VCTC Intercity Services

Financial Statements

Fiscal Years Ended June 30, 2021 and 2020

VCTC Intercity Services

Fiscal Years Ended June 30, 2021 and 2020

TABLE OF CONTENTS

Independent Auditor's Report	<u>Page</u> 1
Financial Statements:	
Comparative Statement of Net Position	3
Comparative Statement of Revenues, Expenses, and Changes in Net Position	4
Comparative Statement of Cash Flows	5
Notes to Financial Statements: General Information Summary of Significant Accounting Policies Cash and Investments Due from Other Governments Capital Assets Unearned Revenue Transportation Development Act Compliance Requirements Organization Paid Fares Investment Expense Restrictions Contingencies	7 7 9 9 10 10 11 13 13 14
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 <i>Government Auditing Standards</i>	15



Board of Commissioners Ventura County Transportation Commission Ventura, California

INDEPENDENT AUDITOR'S REPORT

We have audited the accompanying financial statements of the Ventura County Transportation Commission's ("VCTC's") Intercity Fund, which is funded by Transportation Development Act Article 6.5, the Local Transportation Development Act Article 3 Local Transportation Fund, and Greenhouse Gas Reduction Fund – Low Carbon Transit Operations Program funds ("VCTC Intercity Fund"), as of and for the years ended June 30, 2021 and 2020, and the related notes to the financial statements as listed in the table of contents.

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 opinions 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 opinions.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of VCTC Intercity Fund of VCTC, as of June 30, 2021 and 2020, and the change in financial position of VCTC Intercity Fund of VCTC for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Emphasis of Matters

As discussed in Note 1, the financial statements present only the VCTC Intercity Fund of VCTC and do not purport to, and do not present fairly, the financial position of VCTC as of June 30, 2021 and 2020, the changes in its financial position, or, where applicable, its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated December 14, 2021 on our consideration of VCTC's internal control over financial reporting for the VCTC Intercity Fund and on our tests of its compliance with certain provisions of laws, regulations, contracts, 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 VCTC'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 VCTC's internal control over financial reporting and compliance.

Lake Forest, California December 14, 2021

Convad LLP

VCTC Intercity Services

Comparative Statement of Net Position

June 30, 2021 and 2020

<u>Assets</u>	2021	2020
Cash and investments (Note 3) Due from other funds Interest receivable	\$ 1,119,7 -	98 \$ 757,927 195,914 01 1,326
Due from other governments (Note 4) Prepaids	429,7 24,7	59 287,383
Total current assets	1,574,7	
Non-current assets: Capital assets, net (Note 5)	11,205,7	49 13,071,486
Total assets	12,780,4	87 14,314,036
Deferred outflows of resources		
Deferred outflows of resources - pensions Deferred outflows of resources - OPEB	133,5 21,2	
Total deferred outflows of resources	154,8	
Liabilities		
Accounts payable	654,0	39 1,196,469
Unearned revenue (Note 6)	72,8	, ,
Due to other fund	648,8	
Non-current liability due within one year	13,3	
Total current liabilities	1,389,0	86 1,252,528
Non-current liabilities:		
Due beyond one year Net pension liability	191,3	49 175,761
Net OPEB liability	26,5	
Total non-current liabilities	217,9	15 204,685
Total liabilities	1,607,0	01 1,457,213
Deferred inflows of resources		
Deferred inflows of resources - pensions	14,9	
Deferred inflows of resources - OPEB	6,9	_
Total deferred inflows of resources	21,8	35 23,873
Net position		
Net investment in capital assets Restricted for transportation (deficit)	11,205,7 100,7	, ,
Total net position	\$ 11,306,5	21 \$ 12,905,036

See accompanying notes to financial statements.

VCTC Intercity Services

Comparative Statement of Revenues, Expenses, and Changes in Net Position

For the Fiscal Years Ended June 30, 2021 and 2020

	2021	2020
Operating revenues: Passenger fares for transit services Organization paid fares (Note 8) Passenger route guarantee	\$ - 753,815	\$ 670,800 151,215 1,368,728
Total operating revenues	753,815	2,190,743
Operating expenses: Operations	9,519,427	10,572,618
Total operating expenses	9,519,427	10,572,618
Operating loss	(8,765,612) (8,381,875)
Non-operating revenues: FTA grants LCTOP funds Prop 1B OES Local Transit Fund State Transit Assistance funds Interest income Other income Total non-operating revenues Non-operating expenses: Investment expense (Note 9)	6,039,138 550,351 - 351,191 - 227,466 7,168,146	640,000 2,426 35,713 9,384,807 16,498 16,384 11,993,144
Total non-operating expenses	1,049	
Income before other revenue, expenses, and transfers Transfer in	(1,598,515) 3,611,269
Change in net position	(1,598,515) 3,611,269
Net position at beginning of year	12,905,036	9,293,767
Net position at end of year	\$ 11,306,521	\$ 12,905,036

See accompanying notes to financial statements.

VCTC Intercity Services

Comparative Statement of Cash Flows

For the Fiscal Years Ended June 30, 2021 and 2020

	2021	2020
Cash flow from operating activities:		
Cash received from passenger fares	\$ -	\$ 674,250
Cash received from organization paid fares	-	151,215
Cash received from route guarantee	753,815	1,368,728
Cash paid for operating costs, net of support	(8,289,127)	(8,250,705)
Net cash used for operating activities	(7,535,312)	(6,056,512)
Cash flow from non-capital financing activities:		
Cash received from FTA grants	5,886,055	1,739,393
Cash received from local transportation fund	, , , <u>-</u>	35,713
Cash received from state transit assistance funds	1,195,914	9,376,098
Cash received from state grants	550,351	642,426
Cash received/(paid) from/to local contribution revenues	713	(713)
Cash received/(paid) from/to miscellaneous sources	264,274	<u>(28, 114)</u>
Net cash provided by noncapital financing activities	7,897,307	11,764,803
Cash flow from capital financing activities:		
Cash paid for acquisition of capital assets		(5,505,004)
Net cash used for capital financing activities		(5,505,004)
Cash from investing activities:		
Cash received/(paid) from/to interest received from investments	(124)	18,520
Net cash provided/(used) by/for investing activities	(124)	18,520
Net increase in cash and investments	361,871	221,807
Cash and investments, beginning of year	757,927	536,120
Cash and investments, end of year	<u>\$ 1,119,798</u>	<u>\$ 757,927</u>

See accompanying notes to financial statements.

VCTC Intercity Services

Comparative Statement of Cash Flows

For the Fiscal Years Ended June 30, 2021 and 2020

	2021	2020
Reconciliation of operating loss to net cash used for operating activities:		
Operating loss	\$ (8,765,612)	\$ (8,381,875)
Adjustments to reconcile operating loss to net cash provided by operating activities:		
Depreciation expense	1,865,737	1,846,055
Changes in operating assets and liabilities:		0.450
Decrease in accounts receivable	(04.700)	3,450
Decrease/(increase) in prepaids	(24,780)	800
Decrease in deferred outflows of resources - pensions Decrease in deferred outflows of resources - OPEB	(80,737)	· · · /
200.0000 00.00.000 00.0000.000 0. 22	(2,047)	, ,
Increase/(decrease) in accounts payable	(542,430) 3,365	
Increase in non-current liabilities due within one year	•	1,278 8,740
Increase/(decrease) in deferred inflows of resources - pensions Increase/(decrease) in deferred inflows of resources - OPEB	(1,774)	4,833
Increase in non-current liabilities due beyond one year - pensions	(264) 15,588	40,750
Increase/(decrease) in non-current liabilities due beyond one year - OPEE		5,819
increase/(decrease) in non-current habilities due beyond one year - Of LL	(2,330)	3,019
Total adjustments	1,230,300	2,325,363
Net cash used for operating activities	\$ (7,535,312)	\$ (6,056,512)

Non-cash investing, capital, and financing activities:

The VCTC Intercity Services fund had no non-cash financing activity in fiscal years 2020-21 and 2019-20.

VCTC Intercity Services

Notes to Financial Statements

Fiscal Years Ended June 30, 2021 and 2020

(1) General Information

The financial statements are intended to reflect the financial position and changes in financial position for the VCTC Intercity Services ("VCTC Intercity Fund") of the Ventura County Transportation Commission ("VCTC") only.

Pursuant to Section 99313.3 of the California Public Utilities Code, State Transit Assistance Fund moneys may be used for public transportation purposes, including community transit services.

(2) <u>Summary of Significant Accounting Policies</u>

Fund Accounting

The accounts of VCTC are organized on the basis of funds and account groups. A fund is defined as an independent fiscal and accounting entity wherein operations of each fund are accounted for in a separate set of self-balancing accounts that record resources, related liabilities, obligations, reserves, and equity segregated for the purpose of carrying out specific activities or attaining certain objectives in accordance with special regulations, restrictions, or limitations. VCTC accounts for the activity of the VCTC Intercity Fund in an Enterprise Fund.

Measurement Focus and Basis of Accounting

Enterprise Funds are accounted for using the accrual basis of accounting. The revenues are recognized in the accounting period when they are earned, and expenses are recognized in the accounting period in which the liability is incurred.

VCTC applies pronouncements of the Financial Accounting Standards Board ("FASB") issued on or before November 30, 1989 that are not in conflict with applicable GASB pronouncements.

Capitalization Policy

The VCTC Intercity Fund capitalizes and depreciates assets with an initial individual cost of more than \$5,000 and an estimated useful life in excess of one year. The costs of normal maintenance and repairs that do not add to the value of the asset or materially extend the life of the asset are not capitalized.

VCTC Intercity Services

Notes to Financial Statements

Fiscal Years Ended June 30, 2021 and 2020

(2) <u>Summary of Significant Accounting Policies (Continued)</u>

<u>Deferred Outflows/Inflows of Resources</u>

VCTC has adopted GASB Statement No. 63, Financial Reporting of Deferred Outflows of Resources, Deferred Inflows of Resources, and Net Position that was issued in June 2011. Deferred outflows of resources represent a consumption of net position that applies to future periods and will not be recognized as an outflow of resources (expense) until then. Deferred inflows of resources represent an acquisition of net position that applies to future periods and so will not be recognized as an inflow of resources (revenue) until that time.

Revenue Recognition

Recognition of revenues arising from nonexchange transactions, which include revenues from taxes, certain grants, and contributions, is based on the primary characteristic from which the revenues are received by VCTC.

For VCTC, funds received under Transportation Development Act Article 6.5, Section 99312(c) of the Public Utilities Code possess the characteristic of a voluntary nonexchange transaction similar to a grant. Revenues under TDA Article 6.5, Section 99313 and 99314, TDA Article 3, and revenues under Proposition 1B are recognized when related costs have been incurred. An unearned revenue arises when grant receipts are collected in excess of reimbursable costs incurred.

Fund operating revenues, such as passenger fares, result from exchange transactions associated with the principal activity of the fund. Exchange transactions are those in which each party receives and gives up essentially equal values.

Net Position

The components of net position reflect the component classifications described below.

- Net Investment in Capital Assets this includes capital assets, net of depreciation, reduced by the outstanding balances of bonds and notes, if any, that are attributable to the acquisition, construction, or improvement of those assets. Applicable deferred outflows of resources and deferred inflows of resources, if any, should also be included in this component of net position.
- Restricted this includes assets, mainly cash and investments, bound by constraints on resources that are externally imposed by creditors, grantors, contributors, or laws and regulations of other governments.

VCTC Intercity Services

Notes to Financial Statements

Fiscal Years Ended June 30, 2021 and 2020

(2) Summary of Significant Accounting Policies (Continued)

Unrestricted – this includes the remaining balance of the net amount of assets, deferred
outflows of resources that are not included in the determination of net investment in capital,
or the restricted components of net position.

It is VCTC's policy that restricted resources will be applied first, followed by unrestricted resources, in the absence of a formal policy adopted by the Board of Commissioners.

Use of Estimates

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

(3) Cash and Investments

VCTC has pooled its cash and investments in order to achieve a higher return on investments while facilitating the management of cash. The balance in the pool account is available to meet current operating requirements. Cash in excess of current requirements is invested in various interest-bearing accounts and other investments for varying terms. The VCTC Intercity Fund's cash and investments as of June 30, 2021 and 2020 were \$1,119,798 and \$757,927, respectively.

The VCTC Intercity Fund's cash is deposited in VCTC's internal investment pool, which is reported at fair value. Interest income is allocated on the basis of average cash balances. Investment policies and associated risk factors applicable to VCTC Intercity Fund are those of VCTC and are included in VCTC's basic financial statements.

See VCTC's basic financial statements for disclosures related to cash and investments including those disclosures relating to interest rate risk, credit rate risk, custodial credit risk, and concentration risk.

(4) Due from Other Governments

Due from other governments consists of amounts due from the Federal Transit Administration, totaling \$429,759 and \$287,383, respectively, for years ended June 30, 2021 and 2020.

VCTC Intercity Services

Notes to Financial Statements

Fiscal Years Ended June 30, 2021 and 2020

(5) Capital Assets

Capital assets are recorded at cost and are depreciated over their estimated useful lives. The purpose of depreciation is to spread the cost of capital assets over the life of these assets. The amount charged to depreciation expense each year represents that year's pro rata share of the cost of capital assets.

Depreciation of all capital assets is charged as an expense against operations each year, and the total amount of depreciation taken over the years, called accumulated depreciation, is reported on the balance sheet as a reduction in the book value of the capital assets.

Depreciation of capital assets in service is provided using the straight-line method which means the cost of the asset is divided by its expected useful life in years, and the result is charged to expense each year until the asset is fully depreciated. VCTC assigned the useful lives listed below to capital assets.

Bus, vehicle, and equipment 5-12 years

Capital assets consisted of the following as of June 30, 2021:

	Balance on July 1, 2020	Additions / <u>Transfers</u>	Retirements	Balance on June 30, 2021
Capital assets being depreciated: Vehicles and equipment	\$ 19,184,61 <u>8</u>	\$	\$ -	\$ 19,184,618
Total capital assets being depreciated	19,184,618	-	<u> </u>	19,184,618
Less accumulated depreciation for: Vehicles and equipment	(6,113,132)	(1,865,737)		(7,978,869)
Total accumulated depreciation	<u>(6,113,132</u>)	(1,865,737)		<u>(7,978,869</u>)
Capital assets, net	\$ 13,071,486	\$(1,865,737)	\$	\$ 11,205,749

(6) Unearned Revenue

The balance of unearned revenue as of June 30, 2021 and 2020 consisted of California State University Channel Islands ("CSUCI") funds and a credit from Roadrunner Management Services for the amount of \$72,876 and \$46,062, respectively.

VCTC Intercity Services

Notes to Financial Statements

Fiscal Years Ended June 30, 2021 and 2020

(7) <u>Transportation Development Act Compliance Requirements</u>

VCTC Intercity Services is subject to the provisions pursuant to Section 6634 of the California Code of Regulations and Section 99268.3 of the Public Utilities Code.

A. Section 6634

Pursuant to Section 6634, a transit claimant is precluded from receiving moneys from the State Transit Assistance Fund in an amount which exceeds the claimant's capital and operating costs less the actual amount of fares received, the amount of local support required to meet the fare ratio, the amount of federal operating assistance, and the amount received during the year from a city or county to which the operator has provided services beyond its boundaries.

During the Fiscal Year 2020/21 the funds received from the State Transit Assistance Fund complied with the above provision.

B. Section 99268.3

Section 99268.3 indicates that an operator in Ventura County providing regular public transportation shall be eligible for TDA funds if it maintains for the fiscal year, ratio of fare revenue to operating costs at least equal to 20%.

Farebox revenue*: Farebox revenue Pouto guarante a Country	\$ -
Route guarantee – Santa Barbara County Association of Governments Route guarantee – CSU Channel Islands	722,800 31,015
Total farebox revenue	<u>\$ 753,815</u>
Operating expenses: Less depreciation Less capital vehicle leases	\$ 9,519,427 (1,865,737) (261,504)
Net adjusted operating expenses	<u>\$ 7,392,187</u>
Fare ratio	<u>10.20%</u>
Required fare ratio pursuant to PUC Section 99268.3	<u>20.00%</u>

^{*} VCTC includes a portion of the local contribution as a route guarantee.

VCTC Intercity Services

Notes to Financial Statements

Fiscal Years Ended June 30, 2021 and 2020

(7) <u>Transportation Development Act Compliance Requirements (Continued)</u>

During the Fiscal Year 2020/21, VCTC maintained a ratio of fare revenues to operating costs of 10.20%. The ratio did not meet the minimum ratio of 20%.

Due to the COVID-19 pandemic, VCTC suspended the collection of fares for services for the period July 1, 2020 through June 30, 2021. On June 29, 2020, the Governor of California signed Assembly Bill 90 which prohibits the imposition of a penalty on operators that do not maintain the required ratio of fare revenues to operating cost during the 2019-20 or 2020-21 fiscal years. Although the fare ratio requirement was not met, in accordance with Assembly Bill 90, there was no penalty.

C. Section 99314.6

Section 99314.6 states that funds shall be allocated for operating or capital purposes pursuant to Sections 99313 and 99314 to an operator if the operator meets an efficiency standard for either of two alternate measurement periods. The operator may use its entire allocation for operating purposes if the current period's total operating cost per revenue vehicle hour ("operating rate") does not exceed the preceding period's operating rate plus an amount equal to the percentage change in the regional Consumer Price Index ("CPI") multiplied by the preceding operating rate. The two alternate measurement methods are (1) the current year ("CY") compared to the prior year ("PY") and (2) the CY 3-year average (consecutive 3 years ending with the current year) compared to the PY year 3-year average (consecutive 3 years ending with the prior year).

During the Fiscal Year 2020/21, VCTC did not meet the efficiency standard for either measurement method. The calculation under the two methods is illustrated below.

		3 Year
	Single Year	<u>Average</u>
CY Operating Rate	\$ 150.62	\$ 139.42
PY Operating Rate	137.19	130.62
CPI Change %	3.99%	2.90%
CY Target Operating Rate	\$ 142.66	\$ 134.41
CY Operating Rate Over Target	\$ 7.96	\$ 5.01
CY Over Target %	5.58%	3.73%

If the operator fails to meet this standard, the funds shall be reallocated from operations to capital purposes. The allocation for operations is the total allocation reduced by the lower of the two percentages in which the operator exceeded the target operating rate. The remaining amount must be used for capital purposes.

VCTC Intercity Services

Notes to Financial Statements

Fiscal Years Ended June 30, 2021 and 2020

(7) <u>Transportation Development Act Compliance Requirements (Continued)</u>

State Transit Assistance funds \$ 351,191

Allocation restricted to capital expenditure (3.73%) \$ 13,099

VCTC allocated \$0 in State Transit Assistance funds for capital additions during Fiscal Year 2020/21, less than the required capital expenditure amount of \$13,099.

Due to the COVID-19 pandemic, VCTC suspended the collection of fares for services for the period July 1, 2020 through June 30, 2021. On June 29, 2020, the Governor of California signed Assembly Bill 90 which prohibits the imposition of a penalty on operators that do not meet the required efficiency standard during the 2019-20 or 2020-21 fiscal years. Although the efficiency standard was not met, which would have resulted in capital expenditure requirements, in accordance with Assembly Bill 90, the capital expenditure requirements were waived and there is no penalty.

(8) <u>Organization Paid Fares</u>

Implemented in Fiscal Year 2018/19, the College Easy Ride Pass Pilot Program allows students from Moorpark, Oxnard and Ventura Colleges, Cal State University Channel Islands, and Cal Lutheran University to ride the bus for free during the school year. This program is funded by the Low Carbon Transit Operations Program. These funds are used to reimburse the bus transit provider for the rides taken by the students. The organization paid fares received for the fiscal year ended June 30, 2021 and 2020 were \$0 and \$151,215, respectively.

(9) <u>Investment Expense</u>

Investment expense for the fiscal year ended June 30, 2021 consists of fair value adjustment and investment income, where unrealized loss due to the fair value adjustment in Fiscal Year 2020/21 is greater than the investment income. Fair value adjustment and investment income for the fiscal year ended June 30, 2021 was as follows:

	FY 2021
Fair value adjustment	\$ 2,474
Investment income	<u>(1,425</u>)
Total investment expense	\$ 1,049

VCTC Intercity Services

Notes to Financial Statements

Fiscal Years Ended June 30, 2021 and 2020

(10) Restrictions

Funds received pursuant to the Transportation Development Act of the State of California may only be used for public transportation and transit.

(11) Contingencies

See VCTC's basic financial statements for disclosures related to contingencies including those relating to various legal actions, administrative proceedings, or claims in the ordinary course of operations.



Board of Commissioners Ventura County Transportation Commission Ventura, California

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

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 Ventura County Transportation Commission's ("VCTC's") Intercity Fund, which is funded by Transportation Development Act Article 6.5, the Local Transportation Development Act Article 3 Local Transportation Fund, and Greenhouse Gas Reduction Fund – Low Carbon Transit Operations Program funds ("VCTC Intercity Fund"), as of and for the years ended June 30, 2021 and 2020, and the related notes to the financial statements, and have issued our report thereon dated December 14, 2021.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered VCTC'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 opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of VCTC's internal control. Accordingly, we do not express an opinion on the effectiveness of VCTC'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 financial statements of the VCTC Intercity Fund are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, including §6667 of Part 21 of the California Code of Regulations, 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*, including §6667 of Part 21 of the California Code of Regulations.

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.

Lake Forest, California December 14, 2021

Convad LLP