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, 2023 and 2022

The report accompanying these financial statements was issued by BDO USA, P.C., a Virginia professional corporation, and the U.S. member of BDO International Limited, a UK company limited by guarantee.

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

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Years Ended September 30, 2023 and 2022

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, 2023 and 2022, 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, 2023 and 2022, 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.

Emphasis of Matter

As discussed in Note 2 to the financial statements, the Corporation has changed its method of accounting for leases for the year ended September 30, 2023 due to the adoption of Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) Topic 842, *Leases*. Our opinion is not modified with respect to this matter.

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 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 April 4, 2024 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, P.C.

April 4, 2024

Financial Statements

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

Statements of Financial Position (Amounts in 000's)

September 30,		**2023**		2022
Assets				
Current assets				
Cash and cash equivalents	$	**56,347**	$	66,828
Short-term investments		**2,513**		2,494
Receivables:				
Contributions receivable		**679**		2,725
Grant and contract receivables		**2,912**		3,706
Other receivables		**1,670**		5,748
Prepaid expenses and other assets		**2,431**		2,756
Total current assets		**66,552**		84,257
Noncurrent assets				
Deposits		**60**		302
Right-of-use assets - operating leases		**32,522**		-
Right-of-use assets - finance leases		**14**		-
Property and equipment, net		**1,852**		1,219
Total noncurrent assets		**34,448**		1,521
Total assets	$	**101,000**	$	85,778
Liabilities and Net Assets				
Current liabilities				
Accounts payable and accrued expenses	$	**9,408**	$	9,703
Pass-through liability		**24**		33
Grant commitments:				
Expendable grants		**1,083**		759
Refundable advances:				
Foreclosure prevention		**-**		119
Grants/shared equity/other		**33,242**		66,530
Lease liabilities - operating leases, current		**2,221**		-
Lease liabilities - finance leases		**20**		-
Total current liabilities		**45,998**		77,144
Noncurrent liabilities				
Deferred rent liability		**-**		831
Lease liabilities - operating leases, noncurrent		**34,727**		-
Total liabilities		**80,725**		77,975
Commitments and contingencies				
Net assets				
Without donor restrictions		**12,594**		(628)
With donor restrictions		**7,681**		8,431
Total net assets		**20,275**		7,803
Total liabilities and net assets	$	**101,000**	$	85,778

See accompanying notes to financial statements.

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

Statement of Activities (Amounts in 000's)

Year ended September 30, 2023	Without Donor Restrictions	With Donor Restrictions	Total
Revenue, gains, and other support			
Congressional appropriations	$ 203,515	$ -	$ 203,515
Grants	4,289	-	4,289
Contributions	10,217	4,476	14,693
Training registration fees	3,156	-	3,156
Contracts	1,994	-	1,994
Publications and subscriptions	395	-	395
Other income	838	-	838
Investment returns, net	3,472	105	3,577
Net assets released from restrictions:			
Satisfaction of program restrictions	5,331	(5,331)	-
Total revenue, gains, and other support	233,207	(750)	232,457
Expenses			
Program services:			
Capacity building	98,685	-	98,685
National foreclosure mitigation counseling	154	-	154
Housing stability counseling	35,364	-	35,364
Preserving affordable housing	44,606	-	44,606
Training and informing	18,622	-	18,622
Organizational assessment	9,119	-	9,119
Total program services	206,550	-	206,550
Supporting services:			
General and administrative support	11,856	-	11,856
Resource development	1,579	-	1,579
Total supporting services	13,435	-	13,435
Total expenses	219,985	-	219,985
Change in net assets	13,222	(750)	12,472
Net assets, beginning of year	(628)	8,431	7,803
Net assets, end of year	$ 12,594	$ 7,681	$ 20,275

See accompanying notes to financial statements.

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

Statement of Activities (Amounts in 000's)

Year ended September 30, 2022	Without Donor Restrictions	With Donor Restrictions	Total
Revenue, gains, and other support			
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)	-
Total revenue, gains, and other support	227,462	(170)	227,292
Expenses			
Program services:			
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
Total program services	215,838	-	215,838
Supporting services:			
General and administrative support	10,770	-	10,770
Resource development	1,525	-	1,525
Total supporting services	12,295	-	12,295
Total expenses	228,133	-	228,133
Change in net assets	(671)	(170)	(841)
Net assets, beginning of year	43	8,601	8,644
Net assets, end of year	$ (628)	$ 8,431	$ 7,803

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			
Year ended September 30, 2023	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	Total
Grants and grant commitments	$ 63,522	$ -	$ 32,003	$ 44,606	$ 1,489	$ 1	$ 141,621	$ -	$ -	$ -	$ 141,621
Personnel	22,421	69	2,146	-	8,913	6,485	40,034	5,928	1,047	6,975	47,009
Professional services	5,611	74	532	-	3,209	890	10,316	2,181	110	2,291	12,607
Other operating costs	3,151	8	469	-	2,377	763	6,768	2,530	150	2,680	9,448
Occupancy	1,874	2	69	-	1,053	750	3,748	730	160	890	4,638
Conferences and workshops	946	-	60	-	1,079	48	2,133	144	35	179	2,312
Travel	911	-	61	-	320	110	1,402	94	65	159	1,561
Depreciation and amortization	249	1	24	-	182	72	528	249	12	261	789
Total expenses	$ 98,685	$ 154	$ 35,364	$ 44,606	$ 18,622	$ 9,119	$ 206,550	$ 11,856	$ 1,579	$ 13,435	$ 219,985

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			
Year ended September 30, 2022	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	Total
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
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
Depreciation and amortization	423	2	45	-	165	113	748	417	21	438	1,186
Total expenses	$ 101,593	$ 656	$ 43,638	$ 45,256	$ 16,483	$ 8,212	$ 215,838	$ 10,770	$ 1,525	$ 12,295	$ 228,133

See accompanying notes to financial statements.

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

Statements of Cash Flows (Amounts in 000's)

Years ended September 30,		**2023**		2022
Cash flows from operating activities				
Change in net assets	$	**12,472**	$	(841)
Adjustments to reconcile change in net assets to net cash used in operating activities:				
Bad debt expense		**1**		47
Depreciation and amortization		**789**		1,186
Loss on disposal of property and equipment		**156**		-
Non-cash lease expense		**3,861**		-
(Increase) decrease in assets				
Receivables:				
Contributions receivable		**2,046**		(1,120)
Grant and contract receivables		**794**		353
Other receivables		**4,077**		(5,452)
Prepaid expenses and other assets		**325**		(611)
Deposits		**242**		-
Increase (decrease) in liabilities				
Accounts payable and accrued expenses		**(295)**		3,303
Pass-through liability		**(9)**		(13,974)
Grant commitments:				
Expendable grants		**324**		686
Refundable advances:				
Foreclosure prevention		**(119)**		(610)
Grants/shared equity/other		**(33,288)**		(46,700)
Deferred revenue		**-**		(1)
Deferred rent liability		**-**		(1,595)
Principal reduction in lease liabilities - operating leases		**(183)**		-
Net cash used in operating activities		**(8,807)**		(65,329)
Cash flows from investing activities				
Purchases of investments		**(2,513)**		(2,500)
Sales of investments		**2,494**		2,509
Purchases of property and equipment		**(1,578)**		(168)
Net cash used in investing activities		**(1,597)**		(159)
Cash flows from financing activities:				
Principal reduction in lease liabilities - finance leases		**(77)**		-
Net cash used in financing activities		**(77)**		-
Decrease in cash and cash equivalents		**(10,481)**		(65,488)
Cash and cash equivalents, beginning of year		**66,828**		132,316
Cash and cash equivalents, end of year	$	**56,347**	$	66,828
Supplemental disclosure of noncash activities				
Noncash items upon adoption of Topic 842:				
Right-of-use assets - operating leases	**$**	**4,241**	$	-
Lease liabilities - operating leases	**$**	**5,072**	$	-
Derecognition of deferred rent liability	**$**	**831**	$	-
Right-of-use assets - finance leases	**$**	**97**	$	-
Lease liabilities - finance leases	**$**	**97**	$	-
Net recognition of new operating leases during 2023:				
Right-of-use assets - operating leases	**$**	**32,059**	$	-
Lease liabilities - operating leases	**$**	**32,059**	$	-
Cash paid for interest	**$**	**2**	$	-

See accompanying notes to financial statements.

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, 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. The final year of the program is the year ended September 30, 2023 and the program has been fully spent during the year ended September 30, 2023.

Housing Stability Counseling

The American Rescue Plan (ARP) provided funding to NeighborWorks America to design and administer it's 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) and other venues.

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 $24 and $33 at September 30, 2023 and 2022, respectively.

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

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:

September 30,		**2023**		2022
Cash and cash equivalents	**$**	**56,347**	$	66,828
Short-term investments		**2,513**		2,494
Receivables		**5,261**		12,179
Total financial assets available within one year		**64,121**		81,501
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		**(5,181)**		(5,931)
Refundable advances – NFMC		**-**		(119)
Refundable advances – grants and contracts		**(6,836)**		(6,728)
Refundable advances - shared equity		**(3,765)**		(2,922)
Refundable advances - American Rescue Plan		**(22,641)**		(56,880)
Pass-through amounts for LIFT program		**(24)**		(33)
Total amounts unavailable for general expenditures within one year		**(40,947)**		(75,113)
Total financial assets available to management for general expenditure within one year	**$**	**23,174**	$	6,388

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 10 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.

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, 2023 and 2022.

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, 2023 and 2022. 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.

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, 2023 and 2022, 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 $55,800 as of September 30, 2023.

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, 88% and 92% for the years ended September 30, 2023 and 2022, respectively. 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, 2023 and 2022, the Corporation has accrued $1,083 and $759, respectively, in grant commitments.

Refundable Advances

Refundable advances consist 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 shared equity, NFMC and ARP under supplemental congressional appropriations. Grants and supplemental conditional contributions received in advance for which the conditions have not been met are refundable until those conditions are met. Congressional appropriations for the shared equity, NFMC and ARP, received but not yet awarded to sub-recipients, are refundable until the awards are made. At September 30, 2023 and 2022, the Corporation has refundable advances totaling to $33,242 and $66,649, respectively.

Leases

The Corporation determines whether a contract contains a lease at inception based on whether a right to control the use of an identified asset is conveyed. The Corporation's leases are classified as either operating leases or financing leases. The Corporation records lease right-of-use assets and lease liabilities in the statements of financial position.

The Corporation determines if an arrangement contains a lease at inception. The Corporation has operating leases primarily for its offices and financing lease primarily for copiers and media production equipment. Right-of-use ("ROU") asset represent the Corporation's right to use an underlying asset for the lease term and lease liability represent the Corporation's obligation to make lease payments arising from the lease. ROU asset and lease liability are recognized based on the present value of the future minimum lease payments over the lease term at commencement date. The lease term is determined to be the non-cancelable period including any lessee renewal options which are considered to be reasonably certain of exercise. For all leases, the Corporation has elected the practical expedient to utilize the risk-free rate over a similar period as the remaining lease term as the applicable discount rate. Lease expense for fixed lease payments on operating leases is recognized over the expected term on a straight-line basis.

The Corporation's operating leases typically include non-lease components such as common area maintenance costs, utilities, and other maintenance costs. The Corporation has chosen not to elect the practical expedient, which allows the combination of lease and non-lease components without separate recognition. The Corporation will continue to separately identify and account for lease components separately, ensuring a clear delineation of expenses associated with the lease and non-lease components.

The Corporation's lease terms may include options to extend or terminate the lease. The Corporation generally uses the base, noncancellable, lease term when recognizing the right-of-use assets and liabilities, unless it is reasonably certain that the Corporation will exercise those options. The Corporation's lease agreements do not contain any material residual value guarantees or material restrictive covenants.

As a matter of policy, the Corporation elected to exclude leases with terms of 12 months or less from the statement of financial position date. Lease expense for these short-term leases is recognized on a straight-line basis over the expected term of the 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.

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 supplemental congressional funding such as NFMC, shared equity 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, 2023 and 2022, conditional contributions totaling to $6,119 and $7,258, 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.

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.

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, 2023 and 2022.

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 10.

Recently Adopted Accounting Pronouncements

In February 2016, the Financial Accounting Standards Board (FASB) issued Accounting Standards Update (ASU) 2016-02, *Leases* Accounting Standards Codification (ASC) Topic 842 (ASC 842), which amends the accounting for lease assets and lease liabilities. ASC 842 requires lessees to recognize both finance and operating lease assets and liabilities generated by lease arrangements longer than a year on their statement of financial position. This guidance also expands the required quantitative and qualitative disclosures for leasing arrangements and gives rise to other changes impacting certain aspects of lessee and lessor accounting. The Corporation adopted ASC 842 using the modified retrospective transition method. Under this transition method, financial statements for periods after the adoption date are presented in accordance with ASC 842 and prior-period financial statements continue to be presented in accordance with ASC 840, the accounting standard originally in effect for such periods.

Upon transition, the Corporation applied the package of practical expedients permitted under the ASC 842 transition guidance. As a result, the Corporation did not reassess (1) whether expired or existing contracts contain leases under the new definition of a lease, including whether an existing or expired contract contains an embedded lease, (2) lease classification for expired or existing leases and (3) any initial direct costs of existing leases. As a result of the adoption of ASC 842, the corporation recorded operating right-of-use assets of $4,241 net of $831 deferred rent liability, and operating lease liabilities of $5,072 upon transition. Additionally on October 1, 2022, the Corporation recorded a finance lease right-of-use asset and finance lease liability totaling $97 in the accompanying statements of financial position upon adoption of ASC 842. The adoption of this standard had no significant impact on the operational results in the accompanying statements of activities and change in net assets.

Recent Accounting Pronouncements Not Yet Adopted

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, 2023 and deemed they were not applicable to the Corporation or are not anticipated to have a material effect on the financial statements.

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

3. Property and Equipment

Property and equipment consist of the following:

September 30,		2023		2022
Computer and software equipment	$	**5,805**	$	5,732
Leasehold improvements		**3,899**		10,055
Furniture and fixtures		**68**		1,226
Total property and equipment at cost		**9,772**		17,013
Less: accumulated depreciation and amortization		**(7,920)**		(15,794)
Total property and equipment, net	$	**1,852**	$	1,219

Depreciation and amortization expense for the years ended September 30, 2023 and 2022 was $789 and $1,186, respectively.

4. Net Assets With Donor Restrictions

At September 30, 2023 and 2022, net assets with donor restrictions consist of the following:

		2023		2022
Purpose restricted:				
Wells Fargo	$	**2,518**	$	2,415
Kresge		**663**		57
Walton Family Foundation		**647**		761
Fifth Third Foundation		**337**		649
RW Johnson		**281**		447
Scholarship/Endowment		**224**		120
JP Morgan Chase		**116**		1,180
American Express		**50**		-
First Republic		**49**		52
Morgan Stanley		**46**		46
All others		**250**		204
Total purpose restricted		**5,181**		5,931
Perpetual in nature		**2,500**		2,500
Total net assets with donor restrictions	$	**7,681**	$	8,431

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

During the years ended September 30, 2023 and 2022, net assets released from donor restriction consist of the following:

		2023		2022
Purpose restrictions accomplished:				
Wells Fargo	$	**2,977**	$	4,312
JP Morgan Chase		**1,104**		3,868
Fifth Third Foundation		**312**		411
RW Johnson		**166**		287
First Republic		**154**		48
Kresge		**119**		193
Walton Family Foundation		**114**		21
American Express		**-**		100
Morgan Stanley		**-**		60
All others		**385**		606
Total purpose restricted		**5,331**		9,906
Total net assets released from donor restrictions	$	**5,331**	$	9,906

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.

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

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, 2023 and 2022.

		Subject to Spending Policy and Appropriation		Perpetual in Nature		Total
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
Investment return, net		105		-		105
Amounts appropriated for expenses		-		-		-
Endowment net assets, September 30, 2023	**$**	**225**	**$**	**2,500**	**$**	**2,725**

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.

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

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 for each of the years ended September 30, 2023 and 2022.

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 for each of the years ended September 30, 2023 and 2022.

7. Operating and Finance Leases

On June 1, 2013, the Corporation entered into a 10-year lease agreement for its main headquarters office, which expired in May 2023. The lease provided for a tenant improvement allowance of approximately $4,900 and one-year rent abatement. On December 17, 2021, the Corporation exercised the termination option for its main headquarters, and the termination became effective on 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 2027.

Components and non-components of lease expense are reflected in the occupancy cost in the accompanying statement of functional expenses. These costs are as follows:

Year Ended September 30,	2023
Operating lease expense	$ 3,946
Short-term lease	$ 493
Variable lease expense	$ 199

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

Supplemental quantitative information related to the operating and finance leases for the year ended September 30, 2023 is as follows:

Operating Leases		
Right-of-use assets obtained in exchange for new lease obligations	$	36,300
Cash paid for amounts included in the measurement of lease liabilities - office operating cashflows	$	1,173
Weighted-average remaining lease term in years		10
Weighted-average discount rate		3.63%
Finance Leases		
Right-of-use assets obtained in exchange for new lease obligations	$	97
Cash paid for amounts included in the measurement of lease liabilities – equipment operating cashflows	$	56
Weighted-average remaining lease term in years		0.25
Weighted-average discount rate		4.02%

Remaining maturities of the operating lease liabilities as of September 30, 2023 are as follows:

Years ending September 30,		
2024	$	2,361
2025		4,368
2026		3,773
2027		3,868
2028		3,800
Thereafter		27,468
Total future minimum lease payments		45,638
Less amounts representing interest		(8,690)
	$	36,948

The Corporation is a party to an office equipment lease, primarily for copiers and media production equipment, which ends in fiscal year 2024. The office equipment lease is under a finance lease. The finance lease interest expense and amortization for the year ended September 30, 2023 amounted to $2 and $83, respectively.

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

Transitional disclosure

Expected future minimum lease payments on office facility and equipment leases as of September 30, 2022 were as follows:

Years ending September 30,		
2023	$	3,311
2024		3,529
2025		2,068
2026		3,863
2027		3,868
Thereafter		31,269
	$	47,908

Occupancy expense for the year ended September 30, 2022 amounted to $3,433.

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 year ended September 30, 2022, amounted to $132. Commitments under noncancelable office equipment operating leases are as follows: $141 in FY2023 and $48 in FY2024.

8. 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, 2023, the Corporation had twelve such contracts in place extending through fiscal 2026. The maximum penalty assuming all contracts were cancelled at the latest possible date is $1,764 in FY2024, $399 in FY2025 and $201 in FY2026.

The Corporation receives funds from federal sources that are subject to auditing by the Government Accountability Office (GAO). During the years ended September 30, 2023 and 2022, GAO conducted an audit of the Corporation's policies and procedures over procurement, conflicts of interest and whistleblowers in relation to fiscal year 2021. The GAO report was issued in June 2023 which reported recommendations to improve such policies and procedures but did not result in any material adjustments to the Corporation's financial statements.

As per the Recapture and De-obligation Procedure of Housing Stability Counseling Program/American Rescue Plan programs, 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.

9. 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 2023 and 2022 were $3,293 and $3,333, respectively.

10. 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.

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.

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

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, 2023 and 2022. 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, 2023
Freddie Mac US Bonds Domestic Unsecured	**$ -**	**$ 2,513**	**$ -**	**$ 2,513**
Total	**$ -**	**$ 2,513**	**$ -**	**$ 2,513**

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
Total	$ -	$ 2,494	$ -	$ 2,494

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, 2023 and 2022.

11. 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 five employees, for a total of $361 and $43, during the years ended September 30, 2023 and 2022, respectively. As a result of these agreements, the Corporation made payments totaling $165 and $19 during the years ended September 30, 2023 and 2022, respectively. The Corporation entered into separation agreements during the years ended September 30, 2023 and 2022 that cross over into the subsequent year and were accrued at September 30, 2023 and 2022, totaling $196 and $24, respectively.

12. Subsequent Events

Subsequent events were evaluated through April 4, 2024, 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

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

Schedule of Expenditures of Federal Awards

Year ended September 30, 2023

Federal Grantor/Pass-Through Grantor/Program or Cluster Title	*Federal Assistance Listing/ Public Law Number*	*Provided to Subrecipients*	*Total Federal Expenditures*
Congressional Appropriations Program:			
NeighborWorks® System Program			
FY 2023 Appropriation	21.U01 / PL# 117.328	$ 101,991,676	$ 166,000,000
FY 2023 Shared Equity	21.U02 / PL# 117.328	1,500,000	1,500,000
FY 2022 Shared Equity	21.U02 / PL# 117.103	1,100,000	1,103,236
FY 2021 Shared Equity	21.U02 / PL# 116.260	135,634	309,396
FY 2020 Shared Equity	21.U02 / PL#116.94	130,000	244,555
COVID-19 - American Rescue Plan	21.U04 / PL# 117.2	32,002,655	34,238,724
Total NeighborWorks® System Program		136,859,965	203,395,911
NeighborWorks® National Foreclosure Mitigation Counseling Program	21.U03 / PL# 114.113	-	118,666
Total Congressional Appropriations Program		136,859,965	203,514,577
U.S. Department of Housing and Urban Development:			
Housing Counseling Assistance Program	14.169	2,523,684	2,966,558
Housing Counseling Training Program	14.316	243,215	1,184,785
Total U.S. Department of Housing and Urban Development		2,766,899	4,151,343
Corporation for National and Community Service:			
Volunteers in Service to America	94.013	-	137,196
Total Expenditures of Federal Awards		$ 139,626,864	$ 207,803,116

See notes to schedule of expenditures of federal awards.

Notes to Schedule of Expenditures of Federal Awards
Year Ended September 30, 2023

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, 2023. 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 2023.

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

BDO

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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, 2023, 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 April 4, 2024.

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.

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 no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of This Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the 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, P.C.

April 4, 2024

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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

Opinion on the Major Federal Program

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, 2023. 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.

In our opinion, the Corporation complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on the major federal program for the year ended September 30, 2023.

Basis for Opinion on the Major Federal Program

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 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.

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.

Other Matters

The results of our auditing procedures disclosed an instance of noncompliance which is required to be reported in accordance with the Uniform Guidance and which is described in the accompanying schedule of findings and questioned costs as item **2023-001**. Our opinion on the major federal program is not modified with respect to this matter.

Government Auditing Standards requires the auditor to perform limited procedures on the Corporation's response to the noncompliance finding identified in our compliance 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 each 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.

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. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, as discussed below, we did identify a certain deficiency in internal control over compliance that we consider to be a significant deficiency.

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. *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. We consider the deficiency in internal control over compliance described in the accompanying schedule of findings and questioned costs as item **2023-001** to be a significant deficiency.

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, P.C.

April 4, 2024

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

Schedule of Findings and Questioned Costs
Year Ended September 30, 2023

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?	___ yes	X No

Federal Awards

Internal control over the major federal program:		
• Material weakness(es) identified?	___ yes	X No
• Significant deficiency(ies) identified?	X yes	___ none reported
Type of auditor's report issued on compliance for the major federal program:	Unmodified	
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:

Assistance Listing Number(s)	Name of Federal Program or Cluster
	Congressional Appropriations Program:
	NeighborWorks® System Program
21.U01 / PL# 117.328	FY 2023 Appropriation
21.U02 / PL# 117.328	FY 2023 Shared Equity
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.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?	___ yes	X No

Section II - Financial Statement Findings

During the audit for the year ended September 30, 2023, there were no findings related to the financial statements which are required to be reported in accordance with generally accepted government auditing standards (GAGAS).

Section III - Federal Award Findings and Questioned Costs

2023-001 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 2023 Appropriation

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.

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 during the first quarter of fiscal year 2023 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 10 procurement samples for testing. We noted that 2 out of the 10 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 2 procurement files, we noted that the 2 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 2 noncompetitive procurements is $105,985 for the year ended September 30, 2023. The total contract value of the 2 noncompetitive procurements is $430,000 with contract terms that ranges from 6 months to 4 years. The total federal expenditures for all of the 10 procurement samples selected for testing is $2,472,158 for the year ended September 30, 2023.

Repeat Finding: This is a repeat finding of **2022-001**.

Recommendation: We understand that the Corporation updated its procurement policies and procedures in March 2023 to conform with the requirements identified in the Uniform Guidance procurement requirements. We recommend that the Corporation should ensure that the use of *Noncompetitive Procurement* criteria under the Uniform Guidance procurement requirements are adhered to and appropriate justifications for these contracts are used and documented appropriately. In addition, the Corporation should continue to use the 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 Documents

NeighborWorks® AMERICA

Appendix A –Summary Schedule of Prior Year Audit Findings

Status of Prior Year Findings

Finding: <u>2022-001 - Procurement, Suspension and Debarment</u>

<u>Information on the Federal Program:</u>

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

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.

Current Year Status:

Effective March 31, 2023, the corporation revised its procurement policy and procedures to conform with Uniform Guidance procurement requirements. Training was provided on Uniform Guidance procurement requirements that was 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. A new contracts management system was implemented during the first quarter of fiscal year 2023. In addition, additional quality checks were implemented to ensure compliance with Uniform Guidance for noncompetitive procurements.

The above process was implemented beginning March 2023 and therefore, for the FY2023 audit, this was a continuing issue.

NeighborWorks® AMERICA

Appendix B – Management's Corrective Action Plan
Year Ended September 30, 2023

2023-001 Procurement, Suspension and Debarment

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

Estimated completion date: September 2024

Corrective Action: Management agrees with the findings and recommendations set forth within. During the first quarter of fiscal year 2023, prior to the 2022-001 finding, noncompetitive procurements completed followed the prior procurement policy that did not align with Uniform Guidance as relates to noncompetitive procurement justifications. The Corporation has since completed its revised procurement policies and procedures to conform with Uniform Guidance procurement requirements. Training on the Uniform Guidance procurement requirements was developed and 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. Moreover, 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.

During fiscal year 2024, management has continued its response to the recommendations by engaging with technical experts to enhance the contracts management system and strengthen internal controls. Additional training is being developed on the enhanced system and processes to ensure continued compliance with Uniform Guidance as relates to noncompetitive procurements.