

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

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

COMPLIANCE ENGAGEMENT REPORT

OF

STEUBEN TOWNSHIP

STEUBEN COUNTY, INDIANA

January 1, 2020 to December 31, 2023



**FILED**

05/09/2025



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SCHEDULE OF OFFICIALS

<u>Office</u>	<u>Official</u>	<u>Term</u>
Trustee	Ralph Kugler	01-01-20 to 12-31-25
Chair of the Township Board	Mark White	01-01-20 to 12-31-25



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## INDIANA STATE BOARD OF ACCOUNTS

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TO: THE OFFICIALS OF STEUBEN TOWNSHIP, STEUBEN COUNTY, INDIANA

As authorized under Indiana Code 5-11-1, we performed certain procedures to the accounting records and related documents of Steuben Township (Township), for the period of January 1, 2020 to December 31, 2023. The objective of this engagement was to determine compliance with applicable Indiana laws, regulations, and uniform compliance guidelines (Guidelines) established by the Indiana State Board of Accounts pursuant to Indiana Code 5-11-1-24. The objective of this engagement is not to opine on compliance or financial activity of the Township as this engagement was not conducted in accordance with any standards established by an authoritative standard-setting body, and, as such, we do not provide any opinions on compliance or financial activity.

Management is responsible for preparing and maintaining its accounting records and related documents in accordance with applicable Indiana laws, regulations, and Guidelines. Management's responsibility also includes, but is not limited to, complying with other applicable Indiana laws, regulations, and Guidelines concerning how it operates: authorized sources and uses of funds; what reports are required to be prepared and filed; and what depositories and investment types are allowable.

We fulfilled our responsibility as detailed in the first paragraph, using procedures that verified the appropriate accounting for and reporting of cash, receipts, and disbursements; and the appropriate sources and uses of funds in accordance with applicable Indiana laws, regulations, and Guidelines. Expanding the scope and nature of these procedures can and does occur in specific circumstances.

The comments contained herein, if any, describe the identified reportable instances of noncompliance found during our engagement. Our procedures were not designed to identify all instances of noncompliance; therefore, noncompliance may exist that is unidentified. Any Official Response to the comments incorporated within this report was not verified for accuracy.

The Schedule of Officials and Statements of Receipts, Disbursements, and Cash and Investment Balances - Regulatory Basis (Statements) are informational only. The Statements have not been subjected to any procedures designed to express an opinion or provide any assurance on them, and, accordingly, we do not express an opinion or provide any assurance on them.

This report is intended solely for the information and use of management, governance, and others within the organization. This restriction is not intended to limit the distribution of this report, which is a matter of public record. Reports can be found on the Indiana State Board of Accounts' website: <http://www.in.gov/sboa/>, and the Township's Annual Financial Reports filed by management can be found on the Indiana Gateway for Government Units financial reporting system website: <http://www.gateway.ifionline.org>.

The contents of this report were communicated to Ralph Kugler, Trustee; Steve Anstett, Township Board member; and Kim Kugler, Deputy Trustee, on April 30, 2025.



Beth Kelley, CPA, CFE  
Deputy State Examiner

April 22, 2025

STEUBEN TOWNSHIP, STEUBEN COUNTY  
COMMENTS

**LIT CERTIFIED SHARES**

*Condition and Context*

Due to a lack of internal controls, the Township receipted a portion of its LIT Certified Shares distributions during 2023 to the Township Assistance fund and the Fire Fighting fund. 100 percent of the LIT Certified Shares distributions should have been receipted to the Township fund. A memorandum from the Indiana State Board of Accounts dated February 10, 2022, stated: "It has come to our attention that some units are not recording Local Income Tax (LIT) Certified Shares distributions into the General Fund upon receipt. The purpose of this memorandum is to remind civil taxing units of the Indiana State Board of Account's (SBOA) position that LIT Certified Shares be receipted into General Fund. For those civil taxing units that have budgeted LIT Certified Shares with plans on receipting into a fund other than General for the 2022 year, we will not take exception. We will expect that for years 2023 and beyond, LIT Certified Shares be receipted and accounted for in the General Fund."

*Criteria*

Units are required to comply with all grant agreements, rules, regulations, bulletins, directives, letters, letter rulings, court decisions, and filing requirements concerning reports and other procedural matters of federal and state agencies. Units must file accurate reports required by federal and state agencies. Noncompliance may require corrective action. (Accounting and Uniform Compliance Guidelines Manual for Townships, Chapter 1)

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. . . ."

STEUBEN TOWNSHIP, STEUBEN COUNTY  
COMMENTS  
(Continued)

**CAPITAL ASSETS**

*Condition and Context*

Due to the lack of internal controls, the Township did not have a written capital asset policy that detailed the threshold at which an item is considered a capital asset.

*Criteria*

Every unit must have a capital assets policy that details the threshold at which an item is considered a capital asset. Every unit must have a complete detail listing of all capital assets owned which reflects their acquisition value. Capital Asset Ledger (Form 369) has been prescribed for this purpose. A complete physical inventory must be taken at least every two years, unless more stringent requirements exist, to verify account balances carried in the accounting records. (Accounting and Uniform Compliance Guidelines Manual for Townships, Chapter 1)

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STATEMENTS OF RECEIPTS, DISBURSEMENTS, AND CASH  
AND INVESTMENT BALANCES - REGULATORY BASIS

STEUBEN TOWNSHIP, STEUBEN COUNTY  
 STATEMENT OF RECEIPTS, DISBURSEMENTS,  
 AND CASH AND INVESTMENT BALANCES -  
 REGULATORY BASIS  
 For the Years Ended December 31, 2020 and 2021

Fund	Cash and Investments 01-01-20	Receipts	Disbursements	Cash and Investments 12-31-20	Receipts	Disbursements	Cash and Investments 12-31-21
Township	\$ 62,954	\$ 38,064	\$ 50,675	\$ 50,343	\$ 40,704	\$ 23,743	\$ 67,304
Park and Recreation	7,943	8,902	6,310	10,535	8,989	6,298	13,226
Township Assistance	40,961	8,241	32,959	16,243	8,602	7,158	17,687
Fire Fighting	66,184	58,770	55,734	69,220	60,937	52,340	77,817
Rainy Day	12,031	50,000	1,000	61,031	-	300	60,731
Cumulative Fire	59,020	17,065	15,000	61,085	18,449	2,792	76,742
Special Projects	4,930	3,000	3,451	4,479	3,300	1,533	6,246
Totals	<u>\$ 254,023</u>	<u>\$ 184,042</u>	<u>\$ 165,129</u>	<u>\$ 272,936</u>	<u>\$ 140,981</u>	<u>\$ 94,164</u>	<u>\$ 319,753</u>

STEUBEN TOWNSHIP, STEUBEN COUNTY  
 STATEMENT OF RECEIPTS, DISBURSEMENTS,  
 AND CASH AND INVESTMENT BALANCES -  
 REGULATORY BASIS  
 For the Years Ended December 31, 2022 and 2023

Fund	Cash and Investments 01-01-22	Receipts	Disbursements	Cash and Investments 12-31-22	Receipts	Disbursements	Cash and Investments 12-31-23
Township	\$ 67,304	\$ 39,953	\$ 24,548	\$ 82,709	\$ 33,597	\$ 26,612	\$ 89,694
Park and Recreation	13,226	9,228	5,112	17,342	9,662	5,162	21,842
Township Assistance	17,687	10,283	8,599	19,371	5,634	9,258	15,747
Fire Fighting	77,817	60,995	48,959	89,853	47,540	55,961	81,432
Rainy Day	60,731	-	-	60,731	-	6,272	54,459
Cumulative Fire	76,742	19,131	9,992	85,881	14,225	14,591	85,515
Special Projects	6,246	3,781	1,694	8,333	2,675	1,936	9,072
Totals	<u>\$ 319,753</u>	<u>\$ 143,371</u>	<u>\$ 98,904</u>	<u>\$ 364,220</u>	<u>\$ 113,333</u>	<u>\$ 119,792</u>	<u>\$ 357,761</u>