

**STATE BOARD OF ACCOUNTS  
302 West Washington Street  
Room E418  
INDIANAPOLIS, INDIANA 46204-2769**

**Paul D. Joyce, CPA  
State Examiner**

FINANCIAL STATEMENT AND  
FEDERAL SINGLE AUDIT REPORT  
OF  
ELKHART & ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
ST. JOSEPH COUNTY, INDIANA  
July 1, 2023 to June 30, 2024



**FILED**

04/02/2025



Paul D. Joyce, CPA  
State Examiner

## INDIANA STATE BOARD OF ACCOUNTS

302 WEST WASHINGTON STREET  
ROOM E418  
INDIANAPOLIS, INDIANA 46204-2769  
Telephone: (317) 232-2513  
Fax: (317) 232-4711  
[www.in.gov/sboa](http://www.in.gov/sboa)

To: The Officials of the Elkhart & St. Joseph Counties Head Start Consortium  
Elkhart & St. Joseph Counties Head Start Consortium  
St. Joseph County, Indiana

As authorized under Indiana Code 5-11-1, we engaged private examiners under our review to perform the audit of the Elkhart & St. Joseph Counties Head Start Consortium. We have reviewed the audit report opined upon by Crowe LLP, Independent Public Accountants, for the period July 1, 2023 to June 30, 2024. Per the *Independent Auditor's Report*, the financial statements included in the report present fairly the financial condition of the Elkhart & St. Joseph Counties Head Start Consortium as of June 30, 2024, and the results of its operations for the period then ended, on the basis of accounting described in the report.

We call your attention to the findings in the report on pages 19 through 22. Please refer to the Schedule of Findings and Questioned Costs for further details related to the findings. Management's Corrective Action Plan appears on pages 23 and 24.

In our opinion, Crowe LLP prepared the audit report in accordance with the guidelines established by the Indiana State Board of Accounts.

In addition to the report presented herein, a supplemental report for the Elkhart & St. Joseph Counties Head Start Consortium was prepared in accordance with the guidelines established by the Indiana State Board of Accounts.

The report is filed with this letter in our office as a matter of public record.

Tammy R. White, CPA  
Deputy State Examiner

**ELKHART AND ST. JOSEPH  
COUNTIES HEAD START CONSORTIUM**  
St. Joseph County, Indiana

**FINANCIAL STATEMENT**  
June 30, 2024

ELKHART AND ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
St. Joseph County, Indiana

FINANCIAL STATEMENT  
June 30, 2024

CONTENTS

SCHEDULE OF OFFICIALS (Unaudited) .....	1
INDEPENDENT AUDITOR'S REPORT .....	2
FINANCIAL STATEMENT	
STATEMENT OF RECEIPTS, DISBURSEMENTS, AND CASH AND INVESTMENT BALANCES – REGULATORY BASIS.....	5
NOTES TO FINANCIAL STATEMENT.....	6
OTHER INFORMATION (Unaudited)	
COMBINING SCHEDULE OF RECEIPTS, DISBURSEMENTS, AND CASH AND INVESTMENT BALANCES – REGULATORY BASIS.....	9
STATE REPORTING INFORMATION .....	10
SUPPLEMENTARY INFORMATION	
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS .....	11
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS.....	12
INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENT PERFORMED IN ACCORDANCE WITH <i>GOVERNMENT AUDITING STANDARDS</i> .....	13
INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE.....	15
SCHEDULE OF FINDINGS AND QUESTIONED COSTS .....	18

ELKHART AND ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
SCHEDULE OF OFFICIALS (Unaudited)  
June 30, 2024

---

<u>Office</u>	<u>Official</u>	<u>Term</u>
Executive Director	Dr. Kathy Guajardo	07-01-23 to 06-30-24
Board President	Jane Allen	07-01-23 to 06-30-24



## INDEPENDENT AUDITOR'S REPORT

Those Charged with Governance  
Elkhart and St. Joseph Counties Head Start Consortium  
Elkhart, Indiana

### **Report on the Audit of the Financial Statement**

#### ***Opinions***

We have audited the accompanying statement of receipts, disbursements, and cash and investment balances of the Elkhart and St. Joseph Counties Head Start Consortium (the Unit) as of and for the year ended June 30, 2024, and the related notes to the financial statement.

#### ***Unmodified Opinion on Regulatory Basis of Accounting***

In our opinion, the financial statement referred to above present fairly, in all material respects, the cash and investment balances of the Unit as of June 30, 2024, and its cash receipts and disbursements for the year then ended in accordance with the financial reporting provisions of the Indiana State Board of Accounts described in Note 1.

#### ***Adverse Opinion on U.S. Generally Accepted Accounting Principles***

In our opinion, because of the significance of the matter discussed in the Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles paragraph, the financial statement referred to below does not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of the Unit as of June 30, 2024, or changes in net position or cash flows thereof for the year then ended.

#### ***Basis for Opinion***

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS) and 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 the Unit, 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 opinion.

#### ***Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles***

As discussed in Note 1 to the financial statement, the Unit prepares its financial statement on the prescribed basis of accounting that demonstrates compliance with the reporting requirements established by the Indiana State Board of Accounts as allowed by state statute (IC 5-11-1-6), which is a basis of accounting other than accounting principles generally accepted in the United States of America.

The effects on the financial statement of the variances between the regulatory basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material and pervasive.

---

(Continued)

## ***Responsibilities of Management for the Financial Statement***

Management is responsible for the preparation and fair presentation of the financial statement in accordance with the financial reporting provisions of the Indiana State Board of Accounts as allowed by state statute (IC 5-11-1-6) as described in Note 1, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the financial statement that is free from material misstatement, whether due to fraud or error.

## ***Auditor's Responsibilities for the Audit of the Financial Statement***

Our objectives are to obtain reasonable assurance about whether the financial statement as a whole is 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 GAAS 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 statement.

In performing an audit in accordance with GAAS 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 statement, 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 statement.
- 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 the Unit'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 statement.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Unit's ability to continue as a going concern for a reasonable period of time.

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 statement that collectively comprise the Unit's financial statement. The accompanying Schedule of Expenditures of Federal Awards as required by Title 2 *U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* is presented for purposes of additional analysis and are not a required part of the financial statement. The Schedule of Expenditures of Federal Awards is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statement. The information has been subjected to the auditing procedures applied in the audit of the financial statement and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statement or to the financial statement themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the Schedule of Expenditures of Federal Awards is fairly stated, in all material respects, in relation to the financial statement as a whole.

---

(Continued)

### ***Other Information***

Management is responsible for the other information included with the financial statement. The other information comprises the Schedule of Officials, Other Information Schedule, and State Reporting Information, but does not include the financial statement and our auditor's report thereon. Our opinion on the financial statement does not cover the other information, and we do not express an opinion or any form of assurance thereon.

In connection with our audit of the financial statement, our responsibility is to read the other information and consider whether a material inconsistency exists between the other information and the financial statement, or the other information otherwise appears to be materially misstated. If, based on the work performed, we conclude that an uncorrected material misstatement of the other information exists, we are required to describe it in our report.

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

In accordance with *Government Auditing Standards*, we have also issued our report dated March 28 2025 on our consideration of the Unit'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 the Unit'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 the Unit's internal control over financial reporting and compliance.

  
Crowe LLP

Indianapolis, Indiana  
March 28, 2025

ELKHART AND ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
STATEMENT OF RECEIPTS, DISBURSEMENTS, AND CASH AND  
INVESTMENT BALANCES - REGULATORY BASIS  
For the Year Ended June 30, 2024

---

<u>Fund</u>	Cash and Investments <u>07-01-23</u>	<u>Receipts</u>	<u>Disbursements</u>	Cash and Investments <u>06-30-24</u>
ARP American Rescue Plan	\$ (73,700)	\$ 747,083	\$ 470,596	\$ 202,787
Unrestricted Supplemental Funds	40,531	59,941	67,385	33,087
CRRSA Corona Virus Response and Relief Supple Appr	-	42,517	329,928	(287,411)
Early Head Start Child Care Partnership	(62,974)	2,887,407	2,830,894	(6,461)
Head Start	(365,074)	11,535,716	11,231,799	(61,157)
Elkhart Title I	65,042	-	-	65,042
FEE Base	47,172	51,528	-	98,700
South Bend Title I	82,709	121,786	-	204,495
CACFP (USDA)	511,274	665,141	579,356	597,059
Agency Wide All Program	3,860	-	3,860	-
Other Program	(13,585)	13,585	-	-
Reconciliation Services	(103,006)	103,438	432	-
	<u>\$ 132,249</u>	<u>\$ 16,228,142</u>	<u>\$ 15,514,250</u>	<u>\$ 846,141</u>
Totals	<u>\$ 132,249</u>	<u>\$ 16,228,142</u>	<u>\$ 15,514,250</u>	<u>\$ 846,141</u>

---

See notes to financial statement.

**NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

Reporting Entity: The Elkhart and St. Joseph Counties Head Start Consortium (the Unit) was established under the laws of the State of Indiana. The Unit operates under an appointed governing board.

The accompanying financial statement presents the financial information for the Unit.

Basis of Accounting: The financial statement is reported on a regulatory basis of accounting prescribed by the Indiana State Board of Accounts in accordance with state statute (IC 5-11-1-6), which is a comprehensive basis of accounting other than accounting principles generally accepted in the United States of America. The basis of accounting involves the reporting of only cash and investments and the changes therein resulting from cash inflows (receipts) and cash outflows (disbursements) reported in the period in which they occurred.

The regulatory basis of accounting differs from accounting principles generally accepted in the United States of America (GAAP), in that receipts are recognized when received in cash, rather than when earned, and disbursements are recognized when paid, rather than when a liability is incurred. The regulatory basis also allows for all investments to be stated at cost, while GAAP requires fair value for qualifying investments.

Cash and Investments: Investments are stated at cost. Any changes in fair value of the investments are reported as receipts in the year of the sale of the investment.

Receipts: Receipts are presented in the aggregate on the face of the financial statement. The aggregate receipts include the following sources:

*Intergovernmental receipts.* Amounts received from other governments in the form of operating grants, entitlements, or payments in lieu of taxes. Examples of this type of receipts include, but are not limited to: federal grants, state grants, cigarette tax distributions received from the state, motor vehicle highway distribution received from the state, local road and street distribution received from the state, financial institution tax received from the state, auto excise surtax received from the state, commercial vehicle excise tax received from the state, major moves distributions received from the state, and riverboat receipts received from the county.

Disbursements: Disbursements are presented in the aggregate on the face of the financial statement. The aggregate disbursements include the following uses:

*Personal services.* Amounts disbursed for salaries, wages, and related employee benefits provided for all persons employed. In those Units where sick leave, vacation leave, overtime compensation, and other such benefits are appropriated separately, such payments would also be included.

*Supplies.* Amounts disbursed for articles and commodities that are entirely consumed and materially altered when used and/or show rapid depreciation after use for a short period of time. Examples of supplies include office supplies, operating supplies, and repair and maintenance supplies.

*Other services and charges.* Amounts disbursed for services including, but are not limited to: professional services, communication and transportation, printing and advertising, insurance, utility services, repairs and maintenance, and rental charges.

*Capital outlay.* Amounts disbursed for land, infrastructure, buildings, improvements, and machinery and equipment having an appreciable and calculable period of usefulness.

---

(Continued)

## **NOTE 2 - DEPOSITS AND INVESTMENTS**

Deposits, made in accordance with state statute (IC 5-13), with financial institutions in the State of Indiana, at year end, should be entirely insured by the Federal Depository Insurance Corporation or by the Indiana Public Deposit Insurance Fund (PDIF). This includes any deposit accounts issued or offered by a qualifying financial institution.

State statutes authorize the Unit to invest in securities including, but not limited to, the following: federal government securities, repurchase agreements, and certain money market mutual funds. Certain other statutory restrictions apply to all investments made by local governmental units. Given the limited investment parameters applicable under state statute, certain risks, such as credit, custodial, concentration, and interest rate are not deemed significant.

The Unit held cash deposits with financial institutions that maintained FDIC and PDIF coverages, as applicable.

## **NOTE 3 - RISK MANAGEMENT**

The Unit may be exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions and natural disasters. These risks can be mitigated through the purchase of insurance, establishment of a self-insurance fund, and/or participation in a risk pool. The purchase of insurance transfers the risk to an independent third-party. The establishment of a self-insurance fund allows the Unit to set aside money for claim settlements. The self-insurance fund would be included in the financial statement. The purpose of participation in a risk pool is to provide a medium for the funding and administration of the risks.

The Unit has purchased insurance to address the risks described above.

## **NOTE 4 - PENSION PLAN**

### *Public Employees' Retirement Fund*

#### *Plan Description*

The Indiana Public Employees' Retirement Fund (PERF) is a defined benefit pension plan. PERF is an agent multiple-employer public employee retirement system, which provides retirement benefits to plan members and beneficiaries. All full-time employees are eligible to participate in this defined benefit plan. State statutes (IC 5-10.2 and 5-10.3) govern, through the Indiana Public Retirement System (INPRS) Board, most requirements of the system, and give the Commission to contribute to the plan.

The Public Employees' Hybrid Plan (PERF Hybrid) consists of two components: PERF DB, the employer-funded monthly defined benefit component, and the Public Employees' Hybrid Members Defined Contribution Account, the defined contribution component.

The Retirement Savings Plan for Public Employees (My Choice) is a multiple-employer defined contribution plan. It is administered through the INPRS Board in accordance with state statutes (IC 5-10.2 and IC 5-10.3) and administrative code (35 IAC 1.2), which govern most requirements of the system and give the Commission ability to contribute to the plan.

---

(Continued)

**NOTE 4 - PENSION PLAN** (Continued)

New employees hired have a one-time election to join either the PERF Hybrid or the My Choice.

INPRS administers the plan and issues a publicly available financial report that includes financial statements and required supplementary information for the plan as a whole and for its participants. That report may be obtained by contacting:

Indiana Public Retirement System  
1 North Capital Street, Suite 001  
Indianapolis, IN 46204  
Ph. (888) 526-1687

*Contributions*

Members' contributions are set by state statute at 3 percent of compensation for both the defined contribution component of PERF Hybrid and My Choice. The employer may elect to make the contribution on behalf of the member of the defined contribution component of PERF Hybrid and My Choice members may receive additional employer contribution in lieu of the PERF DB. Contributions to the PERF DB are determined by INPRS Board based on actuarial valuation.

**NOTE 5 - CASH BALANCE DEFICITS**

The financial statement contains three funds with deficits in cash totaling \$355,029 that existed at June 30, 2024. This is a result of certain funds being set up for reimbursable grants, but for which reimbursement was not yet received by June 30, 2024.

**OTHER INFORMATION (Unaudited)**

ELKHART AND ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
 COMBINING SCHEDULE OF RECEIPTS, DISBURSEMENTS, AND CASH AND  
 INVESTMENT BALANCES - REGULATORY BASIS  
 For the Year Ended June 30, 2024

	ARP American Rescue Plan	Unrestricted Supplemental Funds	CRRSA Corona Virus Response and Relief Supple Appr	Early Head Start Child Care Partnership	Head Start	Elkhart Title I	FEE Base	South Bend Title I	CACFP (USDA)	Agency Wide All Program	Other Program	Reconciliation Services	Totals
Cash and investments - beginning	\$ (73,700)	\$ 40,531	\$ -	\$ (62,974)	\$ (365,074)	\$ 65,042	\$ 47,172	\$ 82,709	\$ 511,274	\$ 3,860	\$ (13,585)	\$ (103,006)	\$ 132,249
Receipts:													
Intergovernmental receipts	747,083	59,941	42,517	2,887,407	11,535,716	-	51,528	121,786	665,141	-	13,585	103,438	16,228,142
Total receipts	747,083	59,941	42,517	2,887,407	11,535,716	-	51,528	121,786	665,141	-	13,585	103,438	16,228,142
Disbursements:													
Personal services	470,596	67,385	329,928	2,830,894	11,231,799	-	-	-	579,356	3,860	-	432	15,514,250
Total disbursements	470,596	67,385	329,928	2,830,894	11,231,799	-	-	-	579,356	3,860	-	432	15,514,250
Excess (deficiency) of receipts over disbursements	276,487	(7,444)	(287,411)	56,513	303,917	-	51,528	121,786	85,785	(3,860)	13,585	103,006	713,892
Cash and investments - ending	\$ 202,787	\$ 33,087	\$ (287,411)	\$ (6,461)	\$ (61,157)	\$ 65,042	\$ 98,700	\$204,495	\$ 597,059	\$ -	\$ -	\$ -	\$ 846,141

ELKHART AND ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
STATE REPORTING INFORMATION  
June 30, 2024

---

The reports presented herein were prepared in addition to another official report prepared for the Commission as listed below:

Indiana State Board of Accounts Compliance Examination of the Elkhart and St. Joseph Counties Head Start Consortium.

The above report contains the results of the compliance examination as required by the Indiana State Board of Accounts' *Accounting and Uniform Compliance Guidelines Manual For Special Districts*.

ELKHART AND ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
 Year ended June 30, 2024

Federal Grantor Agency Cluster Title/Program Title/Project Title	Pass-Through Entity or Direct Grant	Assistance Listing Number	Pass-Through Entity (or Other) Identifying Number	Total Federal Awards Expended	Passed Through to Subrecipient
<u>Department of Agriculture</u>					
Child and Adult Care Food Program CACFP	Direct Award	10.558	FY2024	\$ 665,141	\$ -
Total – Department of Agriculture				<u>665,141</u>	<u>-</u>
<u>Department of Health and Human Services</u>					
Head Start Cluster					
Head Start and Early Head Start	Direct Award	93.600	05CH011249	11,362,314	-
Head Start and Early Head Start – COVID-19 ARPA			05HE000044	689,736	-
Head Start and Early Head Start – COVID19 CRRSA			05HE000044	42,517	-
Early Head Start – Child Care Partnership			05HP000285	<u>2,841,663</u>	<u>-</u>
Total – Department of Health and Human Services				<u>14,936,230</u>	<u>-</u>
Total federal awards expended				<u>\$15,601,371</u>	<u>\$ -</u>

See accompanying notes to the schedule of expenditure of federal awards.

ELKHART AND ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
Year ended June 30, 2024

---

**NOTE 1 - BASIS OF PRESENTATION**

The accompanying schedule of expenditures of federal awards (the "Schedule") includes the federal award activity of Elkhart and St. Joseph Counties Head Start Consortium (the "Unit") under programs of the federal government for the year ended June 30, 2024. 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 the Unit, it is not intended to and does not present the receipts, disbursements, and cash and investment balances – regulatory basis of the Unit.

Expenditures reported on the Schedule are reported on the cash basis of accounting. Such expenditures are recognized following cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. When federal grants are received on a reimbursement basis, the federal awards are considered expensed when the reimbursement is received.

**NOTE 2 - INDIRECT COST RATE**

The Unit has elected not to use the 10-percent de minimis indirect cost rate as allowed under the Uniform Guidance.

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*

Those Charged with Governance  
Elkhart and St. Joseph Counties Head Start Consortium  
Elkhart, Indiana

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 statement of the Elkhart and St. Joseph Counties Head Start Consortium ("Unit"), which comprise the statement of receipts, disbursements, and cash and investment balances of the Unit as of and for the year ended June 30, 2024 and the related notes to the financial statement, which collectively comprise the Unit's financial statement, and have issued our report thereon dated March 28, 2025.

### Internal Control Over Financial Reporting

In planning and performing our audit of the financial statement, we considered the Unit'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 statement, but not for the purpose of expressing an opinion on the effectiveness of the Unit's internal control. Accordingly, we do not express an opinion on the effectiveness of the Unit'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 statement 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 and therefore, material weaknesses or significant deficiencies may exist that were not identified. We did identify a certain deficiency in internal control, described in the accompanying *Schedule of Findings and Questioned Costs* as item 2024-001 that we consider to be a material weakness.

---

(Continued)

## **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the Unit's financial statement 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 financial statement. 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*.

## **Unit's Response to Finding**

Government Auditing Standards requires the auditor to perform limited procedures on the Unit's response to the finding identified in our audit and described in the accompanying Schedule of Findings and Questioned Costs. The Unit's response was not subjected to the other auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on the response.

## **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.

The logo for Crowe LLP, featuring the word "Crowe" in a cursive script followed by "LLP" in a bold, sans-serif font. Below the script "Crowe" is the text "Crowe LLP" in a smaller, sans-serif font.

Indianapolis, Indiana  
March 28, 2025



INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR MAJOR FEDERAL PROGRAM;  
REPORT ON INTERNAL CONTROL OVER COMPLIANCE

Those Charged with Governance  
Elkhart and St. Joseph Counties Head Start Consortium  
Elkhart, Indiana

**Report on Compliance for Major Federal Program**

***Opinion on Major Federal Program***

We have audited Elkhart and St. Joseph Counties Head Start Consortium's (Unit) 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 the Unit's major federal program for the year ended June 30, 2024. The Unit'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, the Unit complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on Head Start for the year ended June 30, 2024.

***Basis for Opinion on Major Federal Program***

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America (GAAS); the standards applicable to financial audits contained in Government Auditing Standards issued by the Comptroller General of the United States (*Government Auditing Standards*); 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 the Unit 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 the Unit'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 the Unit's federal programs.

### ***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 the Unit'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 GAAS, *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 the Unit's compliance with the requirements of the major federal program as a whole.

In performing an audit in accordance with GAAS, *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 the Unit'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 the Unit'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 the Unit'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.

### ***Other Matters***

The results of our auditing procedures disclosed instances of noncompliance, which are required to be reported in accordance with the Uniform Guidance and which are described in the accompanying schedule of findings and questioned costs as item 2024-002. Our opinion on each major federal program is not modified with respect to these matters.

*Government Auditing Standards* requires the auditor to perform limited procedures on the Unit's response to the noncompliance findings identified in our audit described in the accompanying schedule of findings and questioned costs. The Unit's response was not subjected to the other auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

## Report on Internal Control Over Compliance

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 and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we did identify certain deficiencies in internal control over compliance that we consider to be a material weakness and significant deficiencies.

*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. We consider the deficiency in internal control over compliance described in the accompanying schedule of findings and questioned costs as item 2024-002 to be a material weakness.

*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. We consider the deficiency in internal control over compliance described in the accompanying schedule of findings and questioned costs as item 2024-003 to be a significant deficiency.

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.

*Government Auditing Standards* requires the auditor to perform limited procedures on the Unit's response to the internal control over compliance findings identified in our audit described in the accompanying schedule of findings and questioned costs. The Unit's response was not subjected to the other auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

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.

  
Crowe LLP

Indianapolis, Indiana  
March 28, 2025

ELKHART AND ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
 SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
 June 30, 2024

---

**Section I – Summary of Auditor’s Results**

***Financial Statement***

Type of auditors report issued      Adverse as to GAAP, Unmodified as to regulatory basis

Internal control over financial reporting

Material weakness(es) identified?        X   Yes             No

Significant deficiencies identified not considered to be material weaknesses?             Yes        X   None Reported

Noncompliance material to financial statement noted?             Yes        X   No

***Federal Awards***

Internal control over major programs

Material weakness(es) identified?        X   Yes             No

Significant deficiencies identified not considered to be material weaknesses?        X   Yes             None Reported

Type of auditor’s report issued on compliance for major programs      Unmodified

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

Identification of major programs

<u>Assistance Listing Number</u>	<u>Name of Federal Program or Cluster</u>
93.600	Head Start Cluster

Dollar threshold used to distinguish between Type A and Type B programs      \$ 750,000

Auditee qualified as low-risk auditee?             Yes        X   No

---

(Continued)

**Section II – Financial Statement Findings**

**FINDING 2024-001**

Subject: Preparation of the Schedule of Expenditures of Federal Awards  
Audit Findings: Material Weakness

**Criteria:** The Indiana State Board of Accounts (SBOA) is required under Indiana Code 5-11-1-27(e) to define the acceptable minimum level of internal control standards. To provide clarifying guidance, the State Examiner compiled the standards contained in the manual, *Uniform Internal Control Standards for Indiana Political Subdivisions*. All political subdivisions subject to audit by SBOA are expected to adhere to these standards. The standards include adequate control activities. According to this manual:

"Control activities are the actions and tools established through policies and procedures that help to detect, prevent, or reduce the identified risks that interfere with the achievement of objectives. Detection activities are designed to identify unfavorable events in a timely manner whereas prevention activities are designed to deter the occurrence of an unfavorable event. Examples of these activities include reconciliations, authorizations, approval processes, performance reviews, and verification processes.

An integral part of the control activity component is segregation of duties. . . . There is an expectation of segregation of duties. If compensating controls are necessary, documentation should exist to identify both the areas where segregation of duties are not feasible or practical and the compensating controls implemented to mitigate the risk. . . .

The Green Book identifies a list of control activity categories that are meant only to illustrate the range and variety of control activities; the list is by no means all inclusive, but is reproduce here for reference purposes:

- Accurate and timely recording of transactions. . . ."

2 CFR 200.508 states in part:

"The auditee must: . . .

(b) Prepare appropriate financial statements, including the schedule of expenditures of Federal Awards in accordance with § 200.510 Financial statements. . . ."

2 CFR 200.510(b) states:

"*Schedule of expenditures of Federal awards.* The auditee must also prepare a schedule of expenditures of Federal awards for the period covered by the auditee's financial statements which must include the total Federal awards expended as determined in accordance with § 200.502 Basis for determining Federal awards expended. While not required, the auditee may choose to provide information requested by Federal awarding agencies and pass-through entities to make the schedule easier to use. For example, when a Federal program has multiple Federal award years, the auditee may list the amount of Federal awards expended for each Federal award year separately. At a minimum, the schedule must:

(1) List individual Federal programs by Federal agency. For a cluster of programs, provide the cluster name, list individual Federal programs within a cluster of programs, and provide the applicable Federal agency name. For R&D, total Federal awards expended must be shown either by individual Federal award or by Federal agency and major subdivision within the Federal agency. For example, the National Institutes of Health is a major subdivision in the Department of Health and Human Services.

(2) For Federal awards received as a subrecipient, the name of the pass-through entity and identifying number assigned by the pass-through entity must be included.

---

(Continued)

ELKHART AND ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
June 30, 2024

---

**Section II – Financial Statement Findings** (Continued)

**FINDING 2024-001** (Continued)

(3) Provide total Federal awards expended for each individual Federal program and the assistance listing number (ALN) or other identifying number when the ALN information is not available. For a cluster of programs also provide the total for the cluster.

(4) Include the total amount provided to subrecipients from each Federal program.

(5) For loan or loan guarantee programs described in § 200.502 Basis for determining Federal awards expended, paragraph (b), identify in the notes to the schedule the balances outstanding at the end of the audit period. This is in addition to including the total Federal awards expended for loan or loan guarantee programs in the schedule.

(6) Include notes that describe that significant accounting policies used in preparing the schedule and note whether or not the auditee elected to use the 10% de minimis cost rate as covered in §200.414 Indirect (F&A) costs."

**Condition:** The Unit did not have a proper system of internal control in place to prevent, or detect and correct, errors on the Schedule of Expenditures of Federal Awards (SEFA).

**Cause:** Management had not established a system of internal control that would have ensured proper reporting of the SEFA.

**Context:** The federal grant information entered and submitted in the Indiana Gateway for Government Units financial reporting system was the source of the SEFA. The SEFA was not reviewed prior to submission. Additionally, we noted the following errors the year ended June 30, 2024:

- The Head Start Cluster (93.600) expenditures were understated by \$430,116
- The Child and Adult Care Food Program (10.558) expenditures were incorrectly labeled with the ALN of 93.600

Audit adjustments were proposed, accepted by the Unit, and made to the SEFA to correct the issues noted above.

**Effect:** Without a proper system of internal control in place that operated effectively, material misstatements of the SEFA remained undetected. The SEFA contained the errors identified in the Context section.

**Identification as a repeat finding:** No.

**Recommendation:** We recommended that the Unit's management establish a formal review over the SEFA to ensure amounts reported are accurate. The Unit should establish a documented, secondary review to ensure the amounts reported on the SEFA agree to the supporting federal receipt fund ledger detail.

**Views of Responsible Officials and Planned Corrective Actions:** Management agrees with the finding and has prepared a corrective action plan.

---

(Continued)

**Section III – Federal Award Findings and Questioned Costs**

**FINDING 2024-002**

**Information on the federal program:**

Subject: Head Start Cluster - Activities Allowed or Unallowed, Allowable Costs/Cost Principles  
Federal Agency: Department of Health and Human Services  
Federal Program: Head Start Cluster  
Assistance Listing Number: 93.600  
Federal Award Numbers and Years (or Other Identifying Numbers): 05CH011249, 05HP000285  
Compliance Requirement: Activities Allowed or Unallowed, Allowable Costs/Cost Principles  
Audit Finding: Material Weakness, Noncompliance

**Criteria:** 2 CFR section 200.303 states in part: "The non-Federal entity must:

(a) Establish and maintain effective internal control over Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal awards in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in 'Standards for Internal Control in the Federal Government' issued by the Comptroller General of the United States or the 'Internal Control Integrated Framework', issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). . . ."

**Condition:** An effective internal control system was not in place at the Unit to ensure compliance with requirements related to the grant agreement and the activities allowed or unallowed and allowable costs/cost principle compliance requirements. The Unit did not have adequate documentation to support expenditures.

**Cause:** The Unit's management had not developed a system of internal controls to ensure compliance with the compliance requirements listed above.

**Effect:** The failure to establish an effective internal control system placed the Unit at risk of noncompliance with the grant agreement and the compliance requirements. A lack of segregation of duties within an internal control system could have also allowed noncompliance with the compliance requirements and allowed the misuse and mismanagement of federal funds and assets by not having proper oversight, reviews, and approvals over the activities of the programs.

**Questioned Costs:** \$5,407

**Context:** During testing, we noted the following issues in a sample of sixty head start cluster account payable and payroll transactions:

- The Unit paid \$5,407 in sales tax on 3 selections which is an unallowable cost. The Unit is tax-exempt as a governmental entity in the state and should not pay sales tax.

**Identification as a repeat finding, if applicable:** This is a repeat finding from the immediately prior audit. The prior audit finding number was 2023-001.

**Recommendation:** We recommend the Unit obtain the necessary documentation to show vendors the Unit is a tax-exempt entity.

**Views of Responsible Officials and Planned Corrective Actions:** Management agrees with the finding and has prepared a corrective action plan.

---

(Continued)

ELKHART AND ST. JOSEPH COUNTIES HEAD START CONSORTIUM  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
June 30, 2024

---

**Section III – Federal Award Findings and Questioned Costs** (Continued)

**FINDING 2024-003**

**Information on the federal program:**

Subject: Head Start Cluster - Internal Controls  
Federal Agency: Department of Health and Human Services  
Federal Program: Head Start Cluster  
Assistance Listing Number: 93.600  
Federal Award Numbers and Years (or Other Identifying Numbers): 05CH011249, 05HP000285  
Compliance Requirement: Reporting  
Audit Finding: Significant Deficiency

**Criteria:** 2 CFR section 200.303 states in part: "The non-Federal entity must:

(a) Establish and maintain effective internal control over Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal awards in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in 'Standards for Internal Control in the Federal Government' issued by the Comptroller General of the United States or the 'Internal Control Integrated Framework', issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). . . ."

**Condition:** An effective internal control system was not in place at the Unit in order to ensure compliance with requirements related to the grant agreement and the reporting compliance requirement.

**Cause:** The Unit's management had not developed a system of internal controls to ensure compliance with the reporting requirements.

**Effect:** The failure to establish an effective internal control system placed the Unit at risk of noncompliance with the grant agreement and the compliance requirements. A lack of segregation of duties within an internal control system could have also allowed noncompliance with the compliance requirements and allowed the misuse and mismanagement of federal funds and assets by not having proper oversight, reviews, and approvals over the activities of the programs.

**Questioned Costs:** None.

**Context:** We noted that for the two federal financial reports in a sample of two reports, the Supervisor prepared the report without a secondary, documented review before the submission of the report to ensure the accuracy of the report. The amounts reported agreed to the supporting records without error.

**Identification as a repeat finding, if applicable:** This is a repeat finding from the immediately prior audit. The prior audit finding number was 2023-003.

**Recommendation:** We recommended that the Unit implement a documented, formal review of the reports before they are submitted.

**Views of Responsible Officials and Planned Corrective Actions:** Management agrees with the finding and has prepared a corrective action plan.



*Elkhart and St. Joseph Counties Head Start Consortium*

245 North Lombardy, Suite A ~ South Bend, IN 46619

Office Phone: (574) 393-5864~ Fax: (574) 283-8108

Toll – Free: (866) 440-8843 Web site: [www.headstartesj.com](http://www.headstartesj.com)

Dr. Kathy L. Guajardo, Executive Director

March 26, 2025

CORRECTIVE ACTION PLAN OF CURRENT AUDIT FINDINGS

June 30, 2024

**Finding 2024-001 - Preparation of the Schedule of Expenditures of Federal Awards**

Contact Person Responsible for Corrective Action: Brenda Overton

Contact Phone Number: 574.393.5866

Views of Responsible Official: We concur with the finding.

Description of Corrective Action Plan: We will work to double check all amounts on the SEFA to ensure the amounts recorded agree to the underlying detail for the year.

Anticipated Completion Date: FY25 AFR

**Finding 2024-002 – Head Start Cluster - Activities Allowed or Unallowed, Allowable Costs/Cost Principles**

Contact Person Responsible for Corrective Action: Brenda Overton

Contact Phone Number: 574.393.5866

Views of Responsible Official: We concur with the finding.

Description of Corrective Action Plan: We will ensure all vouchers are reviewed by a secondary individual, all supporting backup is maintained for each claim, and all payroll amounts agree to approved contracts.

Anticipated Completion Date: April 2025

**Finding 2024-003**– Head Start Cluster – Reporting

Contact Person Responsible for Corrective Action: Brenda Overton  
Contact Phone Number: 574.393.5866

Views of Responsible Official: We concur with the finding.

Description of Corrective Action Plan: We will ensure all required federal reports have a documented, formal review of the reports before they are submitted to ensure the information submitted is accurate

Anticipated Completion Date: April 2025

**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS**

**FINDING 2023-001**

**Information on the federal program:**

Subject: Head Start Cluster - Activities Allowed or Unallowed, Allowable Costs/Cost Principles

Federal Agency: Department of Health and Human Services

Federal Program: Head Start Cluster

Assistance Listing Number: 93.600

Federal Award Numbers and Years (or Other Identifying Numbers): 05CH011249, 05HP000285, 05HE000044

Compliance Requirement: Activities Allowed or Unallowed, Allowable Costs/Cost Principles

Audit Finding: Material Weakness, Noncompliance

During testing, we noted the following issues in a sample of sixty head start cluster account payable and payroll claims:

- Two sample selections were not approved by a secondary individual.
- The Unit paid \$7,436 in sales tax on 5 selections which is an unallowable cost. The Unit is tax-exempt as a governmental entity in the state and should not pay sales tax.
- The amount paid to one employee did not agree to the employee's approved contract. The amount charged to the grant as \$27 more than what the employee's approved personnel file stated.

*Status:* Not resolved, see finding 2024-002.

**FINDING 2023-002**

**Information on the federal program:**

Subject: Head Start Cluster – Equipment  
Federal Agency: Department of Health and Human Services  
Federal Program: Head Start Cluster  
Assistance Listing Number: 93.600  
Federal Award Numbers and Years (or Other Identifying Numbers): 05CH011249,  
05HP000285, 05HE000044  
Compliance Requirement: **Equipment**  
Audit Finding: Significant Deficiency

For the eight buses sampled for equipment testing, the buses were not added to the capital assets listing. Additionally, no inventory was performed during the audit period.

*Status:* Resolved.

**FINDING 2023-003**

Subject: Head Start Cluster - Internal Controls  
Federal Agency: Department of Health and Human Services  
Federal Program: Head Start Cluster  
Assistance Listing Number: 93.600  
Federal Award Numbers and Years (or Other Identifying Numbers): 05CH011249,  
05HP000285, 05HE000044  
Compliance Requirement: **Reporting**  
Audit Finding: Significant Deficiency

We noted that for the three federal financial reports in a sample of three reports, the Supervisor prepared the report without a secondary, documented review before the submission of the report to ensure the accuracy of the report. The amounts reported agreed to the supporting records without error.

*Status:* Not resolved, see finding 2024-004.

Respectfully,

Dr. Kathy L. Guajardo, Executive Director

  
Brenda Overton, Fiscal Officer  
