

**KLEIN BUENDEL, INC.**

**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS UNDER  
THE DEPARTMENT OF HEALTH AND HUMAN SERVICES**

**YEAR ENDED DECEMBER 31, 2020**

**KLEIN BUENDEL, INC.  
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## INDEPENDENT AUDITORS' REPORT

Board of Directors and Stockholders  
Klein Buendel, Inc.  
Golden, Colorado

### **Report on the Schedule of Expenditures of Federal Awards Under the Department of Health and Human Services**

We have audited the accompanying schedule of expenditures of federal awards under the Department of Health and Human Services (the Schedule) of Klein Buendel, Inc. (the Company) for the year ended December 31, 2020, and the related notes to the Schedule.

#### ***Management's Responsibility for the Financial Statements***

Management is responsible for the preparation and fair presentation of the Schedule 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.

#### ***Auditors' Responsibility***

Our responsibility is to express opinions on the Schedule 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 and Title 45 U.S. Code of Federal Regulations (CFR) Part 75, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for U.S. Department of Health and Human Services (HHS) Awards*. 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 Schedule. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the Schedule, 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 Schedule 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 Schedule.

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

Board of Directors and Stockholders  
Klein Buendel, Inc.

***Opinion***

In our opinion, the Schedule referred to above present fairly, in all material respects, the expenditures of federal awards under the Department of Health and Human Services of Klein Buendel, Inc. for the year ended December 31, 2020 in accordance with accounting principles generally accepted in the United States of America.

**Other Reporting Required by *Government Auditing Standards***

In accordance with *Government Auditing Standards*, we have also issued our report dated June 9, 2021 on our consideration of Klein Buendel, Inc.'s internal control over financial reporting 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 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 Klein Buendel, Inc.'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 Klein Buendel, Inc.'s internal control over financial reporting and compliance.

*CliftonLarsonAllen LLP*

Greenwood Village, Colorado  
June 9, 2021



**INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER  
FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN  
AUDIT OF THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS**

Board of Directors and Stockholders  
Klein Buendel, Inc.  
Golden, Colorado

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 schedule of expenditures of federal awards under the Department of Health and Human Services (the Schedule) of Klein Buendel, Inc. (the Company) for the year ended December 31, 2020, and the related notes to the Schedule and have issued our report thereon dated June 9, 2021.

**Internal Control Over Financial Reporting**

In planning and performing our audit of the Schedule, we considered the Company'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 Schedule, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. Accordingly, we do not express an opinion on the effectiveness of the Company'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 Schedule 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.

Board of Directors and Stockholders  
Klein Buendel, Inc.

### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the Company's Schedule is 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 Schedule. 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 result of that testing, and not to provide an opinion on the effectiveness of the Company'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.

*CliftonLarsonAllen LLP*

Greenwood Village, Colorado  
June 9, 2021



**INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR A  
FEDERAL PROGRAM AND REPORT ON INTERNAL CONTROL OVER COMPLIANCE WHEN  
USING THE PROGRAM-SPECIFIC OPTION TO SATISFY THE U.S. DEPARTMENT OF HEALTH  
AND HUMAN SERVICES AUDIT REQUIREMENTS IN ACCORDANCE WITH 45 CFR 75.501(h)(i)(2)**

Board of Directors and Stockholders  
Klein Buendel  
Golden, Colorado

**Report on Compliance for the National Institutes of Health Research and Development Cluster**

We have audited Klein Buendel, Inc.'s (the Company) compliance with the types of compliance requirements described in Title 45 U.S. Code of Federal Regulations (CFR) Part 75, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for U.S. Department of Health and Human Services (HHS) Awards*, that could have a direct and material effect on the National Institutes of Health Research and Development Cluster for the year ended December 31, 2020.

***Management's Responsibility***

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards to the National Institutes of Health Research and Development Cluster.

***Auditors' Responsibility***

Our responsibility is to express an opinion on compliance for Klein Buendel, Inc.'s National Institutes of Health Research and Development Cluster program based on our audit of the types of compliance requirements referred to above.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; the Title 45 U.S. Code of Federal Regulations (CFR) Part 75, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for U.S. Department of Health and Human Services (HHS) Awards; and the requirements under the grant agreement. Those standards 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 the National Institute of Health Research and Development Cluster occurred. An audit includes examining, on a test basis, evidence about Klein Buendel, 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 the Company's National Institutes of Health Research and Development Cluster. However, our audit does not provide a legal determination of Klein Buendel, Inc.'s compliance.

***Opinion on Compliance for the National Institutes of Health Research and Development Cluster***

In our opinion, Klein Buendel, Inc. complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on the National Institutes of Health Research and Development Cluster for the year ended December 31, 2020.

***Other Matters***

The results of our auditing procedures disclosed an instance of noncompliance, which is required to be reported in accordance with Title 45 U.S. Code of Federal Regulations Part 75 and which is described in the accompanying schedule of findings and questioned costs as item 2020-001. Our opinion on the National Institutes of Health Research and Development Cluster is not modified with respect to these matters.

Klein Buendel Inc.'s response to the noncompliance finding identified in our audit is described in the accompanying schedule of findings and questioned costs. Klein Buendel Inc.'s response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

**Report on Internal Control Over Compliance**

Management of Klein Buendel 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 Klein Buendel Inc.'s internal control over compliance with the types of requirements that could have a direct and material effect on the National Institutes of Health Research and Development Cluster to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance on the National Institutes of Health Research and Development Cluster and to test and report on internal control over compliance in accordance with Title 45 U.S. Code of Federal Regulations (CFR) Part 75, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for U.S. Department of Health and Human Services (HHS) Awards*, 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 Klein Buendel 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 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.



Board of Directors and Stockholders  
Klein Buendel, Inc.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that have not been identified. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, we did identify a certain deficiency in internal control over compliance, described in the accompanying schedule of findings and questioned costs as item 2020-001 that we consider to be a significant deficiency.

Klein Buendel Inc.'s response to the internal control over compliance finding identified in our audit is described in the accompanying Schedule of Findings and Questioned Costs. Klein Buendel Inc.'s response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of Title 45 U.S. Code of Federal Regulations (CFR) Part 75, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for U.S. Department of Health and Human Services (HHS) Awards*. Accordingly, this report is not suitable for any other purpose.



Greenwood Village, Colorado  
June 9, 2021

**KLEIN BUENDEL, INC.**  
**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**YEAR ENDED DECEMBER 31, 2020**

| <u>Federal Agency/Pass-through Agency</u>   | <u>CFDA #</u> | <u>Program Title</u>  | <u>Grant Period</u>                                    | <u>Grant Number</u>    | <u>Provided to Subrecipients</u> | <u>Federal Expenditures</u> |
|---|---------------|---|--|------------------------|----------------------------------|-----------------------------|
| <b>HHS Direct Awards:</b>   |               |   |  |                        |                                  |                             |
| National Institute of Health/National Cancer Institute                                    | 93.393        | Likes Pins and Views: Engaging Moms on Teen Indoor Tanning Thru Social Media  | 6/1/2015-5/31/2021 (with a Suppl. Award) (NCE)         | CA192652 & -05S1       | \$ 103,558                       | \$ 366,729                  |
| National Institute of Health/National Cancer Institute                                    | 93.393        | Web App Technology for Boys and Parents: Improving HPV Vaccine Uptake   | 7/18/2016-6/30/2021                                    | CA210125               | 75,815                           | 539,439                     |
| National Institute of Health/National Institute on Minority Health and Health Disparities | 93.307        | WayToServe Espanol: A Culturally-Appropriate Online Responsible Beverage Service Training for Spanish-Speaking Servers  | 8/15/2016-10/31/21 (3rd and 4th NCE)                   | MD010405               | -                                | 29,248                      |
| National Institute of Health/National Cancer Institute                                    | 93.394        | Sun Safety Ink! A Sun Safety Program for the Tattoo Community   | 1/15/17-12/31/2021 (with a Suppl. Award for sub) (NCE) | CA206569 & -02S1       | 38,220                           | 375,633                     |
| National Institute of Health/National Cancer Institute                                    | 93.353        | Using Technology to Scale-Up an Occupational Sun Protection Policy Program  | 6/23/2017-7/31/2021                                    | CA210259               | 106,451                          | 528,302                     |
| National Institute of Health/National Institute Alcohol Abuse & Alcoholism                | 93.273        | Smartphone Help for DWI Offenders and Their Families: A B-Smart App   | 9/15/2018-8/31/21 (NCE)                                | AA022850               | 54,883                           | 547,028                     |
| National Institute of Health/National Institute on Minority Health and Health Disparities | 93.307        | Caminamos: A location-based Smartphone App for Latinas to Connect with Nearby Walking Partners                          | 9/18/2018-4/30/2021 (NCE)                              | MD009652               | 193,950                          | 529,097                     |
| National Institute of Health/National Institute on Minority Health and Health Disparities | 93.307        | PINPOINT: Gaming technology to engage adolescent sickle cell patients in precision pain                                 | 9/16/2018-6/30/2021 (NCE)                              | MD010746               | 190,543                          | 503,776                     |
| National Institute of Health/National Institute on Minority Health and Health Disparities | 93.307        | Translating an In-Person Brief, Bystander Bullying Intervention (STAC) to a Technology-Based Intervention               | 9/24/2019-2/28/21 (NCE)                                | MD014943               | 73,197                           | 179,247                     |
| National Institute of Health/National Institute on Aging                                  | 93.866        | E-training of Inmate Peer Caregivers for Enhancing Geriatric and End-of-life Care in Prisons - Phase II                 | 6/15/2020-3/31/2021                                    | AG057239               | 118,291                          | 240,461                     |
| National Institute of Health/National Cancer Institute                                    | 93.394        | Using Retrospective and Real-Time Physical Activity Tracking to Predict Risk of Sunburn in Outdoor Exercisers on Strava | 7/6/2020-6/30/2021                                     | CA241637               | -                                | 55,170                      |
| <b>HHS Direct Awards</b>  |               |   |  |                        | <b>\$ 954,907</b>                | <b>\$ 3,894,131</b>         |
| <b>HHS Pass-through Awards:</b>   |               |   |  |                        |                                  |                             |
|   |               |   |  | <u>Contract Number</u> |                                  |                             |
| Real Prevention LLC   | 93.273        | Feasibility of a Mobile Parent-based Intervention to Reduce Alcohol Use by Highschool Seniors                           | 6/1/2019-5/31/2021                                     | PN00019-01             | -                                | 133,198                     |
| Rhode Island Hospital   | 93.865        | Dating Violence Prevention Program Focusing on Middle School Boys   | 8/19/2019-5/31/2021                                    | 701-7137504            | -                                | 167,171                     |
| University of Utah  | 93.394        | A personalized approach to skin cancer prevention among adolescents   | 3/1/2020-2/28/2021                                     | 10052225-01            | -                                | 34,729                      |
| Rutgers, The State University of New Jersey   | 93.394        | A Multi-Level Investigation of US Indoor Tanning Policy Enactment, Implementation Compliance, Impact, and Economics     | 6/1/2020-5/31/2021                                     | 1533                   |                                  | 49,382                      |
| <b>Total Pass-through Awards</b>  |               |   |  |                        | <b>-</b>                         | <b>384,480</b>              |
| <b>Totals</b>   |               |   |  |                        | <b>\$ 954,907</b>                | <b>\$ 4,278,611</b>         |

**KLEIN BUENDEL, INC.**  
**NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**YEAR ENDED DECEMBER 31, 2020**

**NOTE 1 BASIS OF PRESENTATION**

The accompanying schedule of expenditures of federal awards under the Department of Health and Human Services (the Schedule) includes the federal grant activity of Klein Buendel, Inc. (the Company) under programs of the federal government for the year ended December 31, 2020. The information in the Schedule is presented in accordance with the requirements of *Title 45 U.S. Code of Federal Regulations (CFR) Part 75, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards and Audit Requirements for U.S. Department of Health and Human Services (HHS) Awards*. Because the Schedule presents only a selected portion of the operations of the Company, it is not intended to and does not present the financial position, changes in net position, or cash flows of the Company. Pass-through entity identifying numbers are presented where available.

**NOTE 2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

Expenditures reported in the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following, as applicable, cost principles contained in *Title 45 CFR Part 75, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards and Title 48 CFR Subpart 31.2 Contracts with Commercial Organizations*, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

The Company negotiates and receives approval on an indirect cost rate from the National Institutes of Health Division of Financial Advisory Services (DFAS) within the Department of Health and Human Services.

**KLEIN BUENDEL, INC.  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
YEAR ENDED DECEMBER 31, 2020**

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**Section I – Summary of Auditors’ Results**

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***Schedule of Expenditures of Federal Awards Under the Department of Health and Human Services***

**Financial Statements**

1. Type of auditors’ report issued: Unmodified
2. Internal control over financial reporting:
- Material weakness(es) identified?  yes  no
  - Significant deficiency(ies) identified?  yes  none reported
3. Noncompliance material to financial statements noted?  yes  no

**Federal Awards**

1. Internal control over the federal program:
- Material weakness(es) identified?  yes  no
  - Significant deficiency(ies) identified?  yes  none reported
2. Type of auditors’ report issued on compliance for major federal programs: Unmodified
3. Any audit findings disclosed that are Required to be reported in accordance with Section 45 CFR 75?  yes  no

**KLEIN BUENDEL, INC.  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
YEAR ENDED DECEMBER 31, 2020**

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**Section II – Financial Statement Findings**

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Our audit did not disclose any matters required to be reported in accordance with *Government Auditing Standards*.

**KLEIN BUENDEL, INC.**  
**SCHEDULE OF FINDINGS AND QUESTIONED COSTS**  
**YEAR ENDED DECEMBER 31, 2020**

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**Section III – Findings and Questioned Costs – National Institutes of Health Research and  
Development Cluster**

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**2020 – 001**

Federal Agency: National Institute of Health

Federal Program Title: Research and Development Cluster

Award Period: 2020

Type of Finding:

Compliance, Other Matter

Significant Deficiency in Internal Control over Compliance

**Criteria or Specific Requirement:** The Code of Federal Regulations, 45 CFR 75, requires that nonfederal entities must have and use documented procurement procedures. Such procurement procedures must reflect the standards identified for procurement in 45 CFR 75. These standards require various elements, such as cover conflict of interests, avoiding acquisition of unnecessary or duplicative items, maintaining records sufficient to detail the history of the procurement, and conducting procurement in a manner providing full and open competition and adhering to the required methods of procurement for the acquisition of property or services. The required methods of procurement include:

- Micro-purchases: These purchases may be awarded without soliciting competitive quotations if the nonfederal entity considers the price to be reasonable and total price is below the micro-purchase threshold.
- Small purchases: For costs that do not exceed the Simplified Acquisition threshold, this method may be used. Price or rate quotations must be obtained from an adequate number of qualified sources.
- Procurement by sealed bids (formal advertising): When cost is over the Simplified Acquisition threshold, this method or the Procurement by competitive proposals listed below should be used. Bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction.
- Procurement by competitive proposals: This technique is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids.
- Procurement by noncompetitive proposals: This form of procurement is when a proposal from only one source is used. This form of procurement can only be used when item is only available from a single source, for a public emergency, the awarding agency expressly authorizes the proposal, or, after solicitation of a number of sources, competition is determined inadequate.

**KLEIN BUENDEL, INC.**  
**SCHEDULE OF FINDINGS AND QUESTIONED COSTS**  
**YEAR ENDED DECEMBER 31, 2020**

**Condition:** The Company's written procurement policy did not address the federally required elements of written procurement policies listed above.

**Questioned Costs:** None

**Context:** Based on our review of the Company's procurement policy, we noted that the policy did not include documented procurement procedures for the required elements described above.

**Cause:** Management was unaware of the requirements that such elements should be included in their written procurement policy.

**Effect:** The Company is not in compliance with procurement policy requirements as outlined by 45 CFR 75.

**Repeat Finding:** No

**Recommendation:** We recommend that the Company update its written procurement policy so that it incorporates all required procurement elements as outlined by 45 CFR 75.

**Views of Responsible Officials and Planned Corrective Actions:** The company agrees with the finding

**KLEIN BUENDEL, INC.  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
YEAR ENDED DECEMBER 31, 2020**

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**Section IV – Prior Year Findings**

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**FINDINGS—FINANCIAL STATEMENT AUDIT**

There were no financial statement findings in the prior year.

**FINDINGS— FEDERAL AWARD PROGRAM AUDIT**

There were no federal award program audit findings in the prior year





Department of Health and Human Services

Klein Buendel, Inc. respectfully submits the following corrective action plan for the year ended December 30, 2020.

Audit period: January 1, 2020 - December 31, 2020

The finding from the schedule of findings and questioned costs are discussed below. The finding is numbered consistently with the number assigned in the schedule.

#### **FINDING—FEDERAL AWARD PROGRAM AUDIT**

NATIONAL INSTITUTE OF HEALTH

2020-001 Research and Development Cluster

**Recommendation:** We recommend that the Company update its written procurement policy so that it incorporates all required elements of Federal procurement standards.

Explanation of disagreement with audit finding:

There is no disagreement with the audit finding.

Action taken in response to finding:

Klein Buendel's current written procurement policy covers its standard purchases. In addition, there are policies and procedures in place for other purchases but those procedures have not been documented. Klein Buendel will update its written procurement policy to incorporate additional procedures and policies so that the written policy is in compliance with Federal procurement standards.

Name(s) of the contact person(s) responsible for corrective action:

Klein Buendel, Inc.'s Purchasing and Compliance departments will be responsible for updating the procurement policy and can be reached at 303-565-4321.

Planned completion date for corrective action plan:

Klein Buendel will ensure this is completed by December 30, 2021.