lacked a clear and reasonable connection to the June 2025 event, based on the timing and nature of the expense. Additionally, $25.03 categorized as "Ribbon Cutting" was supported only by an internal invoice from Chris Prescott, with no underlying receipt or proof of payment provided. CLA also reviewed a $2,600 expense for Swift Factory rent incurred in January and February; however, based on correspondence indicating the facility was used to organize and prepare for upcoming events, this cost was determined to be reasonably related to the program and was not classified as unsupported. Overall, aside from the items noted above, documentation was generally sufficient to support the expenses reviewed.

Rich Dae Entrepreneurship, Life Skills, and Fitness Program (Double Dutch)

This program focused on entrepreneurship and life skills development, combined with physical fitness activities. Total expenditures were approximately $14,000, with $13,992 supported and $8 unsupported. The unsupported amount was immaterial and related to a minor clerical discrepancy.

Scribes Literary

The Scribes Literary program provided literacy and STEAM-focused programming for youth. Total expenditures were approximately $14,000, with $13,987.24 supported and $12.76 unsupported. The unsupported amount related to a missing receipt for program supplies.

SHEBA Internship Program

This program was designed to place 10–15 interns in professional roles with business partners over an 8-week period, providing hands-on experience, project-based learning, and exposure to subject matter experts. Program descriptions submitted by SHEBA indicate that activities expanded beyond the core internship model to include additional youth-focused initiatives such as pitch competitions, back-to-school drives, college tours, workshops, and scholarship support. The program was also noted to operate on a hybrid basis throughout the program year and serve both returning and new participants. While initial documentation stated the grant was the program's sole funding source, subsequent reporting indicated that other funding sources were also utilized. This subprogram is directly tied to the broader SHEBA Resource Center award, which included a $600,000 MOU and is discussed below.

Testing identified significant documentation, tracking, and compliance issues, resulting in the full amount associated with this subprogram being deemed unsupported. UANC provided funding through multiple disbursements across fiscal years, including $14,764.80 in FY 2023–2024 from unspent BHCA funds and an intended $30,000 allocation in FY 2024–2025. However, due to delays in BHCA funding and the use of alternate funding sources, initial payments were made without a contemporaneous MOU or proper documentation. Subsequent disbursements, including a $600,000 payment tied to the SHEBA Resource Center and additional internship-related funding, were affected by tracking and communication breakdowns, resulting in a duplicate $15,000 payment and total internship funding exceeding intended levels. Although payroll records indicated total internship-related costs of $78,961.91, the allocation of these costs to specific funding sources could not be substantiated. [18]

Overall, the issues identified include duplicate funding, lack of executed agreements at the time of payment, inconsistent reporting of funding sources and program activities, and insufficient documentation to support expenditures, resulting in the full $30,000 being unsupported. These deficiencies reflect broader control weaknesses in grant management, including inadequate reconciliation processes, unclear allocation methodologies, and ineffective tracking of disbursements, ultimately resulting in the entire subprogram balance being unsupported.

SHEBA Resource Center

This program was intended to support SHEBA's Youth Empowerment and Internship programming for FY 2024–2025, including activities such as youth pitch competitions, back-to-school drives, HBCU tours and workshops, and school transitional support services. A Description of Services submitted by SHEBA reflects a broad program scope consistent with the internship subprogram, with overlapping activities, identical frequency of services, and no clearly defined participant population. The program was supported by a $600,000 MOU between UANC and the Society of Human Engagement and Business Alignment, LLC, which was signed in April 2025. However, the MOU budget provided totaled only approximately

[18] "Payroll Records" referenced were comprised of two excel sheets with summarized payment details and no payment support, nor any substantiated payroll reports from third-parties.

$500,000 and did not align with the separate budget documentation provided by UANC. Additionally, program reporting and activity summaries submitted for this subprogram were duplicative of those used for the internship program, and it was noted that the program was not solely funded by this grant. Payments were also made upfront rather than on a reimbursement basis, differing from other UANC funding practices during the same period.

Testing identified significant deficiencies in documentation, support, and oversight, resulting in the full $600,000 being deemed unsupported. Although UANC indicated that both the Resource Center and Internship programs utilized the funds appropriately and that the intent of the agreement was fulfilled, sufficient supporting documentation was not provided to substantiate this conclusion. Payroll support consisted of a high-level summary report totaling $514,928.19 in gross pay, without detailed employee-level breakdowns or clear linkage of payroll costs to specific program activities. **Exhibit 6** shows what was provided to UANC for support for these payroll costs. As a result, it could not be determined whether the payroll expenses were allocable to the program or in compliance with grant requirements. Further, inconsistencies between the MOU, supporting budgets, and program descriptions, combined with overlapping and duplicative reporting across subprograms, limited the ability to distinguish how funds were used. These issues reflect broader weaknesses in grant administration, including inadequate documentation, lack of clear allocation methodologies, and insufficient monitoring of program expenditures, ultimately resulting in the entire subprogram balance being unsupported.

Uplift

The Uplift program supported youth development through community engagement, education, and skill-building initiatives. Total expenditures of approximately $38,927.47 included $34,627.47 supported and $4,300 unsupported. Unsupported costs related to expenditures exceeding approved MOU amounts, unsupported stipend payments, and discrepancies between general ledger detail and supporting payroll records.

African American Parade / Juneteenth Celebration – Subevent

The African American Parade / Juneteenth Celebration (award: $5,000.00) supported an annual community event focused on celebrating culture, history, and equity, with funding specifically allocated for float support. The grant was requested, approved, and paid within a one-day period immediately prior to the event. While grant award communications and a payment request summary were provided, no supporting documentation such as invoices or receipts was obtained to substantiate the use of funds. As a result, the full $5,000.00 was considered unsupported.

Coaches for Cancer Awareness – Subevent

The Coaches for Cancer Awareness event (award: $500.00) supported a program at Windsor High School aimed at promoting prostate cancer awareness. Although documentation included the grant award notification and payment request summary, no additional supporting documentation was provided to demonstrate how the funds were expended. Consequently, the full $500.00 was identified as unsupported.

Community Marriage Event – Subevent

The Community Marriage Event (award: $500.00) supported a "Day of Love & Marriage" event, with funding intended for food, drinks, and memorabilia. While the grant award notification, payment request summary, and a post-event report were provided, no receipts or invoices were available to substantiate the related expenses. Accordingly, the entire $500.00 was determined to be unsupported.

Hartford Relays – Subevent

The Hartford Relays event (award: $5,000.00) supported youth participation in the "Leaders of Our Nation" gala and related event expenses, including trophies, medals, facility costs, and event staffing. Documentation supported a portion of the expenditures, including trophies and certain personnel payments; however, no invoice was provided for facility-related costs, and total supporting documentation did not reconcile to the full award amount. As a result, $823.00 of the funding was identified as unsupported due to incomplete documentation.

Across programs, unsupported costs most frequently resulted from missing or duplicate receipts, inadequate documentation (including handwritten notes and spreadsheets in place of formal records), and expenditures exceeding approved budgets without updated documentation. Additionally, a consistent theme was the lack of alignment between budgeted and actual expenditures by classification, indicating broader issues with financial tracking and compliance.

ii. Reporting and Documentation

Across fiscal years 2024 and 2025, reporting and documentation processes were in place; however, they were not consistently applied, resulting in variability in the completeness, accuracy, and reliability of reported information. Documentation provided varied in format and level of detail, limiting the ability to consistently validate the nature, timing, and allowability of certain transactions.

Financial and programmatic reporting was not uniformly maintained or submitted. In some instances, required reports were not provided for review, while in others, reporting lacked standardization or did not align with underlying financial records. Additionally, inconsistencies were identified between budgeted amounts and reported expenditures, indicating gaps in financial tracking and oversight.

Supporting documentation for expenditures, including invoices, receipts, payroll records, and related materials, was inconsistently retained and provided. Certain transactions were supported only by summaries, screenshots, or internally prepared records without underlying third-party documentation. In other cases, documentation was incomplete, illegible, or not clearly tied to the reported activity or funding source.

Documentation practices also did not consistently demonstrate a clear linkage between reported program activities and the corresponding financial transactions. This limited the ability to verify that expenditures were incurred within the applicable period of performance, aligned with approved budgets, and supported by sufficient evidence.

i. Conclusion

Based on the procedures performed, UANC administered BHCA grant funds across fiscal years 2024 and 2025 through a combination of programmatic funding, subrecipient disbursements, and community outreach initiatives; however, significant deficiencies were identified in documentation, financial tracking, and overall grant administration.

Total unsupported costs identified across both fiscal years amounted to $1,035,535.03, driven primarily by missing or insufficient supporting documentation, lack of verifiable third-party evidence, and reliance on informal records. Unsupported costs were most significant within contracted services and subrecipient-related expenditures, which represent the majority of grant activity.

In addition, inconsistencies between budgeted and actual expenditures were observed across multiple programs, including instances where costs exceeded approved budgets without formal amendments or where expenditures did not align with approved classifications. Funds were also reallocated between programs without sufficient documentation, limiting transparency and accountability.

While efforts were made in fiscal year 2025 to enhance processes, including implementation of standardized payment request forms and electronic record-keeping, these controls were not consistently applied across all programs or funding types. As a result, the effectiveness of these improvements was limited.

Collectively, these conditions reduce assurance over the completeness, accuracy, and compliance of reported financial activity and reflect systemic weaknesses in internal controls, documentation practices, and grant administration.

4. The Prosperity Foundation

iii. Organization Overview

The Prosperity Foundation (TPF) received BHCA grant funding in fiscal year 2024. Per their website, TPF is a nonprofit organization focused on economic development, community engagement, and grantmaking activities within targeted communities.[19] The organization operates programs that support education, workforce development, and community-based initiatives, and relies on grant funding to expand programmatic reach and impact. A search of Tax-Exempt Organizations on the IRS website indicated that The Prosperity Foundation is a 501(c)(3) organization and that its most recent Form 990 filing identified in the documentation was for tax year 2024.

CLA met with Donna Mullen-Lecky on April 14, 2026. During the meeting, Ms. Mullen-Lecky, Interim CEO, noted that Orsella Hughes (Ms. Hughes) was the executive director at the time of the grant and that Ms. Hughes hired a firm identified as “MITAN Consulting” to aid in the

[19] https://www.tpfct.org

grant process. Ms. Mullen-Lecky also noted that no one currently at The Prosperity Foundation was part of the grant process.

iv. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $1,100,000
Date of MOU: 10/6/2023
Date Executed / Submitted via Email on: 3/24/2024
Date of Payment: 12/5/2023-12/19/2023[20]

iii. Use of Funds

The Prosperity Foundation reported utilizing grant funds across multiple budget categories, including program services/grantmaking, professional services, legal services, auditing services, strategic planning workshops, marketing and branding, grant writing and management, events, payroll-related expenses, and other operating costs. The underlying support reflected approximately $616,735.50 in expenses supported in some form, with a reported difference of approximately $483,264.50 between the amount reported and the amount supported. The documentation also identified approximately $859,095.34 of expenditures that were incurred after the period of performance.

Although support was provided for a portion of the expenditures, the level and nature of support was not sufficient in many instances to determine whether the expenditures were reasonable, allowable, or consistent with the intended use of the grant funds. The documentation noted that The Prosperity Foundation provided a handful of invoices, primarily related to professional fees for auditing, legal fees, and accounting services. Additional support included tax documents and payroll summaries for calendar year 2024. The remaining support consisted largely of payment support, including bank statements and check copies.

The general ledger detail indicates that funds were utilized for a broad range of transaction types, including:

Payroll, Salaries, and Benefits ($82,532.65)

The general ledger reflects payroll-related costs totaling $82,532.65, including salaries and wages of $71,537.46 and payroll taxes and related employer costs of $10,995.19. The salaries and wages detail included recurring payroll transactions and support referencing W-2s and employee quarterly earnings reports for calendar year 2024. However, no payroll data was provided for 2023, resulting in $23,846.12 unsupported payroll expenses.

The support included payroll summaries and tax documentation for certain periods, but the documentation did not clearly reconcile payroll costs to specific grant-funded activities or demonstrate how the payroll costs aligned with the approved grant budget categories. In addition, the budget identified separate salary categories for executive/CEO salary,

[20] The date of payments ranged over multiple days, as BHCA had a maximum amount they were allowed to wire each day.

administrative staff, program staff, and technical staff; however, the documentation provided limited CLA's ability to determine whether payroll costs were charged to the appropriate budget categories.

Program Services / Grantmaking and Economic Development ($450,000)

The largest reported programmatic category was "Program Services – Grantmaking," with $450,000 reported. The general ledger detail reflected $450,000 in "Economic Development" payments to other organizations, including Efficiency for All Inc., Greater Hartford YMCA, Lighthouse Community Development, Our Piece of the Pie Inc., St. Matthews UFWB Church, and Upper Albany Neighborhood Collaborative.

Payment support was provided for these transactions; however, nothing was provided showing how these funds were ultimately used. CLA requested support for how these funds were expended, including any MOUs with the recipient organizations and related supporting documentation, but nothing was provided. As a result, CLA was unable to determine whether these apparent pass-through funds were spent in accordance with the grant purpose or whether the ultimate use of funds was allowable. As a result, the entire $450,000 paid for "Economic Development" is considered unsupported.

Legal Services ($55,351.04)

The general ledger reflects legal fees totaling $55,351.04, primarily paid to Crumbie Law Group, with one entry related to Beverly L. Herbert. Invoices and corresponding payments were provided for services rendered by Crumbie Law. However, no supporting documentation or description of services was identified for the payment to Beverly Herbert, totaling $687.50 in unsupported expenses.

Auditing and Accounting Services ($57,400)

The general ledger reflects $57,400 in auditing and accounting service expenses, primarily paid to Whittlesey PC, Benstew LLC, and CLG Consulting. Supporting documentation, including invoices and proof of payment, was provided for audit-related fees totaling $52,350; however, accounting-related expenses of $5,050 were supported only by proof of payment, with no corresponding invoices. CLA was unable to fully determine the nature of the accounting services, the period covered, or whether the costs were specifically related to the BHCA grant.

Strategic Planning Workshops ($274,000)

The general ledger reflects $274,000 in strategic planning or organizational consulting services paid to Breaking Bounds LLC. While payment documentation was provided for these transactions, no invoices or detailed service documentation were made available. As a result, CLA was unable to determine the specific nature of the services performed, the deliverables produced, or whether the expenditures were directly related to grant-funded activities.

Marketing, Branding, and Digital Marketing Consultant Services ($79,302.76)

The general ledger reflects digital marketing consultant expenses totaling $77,802.76, including payments to Kelaiah Kearson, The Narrative, Wix, Wizehive Inc., Kimberly Conway, and MJN Associate. The operations category also included $1,500 of advertisement expenses paid to Abundant Life and Health.

While payment documentation was provided for many of these transactions, supporting invoices and detailed service documentation were not consistently available. Additionally, approximately $5,000 of these expenses had no supporting documentation, including payment support. As a result, CLA was unable to determine the specific services performed, whether the activities directly supported the grant-funded purpose, or whether the amounts were reasonable in relation to documented deliverables.

Grant Writer and Grant Management Services ($77,135)

The general ledger reflects grant consultant expenses totaling $77,135, including payments to MITAN, LLC, MJN & Associates LLC, and Wizehive Inc. While evidence of payments was provided for these expenditures, the support did not consistently include invoices, agreements, scopes of work, or evidence of deliverables. The lack of detailed supporting documentation limited CLA's ability to determine the nature and allowability of the services charged to the grant.

Events, Conferences, Convenings, and Event Products ($14,266.35)

The general ledger reflects event-related expenses totaling $14,266.35, consisting of $12,083.28 for event planning and $2,183.07 for event products. Vendors included Abundant Life and Health, Boathouse New Haven, Upscale Events, LLC, Wall Street Prep, Sweet Milk & Porridge, Adversity to Prosperity, HootSuite, Boardable, Amazon, Staples, DropBox Sign, and other vendors.

While payment documentation was provided for many of these transactions, supporting invoices and detailed service documentation were not consistently available. Additionally, $1,831.04 of these expenses had no supporting documentation, including payment support. As a result, CLA was unable to determine whether these expenses were directly related to grant-funded activities or measurable program outcomes.

Travel and Meetings ($10,692.74)

The general ledger reflects travel and meeting expenses totaling $10,692.74, including costs categorized as conferences, conventions, and meetings. Transactions included payments or charges associated with Merieta, Pistachio Cafe, Breakfastbelle LLC, resort expenses, American Express reimbursements, and others.

Payment support was provided for substantially all transactions; however, one transaction totaling $92.88 did not have any supporting documentation. Additionally, the documentation did not consistently include itemized receipts, participant information, or descriptions of business purpose linking the costs to grant-funded activities. As a result, CLA was unable to determine whether the travel and meeting costs were reasonable, allowable, or directly related to the grant.

Overall, the expenditures reflected in the general ledger were primarily concentrated in administrative, professional service, and operational categories, with significant amounts paid to consultants and third-party organizations. While some level of payment support was provided, supporting documentation was frequently limited to proof of payment and did not consistently include invoices, contracts, scopes of work, or evidence of deliverables. In addition, certain transactions lacked any supporting documentation, and substantial amounts—particularly those related to pass-through funding—did not include evidence of how funds were ultimately used.

iv. Reporting and Documentation

CLA identified significant inconsistencies between the budgeted amounts, amounts reported to BHCA, amounts supported, and the underlying general ledger activity. While the total fiscal year 2024 budgeted amount and the total amount reported were both $1,100,000, the classification and allocation of expenses differed materially across the budget, reporting, and financial records. Only $616,735.50 could be tied to supporting documentation, resulting in a difference of $483,264.50.

Expense categories were not consistently aligned across the budget, reported amounts, and general ledger activity. For example, program services/grantmaking was budgeted at $780,600, with $450,000 reported, while no corresponding supported activity was identified within that classification. Conversely, multiple categories, including legal services, auditing services, strategic planning workshops, marketing and branding, grant writer and management services, and event-related expenses were incurred despite not being reflected in the original budget.

Supporting documentation was limited and often consisted primarily of proof of payment, including bank statements and check copies, along with a limited number of invoices related to professional services and certain payroll and tax records. In many instances, documentation did not include invoices, executed agreements, scopes of work, or evidence of deliverables sufficient to substantiate the nature or purpose of the expenditures.

Based on review of emails, it was also noted that The Prosperity Foundation awarded $60,000 of grant funds to BHCA during fiscal year 2024. However, these funds do not appear to be related to the grant under review, and the purpose or rationale for transferring funds between the entities could not be determined.

v. Conclusion

The Prosperity Foundation received $1,100,000 in BHCA grant funding for fiscal year 2024. Based on the procedures performed, significant concerns were identified related to insufficient supporting documentation, inconsistent reporting, and lack of alignment between budgeted, reported, and actual expenditures.

A substantial portion of costs, particularly payments to consultants and third-party organizations, including $450,000 in pass-through funding could not be substantiated with adequate documentation or evidence of how funds were ultimately used. In addition, expenditures were frequently supported only by proof of payment, without invoices, agreements, or evidence of deliverables, limiting the ability to assess allowability and reasonableness.

Further concerns include expenditures incurred outside the period of performance, unsupported payroll amounts, and material inconsistencies in expense classification that were not reconciled. The transfer of $60,000 to BHCA, which does not appear related to the grant, also raises concerns regarding fund flow and oversight.

Overall, the combination of limited supporting documentation, lack of transparency, and inconsistencies in financial reporting restricted CLA’s ability to verify that a significant portion of grant funds was used in accordance with program requirements.

5. My People Community Services, LLC

i. Organization Overview

My People Community Services, LLC (MPCS) is a Hartford-based nonprofit organization focused on delivering trauma-informed, community-based services to individuals, families, and youth. Based on a review of publicly available information and IRS tax-exempt records, MPCS is recognized as a 501(c)(3) organization, with its most recent Form 990 filed for tax year 2024, consistent with an active nonprofit organization.

The organization provides programming centered on mentorship, supportive housing, workforce development, and life skills training, with an emphasis on culturally responsive services aimed at promoting long-term stability and well-being.

Based on discussions with leadership, including Dr. Dayeshell Muhammad, Director of Operations and Maria Ramos, MPCS operates with established program infrastructure and ongoing community engagement. The organization indicated that the grant funding supported existing program delivery rather than the creation of entirely new initiatives, with a focus on strengthening program capacity and expanding services.

ii. Grant Award, MOU, and Payment Timeline

FY24 BHCA Grant Award Amount: $200,000
FY24 Date of MOU: October 6, 2023
FY24 Date Executed / Signed (per email correspondence): March 25, 2024
FY24 Date of Payment: October 18, 2023

FY25 BHCA Grant Award Amount: $300,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Signed (per email correspondence): November 4, 2024
FY25 Date of Payment: December 20, 2024

For both fiscal years, the MOU was executed after funds were disbursed, which is not consistent with standard grant administration practices, which typically require execution of agreements prior to disbursement. Additionally, email correspondence reviewed indicates that external advocacy or support may have contributed to the facilitation of funding for FY24.

iii. Use of Funds

Based on documentation reviewed, MPCS utilized BHCA funds to support a combination of programmatic and operational activities aligned with its mission.

A substantial portion of expenditures related to staffing and personnel costs, including administrative and program staff, as well as payroll taxes and contracted staffing services. For example, FY24 expenditures included payroll and payroll-related transactions such as recurring staff payments and payroll tax obligations totaling several thousand dollars per pay period.

MPCS also incurred significant expenditures for contracted services and vendor support, including payments for staffing agencies, communications services, and grant-related consulting. Notable examples include approximately $49,709.25 in supported contracted services during FY24 and additional payments in FY25, including a $50,000 contracted service expense related to specialized services.

Program-related expenses represented a key category of spending and included costs associated with mentorship programming, events, and participant support. Examples include:

- Youth and community programming, such as workshops, mentorship events, and retreats;
- Transportation and logistics, including approximately $6,681.36 for transportation services related to program activities;
- Event-related costs, such as facility rentals, catering, and program materials; and
- A multi-day wellness retreat and related programming costs, including lodging, transportation, and activity expenses.

Additional spending included supplies and participant support, such as materials for program delivery (e.g., clothing, educational materials, and event supplies), as well as marketing and outreach activities, including content production, promotional materials, and communications services.

MPCS also included a general and administrative (G&A) allocation equal to approximately 20% of total expenditures, totaling approximately $40,000 in FY24 and $45,000 in FY25. While these amounts were included in both budget and reported expenditures, they were not supported by underlying invoices or direct cost documentation and instead represent allocated administrative overhead.

From a financial support perspective:

- FY24 supported expenditures totaled approximately $194,660.13, resulting in a variance of approximately $5,339.87 compared to reported amounts.
- Approximately $5,600 in FY24 expenses lacked sufficient supporting documentation.
- FY25 expenditures totaled approximately $313,340.78, exceeding the $300,000 award, with the majority supported by documentation and only minor instances of missing receipts (approximately $533).

Additionally, certain expenditures were incurred outside the period of performance, including approximately $24,620 in FY24 and $1,500 in FY25, based on transaction dates identified during testing.

Overall, expenditures were largely aligned with programmatic activities and organizational operations, though certain documentation and timing issues were identified.

iv. Reporting and Documentation

The following observations were noted regarding reporting and documentation:

Supporting Documentation:

The majority of expenditures were supported by payroll records, invoices, and payment documentation, providing a reasonably complete audit trail for most transactions. However, approximately $5,600 in FY24 and $533 in FY25 lacked sufficient support, primarily due to missing receipts or incomplete documentation.

Financial Reporting and Variances:

A variance of approximately $5,340 was identified between reported and supported expenditures for FY24. These differences were relatively minor in the context of total expenditures but indicate inconsistencies in reconciliation processes.

G&A Allocation:

MPCS included a 20% general and administrative allocation in both fiscal years; however, these amounts were not supported by underlying documentation or direct cost detail, limiting the ability to verify these costs.

Timing of Expenditures:

Certain expenditures were incurred outside the period of performance, including approximately $24,620 in FY24 and $1,500 in FY25, indicating weaknesses in tracking and compliance with grant timing requirements.

Grant Administration and Process:

Based on discussions, MPCS described the grant process as less formal than other funding sources, with no formal application process and more flexible expectations regarding fund usage. While periodic check-ins and site visits occurred, management indicated that clearer guidance on requirements and controls would have improved compliance.

Operational Challenges:

MPCS identified a significant issue related to FY25 funding, where an initial payment was misdirected due to fraudulent activity involving incorrect banking information. The issue was subsequently addressed by BHCA through reissuance of funds via check. While this did not result in a loss of funds to the subrecipient, it reflects control weaknesses in payment processing.

Reporting Status:

At the time of review, the final FY25 expenditure report had not been completed; however, supporting documentation was available for the majority of expenditures incurred.

Overall, while MPCS maintained a relatively strong level of supporting documentation compared to other subrecipients, identified gaps reflect weaknesses in documentation consistency, internal controls, and adherence to grant requirements.

v. Conclusion

My People Community Services, LLC received $500,000 in BHCA funding across FY24 and FY25 and utilized the funds to support community-based programming and related operational activities aligned with its mission.

Expenditures included staffing, mentorship programming, vendor and consulting services, program delivery costs, and participant support, all of which are consistent with the organization's service model and program objectives.

However, several documentation and compliance issues were identified, including execution of MOUs after disbursement of funds, unsupported expenditures, reliance on unsupported G&A allocations, expenditures incurred outside the period of performance, and administrative inconsistencies in reporting.

Additionally, identified process issues—including a fraudulent payment incident and lack of formal grant structure—highlight weaknesses in internal controls and grant administration.

Based on the information available, while expenditures appear generally aligned with programmatic intent, the identified deficiencies reflect areas for improvement in documentation practices, financial controls, and compliance with standard grant administration requirements.

6. Greater Hartford Alliance of Black Social Workers

i. Organization Overview

Greater Hartford Alliance of Black Social Workers (GHABSW) is a nonprofit organization (501(c)(3)) focused on community engagement through action-oriented programming grounded in social work principles. Based on a review of publicly available information and IRS tax-exempt records, GHABSW is recognized as a public charity and has filed Form 990-N (e-Postcard), with its most recent filing reflecting gross receipts below $50,000, consistent with a smaller, community-based organization.

Based on information obtained during review, the organization operates with limited administrative infrastructure and relies significantly on volunteer support. During discussions with leadership, it was noted that these capacity constraints impacted the organization's ability to manage grant administration, documentation retention, and financial tracking.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant FY24 Award Amount: $100,000
FY24 Date of MOU: October 6, 2023
FY24 Date Executed / Signed (per email correspondence): Not identified
FY24 Date of Payment: Not Available

BHCA Grant FY25 Award Amount: $50,000
FY25 Date of MOU: September 30, 2024

FY25 Date Executed / Signed (per email correspondence): October 31, 2024
FY25 Date of Payment: October 7,2024

CLA identified the $100,000 FY24 award during review of email correspondence. This award was not included in the original subrecipient data and, as a result, CLA requested additional information from GHABSW. As part of this review, CLA spoke with Ken Green (Mr. Green). During a February 23, 2026 call, Mr. Green stated that, due to GHABSW's limited administrative capacity, BHCA administered the grant on the organization's behalf. He explained that BHCA reimbursed affiliated individuals who were treated as independent contractors and issued Forms 1099. Mr. Green also stated that reimbursement requests and reports were submitted in person but were not retained. Additionally, email correspondence reviewed indicates that external advocacy or support may have contributed to the facilitation of funding for FY24.

iii. Use of Funds

Based on available financial records, general ledger activity, and email correspondence, BHCA funding was used to support a combination of programmatic activities and operational expenditures; however, documentation was limited and did not allow for full verification of expenditures.

Expenditure categories reflected in financial records included:

- Payroll and contract-related payments, including administrative team compensation reported at approximately $51,100 and consultant and program-related payments totaling approximately $18,900;
- Program and conference-related costs, including conference expenditures such as approximately $8,507.89 for venue-related costs and additional catering and event-related expenditures (e.g., $4,675.09);
- Scholarships and outreach-related payments, including multiple scholarship distributions of approximately $1,000 per recipient;
- Marketing, supplies, and administrative expenses, including transactions with vendors such as printing, supplies, and outreach-related materials; and
- Rent and occupancy-related costs, including approximately $8,000 in reported space rental expenses.

Documentation indicates that a portion of FY24 funding was transferred to GHABSW in installments, including transfers of $10,000, $10,000, and $21,000, based on email correspondence requesting funds for program-related activities such as the "Black Excellence in Action Project."

However, based on discussions with leadership and documentation reviewed, many expenditures appear to have been processed and administered directly by BHCA, rather than by GHABSW. Payments to individuals affiliated with GHABSW were treated as contractor payments, with BHCA issuing Forms 1099; however, these forms were not provided for review.

As a result, the structure of the arrangement differs from a traditional subrecipient model, as GHABSW did not maintain direct control over disbursement or complete supporting documentation. The absence of underlying documentation, including invoices, receipts, and reimbursement records, limits the ability to verify the occurrence, allowability, and classification of many expenditures.

While the nature of expenditures appears generally consistent with community programming and outreach activities, the reliance on BHCA for administration and the lack of documentation result in limited audit visibility into how funds were applied.

iv. Reporting and Documentation

The following observations were noted regarding reporting and documentation:

Supporting Documentation:

Documentation available for review was limited. Supporting records primarily consisted of general ledger activity maintained by BHCA and email correspondence related to funding requests. Underlying documentation, such as invoices, receipts, contracts, and reimbursement records, was not retained by GHABSW and was not available for testing.

Financial Records and Tracking:

GHABSW did not maintain independent financial records for the grant. Instead, expenditures were recorded and managed by BHCA, with detailed support not separately tracked or available to the organization. As a result, GHABSW could not provide documentation supporting specific transactions or demonstrate formal tracking of grant expenditures.

MOU Documentation:

No executed MOU was identified for FY24. For FY25, an executed agreement was identified through email correspondence; however, GHABSW was unable to provide a copy independently.

Nature of Arrangement:

Based on discussions with leadership, the arrangement with BHCA involved BHCA administering funds, reimbursing expenditures, and issuing payments directly to individuals affiliated with GHABSW as contractors. This structure is not consistent with a typical subrecipient relationship and limits the clarity of roles, responsibilities, and accountability for grant funds.

Retention of Records:

Leadership indicated that reimbursement requests and program reports were submitted to BHCA but were not retained by GHABSW. Documentation supporting these activities was not identified during testing, resulting in a lack of audit trail for reported expenditures.

Overall, the absence of independently maintained records, combined with reliance on BHCA for grant administration, significantly limits the ability to assess compliance with standard grant requirements.

v. Conclusion

GHABSW received $150,000 in BHCA funding across FY24 and FY25; however, significant documentation and structural limitations were identified.

While expenditures appear to relate to community programming, conferences, scholarships, and operational activities, the lack of supporting documentation, absence of executed agreements for FY24, and reliance on BHCA to administer funds limit the ability to verify the use of funds.

The arrangement described, where BHCA managed expenditures and treated GHABSW-affiliated individuals as contractors, does not align with a traditional subrecipient relationship and reduces transparency and accountability for the use of grant funds.

Based on the information available, these factors raise concerns regarding compliance with standard grant administration practices, documentation retention, and oversight of expenditures.

7. Berkins Family LLC

i. Organization Overview

Berkins Family LLC is a for-profit entity operating as a café business. Public records indicate the entity was established in 2015 and is not a tax-exempt organization. No website or formal public-facing program documentation was identified.

Based on discussions with ownership, Andrea and Doug Barber, the entity operated a café that was supported in part by BHCA grant funding but has since ceased operations. Ownership indicated that grant funds were used to sustain operations during a period of transition to a new location and to support staffing.

The subrecipient represented that “community outreach” activities were conducted, including hiring youth and providing exposure to business operations. However, no documentation was provided to support these statements, and no evidence of a structured, formal community-based program was identified during testing. As such, the activities described appear informal in nature and were not supported by program documentation, participant records, or defined program objectives.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount 2024: $50,000
FY24 Date of MOU: March 5, 2024
FY24 Date Executed / Submitted via Email on: May 14, 2024
FY24 Date of Payment: February 28, 2024

BHCA Grant Award Amount 2025: $50,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Submitted via Email on: December 2, 2024
FY25 Date of Payment: October 16, 2024

CLA noted that for both fiscal years, funds were disbursed prior to execution of the MOU, which is not consistent with standard grant administration practices, which typically require execution of agreements prior to disbursement.

iii. Use of Funds

Based on documentation provided, BHCA funds were used primarily to support general business operations, including payroll, payroll taxes, equipment purchases, and marketing-related expenses. However, the documentation available does not demonstrate a clear linkage between these expenditures and a qualifying programmatic purpose.

The majority of expenditures consisted of payroll and payroll-related costs, which represented a significant portion of overall activity. Internal records reflect payroll expenditures exceeding $123,580.57 in FY24 and $130,177.85 in FY25, substantially exceeding the grant funding amounts. These included recurring payroll disbursements, direct deposits, and tax payments processed through third-party payroll systems. For example, numerous payroll transactions ranging from approximately $3,200 to $5,400 per payroll cycle were identified, along with substantial payroll tax payments, including individual tax remittances exceeding $1,000 and certain aggregated tax payments exceeding $12,800.

Despite the volume of payroll-related activity, no detailed payroll registers, employee listings, timesheets, or allocation methodologies were provided to demonstrate how these costs were calculated or how they were associated with grant-funded activities. Additionally, while ownership indicated that staffing expansion and retention were supported, there was no documentation linking specific employees or positions to any structured program or grant objective.

Expenditures for restaurant equipment and supplies were also identified, including multiple transactions categorized as “Restaurant Equipment – Small Wares,” totaling at least $2,940.59 in sampled amounts, with additional transactions reflected throughout bank activity. These included purchases from vendors such as Amazon and commercial equipment suppliers. Individual transactions included approximately $397.50, $1,024.55, $1,681.17, and other repeated smaller-dollar purchases. However, these transactions were supported only by bank statement entries or internal classifications, and no invoices, receipts, or proof of goods received were provided.

Marketing-related expenses were also recorded, totaling approximately $2,284.20 in FY24 and additional amounts in FY25, including recurring charges to online platforms, advertising services, and small-dollar retail purchases. These included multiple transactions ranging from approximately $30 to $150, as well as recurring charges of approximately $60 to $100. As with other categories, these expenses were supported only by bank activity and lacked invoices, contracts, or documentation demonstrating the purpose or effectiveness of the expenditures.

Across all categories, expenditures were primarily supported by bank statements and internally prepared expense detail, rather than third-party documentation. The total expenditures reflected in the records significantly exceeded the grant funding amounts, and no methodology was provided to identify which costs were charged to the grant versus general business operations. As a for-profit entity, the use of grant funds is subject to requirements that funds support a defined public purpose and not routine business operations.

While ownership indicated that funds were used to sustain operations and support staffing during a period of business transition, the documentation reviewed reflects that expenditures were primarily related to general operating activities and not tied to a defined or documented program. Additionally, ownership indicated that providing further supporting documentation would require significant administrative effort, and no additional documentation was provided in response to requests.

iv. Reporting and Documentation

The following documentation and compliance issues were noted:

Program Purpose and Allowability:

The use of funds appears to support general operations of a for-profit café, with insufficient evidence of a qualifying community-based program. Although the subrecipient described informal outreach activities, no documentation was provided to demonstrate the existence, scope, or outcomes of such efforts.

Supporting Documentation:

Documentation was limited to bank statements and internally prepared expense summaries. Underlying third-party support, including invoices, receipts, contracts, and vendor documentation was not provided for a substantial portion of expenditures. For example, equipment purchases, including transactions such as $397.50 to Amazon and multiple additional purchases, lacked receipts or supporting invoices. Similarly, payroll and payroll tax expenses, which totaled over $100,000 annually, were not supported by payroll registers or detailed calculations.

Financial Reporting and Reconciliation:

Total expenditures reflected in the documentation exceeded the grant award amounts in both fiscal years, with approximately $123,580.57 in FY24 and $130,177.85 in FY25 reflected in records. No reconciliation was provided to identify which expenditures were funded by the grant versus other revenue sources. This lack of allocation prevents validation of reported costs.

Tracking of Grant Expenditures:

There was no evidence of a formal process to track grant expenditures separately from general business activity. Expenses were recorded at the business level without segregation or allocation to grant-funded activities, limiting the ability to determine allowability or compliance.

MOU Execution:

For both fiscal years, MOUs were executed after the disbursement of funds. This indicates that funds were provided prior to formal acceptance of grant terms, which is inconsistent with standard practices and limits assurance that compliance requirements were clearly established.

Administrative Limitations:

The subrecipient indicated that additional documentation would require significant administrative effort and did not provide further support upon request. This limitation further restricted the ability to assess expenditures and compliance.

Overall, the documentation provided was insufficient to support the majority of reported expenditures or demonstrate compliance with grant requirements.

v. Conclusion

Berkins Family LLC received $100,000 in BHCA funding across FY24 and FY25; however, significant concerns were identified regarding the use of funds, documentation, and compliance with grant requirements.

The entity operates as a for-profit business, and documentation reviewed did not demonstrate the existence of a formal, structured community-based program. While the subrecipient described general outreach efforts, such as hiring youth, no supporting documentation was provided to substantiate these activities. As a result, CLA was unable to verify the existence of structured community programming or determine whether expenditures were directly tied to a documented public purpose. Grant funds appear to have been used primarily to support general business operations, including payroll, payroll taxes, equipment purchases, marketing expenses, and other operating costs. A substantial portion of these expenditures lacked third-party support, and records provided consisted primarily of bank statements and internally prepared summaries.

Additionally, MOUs were executed after disbursement of funds, and no clear process was in place to track or allocate grant expenditures. Total expenditures reflected in the records exceeded the amount of grant funding, without a clear delineation of which costs were attributable to the grant.

Based on the information available, CLA identified no documented evidence of structured community programming or other verifiable activities demonstrating how grant funds were used to advance a defined public purpose. Although management described certain community-oriented activities, sufficient supporting documentation was not provided to verify these representations.

8. Mothers United Against Violence

i. Organization Overview

Mothers United Against Violence (MUAV) is a nonprofit organization that provides services throughout the Greater Hartford area and across Connecticut. Based on the information reviewed, the organization operates through grassroots programming and community outreach initiatives and offers direct support to individuals affected by violence, including those who have lost loved ones. A search of the IRS Tax Exempt Organization database indicates that MUAV is recognized as a 501(c)(3) organization and most recently filed a Form 990 for tax year 2024.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $100,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Signed (per email correspondence): October 30, 2024
FY25 Date of Payment: October 16, 2024

iii. Use of Funds

Based on documentation reviewed and discussions with management, BHCA grant funds were intended to support programmatic activities and related operational costs aligned with MUAV's mission.

However, testing indicated that only a limited portion of grant funds had been expended during the period of performance. MUAV reported that a significant portion of funds remained recorded as deferred revenue and had not yet been used for grant-related activities.

Expenditures identified during the review period totaled approximately $13,461, with certain costs incurred after the defined period of performance.

MUAV indicated that funds were applied to other ongoing program activities and that the organization typically expends grant funds over an extended period; however, this approach was not fully aligned with the timing requirements of the BHCA grant.

Subsequent to the period under review, MUAV returned approximately $86,538 of unspent funds to the State.

iv. Reporting and Documentation

The following observations were identified as part of testing procedures:

Supporting Documentation:

General ledger detail and bank statements were provided supporting a portion of expenditures; however, overall spending activity during the period of performance was limited.

Timing of Expenditures:

Certain expenditures were incurred after the period of performance end date, and the majority of grant funds were not expended within the required timeframe.

Use of Funds and Tracking:

MUAV indicated that funds were applied to broader organizational activities and tracked as deferred revenue, rather than being fully expended within the grant period.

Return of Funds:

The majority of unspent grant funds were returned to the State, indicating that funds were not ultimately utilized for their intended purpose during the grant period.

v. Conclusion

Mothers United Against Violence received $100,000 in BHCA grant funding to support community-based programming; however, only a limited portion of funds was expended during the applicable period of performance.

Based on the procedures performed, expenditures totaling approximately $13,461 were identified, with certain costs incurred after the allowable period. The majority of grant funds were not utilized within the required timeframe and were subsequently returned to the State.

While available documentation supports the expenditures that were incurred, the limited use of funds during the grant period and the timing of expenditures indicate that the organization did not fully implement the funded activities as intended within the grant requirements. These conditions limit assurance over program execution and reflect challenges in aligning grant funding with program timing and deployment.

9. MPact Mentoring Inc.

i. Organization Overview

MPact Mentoring Inc. is a community-based organization focused on mentoring, youth development, and community engagement. The organization provides programming intended to support personal growth, education, and workforce readiness outcomes through initiatives such as basketball camps, mentoring programs, and entrepreneurship training. MPact operates as a 501(c)(7) organization, with its most recent Form 990-N filed for Tax Year 2024.

CLA met with Chris Prescott, founder, on April 8, 2026. During the meeting, Mr. Prescott noted that MPact became aware of the BHCA grant opportunity through community relationships and a referral facilitated by a local elected official. He described the award process as consisting of a limited interview process with BHCA leadership, after which the funding amount was determined and communicated without MPact's involvement in setting the award level.

Mr. Prescott indicated that communication with BHCA throughout the grant period was primarily informal, consisting of email and phone discussions, and that reporting requirements were limited to a final report submission. He noted that there were no formal site visits and that oversight was largely based on ongoing communication rather than structured monitoring activities.

Mr. Prescott also described that changes to program implementation occurred due to the loss of an initially secured facility, requiring adjustments to program timing. He indicated that these changes, including modifications to the use of funds, were discussed with BHCA and approved through informal communication rather than formal documented amendments.

With respect to fund administration, Mr. Prescott stated that due to delays in program execution that would have resulted in expenditures occurring after the period of performance, $50,000 of grant funds was transferred to a third-party bookkeeping and payroll provider prior to the end of the period of performance so that the funds could be expended within the required timeframe. He indicated that this approach was discussed with BHCA; however, no formal documentation of such approval was identified.

Mr. Prescott acknowledged that the intended period of performance required expenditures to occur prior to June 30, but noted that certain programs were completed after this date due to logistical constraints. He indicated that extending the period of performance was not formally permitted, and that alternative approaches were used to complete program activities.

Finally, Mr. Prescott indicated that documentation supporting certain expenditures and third-party arrangements was not readily available at the time of the interview but stated that such documentation may exist and could be provided upon follow-up.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $100,000
Date of MOU: April 8, 2024
Date Executed / Submitted via Email on: November 12, 2024
Date of Payment: April 9, 2024

MPact received the full grant award in April 2024; however, the MOU was not executed until November 2024, subsequent to the disbursement of funds. This sequencing is not consistent with standard grant administration practices, which typically require execution of agreements prior to disbursement.

iii. Use of Funds

Based on testing performed, BHCA funds were used to support a range of youth-focused programming and related operational activities. Identified expenditures were primarily associated with:

- Basketball camps and youth training programs, including coaching, media, catering, participant incentives, and program operations;
- A student entrepreneurship cohort program supported by a third-party service provider;
- Program-related events, including competitions and community engagement activities
- Marketing and media production services;
- Administrative and program coordination activities, including payments to the Executive Director.

Testing indicated that a portion of expenditures was supported through check-level documentation and generally aligned with program-related activities. However, variances were identified between budgeted, reported, and supported amounts across multiple program categories, including both over- and under-spending relative to planned budgets.

Additionally, $50,000 of grant funds were transferred to Capital East Travel and Tax, an existing third-party bookkeeping and payroll service provider, to administer payroll and certain program-related expenditures. Testing of this arrangement indicated that a significant portion of expenditures processed through this entity lacked sufficient supporting documentation.

MPact indicated that this arrangement was implemented due to delays in program execution, including the loss of an initially planned facility and resulting adjustments to program timing. While discussions with the grantor were described, formal documentation evidencing approval of the third-party arrangement was not identified.

Payments were also made to URISE Ventures Inc. to support entrepreneurship programming. While these payments were supported at a high level through check documentation and interview explanations, formal contracts and detailed invoices supporting the scope of services and pricing were not consistently available.

MPact further indicated that additional funding sources were used to support similar program activities; however, based on testing performed, it could not be determined whether these funds were consistently tracked and segregated from BHCA grant expenditures.

iv. Reporting and Documentation

The following observations were identified as a result of testing procedures:

Documentation Practices:

Supporting documentation was available at the check level for many transactions; however, underlying documentation such as invoices, receipts, or detailed support was incomplete for certain expenditures, particularly for contracted services and third-party administered transactions.

Third-Party Arrangement (Capital East Travel and Tax):

No formal agreement or contract governing the transfer and administration of $50,000 in funds was provided. A substantial portion of expenditures processed through this arrangement lacked sufficient supporting documentation, limiting the ability to verify the nature and allowability of costs.

Budget-to-Actual Variances:

Testing identified inconsistencies between budgeted amounts, reported expenditures, and supported costs across several program categories.

Period of Performance Considerations:

Certain expenditures were incurred outside of the intended period of performance as a result of program delays and changes in implementation timelines.

v. Conclusion

MPact Mentoring Inc. received $100,000 in BHCA funding and utilized the funds to support youth-focused programming and related operational activities consistent with its stated mission.

Testing identified several documentation and compliance issues, including:

- Execution of the MOU after disbursement of funds;
- Incomplete and inconsistent supporting documentation expenditures;
- Lack of formal agreements and oversight related to third-party fund administration;
- Variances between budgeted, reported, and supported financial data;
- Expenditures incurred outside the intended period of performance.

Total unsupported or insufficiently supported expenditures identified through testing were approximately $26,100. Based on the procedures performed, expenditures appear generally aligned with programmatic objectives; however, the identified deficiencies indicate weaknesses in controls, documentation practices, and grant administration processes. These conditions limit the ability to fully substantiate certain costs and demonstrate compliance with applicable grant requirements.

10. Don's Kitchen

i. Organization Overview

Don's Kitchen is a for-profit entity operating as a restaurant and catering business. Publicly available information indicates the entity was formally established in late 2022 and operates as a small, locally based business. No evidence of nonprofit designation, charitable programming, or structured community-based initiatives was identified during the review.

Available information suggests that the business had a delayed operational start, with indications that full operations did not commence until well after the initial receipt of grant funding. As such, there is limited evidence that the organization had an established operational or programmatic infrastructure in place at the time funds were awarded and disbursed. This timing raises considerations regarding the entity's capacity to deploy funds in alignment with program objectives during the applicable grant periods.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant FY24 Award Amount: $25,000
FY24 Date of MOU: March 1, 2024
FY24 Date Executed / Submitted via Email on: March 19, 2024
FY24 Date of Payment: March 1, 2024

BHCA Grant FY25 Award Amount: $50,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Submitted via Email on: October 23, 2024
FY25 Date of Payment: October 18, 2024

iii. Use of Funds

Based on documentation reviewed, BHCA funds appear to have been used primarily to support general business establishment and operational activities rather than clearly defined, programmatic purposes. Major categories of expenditures included construction and build-out costs, equipment purchases, lease and occupancy-related expenses, loan-related activity, and general operating costs; however, a significant portion of these expenditures lacked adequate support, could not be clearly tied to the grant, or raised questions regarding allowability.

A number of expenditures related to construction, build-out, and contractor services were identified, including approximately $30,000 for general contracting work, $19,834.28 for plumbing and piping services, and additional amounts for fire protection, mechanical testing, and other technical services. In many instances, documentation consisted of proposals, worksheets, or invoices without corresponding proof of payment. For example, the $30,000 contractor cost was supported by a worksheet outlining work performed, but no executed invoice or payment evidence was provided. Similarly, the plumbing-related costs included invoices with handwritten notations indicating payment; however, no verifiable payment support was provided to confirm that these amounts were actually paid.

Expenditures related to equipment and supplies totaled a significant portion of the reported costs but were frequently unsupported or only partially supported. Examples include approximately $19,515 for a commercial dishwasher and $15,137.93 for bulk supply purchases, both of which were supported only by pricing screenshots or partial documentation without invoices or proof of payment. Additional purchases totaling over $22,000 for supplies and materials in FY24 included invoices lacking payment support or documentation indicating outstanding balances at the time of review. These limitations prevent confirmation that the goods were purchased, received, and paid for as reported.

Lease and occupancy-related costs included substantial payments; however, support was inconsistent and, in some cases, raised concerns regarding the nature of the expenditures. One notable transaction included $9,200 paid to a property management entity, which appears to relate to past-due rent, late charges, and legal fees associated with a lease default notice. While payment documentation was provided, no formal invoice or detailed breakdown was included, and the nature of the charges suggests they were related to prior obligations rather than current programmatic use. Additional occupancy-related expenses, such as utilities and insurance, included smaller-dollar transactions where payment amounts did not align with invoiced amounts, and no explanation for these discrepancies was provided.

The review also identified a high volume of general operating expenses and account-based transactions, including retail purchases, vendor payments, and withdrawals, that were not supported by underlying invoices or sufficient documentation. These transactions included numerous small-dollar expenditures as well as aggregated activity captured only through account statements. In several instances, withdrawals ranging from approximately $1,200 to $4,000 per transaction were identified without supporting documentation or explanation of business purpose. Additionally, recurring and miscellaneous vendor charges, including payments to retail stores, service providers, and financial institutions, were identified without supporting invoices or evidence of their connection to grant-related activities.

Certain expenditures were associated with third-party accounts or individuals, with documentation reflecting payments made through accounts or in the name of individuals whose relationship to the business was not clearly established. In these instances, support consisted of account statements or summarized transaction histories without underlying documentation, preventing verification of the business purpose and allowability of these costs.

A significant portion of expenditures, particularly in fiscal year 2025, were incurred outside of the grant period of performance, including approximately $86,208.12 in costs incurred after the grant end date. In total, fiscal year 2025 documentation reflected over $151,890.71 in expenditures, substantially exceeding the $50,000 grant award, without clear identification of which costs were attributable to the grant. The lack of clear allocation and timing further limits the ability to assess compliance with grant requirements.

The review also identified loan-related activity involving a third-party lending arrangement, totaling approximately $25,382.20 in repayment. Documentation indicates that a loan was issued on behalf of the business to support startup costs, with the expectation that grant funding would be used to repay the loan. The loan was subsequently repaid, including interest; however, the subrecipient did not provide documentation supporting the loan agreement, terms, or its inclusion as an allowable use of grant funds. Information regarding the loan was obtained from external sources rather than the subrecipient. The use of grant funds to repay a startup-related loan raises concerns regarding whether the expenditure represents an allowable program cost versus general business financing activity.

Across both fiscal years, documentation did not demonstrate a clear linkage between expenditures and approved grant purposes. In fiscal year 2024, approximately $22,285.03 in expenditures were identified against a $25,000 grant award, leaving $2,714.97 unsupported. Of the amounts documented, only approximately $399.83 was fully supported by both invoice-level documentation and proof of payment, with the remaining amounts supported only by limited or incomplete documentation.

In fiscal year 2025, partial documentation was provided for $126,508.51 in expenditures, and $1,659.54 meeting the criteria for full support. The total grant awarded was $50,000; however, due to insufficient detail and lack of traceability, it could not be determined which expenditures were attributable to grant-funded activities.

Overall, the use of funds reflects a pattern of expenditures focused on general business startup and operational activities, with significant gaps in documentation, substantial unsupported costs, and limited evidence of allowability or alignment with grant requirements. As a for-profit entity, the use of grant funds is subject to requirements that funds support a defined public purpose and not routine business operations.

iv. Reporting and Documentation

The following issues were noted:

Supporting Documentation:

Documentation provided was limited in completeness and reliability. Only a small portion of expenditures was fully supported by both underlying invoices or receipts and corresponding proof of payment. Many items were supported by only one element or by informal documentation such as summaries, screenshots, annotated invoices, or account statements. In some cases, invoices indicated outstanding balances or included annotations indicating payment without verifiable evidence.

Financial Data and Reconciliation:

Comprehensive financial reporting was not maintained. No complete summary of grant expenditures or reconciliation between budgeted amounts, reported expenditures, and supporting documentation was provided for either fiscal year. For FY24, supported expenditures did not fully reconcile to the total grant award. For FY25, documentation significantly exceeded the grant amount without identification of which expenditures were attributable to the grant. As a result, reconciliation of expenditures to approved budgets could not be performed.

Tracking of Grant Expenditures:

There was limited evidence of a formal or consistent process to track grant-related expenditures separately from general business activity. Transactions were not clearly identified as grant-funded, and supporting documentation did not indicate consistent categorization or allocation methodologies. This lack of segregation was particularly evident in FY25, where large volumes of transactions were provided without clear linkage to the grant.

Timing of Expenses:

A significant portion of expenditures occurred outside of the grant period, particularly in FY25 where a substantial amount of costs were incurred after the period of performance ended. In addition, certain transactions lacked sufficient date information to determine when the underlying goods or services were received. This limits the ability to assess compliance with timing requirements.

Nature and Support of Expenditures:

Several material expenditures lacked sufficient documentation to substantiate the nature, purpose, or allowability of the costs. Supporting documentation for large-dollar items, including equipment purchases, construction services, and lease-related costs, was often incomplete or consisted of estimates, worksheets, or pricing documentation rather than executed invoices and payment records. In some cases, there were inconsistencies between billed amounts and amounts paid.

Third-Party and Unclear Transactions:

Certain transactions were supported by documentation that referenced individuals or third parties whose relationship to the business was not clearly established. Additionally, some expenditures were reflected only through account histories or credit card statements without supporting invoices or explanations of business purpose. These transactions included withdrawals, deposits, and vendor payments that could not be substantiated or tied to grant-related activities.

Questionable or Insufficiently Supported Expenses:

The review identified multiple expenditures for lease obligations, equipment, construction services, and operational vendors where supporting documentation was insufficient or unclear. This included instances where documentation reflected outstanding balances, default-related notices, or informal work summaries without corroborating proof of payment or completion.

Loan-Related Activity:

Loan-related transactions were identified in the course of testing; however, supporting documentation for these transactions was not maintained by the subrecipient. Information regarding the loan arrangement and repayment was obtained from third-party sources. The subrecipient did not provide documentation demonstrating how these financing activities were tracked or how they aligned with the intended use of grant funds.

Overall, the lack of consistent, complete, and verifiable documentation, combined with insufficient financial tracking and timing discrepancies, significantly limits the ability to confirm that expenditures were allowable, properly supported, and incurred in accordance with grant requirements.

v. Conclusion

Don's Kitchen received $75,000 in BHCA funding across FY24 and FY25; however, documentation supporting the use of funds was limited, incomplete, and in many cases insufficient to substantiate reported expenditures.

Expenditures were primarily associated with general business establishment and operational activities, including construction, equipment purchases, occupancy costs, and financing-related transactions. A significant portion of these expenditures lacked adequate supporting documentation, could not be reconciled to grant records, or occurred outside of the grant period.

In addition, the absence of comprehensive financial reporting, lack of clear tracking of grant-related expenditures, and reliance on incomplete or informal documentation limit the ability to assess compliance with grant requirements and determine whether funds were used for allowable purposes.

Based on the information available, there are significant concerns regarding the completeness and reliability of documentation, adherence to grant terms and conditions, and the overall ability to support the reported use of funds.

11. DT Cares

i. Organization Overview

DT Cares is a nonprofit organization (501(c)(3)) focused on youth mentorship, wellness, and leadership development programming. Based on a review of publicly available information and IRS tax-exempt records, DT Cares is recognized as a public charity and has filed Form 990-N (e-Postcard), with its most recent filing reflecting gross receipts below $50,000, consistent with its status as a smaller community-based organization.

The organization's mission centers on empowering youth through structured mentorship, wellness programming, and leadership development initiatives. Available information and documentation indicate that DT Cares delivers a range of community-based programming, including school partnerships, mentorship initiatives, and health-focused outreach events.

Based on documentation reviewed, DT Cares operates as an emerging organization established in recent years and has developed community partnerships and programming aimed at serving youth and underserved populations across the Greater Hartford area. While infrastructure and administrative processes are still developing, the organization has demonstrated ongoing program activity and community engagement consistent with its mission.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant FY24 Award Amount: $20,000
FY24 Date of MOU: April 8, 2024
FY24 Date Executed / Signed (per email correspondence): April 23, 2024

FY24 Date of Payment: April 15, 2024

BHCA Grant FY25 Award Amount: $50,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Signed (per email correspondence): October 23, 2024
FY25 Date of Payment: October 7, 2024

iii. Use of Funds

Based on documentation reviewed, DT Cares utilized BHCA funding to support a range of programmatic activities aligned with its mission, including youth mentorship, community wellness initiatives, leadership development programming, and outreach efforts.

Program expenditures included both direct program delivery and supporting operational infrastructure. General ledger data reflects approximately $36,487.99 in FY24 and $68,020.31 in FY25 of supported expenditures, exceeding the total grant award when considered across both fiscal years.

Program-specific expenditures demonstrate consistent community engagement and service delivery. Examples include:

- Community Health & Wellness Initiatives totaling over $6,674.23, including events such as breast cancer walks serving approximately 150–200+ community members and community health-focused programming;
- Program Delivery & Facilitation totaling approximately $6,855, supporting structured programs such as youth mentorship series, school-based programming, and leadership initiatives serving 30–125+ students per program;
- Facilities, Operations, and Program Infrastructure, with expenditures exceeding $10,650, supporting the operational capacity necessary to deliver programming;
- Program Supplies and Participant Support, totaling approximately $6,525.08, supporting direct program materials and participant engagement;
- Outreach, Marketing, and Community Engagement, totaling approximately $2,891.84, including community events, speaking engagements, and partnership activities.

In addition, documentation reflects numerous program activities with defined participation metrics, including:

- Youth mentorship programs serving 20–55+ participants;
- School-based leadership and career events serving 100–200+ students per event;
- Community engagement initiatives, including recurring programming and public events serving 45–350+ individuals;
- Ongoing wellness initiatives, including recurring run clubs and leadership summits serving broader community populations.

While detailed transaction-level support (e.g., invoices and receipts) was not consistently available for all expenditures, the organization provided extensive program-level documentation, including activity summaries, descriptions, and participant data demonstrating the nature and impact of expenditures.

Additionally, DT Cares provided letters of support from community leaders and partner organizations, including municipal officials, school administrators, and community organizations, attesting to the organization's program delivery and community impact.

Overall, although expenditures did not always align precisely with original budget categories and lacked complete traditional documentation, the available evidence supports that funds were used for programmatic activities consistent with the organization's mission.

iv. Reporting and Documentation

The following observations were noted:

Supporting Documentation:

Documentation was inconsistently maintained, and detailed receipts or invoices were not available for all expenditures. As noted by leadership, certain documentation gaps are attributable to the organization's early-stage development and evolving administrative processes. In many instances, expenditures were supported by general ledger data rather than underlying third-party documentation.

Program Evidence and Alternative Support:

In the absence of complete transaction-level support, DT Cares provided extensive narrative documentation, including program descriptions, activity summaries, and participant metrics. These materials demonstrate the occurrence of programmatic activity and provide evidence supporting the use of funds.

Community Impact Documentation:

The organization supplemented financial documentation with letters of support from community stakeholders, including municipalities, school systems, and nonprofit partners. These letters provide qualitative evidence of program delivery and community reach.

Financial Reporting and Alignment:

While expenditures exceeded the grant amount across both fiscal years, no concerns were identified regarding unsupported funds. However, differences between budgeted categories and actual expenditures were noted, reflecting a level of flexibility in how funds were deployed across program activities.

MOU Documentation:

Executed MOUs were incomplete or not consistently retained. Specifically, the FY24 MOU lacked full execution, and the FY25 executed agreement was not retained by the subrecipient, though identified through external documentation.

Overall, while documentation gaps exist, particularly regarding traditional financial support, the combination of general ledger data, program evidence, and third-party attestations provides sufficient support for the use of funds.

v. Conclusion

DT Cares received $70,000 in BHCA funding and utilized the funds to support youth mentorship, wellness, and community-based programming consistent with its mission.

While traditional supporting documentation (e.g., invoices and receipts) was not consistently maintained, the organization provided sufficient alternative documentation, including detailed program summaries, participant metrics, and third-party attestations, to demonstrate community impact and program delivery.

Expenditures reviewed appear reasonable in nature, and the overall use of funds aligns with programmatic objectives. Documentation gaps were noted, particularly related to administrative processes and MOU retention; however, these gaps do not indicate significant concerns regarding the appropriateness of expenditures or overall compliance.

Based on the information available, the use of funds appears appropriate and does not warrant further review.

12. Powell Mental Health

i. Organization Overview

Powell Mental Health LLC is an organization formed in May 2023 with a stated focus on providing behavioral health and wellness services. The organization reports a mission centered on delivering personalized care and improving outcomes for individuals experiencing mental health challenges, with an emphasis on community-based support.

While Powell Mental Health demonstrated a programmatic focus aligned with grant objectives, the organization's financial and administrative infrastructure appeared developing, particularly with respect to formalized grant tracking and documentation practices.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $50,000
FY25 Date of MOU: March 1, 2025
FY25 Date Executed / Signed (per email correspondence): March 7, 2025
FY25 Date of Payment: March 12, 2025

Additionally, email correspondence reviewed indicates that external advocacy or support may have contributed to the facilitation of funding for FY25.

iii. Use of Funds

Based on documentation reviewed and discussions with management, Powell Mental Health reported that BHCA grant funds were primarily used for payroll, occupancy, and technology-related costs.

Supporting documentation reflects total expenditures of approximately $53,984, exceeding the total grant award of $50,000. Expenditures were comprised of the following:

- Payroll Costs: Approximately $46,992 of expenditures were attributed to administrative payroll.
- Occupancy Costs (Rent): Approximately $4,500 related to rent.
- Technology / Telecommunications: Approximately $2,492 related to technology and telecommunications expenses.

In addition:

- A portion of expenditures totaling approximately $16,916 was incurred after the defined period of performance.
- Certain technology-related purchases, including a retail membership, did not appear to align with the originally defined budget category for telecommunications.

Overall, expenditures were primarily directed toward personnel and general operating costs; however, the timing of certain costs and the nature of select purchases limit the ability to conclude full alignment with grant requirements.

iv. Reporting and Documentation

The following observations were identified as part of testing procedures:

Supported vs. Unsupported Expenditures:

Based on procedures performed, expenditures primarily related to payroll ($46,992), rent ($4,500), and technology ($2,492) were partially supported by available documentation.

However, due to the absence of a general ledger and limited transaction-level support, CLA was unable to fully substantiate the allowability and classification of all expenditures, and therefore could not determine that the full population of costs was adequately supported.

Timing of Expenditures:

Approximately $16,916 of expenditures were incurred outside of the defined period of performance and are therefore not considered allowable under standard grant requirements.

Financial Tracking and Verification:

No general ledger data was provided to support reported expenditures, and payments were primarily verified through bank activity and email correspondence rather than comprehensive financial records.

Nature of Certain Expenditures:

Certain technology-related purchases, including a retail membership, raise questions regarding alignment with approved budget categories and could not be fully supported as allowable grant costs based on available documentation.

v. Conclusion

Powell Mental Health received $50,000 in BHCA grant funding to support mental health programming and related operational activities.

Based on the procedures performed, available evidence indicates that funds were expended for organizational activities consistent with the general intent of the program. Although available information indicates that funds supported organizational activities related to behavioral health services, the absence of detailed financial records and program documentation limited CLA's ability to verify the extent to which grant-funded expenditures supported specific community-benefit activities or other documented public-purpose objectives. These conditions reduce transparency into the use of funds and limit assurance over compliance with grant requirements. While no specific instances of misuse were identified based on available information, the documentation limitations represent a control weakness and prevent full substantiation of grant expenditures.

13. URISE Ventures, Inc

i. Organization Overview

URISE Ventures, Inc. (URISE) is a nonprofit organization (501(c)(3)) based on available records, focused on providing technology, entrepreneurship, and workforce development programming for youth and young adults. Based on publicly available information, URISE operates as a community-based organization offering training, mentorship, and innovation-focused programming intended to support economic mobility.

The organization maintains a programmatic focus on entrepreneurship and technology incubation; however, based on procedures performed, formal financial reporting and administrative infrastructure appeared limited.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $50,000
FY25 Date of MOU: March 1, 2025
FY25 Date Executed / Signed (per email correspondence): March 7, 2025
FY25 Date of Payment: March 12, 2025

Additionally, email correspondence reviewed indicates that external advocacy or support may have contributed to the facilitation of funding.

iii. Use of Funds

Based on documentation reviewed and discussions with management, BHCA grant funds were used primarily to support payroll and occupancy-related costs necessary to operate the organization.

Available records, including bank statements, reflected recurring payroll-related transactions processed through a third-party payroll provider, as well as rent-related payments. These expenditures appear consistent with general operational support for ongoing programming activities.

However, due to limited financial detail provided, the full nature, classification, and programmatic linkage of all expenditures could not be determined.

iv. Reporting and Documentation

The following observations were identified as part of testing procedures:

Supporting Documentation:

URISE did not provide detailed financial records such as a general ledger or income statement. Documentation provided consisted primarily of bank statements and high-level financial information.

Financial Data and Reconciliation:

Based on review of available bank activity, payroll and rent-related expenditures were identified and appear to collectively exceed the total grant award; however, a complete reconciliation to grant-specific expenditures could not be performed.

Tracking of Grant Expenditures:

The organization did not demonstrate a formal process to track grant expenditures separately from other operating activity, and supporting documentation did not clearly identify which transactions were funded by the BHCA grant.

Documentation Sufficiency:

The absence of detailed transaction-level support (e.g., invoices, payroll registers, or allocation schedules) limited the ability to fully substantiate the allowability, classification, and programmatic purpose of expenditures.

v. Conclusion

URISE Ventures, Inc. received $50,000 in BHCA grant funding and utilized the funds to support payroll and operational expenses associated with ongoing organizational activities.

Based on the procedures performed, available documentation indicates that expenditures were incurred and generally consistent with operational needs; however, the lack of detailed financial records, absence of a general ledger, and limited supporting documentation restricted the ability to fully verify the nature, allowability, and allocation of expenditures to the grant. These limitations reduce transparency into the use of funds and limit assurance over compliance with grant requirements. While no specific instances of misuse were identified based on available information, the lack of sufficient financial tracking and documentation represents a control weakness and prevents full substantiation of grant expenditures.

14. Hartford Knights Corp

i. Organization Overview

Hartford Knights Corp is a nonprofit organization operating as a youth mentoring and education entity serving at-risk youth in the Greater Hartford area. The organization is recognized as a tax-exempt 501(c)(3) entity and maintains a stated mission focused on delivering community-based programming aimed at youth development and support.

Available information indicates that the organization conducts structured programming, including sports- and education-based initiatives, consistent with its stated mission. The primary activity relevant to the grant period appears to have been a summer youth program, which included gym-based programming and coaching activities. While the organization's mission and programming are aligned with community-based objectives, documentation reviewed during testing indicates limitations in administrative and financial controls related to grant tracking and reporting.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $25,000
Date of MOU: May 22, 2024
Date Executed / Submitted via Email on: Not identified
Date of Payment: May 23, 2024

CLA was unable to locate a fully executed MOU, indicating it was either never executed or not retained. This is not consistent with standard grant administration practices, which typically require execution of agreements prior to disbursement.

iii. Use of Funds

Based on documentation reviewed, Hartford Knights Corp reported that the full $25,000 grant was used to support a summer youth program, with primary emphasis on gym rental and program-related costs. However, documentation provided during testing does not support this representation and instead reflects inconsistencies in how funds were allocated and reported.

The expense report submitted to BHCA indicated that the entire $25,000 was allocated to gym rental (occupancy costs) associated with the summer program. In contrast, detailed records provided for review reflect that the reported expenditures included a combination of gym rental and coach fees totaling approximately $22,327.56, as well as other program-related payments. This inconsistency indicates that the reporting submitted to BHCA does not align with underlying financial activity.

The only expenditure included in those records that was supported with source documentation was a disbursement in the amount of $2,976.99 for uniforms, which was supported by a single receipt. While this expense appears consistent with program-related activity, it represents the only fully supported transaction identified during testing.

Beyond this single supported expenditure, no invoices, receipts, or verifiable proof of payment were provided for the remaining $22,023.01 in reported grant expenditures. Although internal records reflect payments for gym rental (including a payment of approximately $18,395) and multiple smaller payments for coaching services ranging from approximately $210 to $1,000 per individual, no supporting documentation was provided to substantiate these transactions. As a result, the nature, allowability, and occurrence of these expenses could not be verified.

Furthermore, internal records indicate that certain program expenses, including coaching fees, may have been allocated to other funding sources rather than the BHCA grant. This raises additional questions regarding whether costs attributed to the grant were appropriately assigned and whether duplication or misallocation of funding occurred across multiple funding streams.

Additionally, approximately $21,327.56 in expenditures were identified as either incurred outside the grant period of performance or lacking sufficient date information to determine timing. This further limits the ability to assess whether expenditures complied with grant timing requirements.

Overall, while the intended use of funds appears to align with youth programming activities, the lack of supporting documentation, inconsistencies in reporting, and potential misalignment of funding sources prevent verification that grant funds were used for allowable and properly documented purposes.

iv. Reporting and Documentation

The following documentation and compliance issues were identified:

Supporting Documentation:

No invoice or payment support was provided for approximately $22,023.01 of the $25,000 in reported expenditures. The only supported transaction identified was approximately

$2,976.99 for uniforms. For all other expenditures, including gym rental and coaching payments, no invoices, receipts, contracts, or payment records were provided to substantiate the reported costs.

Financial Reporting and Reconciliation:

The grant expense report submitted to BHCA does not align with the detailed expense records provided for review. The report submitted to BHCA indicates that the full $25,000 was allocated to gym rental, whereas internal records reflect a combination of occupancy and personnel-related expenses, including coaching fees. This inconsistency indicates that financial reporting was not accurate or reconciled to underlying records.

Tracking of Grant Expenditures:

There was no evidence of a formal process to track grant expenditures separately from other funding sources. Internal documentation suggests that certain costs were attributed to multiple funding sources, but no allocation methodology or supporting documentation was provided. This lack of segregation limits the ability to confirm that expenditures were properly charged to the grant.

Timing of Expenses:

Approximately $21,327.56 in expenditures were either incurred outside the grant period or lacked sufficient date information to determine when the underlying services were performed. This limits the ability to confirm compliance with period of performance requirements.

Nature and Support of Expenditures:

Although expenditures appear to relate to program activities such as gym rental and coaching services, the absence of supporting documentation (e.g., rental agreements, invoices, contracts, or payment records) prevents verification of the nature, reasonableness, and allowability of these costs.

Execution of MOU:

No fully executed MOU was identified or provided by the subrecipient. The absence of a signed agreement indicates that the grant may not have been formally accepted in accordance with standard practices and limits assurance that the subrecipient was operating under clearly defined terms and conditions.

Overall, the lack of supporting documentation, inconsistencies in financial reporting, absence of executed agreements, and insufficient tracking of grant expenditures significantly limit the ability to confirm that funds were used in accordance with grant requirements.

v. Conclusion

Hartford Knights Corp received $25,000 in BHCA funding; however, significant deficiencies were identified in documentation, financial reporting, and compliance with grant requirements.

While the organization reported that funds were used to support a summer youth program, only approximately $2,976.99 of expenditures was supported by adequate documentation. The remaining $22,023.01 of reported expenditures lacked sufficient support to verify allowability, occurrence, or alignment with grant objectives.

In addition, inconsistencies between the expense report submitted to BHCA and internal financial records, combined with the lack of a fully executed MOU and limited evidence of grant tracking, raise concerns regarding the accuracy and reliability of reported information.

Based on the information available, there are significant concerns regarding the completeness of documentation, the accuracy of financial reporting, compliance with grant requirements, and the ability to support the reported use of funds.

15. Leo's Pride Dental

i. Organization Overview

Leo’s Pride Dental is a dental practice organized as a professional limited liability company. No formal documentation was identified indicating nonprofit status, and the entity appears to operate as a private healthcare provider offering dental services. CLA was unable to identify a website for the entity.

Pursuant to the DECD Guide to Grants Management, grant funds are intended to support eligible entities in carrying out activities that serve a defined public purpose and align with the objectives of the grant program. While for-profit entities may be eligible in limited circumstances, such eligibility must be explicitly permitted by the grant program and requires that funds be used solely for programmatic activities that provide a direct public benefit, separate and distinct from the entity’s normal business operations. Additionally, grant recipients and pass-through entities are required to ensure that expenditures are necessary, reasonable, and directly attributable to the approved program, and that sufficient documentation is maintained to demonstrate compliance with these requirements. In the absence of such alignment and documentation, the use of grant funds for for-profit entities may not be consistent with grant eligibility and allowable use provisions.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $25,000
Date of MOU: March 1, 2025
Date Executed / Signed (per email correspondence): March 17, 2025
Date of Payment: March 20, 2025

iii. Use of Funds

Based on documentation reviewed, BHCA funds were used primarily to support operational expenses, including:

- Payroll costs for staff;
- Rent and occupancy-related expenses;
- Limited contracted services and operational costs.

Supporting documentation indicates that expenditures were largely related to routine business operations.

iv. Reporting and Documentation

The following observations were noted regarding documentation and compliance:

- Supporting Documentation: Documentation was provided for a portion of expenditures, including payroll records and rent payments totaling approximately $22,240.19 of the $25,000 award. The remaining $2,759.81 of expenditures was not supported with documentation.
- Expense Support: Payroll expenses were supported by paystubs and payment records. Rent payments were partially supported; however, documentation for several months was not provided.

Overall, while the nature of expenditures appears to be routine business expenses, gaps in supporting documentation resulted in $2,759.81 of unsupported costs.

v. Conclusion

Leo's Pride Dental received $25,000 in BHCA funding. The entity appears to operate as a private dental practice rather than a nonprofit or community-based organization. Based on documentation reviewed, funds were used primarily for routine business expenses, including payroll and rent/occupancy-related costs.

Documentation was provided for approximately $22,240.19 of the award, primarily through payroll records and rent-related support. However, approximately $2,759.81 was not supported with documentation. While no significant concerns were identified regarding the nature of the supported expenditures, the use of funds appears primarily tied to general business operations, and the unsupported balance limits the ability to fully substantiate the total award.

While management described activities that may have provided community benefit, sufficient documentation was not provided to demonstrate the nature of the services delivered, the population served, or how grant-funded expenditures advanced a documented public purpose.

Based on the information available, the noted documentation gaps and limited evidence of a defined programmatic or community-based purpose indicate a need for stronger documentation practices and clearer linkage between grant-funded expenditures and grant objectives.

16. St. Justin-Saint Michael Parish Corp

i. Organization Overview

St. Justin–Saint Michael Parish Corp is a faith-based organization that operates as nonprofit religious organization, providing religious, youth, and community-oriented programming. Limited information regarding formal nonprofit registration was identified; however, the organization appears to function primarily as a religious entity supporting community engagement activities.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $20,000 (FY24: $10,000; FY25: $10,000)

FY24 Date of MOU: April 3, 2024
FY24 Date Executed: April 25, 2024 (per email correspondence)
FY24 Date of Payment: April 2, 2024

FY25 Date of MOU: September 30, 2024
FY25 Date Executed: October 29, 2024 (per email correspondence)
FY25 Date of Payment: October 8, 2024

Fully executed MOUs were not provided directly by the subrecipient; however, signed versions were identified through email review. In both fiscal years, funds were disbursed prior to execution of the MOU.

iii. Use of Funds

Based on documentation reviewed, BHCA grant funds totaling $20,000 were reported to have been used to support community-based and parish-related programming. However, available financial records indicate that expenditures were limited and primarily administrative in nature, with insufficient detail to clearly demonstrate alignment with specific programmatic activities. Additionally, supporting documentation did not provide a clear breakdown of how funds were allocated across cost categories or tied to defined program objectives.

Total expenditures of approximately $20,000 were identified; however, the lack of detailed financial records and supporting documentation restricted the ability to fully assess the nature and allowability of these costs.

iv. Reporting and Documentation

The following observations were identified as part of testing procedures:

Supporting Documentation:

Limited supporting documentation was provided, and comprehensive financial records (e.g., general ledger, invoices, or detailed expense reports) were not available.

Supported vs. Unsupported Expenditures:

While total expenditures of approximately $20,000 were reported, documentation was insufficient to fully substantiate that these costs were allowable and aligned with grant requirements, and therefore the full population of expenditures could not be considered fully supported.

MOU and Agreement Documentation:

Executed MOUs were not initially provided by the subrecipient and were identified only through email review. In both fiscal years, funds were disbursed prior to execution, which is not consistent with standard grant practices.

Financial Tracking:

The organization did not demonstrate formal tracking of grant expenditures, limiting the ability to distinguish grant-funded activity from general parish operations.

Documentation Sufficiency:

The absence of detailed records and limited responsiveness to documentation requests restricted the ability to establish a complete audit trail or verify compliance with grant requirements.

v. Conclusion

St. Justin–Saint Michael Parish Corp received $20,000 in BHCA funding to support youth-focused community programming. While expenditures were generally supported and aligned with programmatic intent, several compliance and documentation issues were identified.

Funds were disbursed prior to execution of the MOUs, and executed agreements were not retained by the subrecipient. Additionally, inconsistencies were noted in expense classification, and approximately $9,528.73 of FY25 expenditures were incurred outside the period of performance.

Based on the information available, while funds appear to have supported intended activities, these control and timing issues limit full assurance of compliance with grant requirements

17. St. John's Full Gospel Deliverance Church

i. Organization Overview

St. John's Full Gospel Deliverance Church (SJFG) is a full gospel ministry. Public records indicate that SJFG was formed on June 6, 1967, and is classified as a nonprofit religious organization; however, limited organizational and financial information was available for review.

Testing further indicated that, although SJFG was the named subrecipient under the grant agreement, grant funds were intended to support activities of ADDVANTAGE Framework LLC, an entity formed in 2018. The relationship between SJFG and ADDVANTAGE Framework LLC, including governance, oversight, and financial accountability, was not clearly documented based on the information provided.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $15,000
Date of MOU: April 8, 2024
Date Executed / Submitted via Email on: April 23, 2024 – November 7, 2024
Date of Payment: April 2, 2024

While a fully executed MOU was ultimately identified through email review, the exact date of execution could not be determined. Email correspondence indicates the date the subrecipient was provided with the MOU for signature and a later date when a signed version was returned; however, this returned date may not reflect the actual date the agreement was executed. Additionally, available information indicates that funds were disbursed prior to execution of the agreement, which is not consistent with standard grant administration practices, which typically require execution of agreements prior to disbursement. Additionally, email correspondence reviewed indicates that external advocacy or support may have contributed to the facilitation of funding.

iii. Use of Funds

Based on procedures performed, grant funds were reported to have been used to support the "ADDvantage Academy Chess Enrichment Clinic," which included multiple sessions conducted during May and June 2024 and involvement from both participants and volunteers. Attendance documentation reflected limited participation across these sessions, with approximately 20 participants and approximately 10 volunteers across five program dates.

Financial records reviewed do not support the level or nature of the reported program activity. General ledger detail for ADDVANTAGE Framework LLC during the period of performance reflected total recorded expenditures of $643.47, which is significantly lower than the $15,000 in grant funds awarded.

The recorded expenditures consisted primarily of:

- Office supplies (approximately $508);

- Bank charges (approximately $10);
- Dues and subscriptions (approximately $5);
- Owner's draw (approximately $120).

These costs are administrative in nature and do not align with the approved grant budget, which contemplated programmatic expenses such as staffing, equipment, materials, and program delivery costs associated with operating a youth enrichment program.

In addition, general ledger activity identified $6,515.02 in expenditures recorded outside of the period of performance. These costs included items such as meals, office supplies, dues and subscriptions, automobile expenses, and other general expenses. Based on procedures performed, it could not be determined whether these expenditures were related to grant-funded activities or were incurred independently of the grant.

No direct linkage was identified between the reported program activities and the expenditures recorded in the general ledger. Further, no supporting documentation (e.g., invoices, receipts, or bank statements) was provided to substantiate how the $15,000 in grant funds was used. As a result, the full amount of grant funding is considered unsupported.

Overall, the financial records reviewed reflect minimal documented spending during the applicable period and do not demonstrate that grant funds were expended in a manner consistent with the intended purpose or approved budget.

iv. Reporting and Documentation

Procedures performed identified significant limitations in reporting and supporting documentation, including:

Supporting Documentation:

While general ledger detail and certain administrative documents were provided, supporting documentation such as bank statements, invoices, and receipts was not provided to substantiate recorded expenditures.

MOU Execution:

A fully executed MOU was not initially provided by the subrecipient but was identified through correspondence review. The agreement appears to have been executed after funds were disbursed, and the precise execution date could not be confirmed.

Unsupported Expenditures:

Based on procedures performed, the full amount of grant funding lacked sufficient supporting documentation to substantiate allowability and use in accordance with grant requirements.

Entity Relationship and Fund Flow:

The relationship between SJFG (the named subrecipient) and ADDVANTAGE Framework LLC (the entity incurring expenses) was not clearly documented, including the authority under which funds were administered or expended.

Responsiveness to Requests:

Additional documentation and clarification were requested, including details on expenditures, submission of reports, and explanation of entity roles. Keon Berry of ADDVANTAGE Framework LLC indicated an intent to consult legal counsel and did not provide additional information during the period of review.

Public Communication:

Church leadership issued a formal communication acknowledging public discussion related to the grant and indicated that legal counsel was actively engaged.

Overall, the lack of sufficient supporting documentation and inconsistencies between the intended use of funds and recorded expenditures limit the ability to fully assess allowability and compliance with grant requirements.

v. Conclusion

St. John's Full Gospel Deliverance Church received $15,000 in BHCA funding; however, procedures performed identified significant documentation and compliance deficiencies. While the subrecipient reported that funds were used to support a community-based chess enrichment program, financial records reflect minimal expenditures during the period of performance and do not align with the approved grant budget or the scope of reported activities.

Additionally, funds were disbursed prior to execution of the MOU, and the exact execution date could not be determined. The relationship between the named subrecipient and the entity incurring expenses was not clearly documented, and sufficient supporting documentation to substantiate expenditures was not provided.

Based on the procedures performed, there is insufficient support to demonstrate that grant funds were used in accordance with the intended purpose or that expenditures complied with grant requirements.

18. WISE Network

i. Organization Overview

WISE Network is a nonprofit organization (501(c)(3)) serving underserved communities throughout Connecticut. Its mission is to bring together women of diverse backgrounds to inspire, support, and empower one another, their families, and the broader community. The organization was formed on December 28, 2020, and has filed Form 990-N for Tax Year 2024.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $15,000
FY25 Grant Funds: $15,000
FY25 Date of MOU: March 1, 2025
FY25 Date Executed: March 21, 2025 (per email correspondence)
FY25 Date of Payment: March 26, 2025

iii. Use of Funds

Based on documentation reviewed, WISE Network reported using BHCA grant funds to support a leadership development program, including contractor fees, venue costs, program supplies, insurance, and marketing expenses.

Supporting documentation reflects total expenditures of approximately $15,553.71, exceeding the grant award by approximately $553.71.

Expenditures appear aligned with programmatic activities and the organization's mission; however, the extent to which all costs were directly attributable to the grant could not be fully determined where expenditures exceeded the awarded amount.

iv. Reporting and Documentation

The following observations were identified as part of testing procedures:

Supporting Documentation:

Documentation was provided for expenditures, including records supporting program-related costs; however, documentation was not sufficient to fully reconcile all expenditures to the grant.

Supported vs. Unsupported Expenditures:

Based on procedures performed, expenditures up to the $15,000 grant award were generally supported by available documentation. However, amounts exceeding the award (approximately $553.71) could not be attributed to grant funding and were therefore not considered supported under the grant.

Financial Tracking:

While expenditures were identifiable by type (e.g., contractor fees, event costs), formal tracking of grant-specific expenditures was limited, reducing clarity in distinguishing grant-funded versus non-grant-funded activity.

Documentation Sufficiency:

Overall, while documentation generally supported the nature of expenditures, limitations in allocation and reconciliation, budget-to-actual variances, unreconciled general ledger activity totaling approximately $2,769.61, expenditures of approximately $4,776.68 incurred after the June 30, 2025 period of performance, and insufficient detail for certain transactions limited the ability to fully verify the allowability and precise use of grant funds.

v. Conclusion

WISE Network received $15,000 in BHCA grant funding to support leadership development programming. Based on the procedures performed, expenditures were generally consistent with programmatic intent and supported through available documentation. However, total expenditures exceeded the grant award, and limitations in financial tracking and allocation reduced the ability to clearly distinguish grant-funded costs from other organizational activity.

While no material concerns were identified regarding the nature of expenditures, these limitations reduce transparency and limit assurance over precise compliance with grant requirements.

Tier 3

Subrecipients classified as Tier 3 demonstrated documentation limitations; however, available information did not indicate inconsistencies or risk indicators suggestive of noncompliance. In these cases, minor gaps in documentation were noted, but overall activity appeared generally aligned with program objectives based on the information obtained.

19. University of Hartford

i. Organization Overview

The University of Hartford is a private higher education institution located in Connecticut. The University was selected for testing based on the size of its BHCA award and its role in administering multiple grant-funded programs across community, academic, and student-focused initiatives.

CLA conducted an interview with University personnel on April 10, 2026 to understand grant administration and oversight processes.

ii. Grant Award, MOU, and Payment Timeline

FY24 BHCA Grant Award Amount: $250,000
FY24 Date of MOU: October 6, 2023
FY24 Date Executed / Signed (per email correspondence): April 26, 2024
FY24 Date of Payment: December 27, 2023

FY25 BHCA Grant Award Amount: $175,000
FY25 Date of MOU: September 30, 2024

FY25 Date Executed / Signed (per email correspondence): November 18, 2024
FY25 Date of Payment: October 17, 2024

iii. Use of Funds

Based on procedures performed, BHCA grant funds were used to support a range of educational, community-based, and student-focused program activities. These included:

- Tutoring and academic support services for local students;
- Youth engagement and community outreach initiatives;
- Admissions-related programming;
- Business and workforce development activities;
- Career development programming;
- Scholarship funding for eligible students.

Expenses reviewed were generally consistent with the nature of these programs and aligned with approved budgets. CLA performed transaction-level testing using a non-statistical, judgmental selection approach across program categories and obtained supporting documentation appropriate to each expense type, including invoices, payroll records, timesheets, and supporting schedules.

Walkthrough procedures were also performed with University personnel to understand processes for program administration, cost approval, and financial tracking. These procedures included review of student selection processes for scholarships and testing of timekeeping and approval processes for tutoring-related expenditures.

iv. Reporting and Documentation

The University provided comprehensive documentation to support grant expenditures, including general ledger detail, payroll records, invoices, and supporting schedules. These materials were sufficient to substantiate reported expenditures and confirm alignment with program activities.

Grant financial reports were prepared for both fiscal years, and reported amounts were generally consistent with underlying financial records. Documentation also included evidence of funds received, executed MOUs, and supporting materials for specific program components such as scholarships and tutoring.

Supporting Documentation:

Documentation was provided for all sampled transactions, including payroll records, invoices, timesheets, and supporting schedules.

Financial Reporting and Budget Alignment:

Expenditures tracked closely to approved budgets and subsequent revisions, supporting a risk-based testing approach focused on validation rather than reconciliation.

Grant Administration:

The University maintained documentation supporting grant administration activities, including executed MOUs, cash receipts, and grant reports for both fiscal years.

Funding Adjustments and Closeout:

The University received approval to carry forward $5,249.56 of unspent FY24 funds into FY25, and ultimately returned $7,186.49 of remaining funds to DECD, with supporting documentation provided.

Communication and Oversight:

Unlike many other subrecipients, formal award notification emails were not consistently identified; however, documentation indicates that communications occurred through meetings and discussions with grant administrators.

v. Conclusion

The University of Hartford received $425,000 in BHCA grant funding across FY24 and FY25 and utilized the funds to support educational, workforce development, and community-based programming consistent with grant objectives.

Based on the procedures performed, expenditures were supported by adequate documentation, aligned with approved budgets, and consistent with programmatic activities. The University demonstrated established administrative processes, effective financial tracking, and appropriate oversight of grant activities.

While minor administrative observations were noted, including the timing of agreement execution and limited formal award notification documentation, no material concerns were identified related to documentation sufficiency, allowability of costs, or overall compliance with grant requirements.

20. Connecticut Harm Reduction Alliance

i. Organization Overview

Connecticut Harm Reduction Alliance is a nonprofit 501(c)(3) organization focused on addressing public health issues related to substance use through harm reduction strategies. Based on a review of publicly available information and IRS records, the organization is recognized as a tax-exempt entity under Section 501(c)(3), with filings consistent with an active nonprofit organization, including a most recent Form 990 filed for tax year 2024.

The organization is an established provider within Connecticut, offering services such as naloxone distribution, syringe exchange, mobile outreach, and support services for individuals experiencing substance use and housing instability.

Based on discussions with leadership, including Nyandah Reid (Former CFO) and Mark Jenkins (CEO), the organization operates a combination of fixed-site and mobile services, including vans and mobile units that deliver care directly to individuals in the community. These services include wound care, testing (e.g., HIV), and direct outreach to vulnerable populations.

The organization receives a significant portion of its funding from governmental sources, including federal and state agencies, and maintains an established infrastructure for managing grant-funded programs and associated reporting requirements.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant FY24 Award Amount: $100,000
FY24 Date of MOU: October 6, 2023
FY24 Date Executed / Signed (per email correspondence): March 27, 2024
FY24 Date of Payment: November 2, 2023

BHCA Grant FY25 Award Amount: $100,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Signed (per email correspondence): October 22, 2024
FY25 Date of Payment: October 7, 2024

CLA was not provided with the executed MOUs by the subrecipient; however, CLA did locate the executed versions through email review.

iii. Use of Funds

Based on documentation reviewed and discussions with management, BHCA funds were used to support a range of programmatic and operational activities aligned with the organization's harm reduction mission.

A significant portion of expenditures related to program staff, payroll, and benefits, which were supported by general ledger data and payroll-related records. For example, FY24 payroll and related costs included $2,722.25 in program staff salaries, $253.63 in payroll taxes, and supporting benefit costs. These costs were consistent with staffing required to deliver mobile and community-based services.

The organization also reported expenditures for equipment and program infrastructure. Notable purchases included:

- Approximately $36,122.60 for a vehicle (minivan) used for outreach activities;
- Approximately $30,268.70 for an additional vehicle purchase in FY25;
- Approximately $26,450 for a mobile restroom/shower trailer purchased in FY25;
- Equipment and facility-related items such as a $4,254 stove, $8,346.08 safe, and $4,999.99 security system.

These expenditures align with management’s description of using funds to expand mobile service capacity, including outreach vans and shower facilities designed to serve individuals experiencing homelessness.

In addition, expenditures for supplies, outreach materials, and operational equipment totaled approximately $23,954.76 in FY24, including purchases of computer equipment, mobile technology, safety equipment, and general program supplies. These purchases were supported by invoices and receipts and were consistent with operational needs.

Contracted services and administrative costs were also incurred, including approximately $4,941 in contracted services and $5,000 in consultation fees in FY24, as well as administrative and grant management costs totaling approximately $6,260.27.

Marketing and outreach expenditures, totaling approximately $2,415.99, supported community engagement activities such as public events and awareness campaigns.

While variances existed between budgeted categories and actual expenditures, these differences were primarily due to reclassification of costs across categories rather than unsupported spending. For example, certain expenditures initially categorized as “other” or “supplies” were supported through detailed invoices but differed from original budget classifications.

From a financial perspective, reported expenditures submitted to BHCA for FY24 totaled approximately $97,153.92, or $2,846.08 below the award, while FY25 expenditures totaled approximately $99,139.70, or $860.30 below the award. However, testing of underlying documentation (e.g., invoices, payment support, general ledger data, etc.) indicated that actual expenditures exceeded the FY24 award by approximately $4,918.32, and when evaluated across both fiscal years, sufficient documentation supported the full $200,000 in grant funding.

Management indicated that funds were treated as flexible, program-support funding, allowing the organization to allocate resources across operational needs necessary to deliver harm reduction services.

iv. Reporting and Documentation

The following observations were noted regarding documentation and compliance:

Supporting Documentation:

Substantial supporting documentation was provided, including invoices, receipts, and detailed general ledger data supporting the majority of expenditures.

Financial Reporting and Variances:

Differences were noted between budgeted and reported expenditures; however, these differences were largely attributable to timing and classification rather than unsupported costs. Reported expenditures were slightly below awarded amounts in both fiscal years, but underlying documentation demonstrated that total expenditures met or exceeded grant funding when viewed collectively.

Tracking of Grant Expenditures:

The organization maintained general ledger tracking and funding stream identification, with management noting efforts to ensure expenditures were properly categorized for audit purposes, including coordination with the grantor to identify appropriate coding and reporting classifications.

Grant Administration and Oversight:

Based on discussions, the grant process was described as relatively informal, with limited guidance provided by the grantor regarding reporting codes, documentation expectations, or follow-up. Management indicated that communication regarding reporting requirements was minimal, and follow-up from the grantor was limited.

MOU Documentation:

Executed MOUs were not maintained by the subrecipient but were obtained through external documentation. Additionally, both fiscal years reflected execution of agreements after disbursement of funds.

Overall, while minor documentation gaps and administrative inconsistencies were identified, the level of supporting documentation and financial tracking was sufficient to substantiate the majority of expenditures and demonstrate alignment with grant requirements.

v. Conclusion

Connecticut Harm Reduction Alliance received $200,000 in BHCA funding across FY24 and FY25 and utilized the funds to support activities consistent with its harm reduction and public health mission.

Expenditures included program staffing, mobile outreach infrastructure, equipment purchases, operating costs, and community engagement activities, all of which align with the organization’s service model and program delivery approach.

While minor discrepancies were identified, including differences between reported and budgeted amounts and timing of MOU execution, these issues were administrative in nature and did not materially impact the validity of expenditures. Supporting documentation provided was substantial, and testing confirmed that expenditures across both fiscal years collectively supported the full grant award.

Based on the information available, the use of funds appears appropriate and consistent with program objectives, and no significant concerns were identified regarding allowability or overall compliance.

21. The West Indian Social Club of Hartford

i. Organization Overview

The West Indian Social Club of Hartford is a nonprofit organization (501(c)(3)) and is a long-standing cultural and community organization founded by Caribbean immigrants who began gathering in Hartford in the 1940s before formally establishing the club. The organization was created to foster connection, social engagement, and cultural expression, and has since evolved into a recognized community institution supporting the West Indian/Caribbean population in the region.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $50,000
FY25 Grant Funds: $50,000
FY25 Date of MOU: March 1, 2025
FY25 Date Executed: March 14, 2025 (per email correspondence)
FY25 Date of Payment: March 27–28, 2025

iii. Use of Funds

Based on documentation reviewed, the subrecipient reported that BHCA grant funds were utilized to support community and cultural activities consistent with the organization's mission, including programming and events intended to serve the local community.

However, detailed financial records and expenditure support were limited, restricting the ability to fully assess the allocation of funds across specific cost categories.

iv. Reporting and Documentation

The following observations were identified as part of testing procedures:

Supporting Documentation:

Documentation provided was limited and did not include comprehensive financial records such as a general ledger or detailed expenditure reports, reducing visibility into how the $50,000 grant award was utilized.

Supported vs. Unsupported Expenditures:

Based on procedures performed, while it was indicated that grant funds were used for community-oriented programming, CLA was unable to fully substantiate that the full $50,000 in expenditures was adequately supported and allowable, due to the absence of detailed transaction-level documentation and supporting records.

Financial Tracking:

The organization did not demonstrate a formal process for tracking grant expenditures separately from other operating activity, limiting the ability to identify which specific costs were funded by BHCA grant proceeds.

Documentation Sufficiency:

The lack of detailed financial records, including limited supporting documentation and absence of reconciliations, restricted the ability to verify the nature, classification, and allowability of expenditures in accordance with grant requirements.

v. Conclusion

The West Indian Social Club of Hartford received $50,000 in BHCA grant funding to support community-based cultural programming and related activities.

Based on the procedures performed, available information indicates that funds were used for activities generally consistent with the organization's mission. However, the absence of comprehensive financial records, limited transaction-level support, and lack of formal grant tracking significantly limited the ability to fully substantiate the allowability and classification of expenditures. These documentation limitations reduce transparency into the use of funds and limit assurance over compliance with grant requirements. While no specific instances of misuse were identified based on available information, the noted control and documentation gaps represent a compliance risk and an area for improved financial management practices.

22. Real Art Ways, Inc.

i. Organization Overview

Real Art Ways, Inc. (Real Art Ways) is a nonprofit, multidisciplinary arts organization that supports contemporary artists and delivers arts-based programming designed to engage the community. The organization provides a range of programming, including film, visual arts, and community engagement initiatives, with a focus on fostering creative expression and audience participation.

Based on a review of publicly available information and IRS tax-exempt records, Real Art Ways operates as a 501(c)(3) nonprofit organization and relies on a combination of public, member, and community support to sustain its operations. The organization has filed Form 990 documentation consistent with an active nonprofit and maintains an established presence within the regional arts community.

The organization's programming includes partnerships with local artists, educational programming, and project-based initiatives designed to support workforce development in creative industries. The grant reviewed was associated with one such initiative focused on filmmaking and apprenticeship-based learning.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $40,000
Date of MOU: March 1, 2025
Date Executed / Signed (per email correspondence): March 19, 2025
Date of Payment: March 26, 2025

The grant supported a Filmmaking Advanced Apprenticeship program scheduled from June 20, 2025, through August 1, 2025. Grant terms required funds to be expended by June 30, 2025; however, correspondence indicates the organization communicated timing considerations with BHCA in advance. Additionally, email correspondence reviewed indicates that external advocacy or support may have contributed to the facilitation of funding.

iii. Use of Funds

Real Art Ways used grant funds to support the Filmmaking Advanced Apprenticeship program, which was delivered in partnership with an external organization responsible for program implementation. The organization issued a payment of $40,000 to Hartford Film and Media Productions (also referred to as Hartford Film Company, LLC) to administer and deliver the program.

Expenditures related to the program were supported through a combination of payroll records, invoices, and vendor documentation, and included the following categories:

- Apprentice salaries totaling approximately $24,286, supporting multiple program participants engaged in hands-on filmmaking training;
- Teaching artist stipends totaling approximately $8,900, reflecting compensation for instructors and program facilitators;
- Equipment and space-related costs totaling approximately $5,391, including rental of space, equipment purchases, and related infrastructure needed for program delivery;
- Community-building and event-related expenses totaling approximately $1,063, including participant engagement activities, meals, and program-related events.

Total documented expenditures amounted to approximately $39,640, which is approximately $360 below the total grant award. The organization indicated that the remaining funds would be applied toward additional program-related equipment purchases, specifically to support ongoing programming needs.

Overall, expenditures were directly aligned with the intended purpose of the grant and supported the delivery of a structured apprenticeship program focused on workforce development in filmmaking and media production.

iv. Reporting and Documentation

Testing indicated that Real Art Ways maintained a relatively strong level of documentation and support, with the following observations:

- Supporting documentation included payroll records, invoices, and confirmations of payment made to the external program partner responsible for delivering the apprenticeship program;
- Documentation supported approximately $39,640 of total expenditures, representing the majority of the grant award;
- Payment and use of funds were corroborated through both financial documentation and email correspondence, providing a clear link between grant funding and program implementation;
- Approximately $20,924 of expenditures were incurred after the stated grant period of performance. While this timing difference was documented and communicated with BHCA in advance, it represents a deviation from standard grant timing requirements.

Despite this timing variance, the nature of the expenditures indicates that funds were used for program-related purposes consistent with the approved scope of work.

v. Conclusion

Real Art Ways received $40,000 in BHCA funding and used the award to support the Filmmaking Advanced Apprenticeship program delivered in partnership with an external organization.

The majority of expenditures were well-documented, supported by invoices and payroll records, and aligned with the objectives of the program. Costs incurred were reasonable in nature and directly related to program delivery, including participant compensation, teaching artist support, equipment, and community engagement activities.

While a portion of expenditures occurred outside the defined period of performance, this timing issue was communicated with BHCA and reflects a minor compliance consideration rather than a fundamental issue with the use of funds.

Overall, the documentation and use of funds are largely consistent with the intent of the grant, with limited exceptions related to timing.

23. Jamaica Progressive League

i. Organization Overview

Jamaica Progressive League (JPL) is a community-based organization in Connecticut. During the review period, JPL established Jamaica Progressive League Community Services (JPLCS) to apply for and administer BHCA grant funding for a senior-focused program.

Although the MOU was executed with JPL, funds were disbursed to JPLCS, which was formed in late 2024 to support the “Empowered Elders” initiative. Documentation reviewed includes a December 19, 2024 email outlining JPLCS’s proposal, tax-exempt status in Connecticut, and a senior-focused program at Cathedral Manor. At that time, JPLCS had not yet obtained formal 501(c)(3) status.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $30,000
Date of MOU: March 1, 2025
Date Executed / Signed (per email correspondence): March 19, 2025
Date of Payment: March 21, 2025

CLA noted the MOU was executed with JLP, but BHCA disbursed funds to JPLCS who was responsible for program implementation.

iii. Use of Funds

Based on documentation reviewed, BHCA funds were used to support program and operational costs associated with the Empowered Elders initiative, including occupancy, utilities, insurance, supplies, and food-related expenses.

Supporting documentation initially consisted of limited receipts and invoices issued by JPL to JPLCS. Upon follow-up, additional support was provided, including maintenance, insurance, food, and utility expenses totaling approximately $55,105.65. Of this amount, JPL invoiced JPLCS $28,718.64, representing 50% of shared costs.

JPL indicated that these invoices reflect an allocation of shared organizational expenses; however, the methodology used to determine the allocation was not documented.

iv. Reporting and Documentation

A review of reporting and supporting documentation for JPL identified that documentation was initially limited and primarily consisted of Amazon receipts and three invoices issued by JPL to its affiliated entity, JPLCS, covering occupancy, utilities, maintenance, insurance, and program-related supplies. Upon follow-up, additional documentation was provided, including $11,200 of maintenance expenses, $11,481.48 of insurance costs supported by $11,788.98 of corresponding bank payments, $734.59 of food purchases, and $31,689.58 of utility expenses supported by $19,827.92 of payments, resulting in $55,105.65 of expenditures supported at varying levels. Of this amount, $28,718.64 was invoiced to JPLCS, reflecting an allocation of shared costs between entities.

Despite the additional documentation provided, support remained inconsistent and did not allow for a clear transaction-level reconciliation. In several instances, expenditures were supported by invoices without corresponding proof of payment, or by bank activity without underlying invoices or receipts. Further, expense classifications on invoices did not align with the underlying supporting documentation, and no formal methodology was provided to support the 50% allocation applied to shared costs. Documentation also included expenses incurred prior to the formal establishment of JPLCS, creating uncertainty regarding the timing and appropriateness of certain costs charged to the grant. Additionally, while the MOU was executed with JPL, funds were disbursed to JPLCS, resulting in inconsistent documentation practices across entities and reduced traceability of expenditures.

Overall, while a portion of expenditures was supported, documentation gaps, misalignment between records, and the absence of a defined allocation methodology limited the ability to fully verify the allowability, accuracy, and completeness of reported expenditures.

v. Conclusion

JPL received $30,000 in BHCA funding to support the Empowered Elders initiative, with funds administered through JPLCS. While expenditures appeared generally aligned with the senior-focused program, the structure created traceability issues because the MOU was executed with JPL while funds were disbursed to and administered by JPLCS.

Supporting documentation was initially limited and later supplemented, supporting approximately $55,105.65 of costs at varying levels. However, JPL invoiced JPLCS for $28,718.64 based on a 50% allocation of shared costs, and no formal methodology was provided to support that allocation.

Overall, documentation gaps, allocation issues, timing considerations, and the structural relationship between JPL and JPLCS limit the ability to fully verify the allowability, accuracy, and completeness of reported expenditures.

24. Greater Hartford Festival of Jazz

i. Organization Overview

The Greater Hartford Festival of Jazz (GHFJ) is a nonprofit organization that produces an annual community-based jazz festival and related cultural programming. The organization operates as a public charity and relies on community support, sponsorships, and other funding sources to deliver free public events and cultural activities.

Based on publicly available information and documentation reviewed, GHFJ's activities are centered on organizing and hosting large-scale community events, including music performances and cultural programming intended to serve the broader Hartford community.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $25,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Signed (per email correspondence): October 21, 2024
FY25 Date of Payment: October 7, 2024

iii. Use of Funds

Based on documentation reviewed, BHCA grant funds were intended to support the organization's festival-related programming and related event costs.

However, testing identified that a significant portion of expenditures associated with the program occurred outside of the defined period of performance. Specifically, expenses were incurred in July 2025, subsequent to the June 30, 2025 period of performance end date.

GHFJ indicated that delays in communication and coordination with the grantor impacted the timing of expenditures. The organization reported that funds were ultimately used in a manner consistent with the approved budget; however, expenditures were not incurred within the required timeframe.

iv. Reporting and Documentation

The following observations were identified as part of testing procedures:

Supporting Documentation:

Supporting documentation was provided for expenditures, including invoices and payment records; however, documentation reflected activity occurring outside the allowable period.

Timing of Expenditures:

A substantial portion of costs was incurred after the end of the period of performance, which is not consistent with standard grant requirements.

MOU Documentation:

An executed MOU for FY25 was identified through CLA procedures, although the subrecipient was unable to independently provide a fully executed version.

Compliance with Grant Requirements:

Although expenditures appear to align with the general purpose of the program, the timing of costs limits the ability to conclude that funds were used in accordance with grant terms and conditions.

v. Conclusion

The Greater Hartford Festival of Jazz received $25,000 in BHCA grant funding to support community-based festival programming.

Based on the procedures performed, while expenditures appear generally aligned with the intended purpose of supporting community cultural activities, a significant portion of costs was incurred outside of the defined period of performance. This represents a deviation from grant requirements governing the timing of expenditures.

As a result, although the nature of expenditures appears reasonable, the timing of costs limits the ability to fully conclude that funds were used in compliance with grant terms. This condition reduces assurance over adherence to grant requirements and indicates a need for stronger adherence to period of performance restrictions in future grant administration.

25. West Indian Independence Celebrations Inc

i. Organization Overview

West Indian Independence Celebrations Inc. (WIIC) is a Hartford-based 501(c)(3) organization responsible for organizing and hosting the annual West Indian Independence Celebration, a one-day cultural festival. The organization's activities center on planning and executing this event, which includes cultural programming, entertainment, and community engagement.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $20,000
FY24 Grant Funds: $20,000
FY24 Date of MOU: not identified
FY24 Date Executed: not identified
FY24 Date of Payment: not identified

Based on procedures performed, supporting documentation for a fully executed MOU was not identified, and complete agreement documentation was not available for review.

iii. Use of Funds

Based on documentation reviewed, BHCA grant funds totaling $20,000 were reported to have been used to support event-related activities associated with the organization's annual West Indian Independence celebration.

Expenditures appear to relate to cultural programming, entertainment, and general event operations, consistent with the organization's mission. However, detailed financial records were not provided, and transaction-level support was limited.

As a result, the specific allocation of the $20,000 and the allowability of all expenditures could not be fully verified, including whether costs were appropriately classified or incurred within the required period of performance.

iv. Reporting and Documentation

The following observations were identified as part of testing procedures:

Supporting Documentation:

Documentation provided was limited and did not include comprehensive financial records such as a general ledger, detailed expenditure reports, or complete supporting documentation for all transactions.

Supported vs. Unsupported Expenditures:

Based on procedures performed, while expenditures appear to relate to event-related activities, CLA was unable to fully substantiate that the full $20,000 in expenditures was adequately supported and allowable, due to incomplete documentation and lack of transaction-level support.

MOU and Agreement Documentation:

A fully executed MOU was not identified for the grant funding, limiting the ability to confirm that expenditures were incurred under a formally executed agreement.

Financial Tracking:

The organization did not demonstrate a formal process for tracking grant expenditures separately from other operating activity, limiting the ability to determine whether all costs were appropriately charged to the grant.

Documentation Sufficiency:

The absence of centralized financial records and incomplete supporting documentation limited visibility into the nature, classification, and allowability of expenditures.

v. Conclusion

West Indian Independence Celebrations Inc. received $20,000 in BHCA grant funding to support community-based cultural programming and its annual event.

Based on the procedures performed, available information indicates that funds were used for purposes generally consistent with the organization's mission. However, the absence of an executed MOU, limited financial records, and lack of transaction-level supporting documentation significantly limited the ability to fully substantiate the allowability and classification of expenditures. These documentation and control limitations reduce transparency into the use of funds and limit assurance over compliance with grant requirements. While no specific instances of misuse were identified based on available information, the identified deficiencies represent a compliance risk and highlight the need for improved grant administration and record-keeping practices.

26. Lift Every Voice and Sing Organization

i. Organization Overview

Lift Every Voice and Sing Organization (LEVS) is a community-based nonprofit organization (501(c)(3)) focused on cultural, educational, and community engagement programming. Based on procedures performed and available information, the organization provides services intended to support community enrichment and outreach initiatives.

LEVS appears to operate on a smaller scale relative to other subrecipients, with administrative and financial functions that are more limited in formality and documentation practices.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $20,000
FY24 Grant Funds: $10,000
FY24 Date of MOU: March 1, 2024
FY24 Date Executed: No signed copy found
FY24 Date of Payment: February 23, 2024

FY25 Grant Funds: $10,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Signed (per email correspondence): October 22, 2024
FY25 Date of Payment: October 9, 2024

A fully executed MOU for FY24 was not identified or provided. Additionally, testing indicated that the FY25 agreement was executed after funds were disbursed, based on comparison of payment and execution dates.

iii. Use of Funds

Based on documentation reviewed and discussions with management, BHCA grant funds were used to support programmatic and community-based activities consistent with the organization's mission.

Expenses reviewed appear to relate to the delivery of programming and general operational support; however, the level of detail provided in supporting documentation limited the ability to fully assess the nature and classification of certain expenditures.

While available records indicate that funds were used for organizational activities, the absence of detailed financial tracking limited transparency into the allocation of grant funds across specific cost categories.

iv. Reporting and Documentation

Supporting Documentation:

Supporting documentation was provided for a portion of expenditures associated with the $20,000 grant award; however, documentation was not consistently maintained across all expenditures.

Supported vs. Unsupported Expenditures:

Based on procedures performed, a portion of expenditures could be tied to supporting documentation, including invoices and payment records related to event services and program activities. However, due to incomplete documentation and the absence of a comprehensive general ledger or equivalent financial report, CLA was unable to fully substantiate that the full $20,000 in expenditures was adequately supported and allowable under grant requirements.

Financial Tracking:

The organization did not demonstrate a formal process to track grant expenditures separately from other operating activity, limiting the ability to determine whether all costs were appropriately charged to the grant.

MOU and Administrative Documentation:

A fully executed MOU for FY24 was not identified, and the FY25 agreement was executed after funds were disbursed. This limits the ability to confirm that expenditures were incurred under a formally executed agreement at the time of payment.

Documentation Sufficiency:

While documentation was provided for certain expenditures, the lack of centralized financial records and incomplete transaction-level support reduced the ability to verify that the full $20,000 was expended in accordance with grant requirements and approved budget categories.

v. Conclusion

Lift Every Voice and Sing Organization received BHCA grant funding to support community-based programming and related activities.

Based on the procedures performed, available documentation indicates that funds were used for organizational purposes generally consistent with the intent of the grant. However, the absence of comprehensive financial records, limited transaction-level support, and lack of formal grant tracking limited the ability to fully substantiate the nature, allowability, and allocation of expenditures. These documentation limitations reduce transparency into the use of funds and limit assurance over compliance with grant requirements. While no specific instances of misuse were identified based on available information, the identified control and documentation gaps represent areas of compliance risk.

27. Exclusive Linez/Sign Design & Banner LLC

i. Organization Overview

Exclusive Linez / Sign Design & Banner LLC is a for-profit business providing printing and marketing services. The organization delivers fee-based services and operates as a commercial enterprise rather than a nonprofit entity.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $20,000
Date of MOU: September 30, 2024
Date Executed / Submitted via Email on: October 22, 2024
Date of Payment: October 9, 2024

CLA noted that the nature of this grant was atypical compared to other awards reviewed.

Although the stated purpose of the grant was to support the local community, the recipient operates as a for-profit entity. The organization's mission includes helping small businesses gain recognition through printing solutions; however, the services provided are fee-based, and the documentation reviewed did not indicate that discounts or pro bono services were consistently offered.

iii. Use of Funds

Based on documentation reviewed, funds were used for:

- Payroll-related costs; and
- Supplies and materials associated with printing operations.

Although expenditures were supported through payroll records, bank statements, and invoices, the nature of the expenses appears primarily related to routine business operations.

iv. Reporting and Documentation

The following issues were noted:

- Program Purpose: The grant supported a for-profit business, with limited evidence of a community-based program or public benefit.
- Supporting Documentation: Documentation was partially provided; however, a portion of expenditures lacked detailed support.
- Fund Usage: Certain expenditures could not be clearly tied to a defined programmatic activity.

As a for-profit entity, the use of grant funds is subject to requirements that funds support a defined public purpose and not routine business operations.

v. Conclusion

Exclusive Linez / Sign Design & Banner LLC received $20,000 in BHCA funding; however, the entity operates as a for-profit business, and the use of funds appears to primarily support ongoing operations. While some supporting documentation was provided, the absence of a clearly defined program and incomplete documentation for certain expenditures raises concerns regarding the appropriateness of the funding and alignment with grant objectives. However, given the dollar amount awarded, and based on discussions with DECD, CLA did not request or obtain further supporting documentation for these expenditures.

28. Angel of Edgewood, Inc

i. Organization Overview

Angel of Edgewood, Inc is a 501(c)(3) nonprofit organization with filings consistent with an active nonprofit organization, including a most recent Form 990 filed for tax year 2024. They are focused on addressing community needs related to poverty, hunger, and inequity, including providing essential resources and community-based support programs.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $10,000
FY24 Grant Funds: $10,000
FY24 Date of MOU: April 10, 2024
FY24 Date Executed: Not identified
FY24 Date of Payment: April 12, 2024

Although an MOU was prepared and dated April 10, 2024, documentation reviewed did not include evidence of a fully executed agreement. Email correspondence indicates the MOU was sent to the subrecipient for review and signature; however, no signed version was provided. Based on correspondence with Jendayi Scott-Miller, Angel of Edgewood disagreed with the language included in the MOU and declined to execute the agreement.

Following communication of these objections, Angel of Edgewood ceased responding to BHCA. Despite the absence of an executed agreement, BHCA disbursed $10,000 to Angel of Edgewood via ACH on April 12, 2024. A proposed budget totaling $10,000 was submitted to CLA. Supporting documentation for expenditures was provided, amounting to $9,992.60.

iii. Use of Funds

Based on reporting and supporting documentation reviewed, BHCA funds were allocated primarily toward the purchase of a security system: Security system purchase: $9,992.60, which was $7.40 less than the $10,000 grant amount. No general ledger or trial balance were provided by Angel of Edgewood. CLA did not follow up for additional financial records due to the small size of the grant and the presence of direct supporting documentation. Sufficient support was provided to substantiate how the majority of the funds were spent.

iv. Reporting and Documentation

The following observations were identified as part of testing procedures:

Supporting Documentation:

Limited documentation was provided to support expenditures, and comprehensive financial records (e.g., general ledger or detailed expense reports) were not available.

Supported vs. Unsupported Expenditures:

Based on procedures performed, approximately $9,993 of expenditures was identified; however, minor amounts (approximately $7) could not be fully reconciled to supporting documentation, and the absence of detailed records limited the ability to fully substantiate all costs.

MOU and Agreement Documentation:

A fully executed MOU was not identified, limiting assurance that expenditures were incurred under a formally executed agreement.

Financial Tracking:

The organization did not demonstrate formal tracking of grant expenditures separate from other activity, limiting the ability to verify that all costs were appropriately charged to the grant.

Documentation Sufficiency:

The lack of detailed financial records and supporting documentation reduced the ability to verify the nature, classification, and allowability of expenditures.

v. Conclusion

Angel of Edgewood, Inc received $10,000 in BHCA grant funding in April 2024; however, no fully executed MOU was identified prior to or after the disbursement of funds. While substantially all funds appear to have been used for a security system purchase, supporting documentation was incomplete and formal financial records were not provided. However, given the relatively small dollar amount and the use of the funds, and based on discussions with DECD, CLA did not request or obtain further supporting documentation.

29. Hartford Health Initiatives

i. Organization Overview

Hartford Health Initiatives (HHI) is a nonprofit organization focused on addressing barriers to health through community-based health programs and outreach efforts. The organization is classified as a nonprofit organization (501(c)(3)) and has filed recent documentation consistent with its nonprofit status.

Based on publicly available information, HHI operates programs designed to improve access to care and promote positive health outcomes within the communities it serves.

HHI maintains a mission-driven service model supported by grant funding and community partnerships. However, based on procedures performed, administrative and financial infrastructure appeared more limited relative to larger or more established entities.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant FY24 Award Amount: $150,000
FY24 Date of MOU: October 6, 2023
FY24 Date Executed / Signed (per email correspondence): May 14, 2024
FY24 Date of Payment: October 17, 2023

BHCA Grant FY25 Award Amount: $200,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Signed (per email correspondence): November 6, 2024
FY25 Date of Payment: October 9, 2024
CLA noted that for FY24, the MOU was not fully executed prior to disbursement of funds.

iii. Use of Funds

Based on documentation reviewed, BHCA grant funds were used to support health-related programming and community initiatives aligned with HHI's mission.

Expenses reviewed consisted primarily of programmatic and operational costs necessary to deliver services; however, the level of documentation provided limited the ability to fully assess the nature and purpose of certain expenditures at a detailed level.

While general ledger activity and bank statement data were available and indicated that expenditures were incurred, underlying transaction-level support (e.g., invoices and receipts) was not consistently provided for non-payroll expenses.

iv. Reporting and Documentation

With respect to expense support, the subrecipient did not provide invoices for non-payroll expenditures. Instead, general ledger detail, bank statements, and payroll paystubs were provided. CLA was able to reconcile all transactions to bank activity and trace payroll to supporting paystubs.

The subrecipient indicated that providing underlying invoices and receipts would present an administrative hardship due to the lack of a centralized financial or administrative function.

The following observations were identified as part of testing procedures:

Supporting Documentation:

General ledger data, bank statements, and payroll records were provided; however, supporting invoices and receipts for non-payroll expenditures were not provided, limiting the ability to substantiate certain costs.

Financial Data and Reconciliation:

CLA was able to reconcile general ledger activity to bank statements, and payroll transactions were supported by paystubs, indicating that recorded expenditures occurred as reported.

Administrative Limitations:

The subrecipient indicated that producing underlying documentation would present a hardship due to the absence of centralized administrative functions or record-keeping processes.

MOU Execution:

A fully executed MOU for FY24 was not initially provided; however, an executed version was identified through additional procedures.

Overall Documentation Sufficiency:

While financial activity could be traced at a summary level, the lack of detailed supporting documentation limited the ability to fully evaluate allowability and classification of certain expenditures.

v. Conclusion

Hartford Health Initiatives received $350,000 in BHCA grant funding across fiscal years 2024 and 2025 and utilized the funds to support community-based health programming and related operational activities.

Based on the procedures performed, financial activity appeared to be recorded and incurred as reported, with general ledger data reconciling to bank statements and payroll expenditures supported through available documentation. However, the absence of underlying invoices, receipts, and detailed transaction-level support for non-payroll expenditures limited the ability to fully substantiate the nature, allowability, and classification of certain costs.

These documentation limitations reduce transparency into how funds were utilized and present challenges in verifying full compliance with grant requirements. While no specific instances of misuse were identified based on available information, the lack of comprehensive supporting documentation represents a control weakness and limits assurance over the use of funds.

30. African Caribbean American Parents of Children with Disabilities (AFCAMP)

i. Organization Overview

AFCAMP is a nonprofit 501(c)(3) organization that provides educational resources, advocacy, and community support to parents and caregivers of children with special needs and others at risk of educational inequity or system involvement. It offers community-based programs to improve outcomes for underserved populations.

Its operations rely partly on grant funding and public support, and recent Form 990 filings are consistent with its tax-exempt status.

ii. Grant Award, MOU, and Payment Timeline

BHCA Grant Award Amount: $75,000
FY25 Grant Funds: $75,000
FY25 Date of MOU: March 1, 2025
FY25 Date Executed: March 18, 2025 (per email correspondence)
FY25 Date of Payment: March 20, 2025

Allowable expenses included costs incurred prior to execution, dating back to December 2024, based on documented approval via email correspondence. This retroactive applicability was explicitly approved via email communication from Ms. Gallon-Clark.

iii. Use of Funds

The funds were expended in accordance with the budget attached to the MOU. Total expenditures were allocated to personnel and administrative support costs necessary for organizational operations. Specifically, funds were used for:

- Executive Director payroll: $35,000
- Finance Director payroll: $25,000
- IRA employer match: $1,800
- Bookkeeping services: $5,200
- IT consulting services: $5,200

While variances were noted between budgeted and actual cost categories, expenditures were consistent with the organization's mission and the general purpose of the grant.

iv. Reporting and Documentation

The following observations were identified as part of testing procedures:

Supporting Documentation:

AFCAMP provided sufficient supporting documentation, including financial records and expenditure support, to substantiate the full $75,000 in grant-funded expenditures.

Supported vs. Unsupported Expenditures:

Based on procedures performed, 100% of expenditures ($75,000) were supported by appropriate documentation, with no unsupported costs identified.

Financial Tracking and Budget Alignment:

Although some differences were noted between budgeted categories and actual expenditures, documentation supports that funds were used for allowable activities aligned with the grant's objectives.

MOU Execution and Timing:

The MOU was executed after the disbursement of funds, and certain expenses were incurred prior to execution; however, these were supported by documented approval and did not impact the overall allowability of expenditures.

Documentation Sufficiency:

Overall documentation was sufficient to support the nature, classification, and allowability of expenditures.

v. Conclusion

AFCAMP received $75,000 in BHCA grant funding and utilized the funds to support programmatic and operational activities consistent with its mission.

Based on the procedures performed, expenditures were fully supported, aligned with grant objectives, and consistent with allowable cost requirements. While minor timing and budget classification variances were observed, no material issues were identified related to documentation sufficiency or compliance.

Overall, AFCAMP demonstrated strong documentation practices and effective use of grant funds, with no unsupported expenditures identified.

31. Town of Windsor

i. Organization Overview

The Town of Windsor is a municipal government entity in Connecticut that provides public services to residents, including community programs and local administrative functions.

ii. Grant Award, MOU, and Payment Timeline

FY24 BHCA Grant Award Amount: $15,000
FY24 Date of MOU: April 8, 2024
FY24 Date Executed / Signed (per email correspondence): May 10, 2024
FY24 Date of Payment: April 8, 2024

FY25 BHCA Grant Award Amount: $20,000
FY25 Date of MOU: September 30, 2024
FY25 Date Executed / Signed (per email correspondence): November 8, 2024
FY25 Date of Payment: October 9-10, 2024

iii. Use of Funds

The Town of Windsor is a municipal government entity in the State of Connecticut, responsible for providing public services and administering community-based programs for residents. As a municipality, the Town maintains established governance, financial management, and administrative infrastructure, including processes for managing public funds and grant-supported activities.

Because the entity operates as a governmental body, it is subject to public accountability requirements and maintains centralized financial systems and controls over expenditures and reporting.

iv. Reporting and Documentation

The Town of Windsor demonstrated established financial tracking and documentation practices consistent with its status as a municipal entity. Observations from testing include:

Supporting Documentation:

Supporting documentation was provided for expenditures, including financial records maintained within the Town's accounting systems.

Financial Reporting and Reconciliation:

Financial data was maintained through formal accounting systems, and expenditures aligned with amounts reported and recorded in the general ledger.

Proof of Funds and Agreement Documentation:

Documentation supporting receipt of funds and executed MOUs was available and consistent with grant records.

Overall Documentation Sufficiency:

Based on procedures performed, documentation was sufficient to support expenditures and demonstrate alignment with grant requirements.

Testing indicated that financial data supported recorded expenditures, reported amounts aligned with supporting documentation, and proof of funds agreed to BHCA records. No significant deficiencies or inconsistencies were identified during testing.

v. Conclusion

The Town of Windsor received $35,000 in BHCA grant funding across fiscal years 2024 and 2025 and utilized the funds to support community-based municipal activities.

Based on the procedures performed, expenditures were supported by appropriate documentation, aligned with recorded financial activity, and consistent with the nature of municipal operations. The Town demonstrated established internal controls, financial tracking, and administrative processes sufficient to support grant compliance.

No material concerns were identified related to documentation sufficiency, allowability of expenditures, or overall compliance with grant requirements.

7. Conclusions

Based on the procedures performed, documentation obtained, and analysis conducted, the results of subrecipient testing indicate significant variability in documentation, reporting practices, and overall compliance with grant requirements across the population of subrecipients.

Of the 31 subrecipients tested, only a limited number demonstrated the ability to provide complete and verifiable documentation supporting reported expenditures. The majority of subrecipients provided partial, inconsistent, or insufficient documentation, and in several cases, no documentation was provided in response to requests. As a result, a substantial portion of expenditures could not be substantiated.

CLA's procedures were designed to evaluate the sufficiency and appropriateness of documentation and to identify potential compliance and control considerations. CLA does not make determinations regarding the recovery or repayment of funds. Decisions related to recovery, including the assessment of unallowable or unsupported expenditures, are the responsibility of DECD and should be made based on the totality of information available, including risk considerations, documentation sufficiency, and the findings and conclusions presented in this report.

Common issues identified across subrecipients include:

A. Insufficient Supporting Documentation:

Many subrecipients were unable to provide invoices, contracts, or payment records to substantiate reported expenditures, limiting the ability to verify allowability and accuracy.

B. Lack of Payroll and Time Allocation Records:

For personnel-related costs, subrecipients frequently did not maintain payroll records or timekeeping documentation sufficient to demonstrate that employee time was allocated to grant-funded activities.

C. Inconsistent Financial Reporting:

Variances were observed between amounts reported to BHCA and underlying accounting records, including instances where expenditures could not be reconciled.

D. Expenditures Outside the Period of Performance:

In multiple cases, costs were incurred outside of the approved grant period, or timing could not be determined due to limited documentation.

E. Inadequate Subrecipient Monitoring and Oversight:

Documentation indicates that BHCA distributed funds to subrecipients without consistently ensuring that supporting documentation was obtained, reviewed, or retained.

F. Use of For-Profit Entities Without Clear Alignment to Public Purpose:

Several grant awards were made to for-profit entities. While certain recipients described activities intended to benefit the community, supporting documentation was often insufficient to demonstrate the existence of structured community programming, identifiable beneficiaries, measurable outcomes, or other evidence linking expenditures to a defined public purpose. Conversely, documentation reviewed frequently reflected expenditures for general business operations and overhead.

G. Governance and Documentation Gaps (e.g., MOUs):

In several instances, Memorandums of Understanding were not executed prior to payment, or were incomplete, limiting enforceability of grant requirements.

Collectively, these issues represent systemic weaknesses in documentation practices, financial controls, and grant administration, which significantly impaired the ability to verify the allowability, timing, and purpose of expenditures.

8. Recommendations

Based on the procedures performed and findings identified, several areas were noted where enhanced monitoring, documentation, and oversight would improve transparency and accountability. Subsequent to the period under review, the enactment of House Bill No. 5039, Public Act No. 26-27[21] established additional statutory requirements governing the administration of legislatively directed funds, including enhanced transparency, reporting, and oversight mechanisms.

The extent to which the recommendations below have been addressed by this legislation is noted accordingly.

I. Recommendations for DECD

These recommendations apply to DECD's internal monitoring and oversight practices and are intended to enhance visibility into subrecipient activity and improve the timely identification of irregularities.

1) Strengthen Monitoring of Existing Requirements

DECD should enhance monitoring procedures to confirm compliance with grant requirements, including verification that recipients maintain adequate documentation, adhere to approved budgets, and comply with reporting obligations.

The enacted legislation establishes requirements for state agencies to adopt uniform policies and procedures governing the administration of legislatively directed funds, including

[21] Public Act No. 26-27 (House Bill 5039), effective July 1, 2026, establishes statutory requirements for the administration of legislatively directed funds, including written agreements specifying intended use, enhanced reporting by recipients and subrecipients, oversight by the Office of Policy and Management, and public transparency through periodic reporting and a statewide database. These requirements were enacted subsequent to the period under review and were not applicable to the funding evaluated in this report.

ensuring funds are used for their intended purposes and implementing reporting and oversight processes.

2) Require Earlier and More Detailed Subrecipient Reporting

DECD should revise its internal processes to obtain subrecipient-level information earlier in the grant cycle, including:

- Identification of subrecipients at the time of award and throughout the funding period;
- Confirmation of executed MOUs prior to disbursement;
- Interim financial reporting to identify discrepancies in a timely manner.

The enacted legislation requires written agreements specifying the intended use of funds, annual reporting by recipients and subrecipients, and the development of publicly accessible reporting on disbursements and fund usage.

These provisions substantially address the need for improved reporting transparency; however, the timing and granularity of interim reporting during the period of performance are not fully defined and may require further implementation guidance.

3) Enhance Follow-Up on Variances and Irregularities

DECD should implement trigger-based follow-up procedures for instances where reported expenditures:

- Vary significantly from expectations;
- Cannot be reconciled to prior submissions;
- Reflect unusual passthrough arrangements.

The legislation includes requirements for periodic reporting, audit review, and corrective action when expenditures are identified as inconsistent with statutory requirements, including potential recoupment provisions.

While these mechanisms support retrospective oversight and accountability, proactive, risk-based monitoring and follow-up during the grant lifecycle are not explicitly defined and remain an area for enhancement.

4) Clarify Documentation Expectations within Agreements

Future grant agreements should more explicitly reinforce existing requirements that:

- Recipients maintain complete, auditable records supporting all expenditures;
- Subrecipient documentation be made available upon request;
- Expenditures align with approved budgets and allowable cost categories.

The legislation requires that funds be distributed pursuant to written agreements that specify the intended use of funds and establishes requirements for documentation, reporting, and compliance through standardized policies and procedures.

In addition, pre-award conferences and published guidance are required to provide instruction on documentation and reporting expectations.

These provisions substantially address documentation clarity; however, consistency in enforcement and expectations for transaction-level support remain dependent on agency policy implementation.

II. Recommendations for Subrecipients (Including BHCA)

These recommendations are intended to verify compliance with requirements already established in grant agreements, MOUs, and application certifications, including documentation, reporting, and allowable use of funds.

1) Documentation and Record Retention

- Maintain Complete Supporting Documentation:
  Subrecipients should retain invoices, contracts, and proof of payment for all expenditures to support reported amounts, consistent with certification requirements that financial information be accurate and complete.

- Maintain Audit-Ready Records:
  Records should be organized, retained for the required period, and made available upon request to support audit and inspection rights outlined in grant agreements.

2) Payroll and Allowable Cost Compliance

- Support Personnel Costs with Documentation:
  Subrecipients must maintain payroll records and time allocation documentation sufficient to demonstrate that personnel costs are attributable to grant-funded activities.

- Verify Expenditures Align with Allowable Categories:
  All expenditures should align with approved budget categories and exclude explicitly ineligible activities (e.g., political contributions, lobbying).

3) Reporting and Reconciliation

- Confirm Accuracy of Financial Reporting:
  Reported expenditures should be reconcilable to underlying accounting records and supported by documentation demonstrating allowability and accuracy.

- Provide Complete and Timely Reports:
  Subrecipients should submit required reports, including final expenditure reporting, with sufficient detail to support compliance with grant requirements.

4) Execution of Agreements

- Execute MOUs Prior to Disbursement:

All subrecipient agreements should be fully executed prior to the disbursement of funds to verify that requirements related to allowable use, reporting, and monitoring are enforceable.

5) Compliance with Period of Performance

- Restrict Expenditures to Approved Timeframes:
  Subrecipients should confirm that costs are incurred within the defined grant period and align with the approved scope of work.

6) Subrecipient Monitoring (Pass-Through Responsibility)

- Perform and Document Monitoring Activities:
  Where applicable, pass-through entities should perform monitoring activities (e.g., site visits, review of reports) and retain documentation evidencing these procedures, consistent with MOU requirements.

While the legislation requires approval of subrecipient transfers and establishes reporting requirements, it does not fully prescribe the scope, frequency, or documentation of ongoing monitoring activities performed by recipients or pass-through entities. As a result, expectations regarding subrecipient monitoring practices remain an area for further clarification.

7) Legal and Regulatory Compliance

- Maintain Good Standing and Registration:
  Subrecipients should maintain compliance with applicable legal and regulatory requirements (e.g., business registration, required filings) as a condition of funding.

Summary

The deficiencies identified during testing primarily reflect inconsistent compliance with existing documentation, reporting, and monitoring requirements, rather than the absence of such requirements. Strengthening enforcement and oversight of these established obligations would significantly improve transparency, accountability, and the ability to verify the proper use of grant funds.

9. Professional Standards Followed by CliftonLarsonAllen

The overall scope of work and approach was conducted utilizing standards in accordance with the Statement on Standards for Forensic Services No. 1 (“SSFS No. 1”) of the American Institute of Certified Public Accountants (AICPA) and the Code of Professional Standards of the Association of Certified Fraud Examiners (ACFE). This report does not constitute an audit, compilation, or review, in accordance with standards of the AICPA, the objective of which would be the expression of an opinion on any specified elements, accounts, or items. Accordingly, CLA does not express such an opinion.

Because of the unique nature of fraud, and because our engagement was limited to the matters described in the engagement letter, fraud and/or financial irregularities may exist within the organization that we may not have identified during the performance of our procedures. However, if during the performance of our services other matters had come to our attention suggesting possible financial improprieties and/or irregularities, we would have communicated such matters to DECD.

The professional standards promulgated by the AICPA prohibit CLA from rendering an opinion as to whether there has been any fraud or other criminal activity by anyone associated with this engagement. Therefore, CLA does not render such opinions.

10. Information about CliftonLarsonAllen LLP

Established on January 2, 2012, CLA is well positioned with knowledge, insight, and industry-specific accounting, tax, and consulting services. CLA is the result of a union between Clifton Gunderson and LarsonAllen, both established more than 60 years ago. CLA has a national forensic and state and local government practice.

CLA is one of the largest professional service and accounting firms in the country with a growing global team. With a nationwide team of experienced professionals, clients include law firms, school districts, CEOs, leaders in education, municipalities, governmental agencies, the law enforcement community, commercial businesses, and not-for-profit agencies. The CLA Forensic Services team is a highly respected and sought-out authority in fraud prevention, detection, and investigation. Our multi-disciplined team is comprised of Certified Public Accountants, Certified Fraud Examiners, professionals Certified in Financial Forensics, and attorneys who practice as forensic accountants.

Emilie Deveraux, CFE, is a signing director in the Forensic Services practice of CLA and an experienced forensic accounting professional with more than 25 years of experience providing forensic accounting and fraud examination services to both regulated industries and private clients. Ms. Deveraux is a results-driven professional offering extensive experience in forensic investigations, data analytics, and the evaluation of financial records, with a strong background in identifying discrepancies, tracing fraudulent activity, and developing well-supported findings and recommendations. She has demonstrated a record of success performing complex financial investigations, conducting fraud risk assessments, supporting litigation matters, and delivering actionable insights through detailed reporting and documentation. In addition, she has significant experience providing anti-fraud and ethics training and has presented at numerous professional conferences and training events focused on fraud, ethics, and financial risk, reflecting a commitment to advancing best practices in fraud prevention and detection.

11. List of Attachments

Attachment I	Subrecipient Population and Tiered Classification Summary
Attachment II	Summary of Documents Provided by Subrecipient
Attachment III	Subrecipient Testing Results Summary

12. List of Exhibits

Exhibit 1	Sample Memorandum of Understanding (MOU)
Exhibit 2	Blue Hills Civic Association FY25 Legislative Grant Application
Exhibit 3	Sample Grant Reporting Form / Budget Narrative Template
Exhibit 4	SHEBA Email Response
Exhibit 5	Outreach Realty Budgets and Reports
Exhibit 6	SHEBA Payroll Summary