

**ROSELLI, CLARK & ASSOCIATES**  
Certified Public Accountants

**TOWN OF OXFORD, MASSACHUSETTS**

**FEDERAL AWARD REPORTS**

**PURSUANT TO THE**

**UNIFORM GUIDANCE**

**YEAR ENDED JUNE 30, 2021**



**TOWN OF OXFORD, MASSACHUSETTS**  
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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 Honorable Board of Selectmen  
Town of Oxford, Massachusetts

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the Town of Oxford, Massachusetts, as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the Town of Oxford, Massachusetts's basic financial statements and have issued our report thereon dated January 10, 2022.

**Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the Town's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Town's internal control. Accordingly, we do not express an opinion on the effectiveness of the Town'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 may exist that have not been identified.

### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the Town'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 entity'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 entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

*Roselli, Clark & Associates*

Roselli, Clark and Associates  
Certified Public Accountants  
Woburn, Massachusetts  
January 10, 2022



**INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR  
PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE REQUIRED BY  
THE UNIFORM GUIDANCE**

To the Honorable Board of Selectmen  
Town of Oxford, Massachusetts

**Report on Compliance for Each Major Federal Program**

We have audited the Town of Oxford, Massachusetts' compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of the Town of Oxford, Massachusetts' major federal programs for the year ended June 30, 2021. The Town of Oxford, Massachusetts' major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

***Management's Responsibility***

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

***Auditor's Responsibility***

Our responsibility is to express an opinion on compliance for each of the Town of Oxford, Massachusetts' major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Town of Oxford, Massachusetts' compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

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

***Opinion on Each Major Federal Programs***

In our opinion, the Town of Oxford, Massachusetts complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2021.

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

Management of the Town of Oxford, Massachusetts is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the Town of Oxford, Massachusetts' internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Town of Oxford, Massachusetts' internal control over compliance.

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

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

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

### **Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance**

We have audited the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of the Town of Oxford, Massachusetts, as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the Town of Oxford, Massachusetts's basic financial statements. We have issued our report thereon dated January 10, 2022, which contained unmodified opinions on those financial statements. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements.

The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance, and is not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America.

In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

*Roselli, Clark & Associates*

Roselli, Clark & Associates  
Certified Public Accountants  
Woburn, Massachusetts

March 22, 2022, except for our report on the Schedule of Expenditures of Federal Awards, for which the date is January 10, 2022

**TOWN OF OXFORD, MASSACHUSETTS**  
**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**YEAR ENDED JUNE 30, 2021**

Federal Grantor / Pass-Through Grantor / Program Title	CFDA Number	Pass-Through Number	Passed Through to Subrecipients	Federal Expenditures
<b><u>U.S. Department of Agriculture</u></b>				
<b>Child Nutrition Cluster</b>				
<i>Passed through the Commonwealth of Massachusetts - Department of Elementary and Secondary Education</i>				
National School Lunch Program:	10.555	14-226	\$ -	\$ 36,627
Non-Cash Assistance (Commodities)				
Summer Food Service Program for Children	10.559	14-226-SF-292	\$ -	\$ 367,661
<b>Total Child Nutrition Cluster</b>			\$ -	<b>404,288</b>
<b><u>U.S. Department of Defense</u></b>				
<i>Direct Award</i>				
Navy Junior Reserve Officer Training Corps (JROTC)	12.UKN		\$ -	\$ 78,943
<b>Total U.S. Department of Defense</b>			\$ -	<b>78,943</b>
<b><u>U.S. Department of Justice</u></b>				
<i>Passed Through the Commonwealth of Massachusetts - Executive Office of Public Safety and Security</i>				
Edward Byrne Memorial Justice Assistance Grant	16.738	SCEPSSFY21BJAGOXFORD	\$ -	\$ 14,735
<b>Total U.S. Department of Justice</b>			\$ -	<b>14,735</b>
<b><u>U.S. Department of the Treasury</u></b>				
<i>Passed through the Commonwealth of Massachusetts - Executive Office for Administration and Finance</i>				
COVID-19 - Coronavirus Relief Fund	21.019	COVID19 226	\$ 33,825	\$ 286,967
<i>Passed through the Commonwealth of Massachusetts - Department of Elementary and Secondary Education</i>				
COVID-19 - Coronavirus Relief Fund	21.019	102-400698-2021-0226	\$ -	\$ 353,372
COVID-19 - Coronavirus Relief Fund	21.019	118-400831-2021-0226	\$ -	\$ 64,600
COVID-19 - Coronavirus Relief Fund	21.019	14-226	\$ -	\$ 5,362
<b>Total COVID-19 - Coronavirus Relief Fund</b>			\$ 33,825	<b>\$ 710,301</b>
<b>Total U.S. Department of the Treasury</b>			\$ 33,825	<b>\$ 710,301</b>
<b><u>U.S. Department of Education</u></b>				
<b>Special Education Cluster (IDEA)</b>				
<i>Passed through the Commonwealth of Massachusetts - Department of Elementary and Secondary Education</i>				
Special Education - Grants to States	84.027	240-391646-2021-0226	\$ -	\$ 5,293
Special Education - Grants to States	84.027	240-292055-2020-0226	\$ -	\$ 28,804
Special Education - Grants to States	84.027	274-484506-2021-0226	\$ -	\$ 7,855
<b>Total Special Education - Grants to States</b>			\$ -	<b>\$ 41,952</b>
Special Education - Preschool Grants	84.173	262-391649-2021-0226	\$ -	\$ 27,545
Special Education - Preschool Grants	84.173	262-292056-2020-0226	\$ -	\$ 3,825
Special Education - Preschool Grants	84.173	298-484500-2021-0226	\$ -	\$ 1,706
<b>Total Special Education - Preschool Grants</b>			\$ -	<b>\$ 33,076</b>
<b>Total Special Education Cluster (IDEA)</b>			\$ -	<b>\$ 75,028</b>

(continued)

See notes to Schedule of Expenditures of Federal Awards

**TOWN OF OXFORD, MASSACHUSETTS**  
**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**YEAR ENDED JUNE 30, 2021**

<b>Federal Grantor / Pass-Through Grantor / Program Title</b>	<b>CFDA Number</b>	<b>Pass-Through Number</b>	<b>Passed Through to Subrecipients</b>	<b>Federal Expenditures</b>
<i>Passed through the Commonwealth of Massachusetts - Department of Elementary and Secondary Education</i>				
Title I Grants to Local Educational Agencies	84.010	305-396483-2021-0226	-	359,210
Title I Grants to Local Educational Agencies	84.010	305-291988-2020-0226	-	50,709
Total Title I Grants to Local Educational Agencies			-	409,919
Supporting Effective Instruction State Grants	84.367	140-396482-2021-0226	-	6,978
Supporting Effective Instruction State Grants	84.367	140-291989-2020-0226	-	63,319
Supporting Effective Instruction State Grants	84.367	140-209302-2019-0226	-	8,087
Total Supporting Effective Instruction State Grants			-	78,384
Student Support and Academic Enrichment Program	84.424	309-396484-2021-0226	-	150
Student Support and Academic Enrichment Program	84.424	309-291990-2020-0226	-	26,494
Student Support and Academic Enrichment Program	84.424	309-209300-2019-0226	-	1,360
Total Student Support and Academic Enrichment Program			-	28,004
COVID-19 - Education Stabilization Fund	84.425D	113-396481-2021-0226	-	257,836
<b>Total U.S. Department of Education</b>			-	<b>849,171</b>
<b><u>U.S. Election Assistance Commission</u></b>				
<i>Passed through the Secretary of the Commonwealth of Massachusetts</i>				
COVID-19 - HAVA Election Security Grants	90.404	SCSEC192021RPOSTAGE2	-	2,474
<b>Total U.S. Election Assistance Commission</b>			-	<b>2,474</b>
<b><u>U.S. Department of Homeland Security</u></b>				
<i>Direct Awards</i>				
Assistance to Firefighter Grant	97.044		-	200,000
Staffing for Adequate Fire and Emergency Response (SAFER)	97.083		-	21,516
<i>Passed through the Commonwealth of Massachusetts - Massachusetts Emergency Management Agency</i>				
Emergency Management Performance Grant	97.042	FY21EMPG1900000OXFOR	-	3,500
Emergency Management Performance Grant	97.042	FY21EMPG2000000OXFOR	-	1,100
Total Emergency Management Performance Grant			-	4,600
<b>Total U.S. Department of Homeland Security</b>			-	<b>226,116</b>
<b>TOTAL FEDERAL GRANT EXPENDITURES</b>			<b>\$ 33,825</b>	<b>\$ 2,286,028</b>

(concluded)

See notes to Schedule of Expenditures of Federal Awards

**TOWN OF OXFORD, MASSACHUSETTS**  
**NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**YEAR ENDED JUNE 30, 2021**

**A. Basis of Presentation**

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of the Town of Oxford, Massachusetts (the Town) under programs of the federal government for the year ended June 30, 2021. The information in this Schedule is presented in accordance with the 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). Because the Schedule presents only a selected portion of the operations of the Town, it is not intended to and does not present the financial position, changes in net position, or cash flows of the Town.

**B. Summary of Significant Accounting Policies**

Accounting policies and financial reporting practices permitted for municipalities in Massachusetts are prescribed by the Uniform Municipal Accounting System (UMAS) promulgated by the Commonwealth of Massachusetts Department of Revenue.

The accompanying Schedule includes the federal grant transactions of the Town. Although some of these programs may be supplemented with state and other revenue, only federal activity is shown. Expenditures reported on the Schedule are reported on the modified accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance.

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

**C. U.S. Department of Agriculture Programs**

The Town receives non-cash commodities from the U.S. Department of Agriculture as a part of the National School Lunch program. The amounts reported as non-cash assistance represent the fair market value of these commodities received during the year.

The amounts reported as cash assistance represent federal reimbursements for meals provided.

**TOWN OF OXFORD, MASSACHUSETTS**  
**SCHEDULE OF FINDINGS AND QUESTIONED COSTS**  
**YEAR ENDED JUNE 30, 2021**

**A. Summary of Audit Results**

***FINANCIAL STATEMENTS***

Type of auditor's report issued	Unmodified
Internal control over financial reporting:	
Material weaknesses identified	No
Significant deficiencies identified not considered to be material weaknesses	No
Noncompliance material to financial statements noted?	No

***FEDERAL AWARDS***

Internal control over major programs:	
Material weaknesses identified	No
Significant deficiencies identified not considered to be material weaknesses	No
Type of auditor's report issued on compliance for major programs	Unmodified
Any audit findings disclosed that are required to be reported in accordance with Uniform Guidance 2 CFR 200.516	No

***IDENTIFICATION OF MAJOR PROGRAMS***

<u>Name of Federal Program</u>	<u>CFDA Number(s)</u>
COVID-19 – Coronavirus Relief Fund	21.019
Dollar threshold used to distinguish between type A and type B programs	\$ 750,000
Auditee qualified as a low-risk auditee?	Yes

**B. Financial Statement Findings**

None

**C. Federal Award Findings and Questioned Costs**

None