RAPE, ABUSE & INCEST NATIONAL NETWORK (RAINN)

AUDITED FINANCIAL STATEMENTS AND SUPPLEMENTARY INFORMATION

YEARS ENDED MAY 31, 2023 AND 2022

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Independent Auditor's Report

To the Board of Directors

Rape, Abuse & Incest National Network (RAINN)

Washington, D.C.

Report on the Audit of the Financial Statements

Opinion

We have audited the accompanying financial statements of **Rape**, **Abuse & Incest National Network** (**RAINN**) (a nonprofit organization), which comprise the Statements of Financial Position as of May 31, 2023 and 2022, and the related Statements of Activities and Changes in Net Assets, Functional Expenses and Cash Flows for the years then ended, and the related notes to the financial statements.

In our opinion, the 2023 financial statements referred to above present fairly, in all material respects, the financial position of **Rape**, **Abuse & Incest National Network (RAINN)** as of May 31, 2023 and the changes in its net assets and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

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. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of **Rape**, **Abuse & Incest National Network (RAINN)** and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Prior Period Financial Statements

The financial statements as of May 31, 2022 were audited by Aronson LLC, who merged with Aprio, LLP as of January 1, 2023, and whose report dated November 10, 2022, expressed an unmodified opinion on those statements.

Emphasis of Matter

As discussed in Note 1 to the financial statements, **Rape**, **Abuse & Incest National Network (RAINN)** changed its method of accounting for leases due to the adoption of ASC 842 as of June 1, 2022. Our opinion is not modified with respect to this matter.

Independent Auditor's Report (Continued)

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about Rape, Abuse & Incest National Network (RAINN)'s ability to continue as a going concern within one year after the date that the financial statements are available to be issued.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards and Government Auditing Standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of Rape, Abuse & Incest National Network (RAINN)'s internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about **Rape**, **Abuse & Incest National Network (RAINN)'s** ability to continue as a going concern for a reasonable period of time.

Independent Auditor's Report (Continued)

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control related matters that we identified during the audit.

Supplementary Information

Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying Schedule of Expenditures of Federal Awards, as required by Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, is presented for purposes of additional analysis and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. 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 January 23, 2024, on our consideration of Rape, Abuse & Incest National Network (RAINN)'s internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of Rape, Abuse & Incest National Network (RAINN)'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 Rape, Abuse & Incest National Network (RAINN)'s internal control over financial reporting and compliance.

Rockville, Maryland January 23, 2024

Statements of Financial Position

	Statements of Fin	anciai i ositioi
May 31,	2023	2022
Assets		
Cash and cash equivalents	\$ 849,401	\$ 1,792,266
Investments	27,194,193	25,586,005
Pledges receivable	450,238	294,820
Accounts receivable	802,033	862,400
Prepaid expenses and deposit	375,234	224,338
Property and equipment, net	1,569,275	1,441,475
Right-of-use assets - operating leases	3,540,474	-
Total assets	\$ 34,780,848	\$ 30,201,304
Accounts payable and accrued expenses Deferred rent Deferred revenue Lease liabilities - operating leases	\$ 1,588,400 - 126,935	\$ 1,132,916 805,201 298,896
	4,289,878	<u> </u>
Total liabilities	6,005,213	2,237,013
Net assets		
Net assets without donor restrictions	28,147,494	26,728,958
Net assets with donor restrictions	628,141	1,235,333
Total net assets	28,775,635	27,964,291
Total liabilities and net assets	\$ 34,780,848	\$ 30,201,304

The accompanying Notes to Financial Statements are an integral part of these financial statements.

Statements of Activities and Changes in Net Assets

Years Ended May 31,	2023	2022
Revenues and support		
Consulting service fees	\$ 9,244,787	\$ 7,364,471
Contributions	4,224,898	6,080,994
Federal grants	1,134,349	2,133,557
PPP loan forgiveness	_	1,301,915
Contributed services and gifts-in-kind	2,391,943	2,762,540
Merchandise sales	_	102
Other revenue	15,227	-
Investment income (loss)	389,604	(1,888,681)
Net assets released from restrictions	6,055,696	5,073,456
	22 457 504	22 020 254
Total revenues and support	23,456,504	22,828,354
Expenses		
Programs	19,452,658	16,958,328
Management and general	761,142	391,500
Fundraising	1,824,168	1,774,574
Total expenses	22,037,968	19,124,402
Total change in net assets without donor restrictions	1,418,536	3,703,952
Change in net assets with donor restrictions		
Contributions	5,448,504	5,944,648
Net assets released from restrictions	(6,055,696)	(5,073,456)
Total change in net assets with donor restrictions	(607,192)	871,192
Total change in net assets	811,344	4,575,144
Net assets, beginning of year	27,964,291	23,389,147
Net assets, end of year	\$ 28,775,635	\$ 27,964,291

The accompanying Notes to Financial Statements are an integral part of these financial statements.

Statement of Functional Expenses

Year Ended May 31, 2023	Com	nmunications	Victims Services	Public Policy	(Consulting Services	Total Programs	N	lanagement and General	Fu	ndraising	Total
Salaries	\$	917,622	\$ 7,679,548	\$ 504,204	\$	1,479,228	\$ 10,580,602	\$	360,755	\$	908,549	\$ 11,849,906
Taxes - payroll		74,099	639,931	40,774		117,877	872,681		26,564		73,447	972,692
Employee benefits		103,237	630,340	34,335		152,793	920,705		27,961		68,269	1,016,935
Accounting		5,284	47,252	3,180		8,555	64,271		1,650		4,806	70,727
Bank and credit card fees		7,376	62,357	4,134		14,758	88,625		3,253		68,296	160,174
Conferences		7,046	63,461	4,757		11,264	86,528		8,193		9,424	104,145
Contractors and consultants		373,099	1,115,304	219,693		216,588	1,924,684		250,600		266,436	2,441,720
Depreciation and amortization		11,655	98,949	5,730		19,745	136,079		5,007		10,219	151,305
Equipment		15,910	91,751	6,151		17,679	131,491		4,383		10,894	146,768
Internet hosting		28,232	225,482	14,804		53,775	322,293		10,672		27,726	360,691
Legal		38,021	114,360	1,111,374		20,005	1,283,760		4,614		21,742	1,310,116
Liability insurance		4,681	39,674	2,498		39,189	86,042		1,763		4,432	92,237
Occupancy expenses		49,921	420,834	28,568		79,832	579,155		15,433		47,976	642,564
Postage		41,549	6,815	496		1,336	50,196		5,376		2,574	58,146
Printing		5,234	24,204	431		114	29,983		89		2,149	32,221
Public education/awareness		1,693,072	38,197	40,412		617	1,772,298		946		172,266	1,945,510
Software		51,308	196,526	27,214		42,800	317,848		13,047		81,860	412,755
State registration fees/other taxes		-	-	19,604		-	19,604		180		18,330	38,114
Supplies		895	3,221	229		690	5,035		1,078		908	7,021
Telephone		13,532	95,071	6,242		21,362	136,207		4,503		11,248	151,958
Travel		8,427	2,868	18,227		15,049	44,571		15,075		12,617	72,263
Total	\$	3,450,200	\$ 11,596,145	\$ 2,093,057	\$	2,313,256	\$ 19,452,658	\$	761,142	\$	1,824,168	\$ 22,037,968

Statement of Functional Expenses

Year Ended May 31, 2022	Cor	nmunications	Victims Services	Public Policy	1	Consulting Services	Total Programs	M	fanagement and General	F	undraising	Total
Salaries	\$	992,825	\$ 5,926,597	\$ 550,693	\$	1,391,030	\$ 8,861,145	\$	252,676	\$	833,864	\$ 9,947,685
Taxes - payroll		81,292	481,747	44,514		113,812	721,365		20,549		68,263	810,177
Employee benefits		80,852	619,061	40,103		103,994	844,010		18,321		65,683	928,014
Accounting		5,443	23,007	2,919		6,520	37,889		945		4,254	43,088
Bank and credit card fees		13,177	76,336	7,052		23,149	119,714		3,225		95,722	218,661
Conferences		723	7,450	3,462		660	12,295		358		23,955	36,608
Contractors and consultants		331,554	503,039	225,300		155,725	1,215,618		42,389		437,269	1,695,276
Depreciation and amortization		9,756	65,705	4,542		13,971	93,974		2,047		8,258	104,279
Equipment		13,321	79,824	7,380		18,645	119,170		3,386		11,180	133,736
Internet hosting		23,379	139,564	12,966		34,631	210,540		6,110		19,886	236,536
Legal		123,264	109,290	1,276,232		2,843	1,511,629		424		1,646	1,513,699
Liability insurance		2,942	50,147	1,484		17,967	72,540		547		2,440	75,527
Occupancy expense		56,632	386,487	35,623		89,816	568,558		15,390		55,429	639,377
Postage		52,746	7,592	569		1,774	62,681		343		10,468	73,492
Printing		46,396	12,067	55		136	58,654		23		1,341	60,018
Public education/awareness		1,474,588	9,224	14,160		84	1,498,056		139		1,055	1,499,250
Software		94,688	483,358	71,353		121,698	771,097		19,413		83,425	873,935
State registration fees/other taxes		8	47	18,102		12	18,169		13		19,297	37,479
Supplies		1,880	7,905	733		3,740	14,258		208		15,340	29,806
Telephone		13,210	79,157	7,327		28,898	128,592		2,884		13,245	144,721
Travel		2,481	2,314	12,249		1,330	18,374		2,110		2,554	23,038
Total	\$	3,421,157	\$ 9,069,918	\$ 2,336,818	\$	2,130,435	\$ 16,958,328	\$	391,500	\$	1,774,574	\$ 19,124,402

Statements of Cash Flows

Years Ended May 31,	2023	2022
Cash flows from operating activities		
Change in net assets	\$ 811,344	\$ 4,575,144
Adjustments to reconcile change in net assets to net cash		
provided by operating activities		
Depreciation and amortization	151,305	104,279
Unrealized and realized (gains) loss on investments	(389,263)	1,889,956
Donated investments	(42,906)	-
PPP loan forgiveness	-	(1,301,915)
Loss on disposal of property and equipment	-	21,732
(Increase) decrease in		
Pledges receivable	(155,418)	407,995
Accounts receivable	60,367	(676,253)
Prepaid expenses and deposit	(150,896)	8,139
Right-of-use assets - operating leases	476,639	-
Increase (decrease) in		
Accounts payable and accrued expenses	455,484	24,308
Deferred rent	-	(58,197)
Deferred revenue	(171,961)	(471,017)
Lease liabilities - operating leases	(532,436)	-
Net cash provided by operating activities	512,259	4,524,171
Cash flows from investing activities		
Purchase of investments	(6,206,359)	(14,659,933)
Proceeds from sale of investments	5,030,340	9,193,254
Purchase of property and equipment	(279,105)	(444,040)
Net cash used by investing activities	(1,455,124)	(5,910,719)
Net change in cash and cash equivalents	(942,865)	(1,386,548)
Cash and cash equivalents, beginning of year	1,792,266	3,178,814
Cash and cash equivalents, end of year	\$ 849,401	\$ 1,792,266
Supplemental non-cash investing and financing activities	 	
Donated investments	\$ 42,906	\$ -

Notes to Financial Statements

1. Organization and significant accounting policies

Organization: Rape, Abuse & Incest National Network (RAINN) (the Organization) was organized for the charitable and educational purposes of establishing and maintaining the National Sexual Assault Hotline, National Sexual Assault Online Hotline and other services for victims; educating the public about sexual assault; and improving the criminal justice response to sexual violence. As a Voluntary Health and Welfare organization, RAINN provides direct services for victims of sexual assault. RAINN is located and operates in Washington, D.C.

Basis of accounting: The financial statements of RAINN have been prepared on the accrual basis of accounting, in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP).

Basis of presentation: Net assets and revenues are classified based on the existence or absence of donor-imposed restrictions and reported as follows:

<u>Net assets without donor restrictions</u> - net assets that are not subject to donor-imposed stipulations.

Net assets with donor restrictions - net assets subject to donor-imposed stipulations as to time or purpose of use or net assets subject to donor-imposed stipulations that neither expire by the passage of time nor can be fulfilled or otherwise removed by the actions of RAINN. Donor-restricted contributions whose restrictions are met in the same reporting period are reported as net assets without donor restrictions on the Statements of Activities and Changes in Net Assets. Net assets with donor restrictions for purpose and time were \$628,141 and \$1,235,333 as of May 31, 2023 and 2022, respectively.

Cash and cash equivalents: RAINN considers all highly liquid debt instruments purchased with an original maturity of three months or less to be cash equivalents. RAINN maintains cash balances at one commercial bank, that can exceed the Federal Deposit Insurance Corporation (FDIC) insured deposit limit of \$250,000 per financial institution. At May 31, 2023 and 2022, RAINN's cash balances held at the commercial bank exceeded the FDIC limit by approximately \$559,000 and \$1,531,000, respectively. Management does not believe that this results in any significant credit risk. RAINN has not experienced any losses through the date when the financial statements were available to be issued.

Investments: Investments consist of money market funds, common stock, exchange traded and close-end funds, and mutual funds, which are stated at fair value based on published market values, and common stock — structured investments which are valued at fair value utilizing quoted prices for similar assets in active markets. Purchases and sales of investments are recorded on a trade-date basis. Interest income is recorded on the accrual basis. Dividends are recorded on the ex-dividend date.

Notes to Financial Statements

Pledges receivable: Pledge receivables are comprised of federal and nonfederal receivables. RAINN records pledges in the period which they are promised or when expenses are incurred for federal programs. Unconditional promises to give are recorded as contributions when received. The allowance for doubtful accounts reflects the best estimate of probable losses determined principally on the basis of historical experience and specific allowances for known troubled accounts. All accounts or portions thereof that are deemed to be uncollectible or that require an excessive collection cost are written off to the allowance for doubtful accounts. Management believes the balance to be fully collectible, therefore no allowance for uncollectible pledges has been recorded.

Accounts receivable: Accounts receivable for contracts are recorded when expenses are incurred, or services or milestones are achieved for programs. The allowance for doubtful accounts reflects the best estimate of probable losses determined principally on the basis of historical experience and specific allowances for known troubled accounts. All accounts or portions thereof that are deemed to be uncollectible or that require an excessive collection cost are written off to the allowance for doubtful accounts. Management believes this balance is fully collectible and therefore no allowance for doubtful accounts is deemed necessary.

Property and equipment: Property and equipment are recorded at the original cost and are depreciated on a straight-line basis over estimated lives of three to five years with a capitalization policy of \$5,000. Leasehold improvements to property are recorded at cost and are amortized over the lesser of the useful life or the remaining term of the lease.

Leases: Prior to adoption of Accounting Standards Codification 842, *Leases*, (ASC 842), RAINN recognized the minimum rents required under operating leases as rent expense on a straight-line basis over the life of the lease. Differences between amounts recognized as expense and the amounts paid were recorded as deferred rent on the Statements of Financial Position.

Notes to Financial Statements

As of June 1, 2022, RAINN adopted Accounting Standards Codification 842, Leases, (ASC 842). For operating leases with initial lease terms greater than 12 months, operating lease right-of-use assets (ROU) and lease liabilities are recognized at the lease commencement date based on the present value of the lease payments over the lease term. ROU assets also include adjustments related to lease payments made and lease incentives received at or before the commencement date. The ROU asset resulting from operating leases is disclosed as right-of-use assets – operating lease and the related liability is included in operating lease liabilities in the Statements of Financial Position. At lease commencement, lease liabilities are recognized based on the present value of the remaining lease payments and discounted using the risk-free rate. Operating lease cost is recognized on a straightline basis over the lease term as occupancy in the accompanying Statements of Functional Expenses. Lease and non-lease components of office lease agreements are accounted for as a single component. Lease terms may include options to extend or terminate the lease when it is reasonably certain that RAINN will exercise that option. RAINN determines if an arrangement is a lease at inception. All leases are recorded on the Statements of Financial Position except for leases with an initial term less than 12 months for which RAINN made the short-term lease election.

Revenue recognition:

RAINN recognizes revenue in accordance with Accounting Standards Codification 606, *Revenue from Contracts with Customers* ("ASC 606"). The standard outlines a five-step model whereby revenue is recognized as performance obligations within a contract are satisfied. The five-step model is outlined below:

- Step 1: Identify the contract(s) with a customer.
- Step 2: Identify the performance obligations in the contract.
- Step 3: Determine the transaction price.
- Step 4: Allocate the transaction price to the performance obligations in the contract.
- Step 5: Recognize revenue when (or as) the entity satisfies a performance obligation.

Consulting service fees – RAINN has contracts with customers to provide hotline and consulting services. Revenue from the contracts is recognized over time as the services are provided. Funds received in advance are contract liabilities and are shown as deferred revenue on the accompanying Statements of Financial Position. Deferred revenue related to service fee contracts was \$126,935 and \$298,896 as of May 31, 2023 and 2022, respectively, and was \$155,083 as of June 1, 2021.

Notes to Financial Statements

The transaction price for service fees is generally fixed with no significant forms of variable consideration. Most of RAINN's contracts have components or other tasks that are considered distinct and are executed independently of one another. In these cases, RAINN has accounted for each task as a separate performance obligation. The transaction price is allocated to the multiple performance obligations using a stand-alone selling price which is based on a cost-plus margin approach.

RAINN generally recognizes revenue over time for each performance obligation and uses a variety of input and output methods. Outputs can be based upon trainings or certain other defined deliverables or, in some cases, time increments. Inputs are typically based on labor cost or hours inputs.

Contract costs – Contract fulfillment costs include the direct cost of labor and supplies. RAINN does not incur significant incremental costs to acquire contracts. Costs are expensed as they are incurred.

Sales of merchandise – RAINN sells shirts, key-chains, and other small merchandise items which include its logo or program message. Revenues from merchandise are recognized at the time of sale.

The following revenue streams are outside the scope of ASC 606:

Contributions – RAINN recognizes all unconditional contributions received as income in the period in which the commitment is made. Contributions are reported as with or without donor restrictions depending on the absence or existence of donor stipulations that limit the use of the contributions.

When a donor restriction expires, that is, when a stipulated time restriction ends or purpose restriction is accomplished, net assets with donor restrictions are reclassified to net assets without donor restrictions and reported in the Statements of Activities and Changes in Net Assets as net assets released from restrictions.

Conditional contributions are recognized as revenue when the conditions on which they depend are substantially met. There were no balances of conditional pledges not yet earned from non-federal sources as of May 31, 2023 and 2022, respectively. Amounts received in advance of conditions being met are recorded as deferred revenue. As of May 31, 2023 and 2022 there was no deferred revenue related to conditional contributions.

Notes to Financial Statements

Federal grants – Revenue from federal grants is considered a conditional contribution where revenue is not recorded until qualifying expenses are incurred and is recognized in amounts equal to total qualifying expenditures made during the period for the purposes specified by the grant. Amounts received in advance are recorded in deferred revenue, and revenue associated with expenditures incurred prior to receiving reimbursement are recorded as pledges receivable. Balances of conditional pledges not yet earned for federal grants total \$652,433 and \$1,786,781 as of May 31, 2023 and 2022, respectively.

Contributed services and gifts-in-kind – RAINN receives contributed legal assistance, media, web hosting, and technology services. Gifts-in-kind that can be used or sold are measured at fair value and recognized as contributions when received. Contributed services are those that can create or enhance a nonfinancial asset or require specialized skills, are provided by entities or persons possessing those skills, and would need to be purchased if they were not donated. These services are reported at their estimated fair value based on donor provided detail of the market value of services provided. These contributions were also expensed and reported by function on the Statements of Functional Expenses. See Note 11.

Functional allocation of expenses: The costs of providing the various programs and activities have been summarized on a functional basis in the Statements of Activities and Changes in Net Assets. Accordingly, certain costs, detailed in the Statements of Functional Expenses, have been allocated among the programs and supporting services benefited. Such allocations are determined by management on an equitable basis.

Expenses that are allocated include the following:

Expenses	Method of Allocation
Bank and credit card fees	Time and effort by department
Contractors and consultants	Time and effort by department
Depreciation and amortization	Time and effort by department
Employee benefits	Time and effort by department
Internet hosting	Time and effort by department
Liability insurance	Time and effort by department
Occupancy expenses	Time and effort by department
Postage	Time and effort by department
Printing	Time and effort by department
Software	Time and effort by department
Travel	Time and effort by department

Notes to Financial Statements

Cash flow classification of donated financial assets: Cash receipts from the sale of donated securities with no donor-imposed restrictions are included in the operating section of the Statements of Cash Flows, while cash receipts from the sale of donated securities with donor-imposed long-term restrictions are classified as financing activities. Otherwise, receipts from the sale of donated financial assets are classified as cash flows from investing activities.

Tax status: RAINN is exempt from federal income taxes under the provision of Section 501(c)(3) of the Internal Revenue Code. Accordingly, no provision for income taxes is reflected in the accompanying financial statements.

RAINN evaluates uncertainty in income tax positions based on a more-likely-than not recognition standard. If that threshold is met, the tax position is then measured at the largest amount that is greater than 50% likely of being realized upon ultimate settlement. As of May 31, 2023 and 2022, there are no accruals for uncertain tax positions. If applicable, RAINN records interest and penalties as a component of income tax expense. Tax years from 2020 through the current year remain open for examination by tax authorities.

Use of accounting 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 the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Recently adopted accounting pronouncements: RAINN adopted Accounting Standards Codification 842, *Leases*, (ASC 842) effective June 1, 2022. This standard requires lessees to recognize leases on the Statement of Financial Position as right-of-use (ROU) assets and lease liabilities based on the value of the discounted future lease payments. In adopting ASC 842, RAINN elected to use the practical expedient package, which includes not reevaluating if a contract is or contains a lease, not reevaluating the classification of a lease, and not reevaluating initial direct costs.

Upon adoption, RAINN recognized operating lease ROU assets and lease liabilities in the amounts of \$4,017,113 and \$4,822,314, respectively, using the modified retrospective alternative method. No cumulative-effect adjustments were required.

Notes to Financial Statements

In September 2020, the FASB issued ASU 2020-07, Not-for-Profit Entities (Topic 958): Presentation and Disclosures by Not-for-Profit Entities for Contributed Nonfinancial Assets, which requires a not-for-profit entity to present contributed nonfinancial assets in the statements of activities as a line item that is separate from contributions of cash or other financial assets. ASU 2020-07 also requires additional qualitative and quantitative disclosures about contributed nonfinancial assets received, disaggregated by category. This ASU is effective for RAINN's fiscal year ending May 31, 2023, and is presented on a modified retrospective basis. ASU 2020-07 did not have a significant impact on RAINN's financial statements.

Subsequent events: Management has evaluated subsequent events for disclosure in these financial statements through January 23, 2024, which is the date the financial statements were available to be issued.

2. Liquidity and availability of resources

The table below presents financial assets available for general expenditures within one year at May 31:

	2023	2022
Cash and cash equivalents	\$ 849,401	\$ 1,792,266
Investments	27,194,193	25,586,005
Pledges receivable	450,238	294,820
Accounts receivable	802,033	862,400
Total resources available	29,295,865	28,535,491
Less amounts not available to be used within		
one year:	((30.141)	(1.102.041)
Net assets with donor restrictions for purpose	(628,141)	(1,102,841)
Financial assets available to meet general	£29 ((7.724	\$ 27 422 650
expenditures over the next twelve months	\$28,667,724	\$27,432,650

The Organization regularly monitors liquidity required to meet its operating needs and other contractual commitments, while also striving to maximize the investment of its available funds. The Organization has various sources of liquidity including cash and cash equivalents, marketable debt and equity securities, and contributions with and without donor restrictions. The Organization considers all expenditures related to its ongoing activities of supporting the Organization's mission, fundraising and administration to be general expenditures. The Organization strives to maintain liquid financial assets sufficient to cover at least six months of general expenditures.

Notes to Financial Statements

3. Program descriptions

Victims Services: RAINN created and operates the National Sexual Assault Hotline, which is available by phone (800.656.HOPE) and online in English (online.RAINN.org) and Spanish (RAINN.org/es). RAINN also operates Safe Helpline, a service for members of the U.S. military affected by sexual assault, through a contract with the Department of Defense. RAINN works closely with more than 1,000 local sexual assault service providers to offer confidential support services, available 24/7, to survivors across the country.

Communications: RAINN educates the public about sexual violence and works with national media and the entertainment industry to elevate sexual violence storylines and reach millions of households across the country. RAINN also operates <u>RAINN.org</u> and social media platforms to provide information about sexual violence, connect people to support, and engage with communities about these issues. Through outreach to communities through a national speakers bureau of nearly 4,000 survivors, and other community partnerships, RAINN is able to mobilize the public to play a role in prevention and recovery.

Public Policy: RAINN works at the federal and state levels to improve the criminal justice system, prevent sexual assault, and ensure justice for survivors. RAINN develops and promotes public policy changes that make communities safer and support survivors. RAINN also leads the national effort to end the rape kit backlog and reform state statutes of limitations laws.

Consulting Services: RAINN works with clients across the public, private, and nonprofit sectors to develop targeted, effective sexual assault education and response programs. RAINN offers a variety of specialized consulting services to meet each organization's unique needs, including hotline services, program assessments, and education and training.

4. Pledges receivable

As of May 31, 2023 and 2022, RAINN's pledges receivable were \$450,238 and \$294,820, respectively. All pledges receivable are due in less than one year and therefore no discount calculation is deemed necessary.

5. Investments

The following is a summary of RAINN's investments as of May 31:

	 2023	2022
Money market funds	\$ 63,364	\$ 56,152
Common stock	85,183	88,861
Common stock – structured investments	3,073,180	3,123,566
Exchange traded and close-end funds	13,181,965	8,003,589
Mutual funds – fixed income, preferred		
securities and equities	10,790,501	14,313,837
Total investments	\$ 27,194,193	\$ 25,586,005

Notes to Financial Statements

6. Fair value

RAINN values certain assets in accordance with a three-tier fair value hierarchy, which prioritizes the inputs used in measuring fair value as follows:

Level 1. Observable inputs such as quoted prices in active markets for identical assets or liabilities.

Level 2. Inputs, other than the quoted prices in active markets, that are observable either directly or indirectly; and

Level 3. Unobservable inputs in which there is little or no market data, which require the entity to develop its own assumptions.

A financial instrument's level within the fair value hierarchy is based on the lowest level of any input that is significant to the fair value measurement.

The fair value of RAINN's investments is as follows:

May 31, 2023		Total	P Ma	Value Mea Quoted rices in Active urkets for dentical Assets Level 1)	Sig (Ob:	ments Usi nificant Other servable nputs evel 2)	S Un	ignificant observable Inputs (Level 3)
Money market			(-					(==+==)
funds	\$	63,364	\$	63,364	\$	-	\$	-
Common stock		85,183		85,183		-		-
Common stock – structured investments		3,073,180		<u>-</u>	3.	073,180		_
Exchange traded and close-end			1	2 101 075	- /	,		
funds Mutual funds – fixed income, preferred	1,	3,181,965	1	3,181,965		-		-
securities and								
equities	10	0,790,501	1	0,790,501		-		-
Total	\$2	7,194,193	\$ 2	4,121,013	\$ 3,	073,180	\$	-

Notes to Financial Statements

May 31, 2022	To	tal	Pr A Mar Id	euoted ices in active rkets for entical assets evel 1)	Ob	gnificant Other oservable Inputs Level 2)	Uno	gnificant observable Inputs Level 3)
Money market funds	\$ 5	6,152	\$	56,152	\$	_	\$	_
Common stock		8,861	Ψ	88,861	Ψ	-	Ψ	-
Common stock – structured								
investments Exchange traded	3,12	3,566		-	3	3,123,566		-
and close-end								
funds	8,00	3,589	8	3,003,589		-		-
Mutual funds – fixed income, preferred								
securities and equities	14.31	3,837	14	,313,837		_		_
•								
Total	\$25,58	36,005	\$ 22	2,462,439	\$ 3,	123,566	\$	-

Level 2 values for common stock - structured investments were developed utilizing quoted prices for similar assets in markets without active trading volumes.

7. Property and equipment

Property and equipment consist of the following at May 31:

	 2023	2022
Furniture and equipment	\$ 325,745 \$	325,745
Software	1,221,315	942,211
Leasehold improvements	845,008	845,008
Total property and equipment	2,392,068	2,112,964
Less: Accumulated depreciation and		
amortization	(822,793)	(671,489)
Total property and equipment, net	\$ 1,569,275 \$	1,441,475

Depreciation and amortization expense for the years ended May 31, 2023 and 2022 was \$151,305 and \$104,279, respectively.

Notes to Financial Statements

8. Operating lease

Upon adoption of the new lease standard, ASC 842, RAINN evaluated current contracts to determine which met the criteria of a lease. The right-of-use (ROU) assets represent RAINN's right to use underlying assets for the lease term, and the lease liabilities represent RAINN's obligation to make lease payments arising from these leases. The ROU assets and lease liabilities, under the operating leases, were calculated based on the present value of future lease payments over the lease terms. The weighted-average discount rate applied to calculate lease liabilities as of May 31, 2023, was 3%. As of May 31, 2023, the weighted-average remaining lease term for the Organization's operating leases was approximately 6.5 years.

RAINN is obligated, as lessee, under a non-cancelable operating lease for office space in Washington, D.C. The lease commenced on January 1, 2013 and will end on November 30, 2029 (including extensions) with fixed annual increases of 2.5% during the lease term.

For the year ended May 31, 2023, total operating lease cost was \$613,130.

Cash paid for operating leases for the year ended May 31, 2023 was \$668,927. There were no noncash investing and financing transactions related to leasing.

Future maturities of the lease obligation under non-cancellable leases as of May 31, 2023 are as follows:

Year Ending May 31,	Tota	1
2024	\$	685,634
2025		702,758
2026		716,104
2027		728,006
2028		746,206
Thereafter		1,156,037
Total		4,734,745
Less: imputed interest		(444,867)
Lease liabilities - operating	\$	4,289,878

For the year ended May 31, 2022, under FASB ASC 840 (pre-adoption of the new standard, ASC 842), total rent expense for all operating leases was \$625,361.

Notes to Financial Statements

The following is a schedule by years of future minimum rental payments required under the operating lease as of May 31, 2022:

Year Ending May 31,	Total		
	•		
2023	\$	668,927	
2024		685,634	
2025		698,827	
2026		550,180	
2027		311,374	
Thereafter		841,490	
Total	\$	3,756,432	

9. Note payable

RAINN entered into a note payable agreement with a financial institution for a loan in the amount of \$1,301,915 on May 4, 2020, pursuant to the Paycheck Protection Program (PPP) under the Coronavirus Aid, Relief, and Economic Security Act (the CARES Act). The PPP loan had a two-year term and bore interest at a rate of 1.00% per annum. Monthly principal and interest payments were deferred for at least six months after the date of disbursement. The CARES Act provides that the PPP loan may be partially or wholly forgiven if the funds are used for certain qualifying expenses as described in the CARES Act. RAINN used the proceeds from the PPP loan for qualifying expenses and applied for forgiveness of the PPP loan in accordance with the terms of the CARES Act. Full forgiveness was granted on July 7, 2021; therefore, income from the PPP loan forgiveness was recorded during the year ended May 31, 2022.

10. Concentration of revenue

The contract with the Department of Defense comprises 31% and 23% of total revenue for the fiscal years ended May 31, 2023 and 2022, respectively and contributions from one donor made up 22% and 21% of total revenue for the fiscal years ended May 31, 2023 and 2022, respectively. One contract made up 75% and 67% of the accounts receivable balance as of May 31, 2023 and 2022, respectively. One donor made up 96% of total pledges receivable as of May 31, 2023 and two donors made up 74% of total pledges receivable as of May 31, 2022.

Notes to Financial Statements

11.	Contributed
	services and
	gifts-in-kind

Contributed services and gifts-in-kind consisted of the following for the years ended May 31:

	2023		2022	
Legal	\$	1,104,506 \$	1,240,218	
Technology services		-	538,482	
Public education services		1,101,475	913,840	
Other		185,962	70,000	
Total	\$	2,391,943 \$	2,762,540	

donor restrictions

12. Net assets with Net assets with donor restrictions are available for the following purposes at May

	 2023	2022
Temporary purpose restrictions Victim Services Public Policy	\$ 620,641 \$ 7,500	1,049,234 53,599
Temporary time restrictions	-	132,500
Total net assets with donor Restrictions	\$ 628,141 \$	1,235,333

13. Related party transactions

RAINN entered into a contracting agreement with A&I Publishing for their services to RAINN. A&I Publishing is wholly owned by the President of RAINN. During the years ended May 31, 2023 and 2022, RAINN incurred expenses of \$547,456 and \$526,420, respectively, under this agreement. In addition, RAINN reimbursed A&I Publishing approximately \$14,793 and \$6,380 for the years ended May 31, 2023 and 2022, respectively, for costs incurred by A&I Publishing on behalf of RAINN. The amount due to A&I Publishing as of May 31, 2023 and 2022 was \$99,389 and \$95,587, respectively, which is included in accounts payable and accrued expenses on the accompanying Statements of Financial Position.

14. Collective bargaining agreement

Approximately 8% and 11% of the Organization's employees are covered by a collective bargaining agreement as of May 31, 2023 and 2022, respectively. The agreement was renewed June 1, 2020 and expires May 31, 2025.



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 Rape, Abuse & Incest National Network (RAINN) Washington, D.C.

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of **Rape**, **Abuse & Incest National Network (RAINN)** (a nonprofit organization), which comprise the Statement of Financial Position as of May 31, 2023, and the related Statements of Activities and Changes in Net Assets, 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 January 23, 2024.

Report on Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered Rape, Abuse & Incest National Network (RAINN)'s internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Rape, Abuse & Incest National Network (RAINN)'s internal control. Accordingly, we do not express an opinion on the effectiveness of the Rape, Abuse & Incest National Network (RAINN)'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 the internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses or significant deficiencies may exist that were not identified.

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* (Continued)

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether **Rape**, **Abuse & Incest National Network** (**RAINN**)'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 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.

Rockville, Maryland January 23, 2024



Independent Auditor's Report on Compliance for Each Major Program and on Internal Control over Compliance Required by the Uniform Guidance

Board of Directors

Rape, Abuse & Incest National Network (RAINN)

Washington, D.C.

Report on Compliance for the Major Federal Program

Opinion on the Major Federal Program

We have audited Rape, Abuse & Incest National Network (RAINN)'s compliance with the types of compliance requirements identified as subject to audit in the OMB Compliance Supplement that could have a direct and material effect on Rape, Abuse & Incest National Network (RAINN)'s major federal program for the year ended May 31, 2023. Rape, Abuse & Incest National Network (RAINN)'s major federal program is identified in the summary of auditor's results section of the accompanying Schedule of Findings and Questioned Costs.

In our opinion, Rape, Abuse & Incest National Network (RAINN) complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on its major federal program for the year ended May 31, 2023.

Basis for Opinion on the Major Federal Program

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of Rape, Abuse & Incest National Network (RAINN) and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for the major federal program. Our audit does not provide a legal determination of Rape, Abuse & Incest National Network (RAINN)'s compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to **Rape**, **Abuse & Incest National Network (RAINN)'s** federal program.

Independent Auditor's Report on Compliance for Each Major Program and on Internal Control over Compliance Required by the Uniform Guidance (continued)

Auditor's Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on Rape, Abuse & Incest National Network (RAINN)'s compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards, Government Auditing Standards, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about Rape, Abuse & Incest National Network (RAINN)'s compliance with the requirements of the major federal program as a whole.

In performing an audit in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding Rape, Abuse & Incest National Network (RAINN)'s compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of Rape, Abuse & Incest National Network (RAINN)'s internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of Rape, Abuse & Incest National Network (RAINN)'s internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Independent Auditor's Report on Compliance for Each Major Program and on Internal Control over Compliance Required by the Uniform Guidance (continued)

Report on 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 Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

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.

Rockville, Maryland January 23, 2024

7110, LLP

Schedule of Expenditures of Federal Awards

Year Ended May 31, 2023							
Federal Grantor/ Program Title	Project Name	Federal Assistance Listing Number	Contract Number	thr	assed ough to recipient	Ex	Federal spenditures
Department of Justice Office for Victims of Crime							
Crime Victim Assistance/Discretionary Grants	RAINN Advancing the Use of Technology to Assist Victims of Crime 2020	16.582	2020-V3- GX-0047	\$	-	\$	540,838
Crime Victim Assistance/Discretionary Grants	RAINN Advancing the Use of Technology to Assist Victims of Crime 2021	16.582	15POVC- 21-GK- 01097- NONF		-		593,511
Total federal expenditure	S			\$	-	\$	1,134,349

Notes to Schedule of Expenditures of Federal Awards

1. Basis of presentation

The accompanying Schedule of Expenditures of Federal Awards (the Schedule) includes the federal award activity of Rape, Abuse & Incest National Network (RAINN) under programs of the federal government for the year ended May 31, 2023. 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 Rape, Abuse & Incest National Network (RAINN), it is not intended to and does not present the financial position, changes in net assets, or cash flows of Rape, Abuse & Incest National Network (RAINN).

- 2. Summary of significant accounting policies
- Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement.
- 3. Indirect rate

Rape, Abuse & Incest National Network (RAINN) has elected not to use the 10 percent de minimis indirect cost rate as allowed under the Uniform Guidance.

Schedule of Findings and Questioned Costs

Year Ended May 31, 2023		
SECTION I - SUMMARY OF AUDITO	OR'S RESULTS	
Financial Statements		
Type of auditor's report issued: Unmodified		
Internal control over financial reporting:		
 Material weakness identified? 	yes	X no
 Significant deficiencies identified that are not considered to be material weaknesses? 	yes	X none reported
Noncompliance material to financial statements noted?	yes	X no
Federal Awards		
Internal control over major programs:		
 Material weakness identified? 	yes	X no
• Significant deficiencies identified that are not considered to be material weakness?	yes	X none reported
Type of auditor's report issued on compliance for major program	ms: Unmodified	
Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?	yes	X no
Identification of Major Programs:		
Assistance Listing Number 16.582	Department of Ju	Federal Program ustice – Crime Victim Discretionary Grants
Dollar threshold used to distinguish between type A and type B programs:	\$750,000	
Auditee qualified as low-risk auditee?	X yes	No

Schedule of Findings and Questioned Costs (Continued)

Year Ended May 31, 2023

SECTION II - FINANCIAL STATEMENT FINDINGS

None

SECTION III - FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

None

SECTION IV – PRIOR YEAR FINDINGS AND QUESTIONED COSTS

None