



**Neighborhood Reinvestment  
Corporation  
(d.b.a. NeighborWorks® America)**

**Financial Statements, Schedule of  
Expenditures of Federal Awards, and  
Independent Auditor's Reports Required  
by *Government Auditing Standards* and  
the Uniform Guidance**  
Years Ended September 30, 2022 and 2021

**Neighborhood Reinvestment  
Corporation  
(d.b.a. NeighborWorks® America)**

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Independent Auditor's Reports Required  
by *Government Auditing Standards* and  
the Uniform Guidance  
Years Ended September 30, 2022 and 2021**

**Neighborhood Reinvestment Corporation  
(d.b.a. NeighborWorks® America)**

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## Independent Auditor's Report

To the Board of Directors  
**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**  
Washington, D.C.

### Report on the Audit of the Financial Statements

#### *Opinion*

We have audited the financial statements of **Neighborhood Reinvestment Corporation (d.b.a. NeighborWorks® America)** (the Corporation), which comprise the statements of financial position as of September 30, 2022 and 2021, and the related statements of activities, functional expenses and cash flows for the years then ended, and the related notes to the financial statements.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Corporation as of September 30, 2022 and 2021, and the changes in its net assets and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

#### *Basis for Opinion*

We conducted our audits in accordance with auditing standards generally accepted in the United States of America (GAAS) and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Corporation and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

#### *Responsibilities of Management for the Financial Statements*

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Corporation's ability to continue as a going concern within one year after the date that the financial statements are issued or available to be issued.



### ***Auditor's Responsibilities for the Audit of the Financial Statements***

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS and *Government Auditing Standards*, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Corporation's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Corporation's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.



### ***Supplementary Information***

Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards, as required by Title 2 U.S. Code of Federal Regulations (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, is presented for purposes of additional analysis and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. Such information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with GAAS. In our opinion, the information is fairly stated, in all material respects, in relation to the financial statements as a whole.

### ***Other Reporting Required by Government Auditing Standards***

In accordance with *Government Auditing Standards*, we have also issued our report dated June 30, 2023 on our consideration of the Corporation's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Corporation's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Corporation's internal control over financial reporting and compliance.

*BDO USA, LLP*

June 30, 2023

## Financial Statements

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**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**

**Statements of Financial Position (Amounts in 000's)**

<i>September 30,</i>	<b>2022</b>	<b>2021</b>
<b>Assets</b>		
<b>Current assets</b>		
Cash and cash equivalents	\$ 66,828	\$ 132,316
Short-term investments	2,494	2,503
Receivables:		
Contributions receivable	2,725	1,605
Grant and contract receivables	3,706	4,106
Other receivables	5,748	296
Prepaid expenses and other assets	2,756	2,145
<b>Total current assets</b>	<b>84,257</b>	<b>142,971</b>
<b>Noncurrent assets</b>		
Deposits	302	302
Property and equipment, net	1,219	2,237
<b>Total noncurrent assets</b>	<b>1,521</b>	<b>2,539</b>
<b>Total assets</b>	<b>\$ 85,778</b>	<b>\$ 145,510</b>
<b>Liabilities and Net Assets</b>		
<b>Current liabilities</b>		
Accounts payable and accrued expenses	\$ 9,703	\$ 6,400
Pass-through liability	33	14,007
Grant commitments:		
Expendable grants	759	73
Refundable advances:		
Foreclosure prevention	119	729
Grants/shared equity/other	66,530	113,230
Deferred revenue	-	1
<b>Total current liabilities</b>	<b>77,144</b>	<b>134,440</b>
<b>Noncurrent liabilities</b>		
Deferred rent liability	831	2,426
<b>Total liabilities</b>	<b>77,975</b>	<b>136,866</b>
<b>Commitments and contingencies</b>		
<b>Net assets</b>		
Without donor restrictions	(628)	43
With donor restrictions	8,431	8,601
<b>Total net assets</b>	<b>7,803</b>	<b>8,644</b>
<b>Total liabilities and net assets</b>	<b>\$ 85,778</b>	<b>\$ 145,510</b>

*See accompanying notes to financial statements.*



**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**

**Statement of Activities (Amounts in 000's)**

<i>Year ended September 30, 2022</i>	Without Donor Restrictions	With Donor Restrictions	Total
<b>Revenue, gains, and other support</b>			
Congressional appropriations	\$ 209,180	\$ -	\$ 209,180
Grants	3,709	-	3,709
Contributions	610	9,743	10,353
Training registration fees	1,932	-	1,932
Contracts	1,279	-	1,279
Publications and subscriptions	374	-	374
Other income	100	-	100
Investment returns, net	372	(7)	365
Net assets released from restrictions:			
Satisfaction of program restrictions	9,906	(9,906)	-
<b>Total revenue, gains, and other support</b>	<b>227,462</b>	<b>(170)</b>	<b>227,292</b>
<b>Expenses</b>			
<b>Program services:</b>			
Capacity building	101,593	-	101,593
National foreclosure mitigation counseling	656	-	656
Housing stability counseling	43,638	-	43,638
Preserving affordable housing	45,256	-	45,256
Training and informing	16,483	-	16,483
Organizational assessment	8,212	-	8,212
<b>Total program services</b>	<b>215,838</b>	<b>-</b>	<b>215,838</b>
<b>Supporting services:</b>			
General and administrative support	10,770	-	10,770
Resource development	1,525	-	1,525
<b>Total supporting services</b>	<b>12,295</b>	<b>-</b>	<b>12,295</b>
<b>Total expenses</b>	<b>228,133</b>	<b>-</b>	<b>228,133</b>
<b>Change in net assets</b>	<b>(671)</b>	<b>(170)</b>	<b>(841)</b>
<b>Net assets, beginning of year</b>	<b>43</b>	<b>8,601</b>	<b>8,644</b>
<b>Net assets, end of year</b>	<b>\$ (628)</b>	<b>\$ 8,431</b>	<b>\$ 7,803</b>

*See accompanying notes to financial statements.*

**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**

**Statement of Activities (Amounts in 000's)**

<i>Year ended September 30, 2021</i>	Without Donor Restrictions	With Donor Restrictions	Total
<b>Revenue, gains, and other support</b>			
Congressional appropriations	\$ 164,326	\$ -	\$ 164,326
Grants	4,355	-	4,355
Contributions	2,126	5,470	7,596
Training registration fees	1,079	-	1,079
Contracts	1,060	-	1,060
Publications and subscriptions	358	-	358
Other income	52	-	52
Investment returns, net	6	3	9
Net assets released from restrictions:			
Satisfaction of program restrictions	8,937	(8,937)	-
<b>Total revenue, gains, and other support</b>	<b>182,299</b>	<b>(3,464)</b>	<b>178,835</b>
<b>Expenses</b>			
<b>Program services:</b>			
Capacity building	107,562	-	107,562
National foreclosure mitigation counseling	176	-	176
Housing stability counseling	880	-	880
Preserving affordable housing	44,313	-	44,313
Training and informing	16,030	-	16,030
Organizational assessment	7,319	-	7,319
<b>Total program services</b>	<b>176,280</b>	<b>-</b>	<b>176,280</b>
<b>Supporting services:</b>			
General and administrative support	9,222	-	9,222
Resource development	1,876	-	1,876
<b>Total supporting services</b>	<b>11,098</b>	<b>-</b>	<b>11,098</b>
<b>Total expenses</b>	<b>187,378</b>	<b>-</b>	<b>187,378</b>
<b>Change in net assets</b>	<b>(5,079)</b>	<b>(3,464)</b>	<b>(8,543)</b>
<b>Net assets, beginning of year</b>	<b>5,122</b>	<b>12,065</b>	<b>17,187</b>
<b>Net assets, end of year</b>	<b>\$ 43</b>	<b>\$ 8,601</b>	<b>\$ 8,644</b>

*See accompanying notes to financial statements.*

**Neighborhood Reinvestment Corporation  
(d.b.a. NeighborWorks® America)**

**Statement of Functional Expenses (Amounts in 000's)**

	Program Services						Supporting Services					Total
	Capacity Building	National		Preserving Affordable Housing	Training and Informing	Organizational Assessment	Total Program Services	General and		Total Supporting Services		
		Foreclosure Mitigation Counseling	Housing Stability Counseling					Administrative Support	Resource Development			
<i>Year ended September 30, 2022</i>												
Grants and grant commitments	\$ 68,231	\$ 388	\$ 39,044	\$ 45,256	\$ 1,002	\$ -	\$ 153,921	\$ -	\$ -	\$ -	\$ -	\$ 153,921
Personnel	22,593	94	2,421	-	8,838	6,059	40,005	5,789	1,109	6,898	46,903	
Professional services	4,807	66	686	-	3,085	654	9,298	1,341	89	1,430	10,728	
Other operating costs	3,495	45	891	-	2,101	769	7,301	2,725	158	2,883	10,184	
Occupancy	1,449	1	476	-	512	543	2,981	344	108	452	3,433	
Depreciation and amortization	423	2	45	-	165	113	748	417	21	438	1,186	
Conferences and workshops	275	48	55	-	606	34	1,018	111	10	121	1,139	
Travel	320	12	20	-	174	40	566	43	30	73	639	
<b>Total expenses</b>	<b>\$ 101,593</b>	<b>\$ 656</b>	<b>\$ 43,638</b>	<b>\$ 45,256</b>	<b>\$ 16,483</b>	<b>\$ 8,212</b>	<b>\$ 215,838</b>	<b>\$ 10,770</b>	<b>\$ 1,525</b>	<b>\$ 12,295</b>	<b>\$ 228,133</b>	

*See accompanying notes to financial statements.*

**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**

**Statement of Functional Expenses (Amounts in 000's)**

	Program Services						Supporting Services					Total
	Capacity Building	National Foreclosure Mitigation Counseling	Housing Stability Counseling	Preserving Affordable Housing	Training and Informing	Organizational Assessment	Total Program Services	General and Administrative Support	Resource Development	Total Supporting Services		
<i>Year ended September 30, 2021</i>												
Grants and grant commitments	\$ 70,378	\$ -	\$ -	\$ 44,313	\$ 6	\$ 5	\$114,702	\$ 13	\$ 1	\$ 14	\$ 114,716	
Personnel	23,654	-	542	-	9,993	5,669	39,858	5,672	1,467	7,139	46,997	
Professional services	6,557	170	264	-	3,567	506	11,064	915	125	1,040	12,104	
Other operating costs	4,613	-	40	-	1,527	458	6,638	1,643	134	1,777	8,415	
Occupancy	1,806	-	23	-	698	546	3,073	541	119	660	3,733	
Depreciation and amortization	355	-	8	-	150	85	598	331	22	353	951	
Conferences and workshops	197	6	3	-	87	49	342	107	8	115	457	
Travel	2	-	-	-	2	1	5	-	-	-	5	
<b>Total expenses</b>	<b>\$ 107,562</b>	<b>\$ 176</b>	<b>\$ 880</b>	<b>\$ 44,313</b>	<b>\$ 16,030</b>	<b>\$ 7,319</b>	<b>\$176,280</b>	<b>\$ 9,222</b>	<b>\$ 1,876</b>	<b>\$ 11,098</b>	<b>\$ 187,378</b>	

*See accompanying notes to financial statements.*

**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**

**Statements of Cash Flows (Amounts in 000's)**

<i>Years ended September 30,</i>	<b>2022</b>	<b>2021</b>
<b>Cash flows from operating activities</b>		
Change in net assets	\$ (841)	\$ (8,543)
<b>Adjustments to reconcile change in net assets to net cash (used in) provided by operating activities:</b>		
Bad debt expense	47	29
Depreciation and amortization	1,186	951
<b>(Increase) decrease in assets</b>		
Receivables:		
Contributions receivable	(1,120)	(1,605)
Grant and contract receivables	353	(2,546)
Other receivables	(5,452)	68
Prepaid expenses and other assets	(611)	(369)
<b>Increase (decrease) in liabilities</b>		
Accounts payable and accrued expenses	3,303	1,720
Pass-through liability	(13,974)	(2,717)
Grant commitments:		
Expendable grants	686	68
Refundable advances:		
Foreclosure prevention	(610)	(176)
Grants/shared equity/other	(46,700)	101,915
Deferred revenue	(1)	(1)
Deferred rent liability	(1,595)	(1,113)
<b>Net cash (used in) provided by operating activities</b>	<b>(65,329)</b>	<b>87,681</b>
<b>Cash flows from investing activities</b>		
Purchases of investments	(2,500)	(2,506)
Sales of investments	2,509	2,505
Purchases of property and equipment	(168)	(280)
<b>Net cash used in investing activities</b>	<b>(159)</b>	<b>(281)</b>
<b>(Decrease) increase in cash and cash equivalents</b>	<b>(65,488)</b>	<b>87,400</b>
<b>Cash and cash equivalents, beginning of year</b>	<b>132,316</b>	<b>44,916</b>
<b>Cash and cash equivalents, end of year</b>	<b>\$ 66,828</b>	<b>\$ 132,316</b>

*See accompanying notes to financial statements.*

# Neighborhood Reinvestment Corporation (d.b.a. NeighborWorks® America)

## Notes to Financial Statements (Amounts in \$000's)

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### 1. Organization, Mission and Program Services

#### *Organization*

Neighborhood Reinvestment Corporation (d.b.a. NeighborWorks® America) (the Corporation) was established by Congress in 1978, by the Neighborhood Reinvestment Corporation Act under 42 U.S.C. 8101-8107. The Corporation is a private nonprofit charitable organization under IRC 501(c)(3). As stated in its enabling documents, the purpose of the Corporation is to continue the joint efforts of the federal financial supervisory agencies and the U.S. Department of Housing and Urban Development (HUD) in promoting reinvestment in older neighborhoods by local financial institutions in cooperation with the community, residents and local governments. These efforts were previously conducted by the Urban Reinvestment Task Force, which the Corporation succeeded.

Funding for the Corporation is primarily through Congressional appropriation as well as through grants from federal and state government agencies, corporations, foundations and private donors. The Corporation's board of directors is determined by statute and consists of the heads of the Comptroller of the Currency, Federal Reserve, National Credit Union Administration, Federal Deposit Insurance Corporation (FDIC) and the U.S. Department of Housing and Urban Development, who are presidential appointees subject to Senate confirmation, or their designated representatives.

#### *Mission*

The Corporation provides financial, technical and organizational support to approximately 247 independent, community-based nonprofit organizations operating in all 50 states and the District of Columbia, known collectively as the NeighborWorks® network, that help low- and moderate- income families rent, purchase and maintain affordable homes. The NeighborWorks® network also revitalizes communities through resident leadership and private and public partnerships that encourage local investment in sustainable projects.

The Corporation provides its services to the NeighborWorks® network through five distinct program service areas, Capacity Building, Housing Stability Counseling, Preserving Affordable Housing, Training and Informing, and Organizational Assessment as described below. In addition, the Corporation administers the National Foreclosure Mitigation Counseling (NFMC) Program which was enacted by Congress on December 26, 2007 in response to the nationwide subprime foreclosure crisis. Since its passage, Congress has appropriated ten successive annual rounds of funding totaling approximately \$848 million to NeighborWorks® America for continuation of the program.

The Corporation maintains its national headquarters in Washington, D.C. and supports its NeighborWorks® network locally through regional offices in Boston, New York, Atlanta, Kansas City, and Denver.

#### *Program Services*

##### *Capacity Building*

Capacity building refers to the practical assistance the Corporation provides to strengthen the performance of NeighborWorks® network organizations, enabling them to respond most effectively and efficiently to the needs of their communities. The Corporation expands the capacity of network members by providing onsite technical assistance and limited funding. As part of Capacity Building,

# Neighborhood Reinvestment Corporation (d.b.a. NeighborWorks® America)

## Notes to Financial Statements (Amounts in \$000's)

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the Corporation promotes increased access to the capital markets through its support of Community Housing Capital and NeighborWorks Capital Corporation. These affiliated organizations play a critical role in meeting the NeighborWorks® network's capital needs by bringing low-cost, flexible private-sector capital and innovative loan products to network members. Flexible loan products help meet the financing needs for housing rehabilitation, homeownership and real-estate development.

### *National Foreclosure Mitigation Counseling (NFMC)*

The NFMC program is designed to provide mortgage foreclosure mitigation assistance to states and areas with high rates of defaults and foreclosures, primarily in the subprime housing market. Through the state housing finance agencies, HUD-approved housing counseling intermediaries and community-based NeighborWorks® organizations, the Corporation provides free assistance to families at risk of losing their homes, helping clients to understand the complex foreclosure process, and identifying possible courses of action to allow them to make informed decisions and take necessary actions.

### *Housing Stability Counseling*

The American Rescue Plan (ARP) provided funding to NeighborWorks America to design and administer its Housing Stability Counseling Program (HSCP). The HSCP is administered nationwide and aims to help eligible nonprofit agencies that provide direct counseling services to individuals and families facing housing instability such as eviction, foreclosure, and homelessness. The HSCP increases the capacity of the Corporation to provide a higher-level housing counseling through HUD-approved housing counseling agencies, State housing finance agencies (SHFA), and NeighborWorks® organizations (NWOs).

### *Preserving Affordable Housing*

The Corporation helps NeighborWorks® organizations construct new housing, repair and renovate existing housing, promote homeownership and further mixed-income affordable housing opportunities. The Corporation also supports the organizations' hazard abatement, energy conservation, post-purchase counseling, and foreclosure prevention activities. Equity capital, in the form of highly flexible Corporation grants to local organizations' revolving loan funds, is also vitally important. Revolving loan funds are used to support home repair, down-payment and closing-cost assistance, energy conservation repairs, commercial and small business loans, predevelopment costs, acquisition of problem properties, and a host of other initiatives.

### *Training and Informing*

Through communications, publishing, research and training functions, the Corporation collects and disseminates pertinent and useful information for the NeighborWorks® network and the broader community development field. The Corporation imparts this data and information through a variety of vehicles, and trains and informs the network and representatives of the broader industry through national and regional training events, publications, on-line (at [www.nw.org](http://www.nw.org)) and other venues.

**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**

**Notes to Financial Statements (Amounts in \$000's)**

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*Organizational Assessment*

The Corporation closely monitors the capacity of each NeighborWorks® organization to successfully manage programmatic risks and to ensure their financial and organizational stability. The organizational assessment function evaluates all of the NeighborWorks® network members to successfully predict, mitigate, and manage risk and steadily increase the health, performance, productivity, and effectiveness of the organizations.

**2. Summary of Significant Accounting Policies**

***Basis of Accounting***

The accompanying financial statements have been prepared on the accrual basis of accounting in accordance with accounting principles generally accepted in the United States (U.S. GAAP).

***Cash and Cash Equivalents***

Cash and cash equivalents are stated at cost which approximates fair value and include investments with original maturities of three months or less. Cash in excess of amounts required to fund current operations are invested overnight.

Cash held as an agent where the Corporation has neither an administrative nor financial direct involvement is recorded as a pass-through liability included on the statements of financial position and amounted to \$33 and \$14,007 at September 30, 2022 and 2021, respectively.

As required by their underlying grant agreements, the Corporation maintains a separate bank account related to its Project Reinvest programs.



**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**

**Notes to Financial Statements (Amounts in \$000's)**

**Liquidity**

The Corporation manages cash to be available to meet current needs. The Corporation's financial assets available within one year of the statement of financial position date available for general expenditure are as follows:

<i>September 30,</i>	<b>2022</b>	<b>2021</b>
Cash and cash equivalents	\$ 66,828	\$ 132,316
Short-term investments	2,494	2,503
Receivables	12,179	6,007
<b>Total financial assets available within one year</b>	<b>81,501</b>	<b>140,826</b>
Less:		
Amounts unavailable for general expenditures within one year, due to:		
Restricted by donors in perpetuity	(2,500)	(2,500)
Restricted by donors with purpose restrictions	(5,931)	(6,101)
Refundable advances - NFMC	(119)	(729)
Refundable advances - grants and contracts	(6,728)	(10,859)
Refundable advances - shared equity	(2,922)	(3,024)
Refundable advances - American Rescue Plan	(56,880)	(99,347)
Pass-through amounts for LIFT program	(33)	(14,007)
<b>Total amounts unavailable for general expenditures within one year</b>	<b>(75,113)</b>	<b>(136,567)</b>
<b>Total financial assets available to management for general expenditure within one year</b>	<b>\$ 6,388</b>	<b>\$ 4,259</b>

**Investments**

Investments are reported at fair value. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. See Note 9 for discussion of fair value measurements. The investment policy of the board of directors' limits investment of the Corporation's funds to U.S. Treasury and Federal Agency Securities or mutual funds consisting of such securities.

Included in investments on the statements of financial position are endowment funds of \$2,500 related to the George Knight Scholarship Endowment more fully described in Note 5. These funds are included as net assets with donor restrictions and are invested consistent with board policy.

Purchases and sales of securities are recorded on a trade-date basis and interest income is recorded on the accrual basis. Investment income or loss is included in the change in net assets without donor restrictions unless their use is restricted by donor stipulations or by law.

**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**

**Notes to Financial Statements (Amounts in \$000's)**

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***Receivables***

***Contributions*** - Contributions receivable consists of amounts due from private corporations and foundations. Unconditional promises to give that are expected to be collected within one year are recorded at their net realizable value. Unconditional promises to give that are expected to be collected in future years are recorded at the present value of estimated future cash flows when the difference between present and nominal value is material. The discounts on those amounts are computed using risk-free interest rates applicable to the years in which the promises are received. Conditional promises to give are not included as support until the conditions are substantially met. There were no long-term receivables at September 30, 2022 and 2021.

***Grants and Contracts*** - Grant and contract receivables consist of amounts due from federal agencies, corporations, and foundations resulting from allowable expenditures incurred which have not been recovered as of the end of the fiscal year.

***Other Receivables*** - Other receivables consist of contracts and miscellaneous receivables from sources other than federal agencies and donor corporations and foundations.

***Allowance for Doubtful Accounts*** - The Corporation uses the allowance method to provide for receivables deemed uncollectible based on management's evaluation of potential uncollectible amounts at year-end. Contributions, grants, and contracts receivable due from federal and state government agencies, foundations and major corporations are generally deemed collectible and no allowance was established for such receivables at September 30, 2022 and 2021. Other receivables are evaluated as to their collectability using the most recent information available.

***Property and Equipment***

Property and equipment consist primarily of computer equipment and related software, furniture and fixtures, and leasehold improvements. Property and equipment is recorded at cost, which includes all costs required to put the asset into service. The Corporation capitalizes all expenditures for property and equipment with a per-unit cost over \$5. Depreciation and amortization are computed using the straight-line method over the estimated useful lives of the assets, which range from 3 to 10 years, or the lesser of the minimum lease period or the asset's useful life for leasehold improvements. When assets are sold or otherwise disposed of, the asset and the related accumulated depreciation and amortization are removed from the accounts and any remaining gain or loss is included in operations. Repairs and maintenance are charged to expense when incurred.

Certain costs of internally developed software are capitalized and once the development project is complete and the software put into service, these costs are amortized over the estimated useful lives of the software, which range from 3 to 5 years.

***Impairment of Long-Lived Assets***

The Corporation reviews long-lived assets for impairment whenever events or changes in circumstances indicate the carrying amount of an asset may not be recoverable. Recoverability of assets to be held and used is measured by a comparison of the carrying amount of an asset to future undiscounted net cash flows expected to be generated by the asset. If such assets are considered to be impaired, the impairment to be recognized is measured by the amount by which the carrying amount of the assets exceeds the fair value of the assets. Assets to be disposed of are reported at the lower of carrying amount or the fair value less costs to sell.

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**Notes to Financial Statements (Amounts in \$000's)**

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***Financial Instruments and Credit Risk***

Financial instruments which potentially subject the Corporation to concentrations of credit risk consist principally of cash and cash equivalents held at creditworthy financial institutions short-term investments, and receivables. At September 30, 2022 and 2021, substantially all of the Corporation's cash and cash equivalents were held at financial institutions in accounts over the Federal Deposit Insurance Corporation (FDIC) limits. Amounts in excess of the FDIC insured limit totaled approximately \$66,300 as of September 30, 2022.

Short-term investments are subject to market fluctuations that may materially affect the investment balance. Credit risk with respect to contributions receivable, grants receivable and other receivables is limited due to the nature of the grantor, typically the federal government, its Agencies and large financial institutions, and the fact that the Corporation's private donors are dispersed over a large geographic area.

***Major Source of Funding***

The Corporation receives a substantial portion of its revenue from congressional appropriations, 92% for each of the years ended September 30, 2022 and 2021. The continued receipt of the appropriation may be dependent upon future overall economic and political conditions and while the Corporation's management anticipates that it will continue to have access to the resources necessary to carry out its programs in their current form, its ability to do so and the extent to which it continues, may be dependent on the above factors.

***Conditional Grants Made***

The Corporation has awarded several HUD certified housing counseling organizations to provide pre and post purchase housing counseling programs. At September 30, 2022 and 2021, the Corporation has accrued \$759 and \$73, respectively, in grant commitments.

***Refundable Advances***

Refundable advances consists of shared equity, National Foreclosure Mitigation Counseling (NFMC), American Rescue Plan (ARP), and conditional contributions grants for which the conditions have not been met, and uncommitted grants of NFMC and ARP under congressional appropriations. Grants and conditional contributions received in advance for which the conditions have not been met are refundable until those conditions are met. Congressional appropriations for the NFMC and ARP, received but not yet awarded to sub-recipients, are refundable until the awards are made. At September 30, 2022 and 2021, the Corporation has refundable advances totaling to \$66,649 and \$113,959, respectively.

***Deferred Revenue***

Deferred revenue consists of training registration fees and unearned contract revenue. Training registration fees and contract revenue received in advance and not yet earned are deferred to the applicable period.

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***Deferred Rent Liability***

The Corporation leases office space under long arrangements which contain rent abatements, escalation clauses and tenant build-out allowances. Rent expense is recognized on a straight-line basis over the life of the underlying lease taking into consideration all such adjustments. The difference between the contractual cash liability and rent expense is recorded as deferred rent liability on the statements of financial position. The liability is amortized as an adjustment to rent expense over the life of the underlying lease.

***Net Assets***

***a) Net Assets Without Donor Restrictions***

Net assets without donor restrictions include resources available for general operations of the Corporation, invested primarily in its property and equipment, or designated by the board of directors for a specific use and is not subject to donor-imposed restrictions.

***b) Net Assets With Donor Restrictions***

Net assets with donor restrictions consist of assets whose use is limited by donor-imposed restrictions. Additionally, some restrictions stipulate that resources be maintained perpetuity but permit the Corporation to expend the income generated in accordance with the provisions of the agreements.

Revenues are reported as increases in net assets without donor restrictions unless use of the related assets is limited by donor-imposed purpose or time restrictions. Donor-restricted contributions, where it is anticipated that such restrictions will be met in the current reporting period, are recorded as with donor restrictions in the period recognized. Expirations of donor-imposed restrictions on net assets (i.e., the donor-stipulated purpose has been fulfilled or the stipulated time period has elapsed) are reported as reclassifications between the applicable classes of net assets. Expenses are reported as decreases in net assets without donor restrictions.

***Pass-Through Liability***

Under certain agency agreements, the Corporation receives assets from the donor and agrees to use those assets on behalf of or transfer those assets, the return on investment of those assets, or both to a specified beneficiary. When such agency agreements are without variance power, the Corporation records the receipt and disbursement of funds on the statements of financial position as a pass-through liability. Accordingly, there is no impact on the statements of activities for such grants.

***Revenue Recognition***

The Corporation is funded through several different sources: congressional appropriations, grants and contracts from government agencies, corporations and foundations, contributions, training registration fees, sale of publications and subscriptions, performance of miscellaneous consulting services, and investment income.

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**Congressional Appropriations** - The Corporation's primary source of funding is through congressional appropriations. Without donor restricted congressional appropriations are recognized as contribution revenue without donor restrictions when the legislation is enacted. Appropriations under the NFMC and ARP programs are considered to be conditional contributions and are recognized as refundable advances and recognized as revenue as related program grant commitments are made and allowable operating expenses incurred.

**Grants** - Grants revenue is comprised of conditional contributions for cost reimbursable federal grants recognized under reimbursement of allowable cost and milestone arrangements on a systematic basis as qualifying costs are incurred or contractual milestones are reached and customer concurrence, if required, has occurred.

**Contributions** - The Corporation recognizes all unconditional contributed support in the reporting period in which the commitment is made. The Corporation reports gifts of cash and other assets as revenue with donor restrictions if they are received with donor stipulations that limit the use of the donated assets. The Corporation also reports investment income on funds with donor restrictions as revenue with donor restrictions. When expenses in accordance with the donors' restrictions are incurred, net assets with donor restrictions are reclassified to net assets without donor restrictions and reported in the statements of activities as net assets released from restrictions. Amounts that have not been collected as of year-end are included in contributions receivable in the accompanying statements of financial position. Conditional contributions are recognized when the conditions are substantially met. At September 30, 2022 and 2021, conditional contributions totaling to \$7,258 and \$11,584, respectively, are available to the Corporation. Revenue related to these conditional contributions will be recognized once the contractual obligations to provide the services have been satisfied.

The Corporation recognizes revenue when it satisfies a performance obligation by transferring a promised good to, or performing a service for, a customer. The amount of revenue recognized reflects the consideration the Corporation expects to receive in exchange for satisfying distinct performance obligations. If a performance obligation does not meet the criteria to be considered distinct, the Corporation combines it with other performance obligations until a distinct bundle of goods or services exists. The Corporation expects that the period between when the Corporation transfers goods and services to their customers and when the customers pay for those goods and services will be one year or less. Therefore, the Corporation has elected the practical expedient not to adjust the promised amount of consideration for the effects of a significant financing component. Amounts received in advance of services performed, but not yet earned, are recorded as deferred revenue.

**Training Registration Fees** - Training registration revenue includes revenue from registrations related to trainings. Performance obligations are satisfied at a point in time, the time of the training, when the services are transferred. Discounts are not offered. Refunds are allowed for registrations within 14 days before the conference. Refunds are not significant. Therefore, no refund liability was recorded. Payment is primarily due at the time of registration.

**Contracts** - Contract revenue includes placed based training, success measures, and other fee-for-service programs. Contracts revenue is recognized over time as the Corporation incurs time and expense, the input method. Amounts paid in advance are recorded as a liability until the services are provided to the customer.

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**Publications** - For publication fees, the transaction price is the price charged by the Corporation for Realizing the American Dream and Keeping the American Dream publications. These books are sold through a third-party where payment is due when the publication is ordered. The third-party vendor also distributes the publications to the customer for a fee. Upon the customer's purchase of the publication, the Corporation defers the revenue until the date the third-party ships the publication at which time the Corporation's performance obligation has been completed and, as such, the Corporation recognizes revenue at a point in time, on the shipping date. Amounts paid in advance are recorded as a liability until the goods are provided to the customer. Refunds are allowed within 30 days. Refunds are not significant therefore no refund liability was recorded.

**Subscriptions** - Under the terms of the subscription software license agreement, the Corporation will give the customer access to proprietary software and related resources for a specified period of time, usually one year. Subscription fees are recognized as revenue over the subscription period. The Corporation's performance obligation in the contract is the "stand ready obligation" to provide access to the software for the subscription period. The Corporation providing the "stand ready obligation" for use of the software over the subscription period represents a single performance obligation of which the Corporation expects the customer to receive and consume the benefits of its obligation ratably, and as such, the Corporation recognizes subscription fees ratably over time, the subscription period, using the output method. Refunds may be requested within 90 days of receipt of the order and are reviewed for approval on an individual basis. Refunds are not significant, and therefore no refund liability has been recorded.

**Investment Returns, Net** - Investment returns are recognized when earned. Unrealized and realized gains and losses and interest and dividends netted against external and direct internal investment expenses are included in the investment returns, net, in the statements of activities.

**Functional Allocation of Expenses**

Costs of program activities and supporting services are presented on a functional basis. Accordingly, certain direct and indirect expenses have been allocated among the programs and supporting services benefited.

Expenses incurred by Programs, General and Administrative, and Resource Development are directly recorded to their respective departments. The General and Administrative expenses are allocated to programs and resource development based on time and effort. See Note 1 for description of program services and below for description of supporting services.

**General and Administrative**

In accordance with the National Affordable Housing Act (P.L. 101-625), the Corporation's administrative expenses are consistently held to less than 15% of expenditures. These expenses include the offices of the chief executive officer, the chief operating officer, the chief financial officer and the general counsel as well as the finance, information management, public policy and legislative affairs, human resources, and administrative services units.

**Resource Development**

This supporting service category includes expenditures which provide the structure necessary to encourage and secure private financial support.

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**Notes to Financial Statements (Amounts in \$000's)**

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***Use of Estimates***

The preparation of the financial statements in conformity with U.S. GAAP requires management to make estimates and assumptions that affect certain reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates.

***Income Taxes***

The Corporation is exempt from federal income taxes under provisions of Section 501(c)(3) of the Internal Revenue Code. In addition, the Corporation has been classified by the Internal Revenue Service as a publicly supported organization under Section 509(a)(1) of the Internal Revenue Code. The Corporation follows the income tax standard for uncertain tax positions. Income tax benefits are recognized for income tax positions taken or expected to be taken in a tax return, only when it is determined that the income tax position will more-likely-than-not be sustained upon examination by taxing authorities. The Corporation has analyzed tax positions taken for filing with the Internal Revenue Service and all state jurisdictions where it operates. The Corporation believes that income tax filing positions will be sustained upon examination and does not anticipate any adjustments that would result in a material adverse effect on the Corporation's financial position, results of activities or cash flows. Accordingly, the Corporation has not recorded any reserves or related accruals for interest and penalties for uncertain income tax positions at September 30, 2022 and 2021.

***Fair Value***

Certain financial instruments are required to be recorded at fair value. Changes in assumptions or estimation methods could affect the fair value estimates; however, management does not believe any such changes would have a material impact on the Corporation's financial condition, results of operations or cash flows. Cash equivalents are recorded at cost, which approximates fair value. The fair values of investments held by the endowment fund are disclosed in Note 9.

***Recently Adopted Accounting Pronouncements***

In September 2020, the Financial Accounting Standards board (FASB) issued Accounting Standards Update (ASU) 2020-07: *Presentation and Disclosures by Not-for-Profit Entities for Contributed Nonfinancial Assets*. The update enhances the presentation and disclosure of such contributed non-financial assets without changing existing recognition and measurement requirements. Management has adopted this standard retrospectively during the year ended September 30, 2022. The adoption of this update did not have a material effect on the financial statements.

***Recent Accounting Pronouncements Not Yet Adopted***

In February 2016, the FASB issued ASU 2016-02, *Leases (Topic 842)*. This ASU requires a lessee to record, for all leases with a lease term of more than 12 months, an asset representing its right to use the underlying asset for the lease term and a liability to make lease payments. For leases with a lease term of 12 months or less, a practical expedient is available whereby a lessee may elect, by class of underlying asset, not to recognize a right-of-use asset or lease liability. A lessee making this accounting policy election would recognize lease expense over the term of the lease, generally in a straight-line pattern. This guidance is effective for financial statements issued for fiscal years beginning after December 15, 2019. Early adoption is permitted. In transition, a lessee and a lessor

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**Notes to Financial Statements (Amounts in \$000's)**

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will recognize and measure leases at the beginning of the earliest period presented using a modified retrospective approach. The modified retrospective approach includes a number of optional practical expedients. These practical expedients relate to identifying and classifying leases that commenced before the effective date, initial direct costs for leases that commenced before the effective date, and the ability to use hindsight in evaluating lessee options to extend or terminate a lease or to purchase the underlying asset. ASU 2018-11 was issued in June 2018 that also permits entities to choose to initially apply ASU 2016-02 at the adoption date and recognize a cumulative-effect adjustment to the opening balance of net assets in the period of adoption. ASU 2016-02 is effective for the Corporation's fiscal year 2023. Management is currently evaluating the impact of this ASU on the financial statements.

In June 2016, the FASB issued ASU 2016-13, *Financial Instruments - Credit Losses (Topic 326), Measurement of Credit Losses on Financial Instruments*. This update, along with ASU 2018-19, *Codification Improvements to Topic 326, Financial Instruments - Credit Losses* changes the impairment model for most financial assets that are measured at amortized cost and certain other instruments from an incurred loss model to an expected loss model. Entities will be required to estimate credit losses over the entire contractual term of an instrument. An entity must apply the amendments in the ASU through a cumulative-effect adjustment to net assets as of the beginning of the first reporting period in which the guidance is effective except for certain exclusions. ASU 2016-13 is effective for the Corporation's fiscal year 2024. Management is currently evaluating the impact of this ASU on the financial statements.

The Corporation has assessed other accounting pronouncements issued or effective during the year ended September 30, 2022 and deemed they were not applicable to the Corporation or are not anticipated to have a material effect on the financial statements.

### 3. Property and Equipment

Property and equipment consist of the following:

<i>September 30,</i>	<b>2022</b>	<b>2021</b>
Computer and software equipment	\$ 5,732	\$ 5,564
Leasehold improvements	10,055	10,055
Furniture and fixtures	1,226	1,226
Total property and equipment at cost	17,013	16,845
Less: accumulated depreciation and amortization	(15,794)	(14,608)
Total property and equipment, net	\$ 1,219	\$ 2,237

Depreciation and amortization expense for the years ended September 30, 2022 and 2021 was \$1,186 and \$951, respectively.



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**4. Net Assets With Donor Restrictions**

At September 30, 2022 and 2021, net assets with donor restrictions consist of the following:

	<b>2022</b>	<b>2021</b>
Purpose restricted:		
Wells Fargo	\$ 2,415	\$ 3,932
JP Morgan Chase	1,180	-
Walton Family Foundation	761	-
Fifth Third Foundation	649	1,000
RW Johnson	447	733
Scholarship/Endowment	120	127
Kresge	57	-
First Republic	52	-
Morgan Stanley	46	106
American Express	-	100
All others	204	103
<b>Total purpose restricted</b>	<b>5,931</b>	<b>6,101</b>
<b>Perpetual in nature</b>	<b>2,500</b>	<b>2,500</b>
<b>Total net assets with donor restrictions</b>	<b>\$ 8,431</b>	<b>\$ 8,601</b>

During the years ended September 30, 2022 and 2021, net assets released from donor restriction consist of the following:

	<b>2022</b>	<b>2021</b>
Purpose restrictions accomplished:		
Wells Fargo	\$ 4,312	\$ 6,974
JP Morgan Chase	3,868	-
Fifth Third Foundation	411	30
RW Johnson	287	66
Kresge	193	348
American Express	100	-
Morgan Stanley	60	61
First Republic	48	-
Walton Family Foundation	21	-
Republic Services Charitable Foundation	-	879
Capital One	-	53
All others	606	526
<b>Total purpose restricted</b>	<b>9,906</b>	<b>8,937</b>
<b>Total net assets released from donor restrictions</b>	<b>\$ 9,906</b>	<b>\$ 8,937</b>

**Neighborhood Reinvestment Corporation**  
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**Notes to Financial Statements (Amounts in \$000's)**

**5. Endowment**

The Corporation received \$2,500 as part of the 2001 Congressional Appropriation for the purpose of establishing The George Knight Scholarship Endowment and funding Training Institute scholarships. The Endowment funds' principal balances will remain in perpetuity, while interest income from the endowments will be used to fund Training Institute scholarships.

*Interpretation of Relevant Law*

The board of directors of the Corporation has interpreted the State Prudent Management of Institutional Funds Act (SPMIFA) as requiring the preservation of the fair value of the original gift as of the gift date of the donor-restricted endowment funds absent explicit donor stipulations to the contrary. As a result of this interpretation, the Corporation classifies as net assets with donor restriction (a) the original value of gifts donated to the donor-restricted endowment, (b) the original value of subsequent gifts to the donor-restricted endowment, and (c) accumulations to the donor-restricted endowment made in accordance with the direction of the applicable donor gift instrument at the time the accumulation is added to the fund. The remaining portion of the donor-restricted endowment fund remain as net assets with donor restriction until those amounts are appropriated for expenditure by the Corporation. The Corporation reports these funds in accordance with, Endowments of Not-for-Profit Organizations: *Net Asset Classification of Funds Subject to an Enacted Version of the Uniform Prudent Management of Institutional Funds Act (UPMIFA), and Enhanced Disclosures for All Endowment Funds*. These endowment funds are invested in highly rated Federal Agency securities consistent with board policy. The returns on the endowment funds invested have been included in net assets with donor restrictions' investment returns on the statements of activities.

*Endowment Net Asset Composition and Changes in Balances*

The following table represents the composition of the Corporation's endowment by net asset class and the changes in donor restricted endowment funds at September 30, 2022 and 2021.

	<b>Subject to Spending Policy and Appropriation</b>	<b>Perpetual in Nature</b>	<b>Total</b>
Endowment net assets, September 30, 2020	\$ 124	\$ 2,500	\$ 2,624
Investment income	3	-	3
Amounts appropriated for expenses	-	-	-
Endowment net assets, September 30, 2021	\$ 127	\$ 2,500	\$ 2,627
Investment return, net	(7)	-	(7)
Amounts appropriated for expenses	-	-	-
Endowment net assets, September 30, 2022	\$ 120	\$ 2,500	\$ 2,620

# Neighborhood Reinvestment Corporation (d.b.a. NeighborWorks® America)

## Notes to Financial Statements (Amounts in \$000's)

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### *Return Objectives and Risk Parameters*

By policy, the endowment fund assets are invested and maintained in a balanced investment program. The primary objective of the board of directors for managing the investment process is to preserve principal and provide reasonable returns. The board of directors consider the combination of broad asset classes; reduction of risk through diversification; and then select the portfolio that may obtain the highest return given an acceptable level of risk within established corporate investment policies.

The endowment assets are invested in a manner that balances the following investing objectives:

1. **Capital Preservation:** the achievement of adequate investment growth such that the purchasing power of the principal amount of the endowment assets is maintained over a reasonable time horizon.
2. **Liquidity:** the generation of interest and dividends to provide sufficient cash flow and liquidity to fund distribution requirements.
3. **Yield:** the achievement of growth in such a manner to protect the endowment assets from excessive volatility in market value from year to year.

### *Spending Policy*

In order to protect the restricted endowments against losses and to ensure relative stability in its annual earnings (which are needed to fund the Training Institute scholarships), management invests the funds in government secured instruments consistent with the Corporation's investment policies.

## **6. Capital Corporations**

**Community Housing Capital:** Community Housing Capital is a national intermediary serving as a direct lender to the NeighborWorks® network, providing financing for the development and preservation of single-family and multi-family affordable housing. Grants made by the Corporation to Community Housing Capital amounted to \$3,000 and \$2,500 for the years ended September 30, 2022 and 2021, respectively.

**NeighborWorks® Capital Corporation:** NeighborWorks® Capital Corporation (NWCC) is an independently incorporated tax-exempt nonprofit organization and certified Community Development Financial Institution (CDFI). NWCC serves the NeighborWorks® network by developing and enhancing resources for the acquisition, development, sale, financing or ownership of affordable single- and multi-family properties and commercial projects. Grants made by the Corporation to NWCC amounted to \$3,000 and \$2,500 for the years ended September 30, 2022 and 2021, respectively.

## **7. Commitments and Contingencies**

### *Operating Leases*

On June 1, 2013, the Corporation entered into a 10-year lease agreement for its main headquarters office, which expires in May 2023. The lease provides for a tenant improvement allowance of approximately \$4,900 and one-year rent abatement. On December 17, 2021, the Corporation

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**Notes to Financial Statements (Amounts in \$000's)**

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elected to exercise the termination option for its main headquarters making the termination of the current office lease effective December 31, 2022.

On December 17, 2021, the Corporation entered into a twelve-year lease agreement for its main headquarters commencing in December 2022 and expiring May 2035. The lease provides a two-year rent abatement with one-year of the two-year rent abatement convertible for additional tenant improvement allowance in the amount of \$3,365, which the Corporation has the intent and ability to exercise, to result in a one-year rent abatement and escalation clauses of 2.5% annually. The Corporation also has other lease agreements with regional offices expiring at various times through 2025.

In accordance with authoritative guidance issued by the FASB, the Corporation recognizes the total cost of its office lease ratably over the lease period. The difference between rent paid and that expensed is reflected as deferred rent liability in the accompanying statements of financial position and is amortized over the term of the lease.

Minimum lease payments under non-cancelable operating leases are as follows:

*Years ending September 30,*

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2023	\$	3,311
2024		3,529
2025		2,068
2026		3,863
2027		3,868
Thereafter		31,269
	\$	47,908

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Occupancy expense for the years ended September 30, 2022 and 2021, amounted to \$3,433 and \$3,733, respectively.

The Corporation is party to office equipment leases, primarily for copiers and media production equipment, which typically have a term of 60 months. Equipment lease expense for the years ended September 30, 2022 and 2021, amounted to \$132 and \$153, respectively. Commitments under noncancelable office equipment operating leases are as follows: \$141 in FY2023 and \$48 in FY2024.

*Commitments and Contingencies*

The Corporation enters into contracts for hotel accommodations and meeting space in connection with its National Training Institutes and other significant trainings up to three years in advance of the events. The contracts often carry cancellation penalties which vary in severity inversely to the date cancellation notice is given. At September 30, 2022, the Corporation had nine such contracts in place extending through fiscal 2024. The maximum penalty assuming all contracts were cancelled at the latest possible date is \$332 in FY2023 and \$457 in FY2024.

The Corporation receives funds from federal sources that are subject to audit by the Government Accountability Office (GAO). During the year ended September 30, 2022, the Corporation was informed of the GAO's intent to conduct an audit of the Corporation's year ended September 30,

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2021 and the GAO audit is ongoing as of the date of this report. At the completion of the GAO's audit of the Corporation's year ended September 30, 2021, management does not believe that any material adjustments will be necessary.

As per the Recapture and De-obligation Procedure of the NFMC program, in the event that counseling demand falls short of the goals projected in the Grantee's application and Grant Agreement or in the event that the grantee does not comply with the terms and conditions of the grant as outlined in the Final Funding Announcement, Notice of Intent to Award Funds, and Grant Agreement, the Corporation may recapture funds already distributed to the Grantee and/or rescind its obligation to distribute un-disbursed awarded funds to the grantee. Pursuant to this procedure, subsequent to year-end, some organizations have voluntarily returned funds or requested funds to be de-obligated. In the ordinary course of activities, the Corporation is party to various legal and administrative actions, including employment matters and claims by organizations in the NeighborWorks® network. In the opinion of management, the potential adverse impact of these legal and administrative actions is insignificant to the financial statements of the Corporation.

## **8. Retirement Plan**

The Corporation has a defined contribution retirement plan subject to independent audit which meets the requirements of Section 401(k) of the U.S. Internal Revenue Code. Each eligible participant may enter into a salary deferral agreement with the Corporation in an amount equal to but not less than 1% or more than 75% of his or her compensation for the contribution period capped at the legal allowable maximum dollar deferral. The Corporation matches each eligible participant's pre-tax contributions at 100% up to a maximum of 6%, and this matching contribution is 100% vested. The Corporation may also contribute a discretionary amount equal to 6% of the social security integration level in effect and 11.7% of each eligible participant's compensation in excess of the social security integration level. This discretionary employer contribution to eligible participants has a 5-year vesting schedule as follows: 20% year 2; 40% year 3; 80% year 4; and 100% year 5. Employees may also borrow against their vested benefits. Employees are eligible for both the discretionary and matching contributions after one year of service.

Total retirement plan expense for fiscal years 2022 and 2021 were \$3,333 and \$3,676, respectively.

## **9. Fair Value Measurements**

A fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value is established by generally accepted accounting principles. The hierarchy gives the highest priority to unadjusted quoted prices in active markets for identical assets or liabilities (Level 1 measurements) and the lowest priority to unobservable inputs (Level 3 measurements). The three levels of the fair value hierarchy under generally accepted accounting principles are described as follows:

### *Basis of Fair Value Measurement*

Level 1 - Inputs to the valuation methodology are unadjusted quoted prices for identical assets or liabilities in active markets that the Corporation has the ability to access. Since valuations are based on quoted prices that are readily and regularly available in an active market, valuation of these products does not entail a significant degree of judgment.

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**Notes to Financial Statements (Amounts in \$000's)**

Level 2 - Inputs to the valuation methodology include: (1) quoted prices for similar assets or liabilities in active markets; (2) quoted prices for identical or similar assets or liabilities in inactive markets; (3) inputs other than quoted prices that are observable for the asset or liability; and (4) inputs that are derived principally from or corroborated by observable market data by correlation or other means.

Level 3 - Inputs to the valuation methodology are unobservable and significant to the fair value measurement.

The asset's or liability's fair value measurement level within the fair value hierarchy is based on the lowest level of any input that is significant to the fair value measurement. Valuation techniques used need to maximize the use of observable inputs and minimize the use of unobservable inputs.

The following tables set forth by level, within the fair value hierarchy, the Corporation's short-term investments at fair value as of September 30, 2022 and 2021. Assets are classified in their entirety based on the lowest level of input that is significant to the fair value measurement.

Description	Quoted Prices in Active Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Other Unobservable Inputs (Level 3)	Balance as of September 30, 2022
Freddie Mac US Bonds Domestic Unsecured	\$ -	\$ 2,494	\$ -	\$ 2,494
<b>Total</b>	<b>\$ -</b>	<b>\$ 2,494</b>	<b>\$ -</b>	<b>\$ 2,494</b>

Description	Quoted Prices in Active Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Other Unobservable Inputs (Level 3)	Balance as of September 30, 2021
Freddie Mac US Bonds Domestic Unsecured	\$ -	\$ 2,503	\$ -	\$ 2,503
<b>Total</b>	<b>\$ -</b>	<b>\$ 2,503</b>	<b>\$ -</b>	<b>\$ 2,503</b>

Government securities classified as Level 2 are valued using quoted market prices for similar assets and liabilities in active markets. There are no unfunded commitments at September 30, 2022 and 2021.

**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**

**Notes to Financial Statements (Amounts in \$000's)**

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## **10. Separation Plan**

The Corporation will provide pay to separated employees under the following involuntary separation conditions:

*Severance* - position elimination, voluntary early retirement and reduction in force.

*Transition Pay* - term-limited positions, resignation in lieu of termination for performance-based or for cause terminations, declination to relocate with position move (outside of existing commuting area) or resignation due to other mutual decision to end the employment relationship.

Employees who are terminated for any other reasons (i.e., performance, cause, misconduct) will not be eligible for severance or transition pay.

In the event an employee accepts other employment with the Corporation prior to the date of a position elimination or reduction in force, the employee will not be eligible for severance pay. If an employee is rehired after separation, he or she may be required to reimburse the severance pay on a pro rata basis, based on whether the total number of weeks on severance pay was more than the number of weeks in which the employee was not employed by the Corporation. The method of repayment will be considered on a case-by-case basis. Further, an employee will be considered to have voluntarily resigned and will not be eligible for severance pay if he or she rejects the Corporation's offer of employment within the same commuting area and pay classification prior to separation.

The Corporation entered into separation agreements with five and three employees, for a total of \$43 and \$226, during the years ended September 30, 2022 and 2021, respectively. As a result of these agreements, the Corporation made payments totaling \$19 and \$164 during the years ended September 30, 2022 and 2021, respectively. The Corporation entered into separation agreements during the years ended September 30, 2022 and 2021 that cross over into the subsequent year and were accrued at September 30, 2022 and 2021, totaling \$24 and \$62, respectively.

## **11. Subsequent Events**

Subsequent events were evaluated through June 30, 2023, which is the date the financial statements were available to be issued. There were no events noted that required adjustment or disclosure to these financial statements.

**Schedule of Expenditures of Federal Awards**

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**Neighborhood Reinvestment Corporation  
(d.b.a. NeighborWorks® America)**

**Schedule of Expenditures of Federal Awards**

*Year ended September 30, 2022*

<i>Federal Grantor/Pass-Through Grantor/Program or Cluster Title</i>	<i>Federal Assistance Listing/ Public Law Number</i>	<i>Provided to Subrecipients</i>	<i>Total Federal Expenditures</i>
<b>Congressional Appropriations Program:</b>			
NeighborWorks® System Program			
FY 2022 Appropriation	21.U01 / PL# 117.103	\$ 106,350,000	\$ 163,000,000
FY 2022 Shared Equity	21.U02 / PL# 117.103	1,000,000	1,000,000
FY 2021 Shared Equity	21.U02 / PL# 116.260	1,267,500	1,322,524
FY 2020 Shared Equity	21.U02 / PL# 116.94	560,500	755,435
FY 2019 Shared Equity	21.U02 / PL# 116.6	-	23,927
COVID-19 - American Rescue Plan	21.U04 / PL# 117.2	39,043,665	42,467,361
<b>Total NeighborWorks® System Program</b>		<b>148,221,665</b>	<b>208,569,247</b>
NeighborWorks® National Foreclosure Mitigation Counseling Program			
	21.U03 / PL# 114.113	388,322	610,678
<b>Total Congressional Appropriations Program</b>		<b>148,609,987</b>	<b>209,179,925</b>
<b>U.S. Department of Housing and Urban Development:</b>			
Housing Counseling Assistance Program	14.169	2,612,881	2,927,632
Housing Counseling Training Program	14.316	176,947	649,480
<b>Total U.S. Department of Housing and Urban Development</b>		<b>2,789,828</b>	<b>3,577,112</b>
<b>Corporation for National and Community Service:</b>			
Volunteers in Service to America	94.013	-	131,391
<b>Total Expenditures of Federal Awards</b>		<b>\$ 151,399,815</b>	<b>\$ 212,888,428</b>

*See notes to schedule of expenditures of federal awards.*

**Neighborhood Reinvestment Corporation  
(d.b.a. NeighborWorks® America)**

**Notes to Schedule of Expenditures of Federal Awards  
Year Ended September 30, 2022**

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**1. Basis of Presentation**

The accompanying Schedule of Expenditures of Federal Awards (the Schedule) includes the federal grant activity of Neighborhood Reinvestment Corporation (d.b.a. NeighborWorks® America) (the Corporation) under programs of the federal government for the year ended September 30, 2022. The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the Schedule presents only a selected portion of the operations of the Corporation, it is not intended to and does not present the statements of financial position, change in net assets or cash flows of the Corporation.

**2. Summary of Significant Accounting Policies**

Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

**3. Indirect Cost Rate**

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

**4. Federal Endowments**

The federal endowments listed in the Schedule are administered directly by the Corporation, and balances and transactions relating to these programs are included in the Corporation's financial statements. There were no transactions impacting the endowment balance during 2022.

**Independent Auditor's  
Reports Required by  
*Government Auditing Standards*  
and the Uniform Guidance**

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**Independent Auditor's Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with *Government Auditing Standards***

To the Board of Directors  
**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**  
Washington, D.C.

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of **Neighborhood Reinvestment Corporation (d.b.a. NeighborWorks® America)** (the Corporation), which comprise the Corporation's statement of financial position as of September 30, 2022, and the related statements of activities, functional expenses and cash flows for the year then ended, and the related notes to the financial statements, and have issued our report thereon dated June 30, 2023.

**Report on Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the Corporation's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Corporation's internal control. Accordingly, we do not express an opinion on the effectiveness of the Corporation's internal control.

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

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

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## **Report on Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the Corporation's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed an instance of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which is described in the accompanying schedule of findings and questioned costs as item **2022-001**.

## **Corporation's Response to Findings**

*Government Auditing Standards* requires the auditor to perform limited procedures on the Corporation's response to the findings identified in our audit and described in the accompanying schedule of findings and questioned costs. The Corporation's response was not subjected to the other auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on the response.

## **Purpose of This Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the Corporation's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Corporation's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

*BDO USA, LLP*

June 30, 2023



## **Independent Auditor's Report on Compliance for the Major Federal Program and Report on Internal Control Over Compliance Required by the Uniform Guidance**

To the Board of Directors  
**Neighborhood Reinvestment Corporation**  
**(d.b.a. NeighborWorks® America)**  
Washington, D.C.

### **Report on Compliance for the Major Federal Program**

#### ***Qualified Opinion***

We have audited **Neighborhood Reinvestment Corporation (d.b.a. NeighborWorks® America)**'s (the Corporation) compliance with the types of compliance requirements identified as subject to audit in the OMB *Compliance Supplement* that could have a direct and material effect on the Corporation's major federal program for the year ended September 30, 2022. The Corporation's major federal program is identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

#### ***Qualified Opinion on the Congressional Appropriations Program***

In our opinion, except for the noncompliance described in the Basis for Qualified Opinion section of our report, the Corporation complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on the Congressional Appropriations Program for the year ended September 30, 2022.

#### ***Basis for Qualified Opinion***

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America (GAAS); the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of the Corporation and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified opinion on compliance for the major federal program. Our audit does not provide a legal determination of the Corporation's compliance with the compliance requirements referred to above.



### *Matter Giving Rise to Qualified Opinion on the Congressional Appropriations Program*

As described in the accompanying schedule of findings and questioned costs, the Corporation did not comply with requirements regarding the Congressional Appropriations Program (Assistance Listing Nos. 21.U01, 21.U02, 21.U03, and 21.U04) as described in finding number **2022-001** for Procurement, Suspension and Debarment.

Compliance with such requirements is necessary, in our opinion, for the Corporation to comply with the compliance requirements applicable to that program.

### ***Responsibilities of Management for Compliance***

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules and provisions of contracts or grant agreements applicable to the Corporation's federal programs.

### ***Auditor's Responsibilities for the Audit of Compliance***

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the Corporation's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material, if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the Corporation's compliance with the requirements of the major federal program as a whole.

In performing an audit in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the Corporation's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of the Corporation's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of the Corporation's internal control over compliance. Accordingly, no such opinion is expressed.



We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

### **Report on Internal Control Over Compliance**

Our consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance and, therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we did identify a certain deficiency in internal control over compliance that we consider to be a material weakness.

*A deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. We consider the deficiency in internal control over compliance described in the accompanying schedule of findings and questioned costs as item **2022-001** to be a material weakness.

*A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

*Government Auditing Standards* requires the auditor to perform limited procedures on the Corporation's response to the internal control over compliance finding identified in our audit described in the accompanying schedule of findings and questioned costs. The Corporation's response was not subjected to the other auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

The Corporation is responsible for preparing a corrective action plan to address the audit finding included in our auditor's report. The Corporation's corrective action plan was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on it.





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

*BDO USA, LLP*

June 30, 2023

**Neighborhood Reinvestment Corporation  
(d.b.a. NeighborWorks® America)**

**Schedule of Findings and Questioned Costs  
Year Ended September 30, 2022**

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**Section I - Summary of Auditor's Results**

***Financial Statements***

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

Unmodified

Internal control over financial reporting:

- Material weakness(es) identified? \_\_\_\_\_ yes      X   No
- Significant deficiency(ies) identified? \_\_\_\_\_ yes      X   none reported

Noncompliance material to financial statements noted?   X   yes    \_\_\_\_\_ No

***Federal Awards***

Internal control over the major federal program:

- Material weakness(es) identified?   X   yes    \_\_\_\_\_ No
- Significant deficiency(ies) identified? \_\_\_\_\_ yes      X   none reported

Type of auditor's report issued on compliance for the major federal program:

Qualified

Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?

  X   yes    \_\_\_\_\_ No

Identification of the major federal program:

<u>Assistance Listing Number(s)</u>	<u>Name of Federal Program or Cluster</u>
	Congressional Appropriations Program:
	NeighborWorks® System Program
21.U01 / PL# 117.103	FY 2022 Appropriation
21.U02 / PL# 117.103	FY 2022 Shared Equity
21.U02 / PL# 116.260	FY 2021 Shared Equity
21.U02 / PL# 116.94	FY 2020 Shared Equity
21.U02 / PL# 116.6	FY 2019 Shared Equity
21.U04 / PL# 117.2	COVID-19 American Rescue Plan
21.U03 / PL# 114.113	National Foreclosure Mitigation Counseling Program

Dollar threshold used to distinguish between type A and type B programs:

\$3,000,000

Auditee qualified as low-risk auditee?

  X   yes    \_\_\_\_\_ No

**Neighborhood Reinvestment Corporation  
(d.b.a. NeighborWorks® America)**

**Schedule of Findings and Questioned Costs  
Year Ended September 30, 2022**

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**Section II - Financial Statement Findings**

**2022-001 Procurement, Suspension and Debarment**

*Finding:*

The Uniform Guidance requires that recipients of federal awards have adequate procedures and controls in place related to procurement and that they ensure that procedures are properly documented. Procedures should provide for full and open competition supported by a cost or price analysis. They should necessitate obtaining a vendor debarment or suspension certification and also provide for retention of files and other supporting documentation which provides evidence of compliance with specified requirements. An ineffective control system related to the procurement process can lead to noncompliance with laws and regulations.

Of the 54 samples tested, controls for 12 of our samples items did not prevent the contract from being procured noncompetitively when the 5 allowable circumstances per 2 CFR 200.320(c) did not apply to the contracts' procurement. The Corporation's controls, as designed, did not identify the instances of noncompetitive procurements. An ineffective control system related to the procurement process can lead to noncompliance with laws and regulations. The Corporation could inadvertently award contracts to vendors whose contract prices are unreasonable. Contracts awarded to invalid vendors may result in disallowed expenditures.

The Financial Statement Finding is the same finding as the Federal Award Finding 2022-001. See Section III for further details, our recommendations and management's views.

**Section III - Federal Award Findings and Questioned Costs**

**2022-001 Procurement, Suspension and Debarment**

Information on the Federal Program:

Program Name:	Congressional Appropriations Program
Federal Agency:	United States Department of Treasury
AL Number/Name:	21.U01 NeighborWorks® System Program FY 2022 Appropriation 21.U04 COVID-19 American Rescue Plan

Criteria: According to 2 CFR § 200.318(a), *General Procurement Standards*, the non-Federal entity must have and use documented procurement procedures, consistent with State and local laws and regulations, for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in the Uniform Guidance.

In addition, 2 CFR §200.318(i) states that the non-federal entity must maintain records sufficient to detail the history of the procurement. These records are required to include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price. All procurement transactions must be conducted in a manner providing full and open competition consistent with §200.319 and must be performed using the appropriate procurement method as outlined in §200.320.

# Neighborhood Reinvestment Corporation (d.b.a. NeighborWorks® America)

## Schedule of Findings and Questioned Costs Year Ended September 30, 2022

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Furthermore, 2 CFR §200.320(c), *Noncompetitive Procurement*, states that there are specific circumstances in which noncompetitive procurement can be used. Noncompetitive procurement can only be awarded if one or more of the following circumstances apply: (1) The acquisition of property or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold; (2) The item is available only from a single source; (3) The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation; (4) The Federal awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request from the non-Federal entity; or (5) After solicitation of a number of sources, competition is determined inadequate.

Condition: During our review of the Corporation's procurement policies, we noted that the Corporation's written internal procurement policies and procedures are not in conformity with the requirements identified in the Uniform Guidance procurement requirements.

During our testing of the procurement, suspension and debarment compliance requirement, we selected 54 procurement samples for testing. We noted that 12 out of the 54 procurement samples were procured by way of a noncompetitive proposal process through a solicitation from only one source under the criteria of either: (1) the item is available only from a single source or (2) there is an urgent and compelling need for the goods or services. However, based on our review of the 12 procurement files, we noted that all of the 12 procurement files do not appropriately justify the use of a noncompetitive procurement process due to the following reasons:

1. The supplies or services being procured are sold or provided by other vendors, not just by a single source.
2. Incumbency of the vendor is not a valid noncompetitive procurement justification.
3. Contracting without providing for full and open competition shall not be justified on the basis of (1) lack of advance planning by the requiring activity; or (2) concerns related to the amount of funds available for the acquisition of supplies or services.

Cause: The Corporation's personnel did not adhere to the federal requirements and the Corporation's internal procurement policies and procedures particularly on the use of noncompetitive procurements.

Effect: Failure to perform procurement procedures in accordance with the Corporation's documented policies and the procurement procedures under the Uniform Guidance procurement requirements could result in expenditures incurred being disallowed.

Questioned Costs: Not determinable.

Context: This is a condition identified per review of the Corporation's compliance with the specified requirements using a non-statistical sample. The total federal expenditures related to the 12 noncompetitive procurements is \$2,786,980 for the year ended September 30, 2022. The total contract value of the 12 noncompetitive procurements is \$13,507,008 with contract terms that ranges from 3 to 5 years. The total federal expenditures for all of the 54 procurement samples selected for testing is \$9,409,871 from a total population of expenditures subject to procurement of \$15,481,554 for the year ended September 30, 2022.

Repeat Finding: This is not a repeat finding.

Recommendation: We recommend that the Corporation update its current procurement policies and procedures to conform with the requirements identified in the Uniform Guidance procurement

**Neighborhood Reinvestment Corporation  
(d.b.a. NeighborWorks® America)**

**Schedule of Findings and Questioned Costs  
Year Ended September 30, 2022**

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requirements. In addition, the Corporation should ensure that the use of the *Noncompetitive Procurement* criteria under the Uniform Guidance procurement requirements are adhered to and appropriate justifications for these contracts are used and documented appropriately. Finally, the Corporation should have a system in place to track and monitor the terms of vendor contracts in order to plan in advance if the contracts will need to be subject to a competitive procurement process providing full and open competition as required.

Views of Responsible Officials: Management agrees with the finding and recommendations set forth within and has developed a corrective action plan to address the instances of noncompliance identified and lapses in prescribed internal controls.

## **Management Prepared Document**

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**Appendix A - Management's Corrective Action Plan  
Year Ended September 30, 2022**

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**2022-001 Procurement, Suspension and Debarment**

Contact: Joseph Wilson  
Title: SVP, Procurement  
Phone Number: 202-760-4193

Estimated completion date: September 2023

Corrective Action: Management agrees with the finding and recommendations set forth within and is nearing completion of its revised procurement policies and procedures to conform with Uniform Guidance procurement requirements. The updated procurement policy is scheduled to be released during the third quarter of the fiscal year 2023. Training on the Uniform Guidance procurement requirements has been developed and will be required for all staff with procurement responsibilities to ensure (1) adherence to Uniform Guidance and (2) that appropriate justifications for noncompetitive contracts are used and properly documented. Last, during the first quarter of the fiscal year 2023, NeighborWorks implemented a new contracts management system that will be used to manage all aspects of vendor contracts from planning to closeout, including the contract expiration date. Full transition to the new system is targeted for the end of the fiscal year 2023.