

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

FEDERAL COMPLIANCE AUDIT REPORT

OF

WEST CENTRAL SCHOOL CORPORATION

PULASKI COUNTY, INDIANA

July 1, 2018 to June 30, 2020



FILED
03/31/2021

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SCHEDULE OF OFFICIALS

<u>Office</u>	<u>Official</u>	<u>Term</u>
Treasurer	Bonnie K. Koebcke Shannon Fritz	07-01-18 to 12-01-19 12-02-19 to 12-31-21
Superintendent of Schools	Don Street Dan Zylstra	07-01-18 to 06-30-19 07-01-19 to 06-30-21
President of the School Board	Todd Miller Jeff Lowry	07-01-18 to 12-31-19 01-01-20 to 12-31-21



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 WEST CENTRAL SCHOOL
CORPORATION, PULASKI 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 West Central School Corporation (School Corporation), for the period of July 1, 2018 to June 30, 2020, and the related notes to the financial statement, which collectively comprise the School Corporation's financial statement and have issued our report thereon dated March 10, 2021, 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 2020-001, that we consider to be material weaknesses.

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 2020-001.

West Central School Corporation's 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

March 10, 2021



INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR THE 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 WEST CENTRAL SCHOOL CORPORATION, PULASKI COUNTY, INDIANA

Report on Compliance for the Major Federal Program

We have audited the West Central School Corporation's (School Corporation) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on its major federal program for the period of July 1, 2018 to June 30, 2020. The School Corporation's major federal program is 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 the School Corporation's major federal program based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; 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 the major federal program. However, our audit does not provide a legal determination of the School Corporation's compliance.

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

Opinion on the 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 its major federal program for the period of July 1, 2018 to June 30, 2020.

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 the major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing our opinion on compliance for the 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 item 2020-002, that we consider to be material weaknesses.

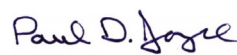
The School Corporation's response to the internal control over compliance findings identified in our audit is described in the accompanying Corrective Action Plan. The School Corporation's response was not subjected to the auditing procedures applied in the audit of compliance, and, accordingly, we express 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 COMPLIANCE FOR THE MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE; AND REPORT ON SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY THE UNIFORM GUIDANCE
(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, 2018 to June 30, 2020, and the related notes to the financial statement. We issued our report thereon dated March 10, 2021, 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 10, 2021

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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.

WEST CENTRAL SCHOOL CORPORATION
 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
 For the Years Ended June 30, 2019 and 2020

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 06-30-19	Total Federal Awards Expended 06-30-19	Passed Through to Subrecipient 06-30-20	Total Federal Awards Expended 06-30-20
<u>Department of Agriculture</u>							
Child Nutrition Cluster							
School Breakfast Program	Indiana Department of Education	10.553					
0800-Lunch			SY 18/19	\$ -	\$ 70,248	\$ -	\$ -
0800-Lunch			SY 19/20	-	-	-	46,760
				<u>-</u>	<u>-</u>	<u>-</u>	<u>46,760</u>
COVID-19 - School Breakfast Program	Indiana Department of Education	10.553					
0800-Lunch			SY 19/20	-	-	-	59,055
				<u>-</u>	<u>-</u>	<u>-</u>	<u>59,055</u>
Total - School Breakfast Program				<u>-</u>	<u>70,248</u>	<u>-</u>	<u>105,815</u>
National School Lunch Program	Indiana Department of Education	10.555					
0800-Lunch			SY 18/19	-	218,720	-	-
0800-Lunch			SY 19/20	-	-	-	152,530
Commodities			SY 18/19	-	41,430	-	-
Commodities			SY 19/20	-	-	-	40,433
				<u>-</u>	<u>-</u>	<u>-</u>	<u>40,433</u>
Sub-Total - National School Lunch Program				<u>-</u>	<u>260,150</u>	<u>-</u>	<u>192,963</u>
COVID-19 - National School Lunch Program	Indiana Department of Education	10.555					
0800-Lunch			SY 19/20	-	-	-	107,310
				<u>-</u>	<u>-</u>	<u>-</u>	<u>107,310</u>
Total - National School Lunch Program				<u>-</u>	<u>260,150</u>	<u>-</u>	<u>300,273</u>
Summer Food Service Program for Children	Indiana Department of Education	10.559					
			SY 18/19	-	8,691	-	-
				<u>-</u>	<u>8,691</u>	<u>-</u>	<u>-</u>
Total - Child Nutrition Cluster				<u>-</u>	<u>339,089</u>	<u>-</u>	<u>406,088</u>
Total - Department of Agriculture				<u>-</u>	<u>339,089</u>	<u>-</u>	<u>406,088</u>
<u>Department of Education</u>							
Title I Grants to Local Educational Agencies	Indiana Department of Education	84.010					
4180-Title I Prog-19			S010A170014	-	19,533	-	-
4180-Title I Prog-19			S010A180014	-	-	-	126,437
4170-Title 1 Proj. 18-6630			S010A170014	-	27,585	-	-
				<u>-</u>	<u>47,118</u>	<u>-</u>	<u>-</u>
Total - Title I Grants to Local Educational Agencies				<u>-</u>	<u>47,118</u>	<u>-</u>	<u>126,437</u>
Special Education Cluster (IDEA)	Indiana Department of Education	84.027					
Special Education Grants to States							
Special Education			18611-049-PN01	-	1,013	-	-
Special Education			19611-049-PN01	-	57,571	-	59,931
Special Education			45717-049-PN01	-	156,357	-	-
Special Education			20611-047-PN01	-	-	-	116,636
				<u>-</u>	<u>-</u>	<u>-</u>	<u>116,636</u>
Total - Special Education Grants to States				<u>-</u>	<u>214,941</u>	<u>-</u>	<u>176,567</u>

WEST CENTRAL SCHOOL CORPORATION
 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
 For the Years Ended June 30, 2019 and 2020

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 06-30-19	Total Federal Awards Expended 06-30-19	Passed Through to Subrecipient 06-30-20	Total Federal Awards Expended 06-30-20
Special Education Preschool Grants	Indiana Department of Education	84.173					
Preschool Grant			18619-049-PN01	-	6,705	-	-
Preschool Grant			19619-049-PN01	-	1,256	-	8,829
Preschool Grant			20619-047-PN01	-	-	-	509
Total - Special Education Preschool Grants				-	7,961	-	9,338
Total - Special Education Cluster (IDEA)				-	222,902	-	185,905
Supporting Effective Instruction State Grants	Indiana Department of Education	84.367					
6840-Title II Part A			S367A180013	-	11,651	-	-
6840-Title II Part A			S367A190013	-	-	-	7,935
6841-Title II Proj. 17-6630			S367A190013	-	-	-	19,996
6842-Title II Proj. 18-6630			S367A190013	-	-	-	14,343
Total - Supporting Effective Instruction State Grants				-	11,651	-	42,274
Student Support and Academic Enrichment Program	Indiana Department of Education	84.424					
5800-Title IV Proj.6630			S424A180015	-	615	-	-
5800-Title IV Proj-17.6630			S424A190015	-	-	-	18,923
Total - Student Support and Academic Enrichment Program				-	615	-	18,923
Total - Department of Education				-	282,286	-	373,539
<u>Department of Health and Human Services</u>							
<u>Medicaid Cluster</u>							
Medical Assistance Program	Indiana Family and Social Services Administration	93.778					
			FY 2019	-	69,815	-	-
			FY 2020	-	-	-	49,142
Total - Medicaid Cluster				-	69,815	-	49,142
Total - Department of Health and Human Services				-	69,815	-	49,142
Total federal awards expended				\$ -	\$ 691,190	\$ -	\$ 828,769

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

WEST CENTRAL SCHOOL CORPORATION
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, 2019 and 2020. 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.

Note 3. Special Education Cooperative

The School Corporation is a member of the Cooperative School Services Special Education Cooperative (Cooperative), which operates the special education program for the School Corporation. As a result, some activity for the Special Education Cluster (IDEA) that is presented on the SEFA is not presented as receipts and disbursements in the financial statement for the School Corporation. This activity is reported on the financial statement of the Cooperative.

WEST CENTRAL SCHOOL CORPORATION
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 Award:

Internal control over major program:	
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 Program and type of auditor's report issued on compliance for it:

<u>Name of Federal Program or Cluster</u>	<u>Opinion Issued</u>
Child Nutrition Cluster	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 2020-001

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

Condition and Context

The School Corporation had not established internal controls over the federal award information entered in the Indiana Gateway for Government Units (Gateway) financial reporting system, which was the source of the School Corporation's Schedule of Expenditures of Federal Awards (SEFA). The School Corporation did not have a proper system of internal controls in place to prevent, or detect and correct, errors on the SEFA.

Due to the lack of internal controls, the SEFA presented for audit included the following errors:

1. The School Breakfast Program was omitted for fiscal year 2019-2020, which understated expenditures by \$105,815.

WEST CENTRAL SCHOOL CORPORATION
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
(Continued)

2. The National School Lunch Program was omitted for 2019-2020, which understated expenditures by \$259,841.
3. The Commodities for the National School Lunch Program were omitted for both 2018-2019 and 2019-2020, which understated expenditures by \$81,864.
4. The Title I Grants to Local Educational Agencies was overstated for 2018-2019, which resulted in an overstatement of \$85,275.
5. The Special Education Grants to States was omitted for both 2018-2019 and 2019-2020, which understated expenditures by \$391,508.
6. The Medical Assistance Program was omitted for both 2018-2019 and 2019-2020, which understated expenditures by \$118,957.
7. Several additional grants had individually immaterial errors that resulted in misstatements of expenditures of \$78,238, in total.
8. Other errors included incorrect federal grantor agency names, cluster names, program names, pass-through entities, and identifying numbers.

Audit adjustments were proposed, accepted by the School Corporation, and made to the SEFA presented in this report.

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. . . ."

2 CFR 200.303 states in part:

"The non-Federal entity must:

- (a) Establish and maintain effective internal control . . ."

WEST CENTRAL SCHOOL CORPORATION
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
(Continued)

2 CFR 200.62 states in part:

"Internal control over compliance requirements for Federal awards means a process implemented by a non-Federal entity designed to provide reasonable assurance regarding the achievement of the following objectives for Federal awards:

(a) Transactions are properly recorded and accounted for, in order to:

(1) Permit the preparation of reliable financial statements . . ."

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.
- (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."

WEST CENTRAL SCHOOL CORPORATION
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
(Continued)

Cause

Management had not established a system of internal controls that would have ensured proper reporting of the SEFA.

Effect

Without a proper system of internal controls in place that operated 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 2020-002

Subject: Child Nutrition Cluster - Internal Controls

Federal Agency: Department of Agriculture

Federal Programs: School Breakfast Program, COVID-19 - School Breakfast Program,
National School Lunch Program, COVID-19 - National School
Lunch Program, Summer Food Service Program for Children

CFDA Numbers: 10.533, 10.555, 10.559

Federal Award Numbers and Years (or Other Identifying Numbers): SY 18/19, SY 19/20

Pass-Through Entity: Indiana Department of Education

Compliance Requirements: Activities Allowed and Unallowed, Allowable Costs/Cost Principles,
Eligibility, Procurement and Suspension and Debarment, Program
Income, Special Tests and Provisions - School Food Accounts,
Special Tests and Provisions - Paid Lunch Equity

Audit Finding: Material Weakness

Condition and Context

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 Activities Allowed and Unallowed, Allowable Costs/Cost Principles, Eligibility, Program Income, Procurement and Suspension and Debarment, Special Tests and Provisions - School Food Accounts, and Special Tests and Provisions - Paid Lunch Equity compliance requirements.

Activities Allowed and Unallowed, Allowable Costs/Cost Principles

The School Corporation established internal control procedures for disbursements from the School Lunch fund; however, the School Corporation did not fully implement this internal control during the audit period. Of the claims tested, 15 percent did not have evidence of an oversight, review, or approval process to ensure allowability.

WEST CENTRAL SCHOOL CORPORATION
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
(Continued)

Eligibility

The School Corporation had not established effective internal controls to ensure only eligible students received meals at no charge or at reduced price. The School Corporation used software to determine student eligibility based on information input. The guidelines are updated annually by the software company, but there is no review or approval at the School Corporation level to ensure they were updated correctly. Paper applications are input by one employee without evidence of a review, or approval process, to ensure accuracy.

Procurement - Micro Purchases

The School Corporation established internal controls for procurement of micro purchases; however, the School Corporation did not fully implement this internal control during our audit period. Of the claims tested, 57 percent did not have evidence of an oversight, review, or approval process to ensure disbursements were equitably distributed among qualified suppliers.

Program Income

The School Corporation had not established effective internal controls over verifying the proper determination and recording of program income. The School Board annually approved the meal prices, which was then updated in the software used to track meals served, but there were no procedures in place to ensure the proper prices were input and charged. Program income was posted to the School Lunch fund without evidence of a review, or approval process, to ensure accuracy.

Special Tests and Provisions - School Food Accounts

The School Corporation had not established effective internal controls to ensure all revenues were accounted for in the School Lunch fund. A school food account was established for the School Corporation; however, an oversight, or review process, was not implemented to ensure revenues were properly recorded in the school food account. One employee was responsible for posting all revenues without evidence of a review, or approval process, to ensure accuracy.

Special Tests and Provisions - Paid Lunch Equity (National School Lunch Program, COVID-19 - National School Lunch Program)

The School Corporation had not established effective internal controls to ensure the paid lunch pricing was properly calculated. Though the School Board approved the final school lunch price; one employee was responsible for preparing the paid lunch equity calculation, which determined if an increase was needed without evidence of a review, or approval process, to ensure accuracy.

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

WEST CENTRAL SCHOOL CORPORATION
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). . . ."

Cause

Management had not developed a system of internal controls to ensure compliance with the grant agreement and the Activities Allowed and Unallowed, Allowable Costs/Cost Principles, Eligibility, Procurement and Suspension and Debarment, Program Income, Special Tests and Provisions - School Food Accounts, and Special Tests and Provisions - Paid Lunch Equity compliance requirements.

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 requirements listed above. A lack of segregation of duties within an internal control system could also allow noncompliance with the compliance requirements and allow 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, to ensure compliance with the grant agreement and the compliance requirements listed above.

Views of Responsible Officials

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

AUDITEE-PREPARED DOCUMENT

The subsequent document was provided by management of the School Corporation. The document is presented as intended by the School Corporation.

West Central School Corporation

1850 S. US 421
P.O. Box 578
Francesville, IN 47946

“Encourage Every Student Every Day” *Engage *Empower *Educate

Phone 219-567-9161
Fax 219-567-9761

CORRECTIVE ACTION PLAN

FINDING 2020-001

Contact Person Responsible for Corrective Action: Shannon Fritz, Corporation Treasurer
Contact Phone Number: 217-567-9161

Views of Responsible Official: We concur with your audit findings. We have initiated the corrective action plan below and believe that based upon your recommendations, the internal control system will be in place as of June 30, 2021.

Description of Corrective Action Plan:

The following internal controls will be implemented to ensure that the SEFA is correct for reporting years starting June 30, 2021 and later. Those controls include the following:

- The treasurer will prepare the Schedule of Expenditures of Federal Awards annually
- The Superintendent will review this schedule for accuracy before it is submitted in Gateway
- The Superintendent will initial and date a copy of the report printed out from Gateway before submission documenting the review.
- This review will include a review of the Federal account numbers and compare the reported dollar amounts to a printout of the annual revenues of the school district report from the computerized accounting system. This report from the accounting system should match the SEFA report in Gateway.
- Monthly the Superintendent will review a revenue history report to ensure that all federal receipts for that period are accurately reported in the computer accounting system.
- The computer accounting system will be utilized to input the federal accounting numbers for the grants. This will be checked by the Assistant Treasurer annually for accuracy.

Anticipated Completion Date: June 30, 2021

Sincerely,

Dan Zylstra

Dan Zylstra
Superintendent

West Central School Corporation

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Francesville, IN 47946

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CORRECTIVE ACTION PLAN

FINDING 2020-002

Contact Person Responsible for Corrective Action: Shannon Fritz, Corporation Treasurer
Contact Phone Number: 217-567-9161

Views of Responsible Official: We concur with your audit findings. We have initiated the corrective action plan below and believe that based upon your recommendations, the internal control system will be in place as of June 30, 2021.

Description of Corrective Action Plan:

Activities Allowed and Unallowed/Allowable Costs

We have fully implemented the internal control system for the federal school lunch program. All claims for the school lunch program will be reviewed for allowability before payment by the treasurer. This will be evidenced by a signature and date on each claim when the treasurer reviews it before payment. Claims are submitted by the Food Service Director and then the corporation treasurer provides this oversight.

Eligibility

We will initiate a review system for our eligibility process. When the computer software is annually updated the Assistant Treasurer will review the work to make sure it was updated correctly. This will be documented by the reviewer writing down the date of the review and what was reviewed. Each paper application will be entered by the school secretaries and reviewed by the other school secretaries. The reviewer will initial and date that the paper application was checked against the computer records.

Procurement - Micro Purchases

The School Corporation will have internal controls for micropurchases fully implemented moving forward. This oversight and review will be conducted for each claim by the Treasurer who will document evidence of this review by initialing and dating of individual claims.

Program Income

Each month, the school treasurer will compare the meal prices on the revenue report to the list of approved meal prices. The treasurer will initial and date the revenue report to ensure that this review takes place monthly.

Special Tests and Provisions - School Food Accounts

The assistant treasurer will run a revenue report monthly for the school district and will review and initial that all receipts to the school lunch fund are posted to the correct fund. This will be evidenced by initialing and dating the revenue report monthly by the school assistant treasurer.

Special Tests and Provisions - Paid Lunch Equity (National School Lunch Program, COVID-19 - National School Lunch Program)

The annual paid school lunch equity calculation will be reviewed for accuracy by the Treasurer. This will be evidenced by the Treasurer initialing and dating this review.

Anticipated Completion Date: June 30, 2021

Sincerely,

Dan Zylstra

Dan Zylstra
Superintendent

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/>.