

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

FEDERAL COMPLIANCE AUDIT REPORT

OF

GREATER CLARK COUNTY SCHOOLS

CLARK COUNTY, INDIANA

July 1, 2017 to June 30, 2019



**FILED**  
03/25/2020



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### SCHEDULE OF OFFICIALS

<u>Office</u>	<u>Official</u>	<u>Term</u>
Chief Financial Officer/Treasurer	Dr. Thomas Dykiel	07-01-17 to 06-30-20
Superintendent of Schools	Dr. Andrew T. Melin (Vacant) Mark Laughner (interim) Mark Laughner	07-01-17 to 01-02-19 01-03-19 to 01-21-19 01-22-19 to 06-30-19 07-01-19 to 06-30-22
President of the School Board	Christina Gilkey Teresa Bottorff-Perkins Katie Hutchinson Janelle Fitzpatrick	01-01-17 to 12-31-17 01-01-18 to 12-31-18 01-01-19 to 12-31-19 01-01-20 to 12-31-20



INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING  
AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF THE FINANCIAL  
STATEMENT PERFORMED IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS*

TO: THE OFFICIALS OF THE GREATER CLARK COUNTY SCHOOLS, CLARK COUNTY, INDIANA

We have audited, 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, the financial statement of the Greater Clark County Schools (School Corporation), for the period of July 1, 2017 to June 30, 2019, and the related notes to the financial statement, which collectively comprise the School Corporation's financial statement and have issued our report thereon dated February 27, 2020, wherein we noted the School Corporation followed accounting practices the Indiana State Board of Accounts prescribes rather than accounting principles generally accepted in the United States of America.

***Internal Control over Financial Reporting***

In planning and performing our audit of the financial statement, we considered the School Corporation's internal control over financial reporting (internal control) to determine the 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 School Corporation's internal control. Accordingly, we do not express an opinion on the effectiveness of the School Corporation'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 combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the School Corporation's financial statement will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or 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 certain deficiencies in internal control, described in the accompanying Schedule of Findings and Questioned Costs as item 2019-001, that we consider to be a material weakness.

INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING  
AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF THE FINANCIAL  
STATEMENT PERFORMED IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS*  
(Continued)

***Compliance and Other Matters***


As part of obtaining reasonable assurance about whether the School Corporation's financial statement is free of 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 determination of financial statement amounts. 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 instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the accompanying Schedule of Findings and Questioned Costs as item 2019-001.

***Greater Clark County Schools' Response to Findings***

The School Corporation's response to the findings identified in our audit is described in the accompanying Corrective Action Plan. The School Corporation's response was not subjected to the auditing procedures applied in the audit of the financial statement and, accordingly, we express no opinion on it.

***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 School Corporation'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 School Corporation's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

  
Paul D. Joyce, CPA  
State Examiner

February 27, 2020, except for our report on the Schedule of Expenditures  
of Federal Awards, for which the date is March 3, 2020



INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE; AND REPORT ON SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY THE UNIFORM GUIDANCE

TO: THE OFFICIALS OF THE GREATER CLARK COUNTY SCHOOLS, CLARK COUNTY, INDIANA

**Report on Compliance for Each Major Federal Program**

We have audited the Greater Clark County Schools' (School Corporation) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of its major federal programs for the period of July 1, 2017 to June 30, 2019. The School Corporation's major federal programs are identified in the Summary of Auditor's Results section of the accompanying Schedule of Findings and Questioned Costs.

***Management's Responsibility***

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

***Auditor's Responsibility***

Our responsibility is to express an opinion on compliance for each of the School Corporation's major federal programs 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; 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). Those standards and the Uniform Guidance 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 a major federal program occurred. An audit includes examining, on a test basis, evidence about the School Corporation'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 each major federal program. However, our audit does not provide a legal determination of the School Corporation's compliance.

***Opinion on Each Major Federal Program***

In our opinion, the School Corporation complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the period of July 1, 2017 to June 30, 2019.

INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING  
AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF THE FINANCIAL  
STATEMENT PERFORMED IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS*  
(Continued)

**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 items 2019-003 and 2019-005. Our opinion on each major federal program is not modified with respect to these matters.

The School Corporation's response to the noncompliance findings identified in our audit is described in the accompanying Corrective Action Plan. The School Corporation'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 the School Corporation 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 the School Corporation's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing our opinion on compliance for each major federal program 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 internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the School Corporation'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 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 combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the 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 were not identified. We identified certain deficiencies in internal control over compliance, as described in the accompanying Schedule of Findings and Questioned Costs as items 2019-002, 2019-003, 2019-004, and 2019-005, that we consider to be material weaknesses.

The School Corporation's response to the internal control over compliance findings identified in our audit is described in the accompanying Corrective Action Plan. The School Corporation'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 the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.



INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING  
AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF THE FINANCIAL  
STATEMENT PERFORMED IN ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS*  
(Continued)

**Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance**

We have audited the financial statement of the School Corporation, as of and for the period of July 1, 2017 to June 30, 2019, and the related notes to the financial statement. We issued our report thereon dated February 27, 2020, which contained a dual opinion on the financial statement. An adverse opinion was issued regarding the presentation in accordance with U.S. Generally Accepted Accounting Principles, and an unmodified opinion was issued regarding the presentation in accordance with the Regulatory Basis of Accounting. Our audit was conducted for the purpose of forming an opinion on the financial statement as a whole. The accompanying Schedule of Expenditures of Federal Awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the financial statement. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial 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 itself, 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.

  
Paul D. Joyce, CPA  
State Examiner

March 3, 2020

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## SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS AND ACCOMPANYING NOTES

The Schedule of Expenditures of Federal Awards and accompanying notes presented were approved by management of the School Corporation. The schedule and notes are presented as intended by the School Corporation.

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GREATER CLARK COUNTY SCHOOLS  
 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
 For the Years Ended June 30, 2018 and 2019

Federal Grantor Agency Cluster Title/Program Title/Project Title	Pass-Through Entity or Direct Grant	Federal CFDA Number	Pass-Through Entity (or Other) Identifying Number	Passed Through to Subrecipient 06-30-18	Total Federal Awards Expended 06-30-18	Passed Through to Subrecipient 06-30-19	Total Federal Awards Expended 06-30-19
<b>Department of Agriculture</b>							
<b>Child Nutrition Cluster</b>							
School Breakfast Program	Indiana Department of Education	10.553					
School Breakfast			FY18	\$ -	\$ 1,003,876	\$ -	\$ -
School Breakfast			FY19	-	-	-	1,050,521
Total - School Breakfast Program				-	1,003,876	-	1,050,521
<b>National School Lunch Program</b>							
School Lunch	Indiana Department of Education	10.555					
School Snack			FY18	-	2,779,692	-	-
School Lunch			FY18	-	49,666	-	-
School Lunch			FY19	-	-	-	2,903,339
School Snack			FY19	-	-	-	46,929
Commodities			FY18 & FY19	-	207,586	-	203,975
Total - National School Lunch Program				-	3,036,944	-	3,154,243
<b>Summer Food Service Program for Children</b>							
Summer Food Program	Indiana Department of Education	10.559					
Summer Food Program			FY18	-	66,620	-	-
			FY19	-	-	-	69,773
Total - Summer Food Service Program for Children				-	66,620	-	69,773
<b>Total - Child Nutrition Cluster</b>							
				-	4,107,440	-	4,274,537
<b>Child Nutrition Discretionary Grants Limited Availability</b>							
School Meal Equipment Grant	Indiana Department of Education	10.579					
			FY19	-	-	-	59,449
<b>Fresh Fruit and Vegetable Program</b>							
Fresh Fruit/Veg	Indiana Department of Education	10.582					
Fresh Fruit/Veg			FY18	-	17,976	-	-
Fresh Fruit/Veg			FY19	-	-	-	21,522
Total - Fresh Fruit and Vegetable Program				-	17,976	-	80,971
<b>Total - Department of Agriculture</b>							
				-	4,125,416	-	4,355,508
<b>Department of Labor</b>							
<b>WIOA Cluster</b>							
WIOA Adult Program	Indiana Department of Workforce Development	17.258					
Work Ethic Certification Program			5107333P14WIAAD1	-	4,467	-	-
Total - WIOA Cluster				4,467	22,443	-	21,522
<b>Total - Department of Labor</b>							
				4,467	4,467	-	-
<b>National Endowment for the Humanities</b>							
Promotion of the Arts Partnership Agreements IAC Grant/Stewart	Indiana Arts Commission/Hanover College	45.025					
			NEA# 16-6100-2018 AND APS-1700	-	4,981	-	5,000
Total - National Endowment for the Humanities				-	4,981	-	5,000

GREATER CLARK COUNTY SCHOOLS  
 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
 For the Years Ended June 30, 2018 and 2019

Federal Grantor Agency Cluster Title/Program Title/Project Title	Pass-Through Entity or Direct Grant	Federal CFDA Number	Pass-Through Entity (or Other) Identifying Number	Passed Through to Subrecipient 06-30-18	Total Federal Awards Expended 06-30-18	Passed Through to Subrecipient 06-30-19	Total Federal Awards Expended 06-30-19
<b>Department of Education</b>							
Special Education Cluster (IDEA)							
Special Education Grants to States							
Idea Pt B Grant FY2016	Indiana Department of Education	84.027	14216-020-PN01	-	22,797	-	-
Idea Pt B Grant FY2017			14217-020-PN01	-	1,674,108	-	79,065
Idea Pt B Grant FY2018			81611-020-PN01	-	638,585	-	1,945,983
Idea Pt B Grant FY2019			19611-020-PN01	-	-	-	402,330
Total - Special Education Grants to States				-	2,335,490	-	2,427,378
Special Education Preschool Grants							
Preschool Grant FY2016	Indiana Department of Education	84.173	45716-022-PN01	-	1,419	-	-
Preschool Grant FY2017			45717-022-PN01	-	97,844	-	6,775
Preschool Grant FY2018			18619-020-PN01	-	29,319	-	90,623
Preschool Grant FY2019			19619-020-PN01	-	-	-	24,079
Total - Special Education_Preschool Grants				-	128,582	-	121,477
Total - Special Education Cluster (IDEA)				-	2,464,072	-	2,548,855
Title I Grants to Local Educational Agencies							
Title I / Basic Grant FY 2017	Indiana Department of Education	84.010	17-1010	-	252,535	-	-
Title I / Basic Grant FY 2018			18-1010	-	1,794,852	-	223,480
Title I / Basic Grant FY 2019			19-1010	-	-	-	1,829,485
1003(a) School Improvement Grant			17-1010	-	140,719	-	-
1003(a) School Improvement Grant			18-1010	-	35,741	-	123,657
Total - Title I Grants to Local Educational Agencies				-	2,223,847	-	2,176,622
Title I State Agency Program for Neglected and Delinquent Children and Youth							
Title I / D Grant FY 2017	Indiana Department of Education	84.013	17-1010	-	18,604	-	-
Title I / D Grant FY 2018			18-1010	-	29,276	-	9,989
Title I / D Grant FY 2019			19-1010	-	-	-	32,598
Total - Title I State Agency Program for Neglected and Delinquent Children and Youth				-	47,880	-	42,587
Impact Aid							
Impact Aid	Indiana Department of Education	84.041	S041A161600	-	628,523	-	-
Impact Aid			S041A171600	-	-	-	628,523
Total - Impact Aid				-	628,523	-	628,523
Special Education-State Personnel Development							
ICTQ/Prof Dev Gr FY18	Indiana University/Bloomington	84.323	FY18	-	15,424	-	-
ICTQ/Prof Dev Gr FY19			FY19	-	-	-	8,217
Total - Special Education-State Personnel Development				-	15,424	-	8,217
Gaining Early Awareness and Readiness for Undergraduate Programs							
Gear Up	Commission for Higher Education of the State of Indiana	84.334	FY18	-	5,241	-	-
Gear Up			FY19	-	-	-	398
Total - Gaining Early Awareness and Readiness for Undergraduate Programs				-	5,241	-	398

GREATER CLARK COUNTY SCHOOLS  
 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
 For the Years Ended June 30, 2018 and 2019

Federal Grantor Agency Cluster Title/Program Title/Project Title	Pass-Through Entity or Direct Grant	Federal CFDA Number	Pass-Through Entity (or Other) Identifying Number	Passed Through to Subrecipient 06-30-18	Total Federal Awards Expended 06-30-18	Passed Through to Subrecipient 06-30-19	Total Federal Awards Expended 06-30-19
English Language Acquisition State Grants	Indiana Department of Education	84.365					
Title III Grant FY2016			S365A150014	-	13,767	-	-
Title III Grant FY2017			S365A160014	-	26,783	-	21,608
Title III Grant FY2018			S365A170014	-	71,929	-	24,310
Title III Grant FY2019			S365A180014	-	-	-	113,566
Total - English Language Acquisition State Grants				-	112,479	-	159,484
Supporting Effective Instruction State Grants	Indiana Department of Education	84.367					
Title II/Pt A FY2016			S367A150013	-	8,916	-	-
Title II/Pt A-E Learning FY2017			S367A160013	-	11,446	-	-
Title II/Pt A FY2017			S367A160013	-	218,375	-	3,692
Title II/Pt A FY2018			S367A170013	-	103,480	-	214,633
Title II/Pt A FY2019			S367A180013	-	-	-	90,155
Total - Supporting Effective Instruction State Grants				-	342,217	-	308,480
School Improvement Grants	Indiana Department of Education	84.377					
Title I School Improvement			S377A00130015	-	113,097	-	-
Title I School Improvement			S377A00140015	-	633,968	-	173,387
Title I School Improvement			S377A00150015	-	-	-	452,368
Total - School Improvement Grant				-	747,065	-	625,755
Student Support and Academic Enrichment Program	Indiana Department of Education	84.424					
Title IV Student Support			S424A180015	-	-	-	97,541
Total - Department of Education				-	6,586,748	-	6,596,462
<b>Department of Health and Human Services</b>							
Medicaid Cluster							
Medical Assistance Program	Indiana State Department of Health	93.778					
Medicaid Administrative Claiming			FY2018	-	128,992	-	-
Medicaid Administrative Claiming			FY2019	-	-	-	129,056
Total - Medicaid Assistance Program				-	128,992	-	129,056
Total - Medicaid Cluster				-	128,992	-	129,056
Assistance Programs for Chronic Disease Prevention and Control	Indiana State Department of Health	93.945					
Other/School Wellness Grant			40093945SCEHD18	-	2,400	-	1,500
Total - Department of Health and Human Services				-	128,992	-	129,056
Total federal awards expended				\$ 4,467	\$ 10,853,004	\$ -	\$ 11,087,526

The accompanying notes are an integral part of the Schedule of Expenditures of Federal Awards.

GREATER CLARK COUNTY SCHOOLS  
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

**Note 1. Summary of Significant Accounting Policies**

*A. Basis of Presentation*

The accompanying Schedule of Expenditures of Federal Awards (SEFA) includes the federal grant activity of the School Corporation under programs of the federal government for the years ended June 30, 2018 and 2019. The information in the SEFA 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 SEFA presents only a select portion of the operations of the School Corporation, it is not intended to and does not present the financial position of the School Corporation.

The Uniform Guidance requires an annual audit of nonfederal entities expending a total amount of federal awards equal to or in excess of \$750,000 in any fiscal year unless by constitution or statute a less frequent audit is required. In accordance with Indiana Code (IC 5-11-1-25), audits of school corporations shall be conducted biennially. Such audits shall include both years within the biennial period.

*B. Other Significant Accounting Policies*

Expenditures reported on the SEFA are reported on the cash basis of accounting. Such expenditures are recognized following, as applicable, either the cost principles in OMB Circular A-87, *Cost Principles for State, Local, and Indian Tribal Governments*, or the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowed or are limited as to reimbursement. When federal grants are received on a reimbursement basis, the federal awards are considered expended when the reimbursement is received.

**Note 2. Indirect Cost Rate**

The School Corporation has elected not to use the 10 percent de minimis indirect cost rate allowed under the Uniform Guidance.



GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS

**Section I - Summary of Auditor's Results**

Financial Statement:

Type of auditor's report issued:	Adverse as to GAAP; Unmodified as to Regulatory Basis
Internal control over financial reporting:	
Material weaknesses identified?	yes
Significant deficiencies identified?	none reported
Noncompliance material to financial statement noted?	yes

Federal Awards:

Internal control over major programs:	
Material weaknesses identified?	yes
Significant deficiencies identified?	none reported
Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?	yes

Identification of Major Programs and type of auditor's report issued on compliance for each:

CFDA Number	Name of Federal Program or Cluster	Opinion Issued
	Child Nutrition Cluster	Unmodified
	Special Education Cluster (IDEA)	Unmodified
84.010	Title I Grants to Local Educational Agencies	Unmodified
84.377	School Improvement Grants	Unmodified
84.041	Impact Aid	Unmodified

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

Auditee qualified as low-risk auditee? no

**Section II - Financial Statement Findings**

**FINDING 2019-001**

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

*Condition and Context*

The School Corporation did not have a proper system of internal controls in place to prevent, or detect and correct, errors on the Schedule of Expenditures of Federal Awards (SEFA). The federal grant information entered and submitted in the Indiana Gateway for Government Units financial reporting system was the source of the SEFA. An oversight or review process had been implemented; however, the control was not effective.

GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
(Continued)

The School Corporation should have proper controls in place over the preparation of the SEFA to ensure accurate reporting of federal awards.

The SEFA presented for audit contained the following errors:

1. The Child Nutrition Cluster was understated by \$207,586 for fiscal year 2017-2018 and \$220,632 for 2018-2019.
2. The Fresh Fruit and Vegetable program was understated by \$21,522 for 2018-2019.
3. The Child Nutrition Discretionary Grants Limited Availability program was understated by \$59,449 for 2018-2019.
4. The Promotion of the Arts Partnership Agreements grant was understated by \$3,731 for 2018 and \$5,000 for 2018-2019.
5. The School Improvement Grant was understated by \$308,674 for 2017-2018 and overstated by \$123,657 for 2019.
6. The Special Education Cluster (IDEA) was understated by \$124,416 for 2017-2018.
7. Title I Grants to Local Educational Agencies were understated by \$166,187 for 2017-2018.
8. The Title I State Agency Program for Neglected and Delinquent Children and Youth grant was understated by \$2,522 for 2018 and \$319 for 2018-2019.
9. The Impact Aid grant was understated by \$628,523 for both 2018 and 2018-2019.
10. The Special Education-State Personnel Development program was understated by \$8,217 for 2018-2019.
11. The Gaining Early Awareness and Readiness for Undergraduate Programs grant was overstated by \$3,943 for 2018 and understated by \$398 for 2018-2019.
12. The English Language Acquisition State Grants program was understated \$13,767 for 2018 and overstated by \$149,139 for 2018-2019.
13. The Supporting Effective Instruction State Grants program was understated by \$8,916 for 2017-2018.
14. The Medicaid Cluster was understated by \$128,992 for 2018 and by \$129,056 for 2018-2019.
15. The Assistance Programs for Chronic Disease Prevention and Control program was understated by \$2,400 for 2017-2018 and \$1,500 for 2018-2019.
16. Multiple pass-through identifying numbers and program names were incorrect.
17. All of the 2019 grants were submitted without the correct federal agency and CFDA number.

Audit adjustments were proposed, accepted by the School Corporation, and made to the SEFA.

GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
(Continued)

*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 reproduced 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 the 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.

GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
(Continued)

- (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.
- (3) Provide total Federal awards expended for each individual Federal program and the CFDA number or other identifying number when the CFDA 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."

*Cause*

The School Corporation's management had not established a system of internal controls that would ensure proper reporting of the SEFA.

*Effect*

Without a proper system of internal controls in place that operates effectively, material misstatements of the SEFA remained undetected. The SEFA contained the errors identified in the *Condition and Context*.

*Views of Responsible Officials*

For the views of responsible officials, refer to the Corrective Action Plan that is part of this report.

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

**FINDING 2019-002**

Subject: School Breakfast Program, National School Lunch Program - Eligibility and Special Test and Provisions - Verification of Free and Reduced Price Applications

Federal Agency: Department of Agriculture

Federal Programs: School Breakfast Program, National School Lunch Program

CFDA Numbers: 10.553, 10.555

Federal Award Number and Year (or Other Identifying Number): FY18

Pass-Through Entity: Indiana Department of Education

Compliance Requirements: Eligibility, Special Tests and Provisions - Verification of Free and Reduced Price Applications

Audit Finding: Material Weakness

GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
(Continued)

*Repeat Finding*

This is a repeat finding from the immediately prior audit report regarding eligibility. The prior audit finding number was 2017-001.

*Condition and Context*

An effective internal control system, which would include segregation of duties, was not in place at the School Corporation in order to ensure compliance with requirements related to the grant agreement and the following compliance requirements: Eligibility and Special Tests and Provisions - Verification of Free and Reduced Price Applications.

*Eligibility*

The federal income guidelines used to determine eligibility were uploaded into the school lunch software by the School Corporation's software vendor. The Confidential Clerical Secretary reviewed the guidelines that were uploaded to ensure that they were correct; however, there was no documentation of this review for fiscal year 2017-2018.

*Special Tests and Provisions - Verification of Free and Reduced Price Applications*

The School Corporation established the control that the Confidential Clerical Secretary would complete the verification and either the other Confidential Clerical Secretary or the manager would review the verifications; however, there was no documentation for this review for 2017-2018.

The lack of controls was isolated to 2017-2018.

*Criteria*

2 CFR 200.303 states in part:

"The non-Federal entity must:

- (a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award 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). . . ."

*Cause*

The School Corporation's management had not developed a system of internal controls that segregated key functions related to the Eligibility and Special Tests and Provisions - Verification of Free and Reduced Price Applications compliance requirements.

GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
(Continued)

*Effect*

The failure to establish an effective internal control system placed the School Corporation at risk of noncompliance with the grant agreement and the Eligibility and Special Tests and Provisions - Verification of Free and Reduced Price Applications 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*

There were no questioned costs identified.

*Recommendation*

We recommended that the School Corporation's management establish a system of internal controls, including segregation of duties, related to the grant agreement and the Eligibility and Special Tests and Provisions - Verification of Free and Reduced Price Applications compliance requirements.

*Views of Responsible Officials*

For the views of responsible officials, refer to the Corrective Action Plan that is part of this report.

**FINDING 2019-003**

Subject: Child Nutrition Cluster - Procurement and Suspension and Debarment

Federal Agency: Department of Agriculture

Federal Programs: School Breakfast Program, National School Lunch Program, Summer Food Service Program

CFDA Numbers: 10.553, 10.555, 10.559

Federal Award Numbers and Years (or Other Identifying Numbers): FY18, FY19

Pass-Through Entity: Indiana Department of Education

Compliance Requirement: Procurement and Suspension and Debarment

Audit Findings: Material Weakness, Other Matters

*Condition and Context*

An effective internal control system, which would include segregation of duties, was not in place at the School Corporation in order to ensure compliance with requirements related to the grant agreement and the Procurement and Suspension and Debarment compliance requirement.

During the audit period, the School Corporation had purchases exceeding \$25,000 for three vendors. For two of the three vendors, there was no evidence that the School Corporation was verifying that the vendor was not suspended or debarred prior to entering into a covered transaction.

The lack of controls and noncompliance were systemic issues, which occurred throughout the audit period.

GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
(Continued)

*Criteria*

2 CFR 200.303 states in part:

"The non-Federal entity must:

(a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award 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). . . ."

2 CFR 180.300 states:

"When you enter into a covered transaction with another person at the next lower tier, you must verify that the person with whom you intend to do business is not excluded or disqualified.

You do this by:

- (a) Checking the SAM Exclusions; or
- (b) Collecting a certification from that person; or
- (c) Adding a clause or condition to the covered transaction with that person."

*Cause*

The School Corporation's management had not developed a system of internal controls that would have ensured compliance with the Procurement and Suspension and Debarment compliance requirement.

*Effect*

The failure to establish an effective internal control system enabled material noncompliance to go undetected. The failure to comply with the grant agreement and the compliance requirement could have resulted in the loss of federal funds to the School Corporation.

*Questioned Costs*

There were no questioned costs identified.

*Recommendation*

We recommended that the School Corporation's management establish and implement control procedures to ensure compliance with the grant agreement and the Procurement and Suspension and Debarment compliance requirement.

*Views of Responsible Officials*

For the views of responsible officials, refer to the Corrective Action Plan that is part of this report.

GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
(Continued)

***FINDING 2019-004***

Subject: Title I Grants to Local Educational Agencies - Special Tests and Provisions - Assessment System Security  
Federal Agency: Department of Education  
Federal Program: Title I Grants to Local Educational Agencies  
CFDA Number: 84.010  
Federal Award Numbers and Years (or Other Identifying Numbers): 17-1010, 18-1010, 19-1010  
Pass-Through Entity: Indiana Department of Education  
Compliance Requirement: Special Tests and Provisions - Assessment System Security  
Audit Finding: Material Weakness

*Repeat Finding*

This is a repeat finding from the immediately prior report. The prior audit finding number was 2017-004.

*Condition and Context*

An effective internal control system, which would include segregation of duties, was not in place at the School Corporation in order to ensure compliance with requirements related to the grant agreement and the Special Tests and Provisions - Assessment system Security compliance requirement.

The Corporation Test Coordinator did not have a control in place to ensure that all School Corporation staff that were required to take the training had done so.

The lack of controls was a systemic issue, which occurred throughout the audit period.

*Criteria*

2 CFR 200.303 states in part:

"The non-Federal entity must:

- (a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award 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). . . ."

*Cause*

The School Corporation's management had not developed a system of internal controls that segregated key functions related to the Special Tests and Provisions - Assessment System Security compliance requirement.



GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
(Continued)

*Effect*

The failure to establish an effective internal control system placed the School Corporation at risk of noncompliance with the grant agreement and the compliance requirement. A lack of segregation of duties within an internal control system could also allow noncompliance with the compliance requirement and allow the misuse and mismanagement of federal funds and assets by not having proper oversight, reviews, and approvals over the activities of the program.

*Questioned Costs*

There were no questioned costs identified.

*Recommendation*

We recommended that the School Corporation's management establish a system of internal controls, including segregation of duties, related to the grant agreement and the Special Tests and Provisions - Assessment System Security compliance requirement.

*Views of Responsible Officials*

For the views of responsible officials, refer to the Corrective Action Plan that is part of this report.

**FINDING 2019-005**

Subject: School Improvement Grants - Procurement and Suspension and Debarment

Federal Agency: Department of Education

Federal Program: School Improvement Grants

CFDA Number: 84.377

Federal Award Numbers and Years (or Other Identifying Numbers): S377A00130015, S377A00140015,  
S377A00150015

Pass-Through Entity: Indiana Department of Education

Compliance Requirement: Procurement and Suspension and Debarment

Audit Findings: Material Weakness, Other Matters

*Condition and Context*

An effective internal control system, which would include segregation of duties, was not in place at the School Corporation in order to ensure compliance with requirements related to the grant agreement and the procurement requirements.

Documentation was not presented to verify methods or rationale used to satisfy the procurement requirements.

The lack of controls and noncompliance were systemic issues, which occurred throughout the audit period.

*Criteria*

2 CFR 200.303 states in part:

"The non-Federal entity must:

GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
(Continued)

(a) Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award 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). . . ."

2 CFR 200.318(a) states: "The non-Federal entity must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this part."

2 CFR 200.318(i) states:

"The non-Federal entity must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price."

2 CFR 200.320 states in part:

"The non-Federal Entity must use one of the following methods of procurement.

(a) Procurement by micro-purchases. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (§ 200.67 Micro-purchase). To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.

(b) Procurement by small purchase procedures. Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources. . . ."

*Cause*

The School Corporation's management had not developed a system of internal controls that would have ensured compliance with the Procurement and Suspension and Debarment compliance requirement.

*Effect*

The failure to establish internal controls enabled material noncompliance to go undetected. The failure to comply with the grant agreement and the compliance requirement could have resulted in the loss of federal funds to the School Corporation.

*Questioned Costs*

There were no questioned costs identified.

GREATER CLARK COUNTY SCHOOLS  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
(Continued)

*Recommendation*

We recommended that the School Corporation's management establish a system of internal controls, including segregation of duties, to ensure compliance with the grant agreement and the Procurement Suspension and Debarment compliance requirement.

*Views of Responsible Officials*

For the views of responsible officials, refer to the Corrective Action Plan that is part of this report.

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#### AUDITEE-PREPARED DOCUMENTS

The subsequent documents were provided by management of the School Corporation. The documents are presented as intended by the School Corporation.

## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

### FINDING 2017-001

Fiscal year in which the finding initially occurred: 2015

Pass-Through Entity: IDOE

Contact Person Responsible for Corrective Action Plan: Dr. Thomas J. Dykiel

Contact Phone Number 812-288-4802 X50121

#### Status of Audit Finding:

The Food Lunch Program was not showing the cash balances to the three months average expenditures to stay in compliance with the Federal Program.

The confidential secretary wasn't performing the necessary review of free and reduced lunch applications as prescribed by federal guidelines.

Internal controls need to be maintained to show separation of duties in the food service department.


The CFO will show evidence of comparing the cash balance to the three month average expenditures to stay in compliance with the Federal Program.

The confidential secretary for food service reviews and documents the review performed to ensure that the Federal income guidelines uploaded into the school lunch software program by the school corporation's software vendor are correct.

Monthly, the Food Service Director will meet with the CFO to determine the compliance with the Paid Lunch Equity Requirement.

Both, confidential secretaries will be involved in the verification of Free/Reduced Price Applications and document it with both of their signatures.

This was completed in July, 2018.



Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 17, 2020

## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

### FINDING 2017-002

Fiscal year in which the finding initially occurred: 2015

Pass-Through Entity: IDOE

Contact Person Responsible for Corrective Action Plan: Dr. Thomas J. Dykiel

Contact Phone Number 812-288-4802 X50121

### Status of Audit Finding:

Semi-Annual Certifications were prepared by the Title I Director's executive assistant and then certified by either the building principal or the Title I Director. However, there is no indication on the certifications that someone other than the certifying official prepared the forms.

The Title I Director was solely responsible for completing and submitting the required Comparability Reports. There was no oversight or approval process in place to ensure that Comparability Reports were accurate.

Additional training has been completed to make sure that we have separation of duties. The Comparability Reports and Time and Effort Logs are being signed off by the Superintendent.

This was completed in July, 2017.



Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 17, 2020

## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

### FINDING 2017-003

Fiscal year in which the finding initially occurred: 2015

Pass-Through Entity: IDOE

Contact Person Responsible for Corrective Action Plan: Dr. Thomas J. Dykiel

Contact Phone Number 812-288-4802 X50121

#### Status of Audit Finding:

An effective internal control system was not in place at the School Corporation to ensure compliance with requirements related to the grant agreement and the Special Tests and Provisions – Annual Report Card/High School Graduation Rate compliance requirement.

An effective internal control system was not in place to ensure that documentation supporting the removal of students from graduation cohorts meets the requirements of the pass-through entity.

Signatures have been requested, but after three attempts to get the signatures, we will stop sending a request. Schools have been instructed to include STN on documentation when students leave the district.

This was completed in July, 2017.



Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 17, 2020



## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

### FINDING 2017-004

Fiscal year in which the finding initially occurred: 2017

Pass-Through Entity: IDOE

Contact Person Responsible for Corrective Action Plan: Dr. Thomas J. Dykiel

Contact Phone Number 812-288-4802 X50121

#### Status of Audit Finding:

An effective internal control system was not in place to ensure that a written test security policy, describing the School Corporation's policies and procedures for ensuring the security of assessment testing, was properly developed and implemented.

The School Corporation had a written test security policy that detailed who was responsible for each area of assessment test security and integrity. However, it did not provide a description of the procedures or plan that were in place to meet all of the assessment system security requirements.

All employees who could have access to the testing booklets have reviewed the information sent out by the state. The testing coordinator has been instructed to create and provide a description of the procedures of the plan.

This is being worked on and hoped to be implemented by the 2020-2021 school year.



Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 17, 2020

## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

### FINDING 2017-005

Fiscal year in which the finding initially occurred: 2017

Pass-Through Entity: IDOE

Contact Person Responsible for Corrective Action Plan: Dr. Thomas J. Dykiel

Contact Phone Number 812-288-4802 X50121

#### Status of Audit Finding:

An effective internal control system was not in place at the Co-Op and there was no oversight by the School Corporation during the 2015-2016 and 2016-2017 school years in order to ensure compliance with requirements related to the grant agreement and the Procurement and Suspension and Debarment compliance requirement.

The Co-Op did not have internal controls in place to ensure the purchasing method used complied with the small purchases procurement method as described in the grant requirements. The Co-Op did not present evidence that an adequate number of quotes were obtained for small purchases with estimated costs above \$3,500. Multiple personal service contracts were entered into without evidence of price or rate quotations being obtained.

In addition, a policy was not set up to verify suspension and debarment so that the contracts that were entered into on behalf of the Co-Op were not made with non-federal entities or individuals excluded from or ineligible for participation in federal assistance programs or activities.

The Co-op came to an end 6/30/2017. Instructions have been given to the Special Education Director and all other directors to make sure that they have the proper documentation on personal service contracts showing price quotations. Small purchases over \$3,500 will have two competitive quotes. The director and her administrative assistant have been notified of this to have effective internal control systems in place to ensure compliance with requirements of the grant and also with the Procurement and Suspension and Debarment compliance requirement.

This was completed by June 30, 2017.



Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 17, 2020

## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

### FINDING 2017-006

Fiscal year in which the finding initially occurred: 2015

Pass-Through Entity: IDOE

Contact Person Responsible for Corrective Action Plan: Dr. Thomas J. Dykiel

Contact Phone Number 812-288-4802 X50121

### Status of Audit Finding:

Semi-Annual Certifications were prepared by the Title II Director's executive assistant and then certified by either the building principal or the Title II Director. There is no indication on the certifications that someone other than the certifying official prepared the forms.

Semi-Annual Certifications prepared by the Executive Assistant will have their initials on the form showing that they have prepared them.

This was completed by January 1, 2019.



Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 17, 2020

## CORRECTIVE ACTION PLAN

### FINDING 2019-001

**Contact Person Responsible for Corrective Action:** Dr. Thomas J. Dykiel

**Contact Phone Number:** 812-288-4802 X50121

**Views of Responsible Official:**

We concur with the findings.

**Description of Corrective Action Plan:**

The treasurer and deputy treasurer will work together to make sure that the correct amounts are reported on the Preparation of the Schedule of Expenditures of Federal Awards. Verification will be made by using the pay requests from the various grants to ensure the proper amounts are being reported. Proper internal controls will be created to ensure proper reporting of the SEFA.

**Anticipated Completion Date:**

This will be reviewed and completed by March 31, 2020.

Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 12, 2020

## CORRECTIVE ACTION PLAN

### FINDING 2019-002

**Contact Person Responsible for Corrective Action:** Dr. Thomas J. Dykiel

**Contact Phone Number:** 812-288-4802 X50121

**Views of Responsible Official:**

We concur with the findings.

**Description of Corrective Action Plan:**

The Confidential Clerical Secretary for food service will document the review performed to ensure that the Federal Income Guidelines used to determine the eligibility were uploaded into the school lunch software by our software vendor. The Confidential Clerical Secretary will make a copy of the Federal Income Guidelines and a copy of what is uploaded into our software. She will sign and date both documents for verification and so will the Food Service Director.

**Anticipated Completion Date:**

This will be reviewed and completed by March 6, 2020.

Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 12, 2020

## CORRECTIVE ACTION PLAN

### FINDING 2019-003

**Contact Person Responsible for Corrective Action:** Dr. Thomas J. Dykiel

**Contact Phone Number:** 812-288-4802 X50121

**Views of Responsible Official:**

We concur with the findings.

**Description of Corrective Action Plan:**

The Confidential Clerical Secretary for food service will document all purchases over \$25,000 that there is no evidence that the vendor was suspended or debarred prior to entering into a covered transaction. Internal controls will be created (spreadsheet) showing the date the Confidential Clerical Secretary looked at the state website. Quarterly, this internal document will be submitted to the Food Service Director and Chief Financial Officer for review.

**Anticipated Completion Date:**

This will be reviewed and completed by March 6, 2020.

Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 12, 2020

## CORRECTIVE ACTION PLAN

### FINDING 2019-004

**Contact Person Responsible for Corrective Action:** Dr. Kimberly Hartlage

**Contact Phone Number:** 812-288-4802 X50107

**Views of Responsible Official:**

We concur with the findings.

**Description of Corrective Action Plan:**

All employees will be required to watch a video pertaining to the Special Tests and Provisions-Assessment system Security compliance requirement. This will become part of our annual videos employees are mandated to watch, such as Blood Borne Pathogens, Sexual Harassment, etc.

**Anticipated Completion Date:**

This will be reviewed and completed by March 31, 2020.

Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 12, 2020

## CORRECTIVE ACTION PLAN

### FINDING 2019-005

**Contact Person Responsible for Corrective Action:** Dr. Kimberly Hartlage

**Contact Phone Number:** 812-288-4802 X50121

**Views of Responsible Official:**

We concur with the findings.

**Description of Corrective Action Plan:**

The director of the federal grants and chief financial officer will develop internal controls for all micro and small purchases that are made with federal money. Documentation will be retained for quotes received on small purchases and methodology for micro purchases.

**Anticipated Completion Date:**

This will be reviewed and completed by March 31, 2020.

Thomas J. Dykiel, Ed.D.  
Chief Financial Officer  
February 12, 2020



## OTHER REPORTS

In addition to this report, other reports may have been issued for the School Corporation. All reports can be found on the Indiana State Board of Accounts' website: <http://www.in.gov/sboa/>.