

VIRGINIA POVERTY LAW CENTER, INC.

**Financial Statements
and
Accompanying Information
for years ended
June 30, 2020 and 2019**

Tax Exempt Providers of Legal Services Support

VIRGINIA POVERTY LAW CENTER, INC.

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Frank J. Barcalow CPA, P.L.L.C.

Independent Auditor's Report

The Board of Directors
Virginia Poverty Law Center, Inc.
Richmond, Virginia

Report on the Financial Statements

We have audited the accompanying financial statements of Virginia Poverty Law Center, Inc. (a nonprofit organization), which comprise the statements of financial position as of June 30, 2020 and 2019, and the related statements of activities, functional expenses and cash flows for the years then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes 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.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with 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. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements 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 entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Virginia Poverty Law Center, Inc. as of June 30, 2020 and 2019, 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.

Other Matters

Other 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* and statement of support, revenue and expenses are presented for purposes of additional analysis and are 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. 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 financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. 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 September 24, 2020 on our consideration of Virginia Poverty Law Inc.'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 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 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 Virginia Poverty Law Inc.'s internal control over financial reporting and compliance.

Frank Barcalow CPA, P.L.L.C.

Frank Barcalow CPA, P.L.L.C.
Richmond, Virginia
September 24, 2020

VIRGINIA POVERTY LAW CENTER, INC.

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Statements of Financial Position June 30, 2020 and 2019

Assets

	<u>2020</u>	<u>2019</u>
Current assets		
Cash and cash equivalents	\$ 909,991	\$ 501,899
Investments	1,212,739	1,770,795
Accounts receivable	440,834	82,958
Prepaid expenses	5,652	20,176
Total current assets	<u>2,569,216</u>	<u>2,375,828</u>
Property and equipment		
Furniture and equipment	102,361	102,361
Less accumulated depreciation	93,581	90,516
Total property and equipment, net	<u>8,780</u>	<u>11,845</u>
Other assets		
Deposits	12,990	12,990
Total assets	<u>\$ 2,590,986</u>	<u>\$ 2,400,663</u>
Liabilities and Net Assets		
Current liabilities		
Accounts payable	\$ 173,653	\$ 61,897
Accrued vacation	72,436	55,107
Funds held for others	85	1,545
Unearned revenue	614,903	711,386
Total current liabilities	<u>861,077</u>	<u>829,935</u>
Long term liabilities		
Note payable - PPP loan	381,000	-
Commitments		
Net assets, without donor restrictions	<u>1,348,909</u>	<u>1,570,728</u>
Total liabilities and net assets	<u>\$ 2,590,986</u>	<u>\$ 2,400,663</u>

See notes to financial statements.

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Statements of Activities For the Years Ended June 30, 2020 and 2019

	2020	2019
	Without donor restrictions	Without donor restrictions
Support and revenue		
Grant income	\$ 3,340,796	\$ 2,943,850
Other income	166,049	210,831
Cy Pres Awards	2,188	97,430
Unrealized gain (loss) on investments	(17,036)	40,367
Realized gains (loss)	4,170	(9,305)
Investment income	37,812	37,395
	<u>3,533,979</u>	<u>3,320,568</u>
Total support and revenue		
	<u>3,533,979</u>	<u>3,320,568</u>
Expenses		
Program Services		
Legal training and support	3,402,347	3,266,689
Supporting services		
Management and general	280,914	279,394
Fundraising expense	72,537	96,738
	<u>3,755,798</u>	<u>3,642,821</u>
Total expenses		
	<u>3,755,798</u>	<u>3,642,821</u>
Change in net assets	(221,819)	(322,253)
Net assets at beginning of year	<u>1,570,728</u>	<u>1,892,981</u>
Net assets at end of year	<u>\$ 1,348,909</u>	<u>\$ 1,570,728</u>

See notes to financial statements.

Statements of Functional Expenses
June 30, 2020 and 2019

For the Year ended June 30, 2020

	Program Expenses	Management and General	Fundraising Expenses	Total Expenses
Personnel	\$ 1,934,560	\$ 232,155	\$ 65,884	\$ 2,232,599
Travel	37,057	-	-	37,057
Space cost	169,099	21,334	3,514	193,947
Consumable supplies	28,394	3,511	-	31,904
Purchase and maintenance of equipment	28,075	3,502	258	31,835
Training	68,262	-	-	68,262
Other direct costs	75,435	9,680	2,881	87,996
Professional services	174,070	10,608	-	184,678
Sub-grant expense	868,293	-	-	868,293
Website	16,162	-	-	16,162
Depreciation expense	2,941	124	-	3,065
Total expenses	\$ 3,402,347	\$ 280,914	\$ 72,537	\$ 3,755,798

For the Year ended June 30, 2019

	Program Expenses	Management and General	Fundraising Expenses	Total Expenses
Personnel	\$ 1,734,061	\$ 202,215	\$ 80,886	\$ 2,017,162
Travel	64,317	-	-	64,317
Space cost	146,596	17,047	6,829	170,472
Consumable supplies	13,261	17,208	6,400	36,868
Purchase and maintenance of equipment	17,550	2,534	1,014	21,098
Training	77,584	-	-	77,584
Other direct costs	48,889	22,238	1,609	72,736
Professional services	74,289	17,892	-	92,181
Sub-grant expense	1,079,996	-	-	1,079,996
Website	7,809	-	-	7,809
Depreciation expense	2,338	260	-	2,598
Total expenses	\$ 3,266,689	\$ 279,394	\$ 96,738	\$ 3,642,821

See notes to financial statements.

**Statements of Cash Flows
For the Years Ended June 30, 2020 and 2019**

	<u>2020</u>	<u>2019</u>
Cash flows from operating activities		
Change in net assets	\$ (221,819)	\$ (322,253)
Adjustments to reconcile increase (decrease) in net assets to net cash provided by (used in) operating activities		
Depreciation	3,065	2,598
Unrealized gain (loss) on investments	(17,036)	40,367
(Increase) decrease in accounts receivable	(357,876)	3,412
(Increase) decrease in prepaid expense	14,523	(441)
(Increase) decrease in deposits	-	(1,528)
Increase (decrease) in accounts payable	111,755	(42,203)
Increase (decrease) in accrued vacation	17,329	(10,973)
Increase (decrease) in funds held for others	(1,460)	1,545
Increase (decrease) in unearned support	(96,483)	(140,419)
	<u>(548,002)</u>	<u>(469,895)</u>
Net cash provided by (used in) operations		
Cash flows used in (provided by) investing activities		
Purchase of equipment	-	(4,246)
Purchase of investments	(137,612)	(1,633,043)
Sale of investments	712,706	1,503,487
	<u>575,094</u>	<u>(133,802)</u>
Net cash provided (used in) investing activities		
Cash flows used in financing activities		
Note payable PPP proceeds	<u>381,000</u>	<u>-</u>
Net cash (used in) provided by financing activities	<u>381,000</u>	<u>-</u>
Net increase (decrease) in cash and cash equivalents	408,092	(603,697)
Cash and cash equivalents at beginning of year	<u>501,899</u>	<u>1,105,596</u>
Cash and cash equivalents at end of year	<u>\$ 909,991</u>	<u>\$ 501,899</u>

See notes to financial statements.

Notes to Financial Statements June 30, 2020 and 2019

Note 1 - Nature of Activities and summary of significant accounting policies

Nature of activities

The Virginia Poverty Law Center, Inc. (Center) provides training and legal support services to local legal service providers on a statewide basis in Virginia.

Basis of presentation

The accompanying financial statements have been prepared on the accrual basis of accounting in accordance with generally accepted accounting principles of the United States. Under generally accepted accounting principles, Virginia Poverty Law Center, Inc. is required to report information regarding its financial position and activities according to two classes of net assets: net assets without donor restrictions and net assets with donor restrictions.

Estimates

The preparation of financial statements in conformity with generally accepted accounting principles of the United States requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

Cash equivalents

For purposes of the Statement of Cash Flows, the Center considers all highly liquid debt instruments purchased with an original maturity of three months or less to be cash equivalents. The carrying amounts reported in the Statements of Financial Position approximates fair values.

Accounts receivable

Accounts receivable are reviewed by management and any that are considered to be uncollectible are charged to expense. There is no allowance for doubtful accounts because there has been historically no bad debt expense.

Grant support

Program funds received on approved grants are recorded as revenue when earned, unless received prior to the grant period, in which case they are recorded as unearned revenue. If any costs are reimbursable, a receivable is recorded to recognize the offsetting revenue.

Property and equipment

Property and equipment with a value great than \$1,000 are capitalized and are stated at cost. Depreciation is computed on the straight-line method over estimated useful lives of 5 to 7 years. Expenditures for maintenance and repairs are expensed currently, while expenditures for major additions and betterments are capitalized.

Allocation of expenses

The costs of providing programs and other activities have been summarized on a functional basis in the Statement of Activities and in the Notes on Functional Expenses. Accordingly, certain costs have been allocated between the program and supporting services benefitted

VIRGINIA POVERTY LAW CENTER, INC.

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Notes to Financial Statements June 30, 2020 and 2019

Note 1 - Summary of significant accounting policies (concluded)

Income taxes

Virginia Poverty Law Center, Inc. is a non-profit charitable organization as defined by Internal Revenue Code Section 501(c)(3) and is not subject to federal or state income taxes. The Center is not considered to be a private foundation within the meaning of Section 509(a) of the Code. The Center's income tax returns are potentially subject to examination by the Internal Revenue Service generally for three years after being filed. The Center has no uncertain tax positions for the current year or prior year.

Investments

Investments are composed of equity securities, certificate of deposits and mutual funds. Investments with readily determinable fair values are reported at their fair values in the statements of financial position. Donated investments are recorded at fair value as of the date received by the Center. Unrealized and realized gains and losses are reflected in the statements of activities.

Note 2 - Commitments

The Center rents office space under a sublease for ninety-three months with a starting monthly lease of \$4,665 per month. The lease payments increase by 3% every twelve months. The lease term ends March 31, 2023. The Center signed an additional sixty month lease ending in April 1, 2022 for additional office space. The lease payment increases by 3% every twelve months. Rental expense for 2020 was \$153,001 and for 2019 was \$134,340.

Minimum rental payments over the life of the lease are as follows:

2021	\$ 134 451
2022	103 556
2023	<u>53 016</u>
	\$ <u>291 023</u>

Note 3 - Grants concentration

The Center's operations are funded primarily through grants from Legal Services Corporation of Virginia. The following tabulation details grants which make up greater than 10% of total funding.

	<u>2020</u>	<u>2019</u>
Legal Services Corporation of Virginia	\$ 904 453	\$ 1 058 803
VOCA grant	577 478	525 020

Note 4 - Pension plan

The Center adopted a pension plan which qualifies under Section 403(b) of the Internal Revenue Code, in which employees may elect to have amounts withheld from their salaries and invested in tax deferred annuities. The Center contributes up to 8% of the employees' salary. Expenses under this plan totaled \$51,047 in 2020 and \$46,884 in 2019.

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Notes to Financial Statements June 30, 2020 and 2019

Note 5 - Investments

The aggregate fair value, gross unrealized holding gains, gross unrealized holding losses, and amortized cost for investments at June 30, 2020 and 2019 are as follows:

	2020			
	<u>Amortized Cost</u>	<u>Unrealized Gains</u>	<u>Unrealized Losses</u>	<u>Fair Value</u>
Exchange Traded Close Ends Funds	\$ 1 115 186	\$ 89 486	\$ 4 071	\$ 1 200 601
Money market	<u>12 138</u>	<u>-</u>	<u>-</u>	<u>12 138</u>
	<u>\$ 1 127 324</u>	<u>\$ 89 486</u>	<u>\$ 4 071</u>	<u>\$ 1 212 739</u>
	2019			
	<u>Amortized Cost</u>	<u>Unrealized Gains</u>	<u>Unrealized Losses</u>	<u>Fair Value</u>
Exchange Traded Close End Funds	\$ 1 089 138	\$ 102 624	\$ -	\$ 1 191 762
Certificate of deposits	<u>579 033</u>	<u>-</u>	<u>-</u>	<u>579 033</u>
	<u>\$ 1 668 171</u>	<u>\$ 102 624</u>	<u>\$ -</u>	<u>\$ 1 770 795</u>

Total interest earned in the current year totaled \$37,812 and the prior year totaled \$37,395.

Note 6 - Subsequent events

In preparing these financial statements, the Center has evaluated events and transactions for potential recognition or disclosure through September 24, 2020 the date the financial statements were issued.

In December 2019, a novel strain of corona-virus was reported to have surfaced in China. The spread of this virus began to cause some business disruption in March 2020. While the disruption is currently expected to be temporary, there is considerable uncertainty around the duration. Therefore, while the Corporation expects this matter to negatively impact its operating results, the related financial impact and duration cannot be reasonably estimated at this time.

Note 7 - Liquidity and Availability

Financial assets available for general expenditure, that is, without donor or other restrictions limiting their use, within one year of the balance sheet date, comprise the following:

Cash and cash equivalents	\$ 909 991
Investments	1 212 739
Accounts receivable	<u>440 834</u>
	<u>\$ 2 563 564</u>

**Notes to Financial Statements
June 30, 2020 and 2019**

Note 8 - Concentration of credit risk

Financial instruments which potentially subject the Center to concentration of credit risks consist principally of cash and cash equivalents. The Center maintains its cash balances in financial institutions located in central Virginia. Accounts at each institution are secured by the Federal Deposit Insurance Corporation up to \$250,000. Balances exceed the insured amount from time to time, but management does not believe there is significant risk.

The Center also has investments with a broker in the central Virginia area which is insured for up to \$100,000 for cash balances and a total of \$500,000 for cash and investment balances by the Securities Investor Protection Corporation (SIPC). The broker has also obtained additional insurance for accounts that have balances greater than the SIPC limit. The insurance does not cover losses caused by market value changes.

Management monitors receivables on a continuing basis and believes the credit risk is minimal because of close monitoring.

Note 9 - Fair value measurements

The Center records fair value adjustments to certain assets and liabilities and to determine fair value disclosures. The fair value of certain assets and liabilities is an exit price, representing the amount that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants. Three levels of the fair value hierarchy are as follows:

Level 1 - Valuation is based on quoted prices in active markets for identical assets and liabilities.

Level 2 - Valuation is based on observable inputs including quoted prices in active markets for similar assets and liabilities, quoted prices for identical or similar assets and liabilities in less active markets, and model-based valuation techniques for which significant assumptions can be derived primarily from or corroborated by observable data in the market.

Level 3 - Valuation is based on model-based techniques that use one or more significant inputs or assumptions that are unobservable in the market.

All investments were measured at fair value by level one valuation.

Note 10 - Accounting pronouncements

In February 2016, *Financial Accounting Standards Board* (FASB) issued new guidance over leases which requires that all leasing activity with terms greater than one year be recognized on the statement of financial position with a right of use asset and a lease liability. The asset and corresponding liability will be calculated based upon the present value of lease payments. The new standard will be effective for periods beginning after December 2021.

**Notes to Financial Statements
June 30, 2020 and 2019**

Note 11 - Paycheck Protection Program Loan Payable

On April 2020, Virginia Poverty Law Center, Inc. received loan proceeds in the amount of \$381,000 under the Paycheck Protection Program (“PPP”). The PPP, established as part of the Coronavirus Aid, Relief and Economic Security Act (“CARES Act”), provides for loans to qualifying businesses for amounts up to 2.5 times of the average monthly payroll expenses of the qualifying organizations. The loans and accrued interest are forgivable after twenty four weeks as long as the borrower uses the loan proceeds for eligible purposes, including payroll, benefits, rent and utilities, and maintains its payroll levels. The amount of loan forgiveness will be reduced if the borrower terminates employees or reduces salaries during the twenty four week period.

The unforgiven portion of the PPP loan is payable over two years at an interest rate of 1%, with a deferral of payments for the first six months. The Organization intends to use the proceeds for purposes consistent with the PPP. While the Organization currently believes that its use of the loan proceeds will meet the conditions for forgiveness of the loan, the Organization cannot guarantee that the loan will be eligible for forgiveness, in whole or in part.

Accompanying Information

VIRGINIA POVERTY LAW CENTER, INC.

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Statement of Support, Revenue and Expenses

For the Year Ended June 30, 2020

(With Summarized Financial Information for the Year Ended June 30, 2019)

	2020								
	Legal Services Corporation of Virginia IOLTA	Domestic Violence Grant	Victim Witness Program	Other Grants	ACA Healthcare Grants	Property and Equipment	General	Total	2019 Total
Support and revenue									
Grants and contracts	\$ 814,453	\$ 68,301	\$ 577,478	\$ 1,200,758	\$ 370,040	\$ -	\$ -	\$ 3,031,030	\$ 2,246,668
Other grants and income	90,000	-	-	-	219,766	-	-	309,766	697,182
Donations	-	-	-	-	-	-	166,049	166,049	210,831
Cy Pres awards	-	-	-	-	-	-	2,188	2,188	97,430
Unrealized gains (losses)	-	-	-	-	-	-	(17,036)	(17,036)	40,367
Realized gains (losses)	-	-	-	-	-	-	4,170	4,170	(9,305)
Interest income	-	-	-	-	-	-	37,812	37,812	37,395
Total support and revenue	904,453	68,301	577,478	1,200,758	589,806	-	193,183	3,533,979	3,320,568
Expenses									
Personnel	335,320	68,301	154,830	1,200,758	121,568	-	351,822	2,232,599	2,017,162
Travel	26,365	-	9,541	-	1,151	-	-	37,057	64,317
Space cost	133,832	-	-	-	-	-	60,115	193,947	170,472
Consumable supplies	30,652	-	-	-	1,252	-	-	31,904	36,868
Purchase and maintenance of equipment	31,835	-	-	-	-	-	-	31,835	21,098
Training	68,262	-	-	-	-	-	-	68,262	77,584
Other direct costs	83,386	-	-	-	4,610	-	-	87,996	72,736
Professional services	178,639	-	2,514	-	3,525	-	-	184,678	92,181
Sub-grant expense	-	-	410,593	-	457,700	-	-	868,293	1,079,996
Website	16,162	-	-	-	-	-	-	16,162	7,809
Depreciation expense	-	-	-	-	-	3,065	-	3,065	2,598
Total expenses	904,453	68,301	577,478	1,200,758	589,806	3,065	411,937	3,755,798	3,642,821
Change in net assets	-	-	-	-	-	(3,065)	(218,754)	(221,819)	(322,253)
Net assets at beginning of year	5,878	-	-	-	-	11,845	1,553,005	1,570,728	1,892,981
Acquisition of equipment	-	-	-	-	-	-	-	-	-
Net assets at end of year	\$ 5,878	\$ -	\$ -	\$ -	\$ -	\$ 8,780	\$ 1,334,251	\$ 1,348,909	\$ 1,570,728

Virginia Poverty Law Center

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Schedule of Expenditures of Federal Awards

For the Year Ended June 30, 2020

<u>Federal Grantor/Pass-Through Grantor/ Program</u>	<u>Federal Catalog Number</u>	<u>Federal Expenditures</u>
U.S. Department of Health and Human Services Cooperative agreement to support navigators in Federally - facilitated And State Partnership exchanges	93.332	391 758
U.S. Department of Justice Victim Witness Program/New Initiative	16.575	577 478
U.S. Department of Justice Violence Against Women	16.588	<u>21 894</u>
Total Expenditures of Federal Awards		\$ <u>991 130</u>

The accompanying notes are an integral part of this schedule

**Notes to the Schedule of Expenditures of Federal Awards
June 30, 2020**

Note 1 - Basis of Presentation

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal grant activity of Virginia Poverty Law Center, Inc. under programs of the federal government for the year ended June 30, 2020. 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), and Legal Services Corporation Audit Guide and Compliance Supplements. Because the Schedule presents only a selected portion of the operations of Virginia Poverty Law Center, Inc., it is not intended to and does not present the financial position, changes in net assets, or cash flows of Virginia Poverty Law Center, Inc.

Note 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 Title 2 U.S. *Code of Federal Regulations* (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* or OMB Circular A-122, *Cost Principles for Non-profit Organizations*, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

Virginia Poverty Law Center, Inc. has not elected to use the 10 percent de minimis indirect cost rate as allowed under the Uniform Guidance.

Note 3 - Sub-recipient

Funding was provided from Department of Human Services Navigator grants to sub-recipients in the amount of \$179,115 for the current year.

Funding was provided from Department of Justice - Victim Witness Program/New Initiative grants to a sub-recipient (Legal Aid Justice Center) in the amount of \$382,202 for the current year.

**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***

Board of Directors
Virginia Poverty Law Center, Inc.
Richmond, Virginia

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 Virginia Poverty Law Center Inc. (a nonprofit organization), which comprise the statement of financial position as of June 30, 2020, 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 September 24, 2020.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered Virginia Poverty Law Center Inc.'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 opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Virginia Poverty Law Center Inc.'s internal control. Accordingly, we do not express an opinion on the effectiveness of the Organization'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 Virginia Poverty Law Center Inc.'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 organization'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 organization's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Frank Barcalow CPA, P.L.L.C.

Frank Barcalow CPA, P.L.L.C.
Richmond, Virginia
September 24, 2020

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

Board of Directors
Virginia Poverty Law Center, Inc.
Richmond, Virginia

Report on Compliance for Each Major Federal Program

We have audited Virginia Poverty Law Center Inc.’s compliance with the types of compliance requirements described in the *OMB Circular Compliance Supplement* that could have a direct and material effect on each of Virginia Poverty Law Center, Inc.’s major federal programs for the year ended June 30, 2020. Virginia Poverty Law Center, Inc.’s 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 Virginia Poverty Law Center, Inc.’s 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 Virginia Poverty Law Center, Inc.’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 each major federal program. However, our audit does not provide a legal determination of Virginia Poverty Law Center, Inc.’s compliance.

Opinion on Each Major Federal Program

In our opinion, Virginia Poverty Law Center, Inc. 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, 2020.

Report on Internal Control Over Compliance

Management of Virginia Poverty Law Center, Inc. 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 Virginia Poverty Law Center, Inc.’s 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 Virginia Poverty Law Center, Inc.’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 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. 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.

Frank Barcalow CPA, P.L.L.C.

Frank Barcalow CPA, P.L.L.C.

Richmond, Virginia

September 24, 2020

Schedule of Findings and Questioned Costs
For the Year Ended June 30, 2020

A - Summary of Auditor's Results
Financial Statements

Type of auditor's 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? yes X none reported

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 section 2 CFR-200.516(a) yes X no

Identification of major programs:

Name of federal program CDFA Number

None

Dollar threshold used to distinguish between Type A
and Type B Programs 750,000

Auditee qualified as low risk? yes X no

B. Findings - financial statement audit

None

C. Findings and questioned costs - major federal awards programs audit

None