

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

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

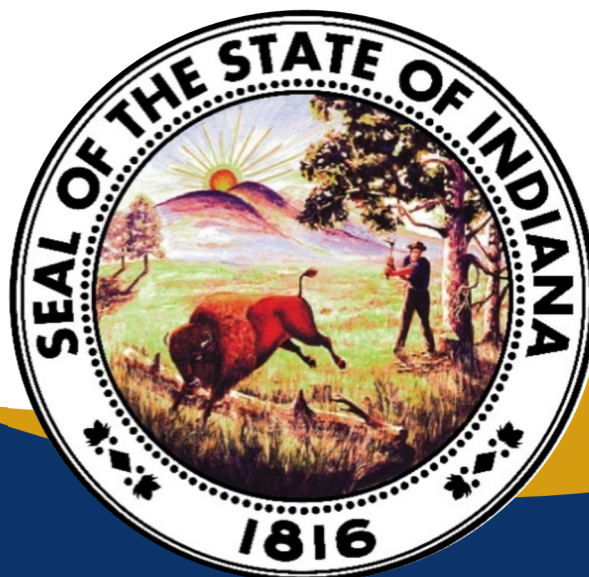
COMPLIANCE EXAMINATION REPORT

OF

ST. JOSEPH COUNTY HOUSING CONSORTIUM

ST. JOSEPH COUNTY, INDIANA

January 1, 2023 to December 31, 2023



**FILED**  
12/05/2024



Paul D. Joyce, CPA  
State Examiner

# INDIANA STATE BOARD OF ACCOUNTS

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December 5, 2024

Board of Directors  
St. Joseph County Housing Consortium  
St. Joseph County, Indiana

This report is supplemental to the audit report of St. Joseph County Housing Consortium (District), for the period from January 1, 2023 to December 31, 2023. It has been provided as a separate report so that the reader may easily identify any findings that pertain to the District. It should be read in conjunction with the financial statement audit report of the District, which provides an opinion on the District's financial statements. This report may be found at [www.in.gov/sboa/](http://www.in.gov/sboa/).

As authorized under Indiana Code 5-11-1, we engaged private examiners under our review to perform the audit of the District and perform procedures to determine compliance with applicable Indiana laws and uniform compliance guidelines established by the Indiana State Board of Accounts. The findings contained herein describe the identified reportable instances of noncompliance found as a result of these procedures.

We have reviewed the supplemental report of St. Joseph County Housing Consortium prepared by Crowe LLP, Independent Public Accountants, for the period January 1, 2023 to December 31, 2023. In our opinion, the supplemental report was prepared in accordance with the guidelines established by the Indiana State Board of Accounts.

We call your attention to the findings in the report on pages 3 through 4.

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

Tammy R. White, CPA  
Deputy State Examiner

ST. JOSEPH COUNTY HOUSING CONSORTIUM

St. Joseph County, Indiana  
January 1, 2023 through December 31, 2023

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ST. JOSEPH COUNTY HOUSING CONSORTIUM  
SCHEDULE OF OFFICIALS  
January 1, 2023 through December 31, 2023

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<u>Office</u>	<u>Official</u>	<u>Term</u>
Chairman of the Consortium Board	Jordan Gathers	01-01-23 to 12-31-23
Director	Pamela C. Meyer (Vacant) Elizabeth Maradik	01-01-23 to 03-17-23 03-18-23 to 06-04-23 06-05-23 to 12-31-23
Clerk Treasurer	Rosa Thomas	01-01-23 to 12-31-23



## INDEPENDENT ACCOUNTANT'S REPORT

To the Indiana State Board of Accounts and  
Management of the St. Joseph County Housing Consortium

We have examined the St. Joseph County Housing Consortium's ("Consortium") compliance with the Indiana State Board of Accounts' *Accounting and Uniform Compliance Guidelines Manual For Special Districts* during the period January 1, 2023 through December 31, 2023. Management of the Consortium is responsible for the Consortium's compliance with the specified requirements. Our responsibility is to express an opinion on the Consortium's compliance with the specified requirements based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the Consortium complied, in all material respects, with the specified requirements referenced above. An examination involves performing procedures to obtain evidence about whether the Consortium complied with the specified requirements. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material noncompliance, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our qualified opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Our examination does not provide a legal determination on the Consortium's compliance with specified requirements.

Our examination disclosed material noncompliance with the *Accounting and Uniform Compliance Guidelines Manual for Special Districts* applicable to the Consortium during the period January 1, 2023 through December 31, 2023, as described in items 2023-001 and 2023-002 on the following Schedule of Examination Findings and Results.

In our opinion, except for the material noncompliance described in the preceding paragraph, the Consortium complied, in all material respects, with the aforementioned requirements during the period January 1, 2023 through December 31, 2023.

*Crowe LLP*  
Crowe LLP

Indianapolis, Indiana  
November 7, 2024

ST. JOSEPH COUNTY HOUSING CONSORTIUM  
SCHEDULE OF EXAMINATION FINDINGS AND RESULTS  
January 1, 2023 through December 31, 2023

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**FINDING 2023-001: INTERNAL CONTROLS**

**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. . . .*"

A similar comment appeared in the prior year report B61719.

**Condition:** During testing, we noted that the Consortium did not meet the minimum standards of internal control. Specifically, we noted the following issues:

*Cash and Investments (Bank Reconciliations)*

Bank reconciliations were prepared by one individual without a documented oversight or review process to ensure the accuracy and completeness of cash and investments. We noted that the bank statement was signed off on to send to the Clerk Treasurer, but there was no documented review of the bank reconciliations. Further, an adjustment was posted to increase ending cash by \$101,862.

*Financial Reporting and Other Information*

One individual prepared and submitted the financial information into the Annual Financial Report (AFR) via the Indiana Gateway for Government Units financial reporting system, which was the source for the financial statement, without a documented oversight or review process to ensure the accuracy and completeness of the information. As a result, an adjustment was posted to reduce disbursements and increase the ending cash balance by \$101,862 on the 2023 AFR.

**FINDING 2023-002: MISSING GATEWAY UPLOADS**

**Criteria:** The Indiana State Board of Accounts (SBOA) Directive 2018-1 states in part, " Beginning with July 2018 files, which will be due September 15, 2018, all cities, towns, townships, Districts, and special districts will use the Upload App to upload files containing financial and governmental unit information on Gateway to allow the State Board of Accounts (SBOA) to conduct audit planning and audit processes prior to on-site work at a unit. This remote process will provide for more efficient data processing and save audit costs for our clients. The Directive was amended with additional required uploads effective December 31, 2023.

The following files and governmental unit information are required to be uploaded monthly by all units:

- Bank Reconcilements, Bank Statements, and Outstanding Check Lists
- Approved Board Minutes, please see the user guide for more information and examples
- Funds Ledger, summarizing total receipts, disbursements, and beginning and ending balances by fund

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(Continued)

ST. JOSEPH COUNTY HOUSING CONSORTIUM  
SCHEDULE OF EXAMINATION FINDINGS AND RESULTS  
January 1, 2023 through December 31, 2023

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**FINDING 2023-002: MISSING GATEWAY UPLOADS** (Continued)

The following files and governmental unit information are required to be uploaded annually by all units:

- Year-end investment statements and register of investments
- Excel Data Capture/ Data Dump
- Detail of Receipts by fund and account
- Detail of Disbursements by fund and account
- Current year Salary ordinance (or Schedule) and Amendments (except Schools)
- Annual Vendor History Report
- Annual Payroll History Report, without social security numbers
- Annual Funds Ledger, summarizing year-to-date total receipts, year-to-date disbursements, and beginning and ending balances by fund
- Accounts Payable/ Accounts Receivable Schedule support
- Direct Federal Grant Agreements/Award Letters and Amendments initiated during the year
- Agreements for Subawards made to Subrecipients for all Federal Grants initiated during the year
- Personnel Policy (to be uploaded in 2023 and in future years if updated)

The same comment appeared in the prior Report B61719.

**Condition:** During testing, we noted the Consortium had only uploaded the December 2023 Bank reconciliation. All other monthly and annual uploads applicable to the Consortium were missing from the Indiana Gateway portal.

ST. JOSEPH COUNTY HOUSING CONSORTIUM  
EXIT CONFERENCE  
January 1, 2023 through December 31, 2023

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The contents of this report were discussed on November 7, 2024 with Rosa Tomas, Clerk Treasurer, and Caleb Bauer, Chairman of the Consortium Board.