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Independent Auditors’ Report on Compliance for Each Major Federal Program; Report on Internal Control over Compliance; and Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

To the Members of the Town Council
Town of Bloomfield, Connecticut

Report on Compliance for Each Major Federal Program

We have audited the Town of Bloomfield, Connecticut’s compliance with the types of compliance requirements described in the OMB Compliance Supplement that could have a direct and material effect on the Town of Bloomfield, Connecticut’s major federal program for the year ended June 30, 2019. The Town of Bloomfield, Connecticut’s major federal program is identified in the summary of auditors’ 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.

Auditors’ Responsibility

Our responsibility is to express an opinion on compliance for the Town of Bloomfield, Connecticut’s major federal program 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 Bloomfield, Connecticut’s 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 the major federal program. However, our audit does not provide a legal determination of the Town of Bloomfield, Connecticut’s compliance.
Opinion on Each Major Federal Program

In our opinion, the Town of Bloomfield, Connecticut, complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on its major federal program for the year ended June 30, 2019.

Report on Internal Control over Compliance

Management of the Town of Bloomfield, Connecticut, 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 Bloomfield, Connecticut’s internal control over compliance with the types of requirements that could have a direct and material effect on the major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for the 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 Bloomfield, Connecticut’s 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 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.

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 deficiencies and, therefore, material weaknesses or significant deficiencies may exist that have not been identified. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, we did identify a certain deficiency in internal control over compliance, described in the accompanying schedule of findings and questioned costs as item 2019-001, that we consider to be a significant deficiency.

The Town of Bloomfield, Connecticut’s response to the internal control over compliance finding identified in our audit is described in the accompanying schedule of findings and questioned costs. The Town of Bloomfield, Connecticut’s response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

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 Bloomfield, Connecticut, as of and for the year ended June 30, 2019, and the related notes to the financial statements, which collectively comprise the Town of Bloomfield, Connecticut’s basic financial statements. We issued our report thereon dated December 5, 2019, 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.

Blum, Shapiro & Company, P.C.
West Hartford, Connecticut
December 5, 2019
<table>
<thead>
<tr>
<th>Federal Grantor/Pass-Through Grantor/ Program or Cluster Title</th>
<th>Federal CFDA Number</th>
<th>Pass-Through Entity Identifying Number</th>
<th>Total Federal Expenditures</th>
</tr>
</thead>
</table>
| **United States Department of Agriculture**  
*Passed Through the State of Connecticut Department of Education:* | | | |
| Child Nutrition Cluster:  
National School Lunch Program | 10.555 | 12060-SDE64370-20560 | $76,412 |
| National School Lunch Program | 10.555 | 12060-SDE64370-20560 | 787,879 |
| School Breakfast Program | 10.553 | 12060-SDE64370-20508 | 254,133 |
| Summer Food Service Program for Children | 10.559 | 12060-SDE64370-20540 | 50,040 |
| Summer Food Service Program for Children | 10.559 | 12060-SDE64370-20548 | 5,172 |
| **Total United States Department of Agriculture** | | | $1,173,636 |
| **United States Department of Transportation**  
*Passed Through the State of Connecticut Department of Transportation:* | | | |
| Highway Safety Cluster:  
National Priority Safety Programs | 20.616 | 12062-DOT57513-22600 | 5,697 |
| Highway Planning and Construction Cluster:  
Highway Planning and Construction | 20.205 | 12062-DOT57124-22108 | 10 |
| Highway Planning and Construction | 20.205 | 12062-DOT57141-22108 | 4 |
| **Total United States Department of Transportation** | | | 5,711 |
| **United States Department of Justice**  
*Passed Through the State of Connecticut Office of Policy and Management:* | | | |
| Edward Byrne Memorial Justice Assistance Grant Program | 16.738 | 12060-OPM20350-21921 | 17,560 |
| **United States Department of Education**  
*Passed Through the State of Connecticut Department of Education:* | | | |
| Special Education Cluster (IDEA):  
Special Education - Grants to States | 84.027 | 12060-SDE64370-20977-2019 | 497,200 |
| Special Education - Grants to States | 84.027 | 12060-SDE64370-20977-2018 | 30,177 |
| Special Education - Preschool Grants | 84.173 | 12060-SDE64370-20983-2019 | 13,733 |
| **Title I Grants to Local Educational Agencies** | | | 541,110 |
| Career and Technical Education -- Basic Grants to States | 84.048 | 12060-SDE64370-20742-2019 | 31,480 |
| Improving Teacher Quality State Grants | 84.367 | 12060-SDE64370-20856-2018 | 70,699 |
| Improving Teacher Quality State Grants | 84.367 | 12060-SDE64370-20856-2018 | 1,535 |
| **Title IV - Student Support** | | | 72,234 |
| **Total United States Department of Education** | | | 1,064,298 |
| **Total Federal Awards** | | | $2,261,205 |

The accompanying notes are an integral part of this schedule.
1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Presentation

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of the Town of Bloomfield, Connecticut, under programs of the federal government for the year ended June 30, 2019. The information in the 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 of Bloomfield, Connecticut, it is not intended to, and does not, present the financial position, changes in fund balance, changes in net position or cash flows of the Town of Bloomfield, Connecticut.

Basis of Accounting

Expenditures reported on the Schedule are reported using the modified 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.

2. INDIRECT COST RECOVERY

The Town of Bloomfield, Connecticut, has elected not to use the 10% de minimis indirect cost rate provided under Section 200.414 of the Uniform Guidance.

3. NONCASH AWARDS

Donated commodities in the amount of $76,412 are included in the Department of Agriculture’s National School Lunch Program, CFDA #10.555. The amount represents the market value of commodities received.
Independent Auditors’ 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 Members of the Town Council
Town of Bloomfield, Connecticut

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 Bloomfield, Connecticut, as of and for the year ended June 30, 2019, and the related notes to the financial statements, which collectively comprise the Town of Bloomfield, Connecticut’s basic financial statements, and have issued our report thereon dated December 5, 2019.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Town of Bloomfield, Connecticut’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 of Bloomfield, Connecticut’s internal control. Accordingly, we do not express an opinion on the effectiveness of the Town of Bloomfield, Connecticut’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 of Bloomfield, Connecticut’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 determination of financial statement amounts. 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 Town of Bloomfield, Connecticut’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 Town of Bloomfield, Connecticut’s internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

West Hartford, Connecticut
December 5, 2019
I. SUMMARY OF AUDITORS’ RESULTS

Financial Statements

Type of auditors’ report issued: 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 major programs:
• Material weakness(es) identified? yes X no
• Significant deficiency(ies) identified? X yes none reported

Type of auditors’ report issued on compliance for major programs: Unmodified

Any audit findings disclosed that are required to be reported in accordance with 2 CFR Section 200.516(a)? yes X no

Major programs:

<table>
<thead>
<tr>
<th>CFDA #</th>
<th>Name of Federal Program or Cluster</th>
</tr>
</thead>
<tbody>
<tr>
<td>10.553/10.555/10.559</td>
<td>Child Nutrition Cluster</td>
</tr>
</tbody>
</table>

Dollar threshold used to distinguish between type A and type B programs: $750,000

Auditee qualified as low-risk auditee? X yes no

II. FINANCIAL STATEMENT FINDINGS

No matters were reported.

III. FEDERAL AWARDS FINDINGS AND QUESTIONED COSTS

Finding No. 2019-001
Procurement and Suspension and Debarment

Programs
Child Nutrition Cluster (10.553/10.555/10.559)
Special Education Cluster (84.027/84.173)
Title I Grants to Local Educational Agencies (84.010)
Career and Technical Education -- Basic Grants to States (84.048)
Improving Teacher Quality State Grants (84.367)
Title IV - Student Support (84.424)

Pass-Through Agency
State of Connecticut Department of Education
Criteria
The Board of Education must comply with procurement standards set out at 2 CFR sections 200.318 through 200.326 within Uniform Guidance.

Condition
The Board of Education's procurement standards do not include the essential elements as outlined in 2 CFR sections 200.318 through 200.326.

Questioned Costs
None noted.

Context
The Board of Education did not have a policy in place in conformity with the federal Uniform Guidance criteria.

Effect
With the absence of a compliant policy, the Board of Education is at risk for noncompliance as it relates to federal procurement.

Cause
The Board of Education was unaware of the details surrounding the new procurement standards.

Recommendation
We recommend that the Board of Education review its formal procurement policies and make necessary changes to comply with the criteria as set out in 2 CFR sections 200.318 and 200.326.

Views of Responsible Officials and Planned Corrective Actions
The Board of Education is aware of Finding 2019-001 and agrees that the finding as stated is correct. The Board of Education will review its formal procurement policies and make necessary changes to comply with the criteria as set out in 2 CFR sections 200.318 and 200.326.