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

FEDERAL COMPLIANCE AUDIT REPORT

OF

TIPPECANOE SCHOOL CORPORATION
TIPPECANOE COUNTY, INDIANA

July 1, 2020 to June 30, 2022



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# SCHEDULE OF OFFICIALS

Office	<u>Official</u>	<u>Term</u>
Treasurer	Amanda Brackett	07-01-20 to 06-30-23
Superintendent of Schools	Dr. Scott Hanback	07-01-20 to 06-30-23
President of the School Board	Dr. Patrick Hein Brian DeFreese	07-01-20 to 12-31-21 01-01-22 to 06-30-23



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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 TIPPECANOE SCHOOL CORPORATION, TIPPECANOE 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 Tippecanoe School Corporation (School Corporation), for the period of July 1, 2020 to June 30, 2022, 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 28, 2023, 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.

# Report on 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) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statement, but not for the purpose of expressing an opinion on the effectiveness of the 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, as described in the accompanying Schedule of Findings and Questioned Costs as item 2022-001, 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)

# Report on 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 2022-001.

# Tippecanoe School Corporation's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the School Corporation's response to findings identified in our audit and described in the accompanying Schedule of Findings and Questioned Costs. 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.

Beth Kelley, CPA, CFE Deputy State Examiner

February 28, 2023



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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 TIPPECANOE SCHOOL CORPORATION, TIPPECANOE COUNTY, INDIANA

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

# **Qualified and Unmodified Opinions**

We have audited the Tippecanoe 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 each of its major federal programs for the period of July 1, 2020 to June 30, 2022. 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.

#### Qualified Opinion on Special Education Cluster (IDEA)

In our opinion, except for the possible effects of the matter described in the *Basis for Qualified and Unmodified Opinions* section of our report, the School Corporation complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on the Special Education Cluster (IDEA) for the period of July 1, 2020 to June 30, 2022.

#### Unmodified Opinion on Each of the Other Major Federal Programs

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 other major federal programs identified in the *Summary of Auditor's Results* section of the accompanying Schedule of Findings and Questioned Costs for the period of July 1, 2020 to June 30, 2022.

# Basis for Qualified and Unmodified Opinions

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America (GAAS); the standards applicable to financial audits contained in Government Auditing Standards issued by the Comptroller General of the United States (Government Auditing Standards); and the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of the School Corporation and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of the School Corporation's compliance with the compliance requirements referred to above.

# 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 (Continued)

Matter Giving Rise to Qualified Opinion on the Special Education Cluster (IDEA)

As described in the accompanying Schedule of Findings and Questioned Costs, we were unable to obtain sufficient appropriate audit evidence supporting the compliance of the School Corporation with the Special Education Cluster (IDEA), as described in item 2022-004 for the Matching, Level of Effort, Earmarking. Consequently, we were unable to determine whether the School Corporation complied with those requirements applicable to that program.

# Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to the School Corporation's federal programs.

# Auditor's Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the School Corporation's compliance based on our audit. Reasonable assurance is a high level of assurance, but is not absolute assurance, and, therefore, is not a guarantee that an audit conducted in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material, if there is a substantial likelihood that, individually, or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the School Corporation's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with GAAS, *Government Auditing Standards*, and the Uniform Guidance, we

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and
  design and perform audit procedures responsive to those risks. Such procedures include
  examining, on a test basis, evidence regarding the School Corporation's compliance with
  the compliance requirements referred to above and performing such other procedures as
  we considered necessary in the circumstances.
- Obtain an understanding of the School Corporation's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of the School Corporation's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

# 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 (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 item 2022-003. Our opinion on each major federal program is not modified with respect to these matters.

Government Auditing Standards requires the auditor to perform limited procedures on the School Corporation's response to the noncompliance findings identified in our audit described in the accompanying Schedule of Findings and Questioned Costs. 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**

Our consideration of internal control over compliance was for the limited purpose described in the *Auditor's Responsibilities for the Audit of Compliance* section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance, and, therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we did identify certain deficiencies in internal control over compliance that we consider to be material weaknesses.

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. We consider the deficiencies in internal control over compliance, as described in the accompanying Schedule of Findings and Questioned Costs as items 2022-002, 2022-003, and 2022-004, to be material weaknesses.

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 audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance Accordingly, no such opinion is expressed.

Government Auditing Standards require the auditor to perform limited procedures on the School Corporation's response to the internal control over compliance findings identified in our audit described in the accompanying Schedule of Findings and Questioned Costs. The School Corporation's response was not subjected to the other auditing procedures applied in the audit of compliance, and, accordingly, we express no opinion on the response.

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

# 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 (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, 2020 to June 30, 2022, and the related notes to the financial statement. We issued our report thereon dated February 28, 2023, which contained a dual opinion on the financial statement. An adverse opinion was issued regarding the presentation in accordance with accounting principles generally accepted in the United States of America, and an unmodified opinion was issued regarding the presentation in accordance with the regulatory basis of accounting. Our audit was performed 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.

> Beth Kelley, CPA, CFE Deputy State Examiner

February 28, 2023

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS AND ACCOMPANYING NOTES	
The Schedule of Expenditures of Federal Awards and accompanying notes presented were pproved by management of the School Corporation. The schedule and notes are presented as intended y the School Corporation.	

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#### TIPPECANOE SCHOOL CORPORATION SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS For the Years Ended June 30, 2021 and 2022

Federal Grantor Agency Cluster Title/Program Title/Project Title	Pass-Through Entity or Direct Grant	Assistance Listing Number	Pass-Through Entity (or Other) Identifying Number	Passed Through to Subrecipient 06-30-21	Total Federal Awards Expended 06-30-21	Passed Through to Subrecipient 06-30-22	Total Federal Awards Expended 06-30-22
Department of Agriculture							
Child Nutrition Cluster School Breakfast Program Food Service Breakfast	Indiana Department of Education	10.553	FY 2021-2022	\$ -	\$ -	\$ -	\$ 1,475,288
COVID-19 - School Breakfast Program Food Service Breakfast	Indiana Department of Education	10.553	FY 2020-2021		72,556		<u>-</u>
Total - School Breakfast Program					72,556		1,475,288
National School Lunch Program Food Service Lunch Program Food Service After School Snack Program Commodities	Indiana Department of Education	10.555	FY 2021-2022 FY 2020-2021	- - -	- 447 548,282	- - 	6,323,799 - 530,812
Subtotal - National School Lunch Program					548,729		6,854,611
COVID-19 - National School Lunch Program Food Service Lunch Program	Indiana Department of Education	10.555	FY 2020-2021		448,257		
Total - National School Lunch Program					996,986		6,854,611
Summer Food Service Program for Children Food Service Summer Lunch Program Food Service Summer Lunch Program	Indiana Department of Education	10.559	FY 2020-2021 FY 2021-2022	- -	3,835,330		- 733,428
COVID-19 - Summer Food Service Program for Children Food Service Summer Lunch Program	Indiana Department of Education	10.559	FY 2020-2021		113,749		
Total - Summer Food Service Program for Children					3,949,079		733,428
Total - Child Nutrition Cluster					5,018,621		9,063,327
Pandemic EBT Administrative Costs P-EBT Admin	Indiana Department of Education	10.649	FY 2021-2022		<u>-</u>		3,063
Total - Department of Agriculture					5,018,621		9,066,390
Federal Communications Commission COVID-19 - Emergency Connectivity Fund Program ARP Emergency Connectivity Grant	Direct Grant	32.009	FY 2021-2022				35,200
Total - Federal Communications Commission							35,200

#### TIPPECANOE SCHOOL CORPORATION SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS For the Years Ended June 30, 2021 and 2022

Federal Grantor Agency Cluster Title/Program Title/Project Title	Pass-Through Entity or Direct Grant	Assistance Listing Number	Pass-Through Entity (or Other) Identifying Number	Passed Through to Subrecipient 06-30-21	Total Federal Awards Expended 06-30-21	Passed Through to Subrecipient 06-30-22	Total Federal Awards Expended 06-30-22
Department of Education							
Special Education Cluster (IDEA)							
Special Education Grants to States	Indiana Department of Education	84.027					
Special Education Basic Grant FY 19			19611-021-PN01	-	37,645	_	_
Special Ed Basic Grant FY 20			20611-021-PN01	-	701,532	-	_
Special Education Basic Grant FY 20			20611-021-PN01	-	· -	-	4,164
Special Ed Basic Grant FY 21			21611-021-PN01	-	2,044,467	-	_
Special Ed Basic Grant FY 21			21611-021-PN01	-	-	-	687,900
Special Ed ARP IDEA 611 FY 2022			22611-021-ARP	-	-	-	90,674
Special Ed Federal Part B 611 FY 2022			22611-021-PN01	-	-	-	1,643,520
Special Ed CEIS Part B FY 2022			22611-05-CEIS				229,494
Total - Special Education Grants to States					2,783,644		2,655,752
Special Education Preschool Grants	Indiana Department of Education	84.173					
Special Ed Preschool Grant FY 20			20619-021-PN01	-	22,881	-	-
Special Ed Preschool Grant FY 21			21619-021-PN01	-	67,125	-	- 04.007
Special Ed Preschool Grant FY 21			21619-021-PN01 22619-021-ARP	-	-	-	31,067
Special Ed ARP IDEA 619 FY 2022			22619-021-ARP 22619-021-PN01	-	-	-	3,908 75,606
Special Ed Preschool 619 FY 2022			22619-021-PN01	<u>-</u>	<u>-</u>		75,606
Total - Special Education Preschool Grants					90,006		110,581
Total - Special Education Cluster (IDEA)					2,873,650		2,766,333
Title I Grants to Local Educational Agencies	Indiana Department of Education	84.010					
Title I Grant FY 20 - 4140.20	'		S010A190014	-	328,236	-	_
Title I Grant FY 21 - 4140.21			S010A200014	-	1,187,942	-	-
Title I Grant FY 21 - 4140.21			S010A200014	-	-	-	315,743
Title I Grant FY 22 - 4140.22			S010A210014				1,033,798
Total - Title I Grants to Local Educational Agencies					1,516,178		1,349,541
							_
Career and Technical Education - Basic Grants to States Perkins Grant FY 20 - 6205.20	Governor's Workforce Cabinet	84.048	20-0512-7865		400 540		
Perkins Grant FY 20 - 6205.20 Perkins Assessment Grant FY 2019			20-0512-7865 20-0512-A19A	-	193,513 2,379	-	-
Perkins Grant FY 21 - 6205.21			21-0512-7865	-	224,508	-	-
Perkins Grant FY 21 - 6205.21  Perkins Grant FY 21 - 6205.21			21-0512-7865	-	224,506	-	152,054
Perkins Assessment Grant - FY 20			21-0512-7605 21-0512-A19A	-	1,275	-	132,034
Perkins Assessment Grant - FY 21			21-0512-A19A	-	1,275	-	1,925
Perkins COVID-19 - Grant Funding			21-0512-C19A	-	5.309	_	-,520
Perkins COVID-19 - Grant Funding			21-0512-C19A	-	-	-	15,179
Perkins Grant FY 22 - 6205.22			22-0512-7865				168,760
Total - Career and Technical Education - Basic Grants to States				_	426,984	_	337,918
. Sta. Sta. Sta. Sta. Sta. Education Date States to States					720,007		301,010

#### TIPPECANOE SCHOOL CORPORATION SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS For the Years Ended June 30, 2021 and 2022

Federal Grantor Agency Cluster Title/Program Title/Project Title	Pass-Through Entity or Direct Grant	Assistance Listing Number	Pass-Through Entity (or Other) Identifying Number	Passed Through to Subrecipient 06-30-21	Total Federal Awards Expended 06-30-21	Passed Through to Subrecipient 06-30-22	Total Federal Awards Expended 06-30-22
English Language Acquisition State Grants	Indiana Department of Education	84.365					
Title III FY 18 - 6880.19	•		S365A180014	-	23,403	-	-
Title III - FY 19 - 6880.20			S365A190014	-	68,920	-	-
Title III - FY 20 - 6880.20			S365A190014	-	-	-	37,881
Title III FY 18 - 6880.21			S365A200014				34,633
Total - English Language Acquisition State Grants					92,323		72,514
Supporting Effective Instruction State Grants	Indiana Department of Education	84.367					
Teacher Leaders Bootcamp			46055	-	103	-	-
Teacher Leaders Bootcamp			46055	-	-	-	3,897
Title II FY 18-20 - 6840.19			S367A180013	-	84,890	-	-
Title II FY 19-21 - 6840.20			S367A190013	-	114,549	-	-
Title II FY 19-21 - 6840.20			S367A190013	-	-	-	253,310
Title II FY 20-21 - 6840.21			S367A200013				140,284
Total - Supporting Effective Instruction State Grants					199,542		397,491
Student Support and Academic Enrichment Program	Indiana Department of Education	84.424					
Title IV - FY 18 - 5800.19	maiana Boparanom or Zadoddon	02.	S424A180015	_	11,102	_	_
Title IV FY 19 - 5800.20			S424A190015	_	97,909	_	_
Title IV FY 19 - 5800.20			S424A190015	-	-	-	8,983
Title IV - FY 20 - 5800.21			S424A200015	-	9,055	-	-
Title IV - FY 20 - 5800.21			S424A200015				1,582
Total - Student Support and Academic Enrichment Program					118,066		10,565
COVID-19 - Education Stabilization Fund	Indiana Department of Education	84.425					
ESSER III		84.425U	S425U200013	-	-	-	108,079
CARES Act - Education Stabilization Relief Fund - 7941.00		84.425D	S425D200013	-	1,242,344	-	-
CARES Act - Education Stabilization Relief Fund - 7941.00		84.425D	S425D200013	-		-	8,560
Elem/Secd School Emergency Relief Fund (ESSER II) - 7931.00		84.425D	S425D210013	-	2,462,494	-	-
Elem/Secd School Emergency Relief Fund (ESSER II) - 7931.00		84.425D	S425D210013				678,071
Total - COVID-19 - Education Stabilization Fund					3,704,838		794,710
Total - Department of Education					8,931,581		5,729,072
Federal Emergency Management Agency Disaster Grants - Public Assistance (Presidentially Declared Disasters) Indiana Secured School Safety	Indiana Department of Homeland Security	97.036	385PA4515000000	_	_	_	524,869
·							
Total - Federal Emergency Management Agency							524,869
Total federal awards expended				\$ -	\$ 13,950,202	\$ -	\$ 15,355,531

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

# TIPPECANOE 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, 2021 and 2022. 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 Greater Lafayette Area Special Services Cooperative (Cooperative). As a result, some of the 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 presented in the financial statement of the Cooperative's fiscal agent.

# Section I - Summary of Auditor's Results

Financial Statement:

Type of auditor's report issued:

Adverse as to GAAP; Unmodified

as to Regulatory Basis

yes

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?

Significant deficiencies identified? none reported

Any audit findings disclosed that are required to be reported

in accordance with 2 CFR 200.516(a)?

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

Listings Number	Name of Federal Program or Cluster	Opinion Issued
04.405	Child Nutrition Cluster Special Education Cluster (IDEA)	Unmodified Qualified
84.425	COVID-19 Education Stabilization Fund	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 2022-001**

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

Repeat Finding

This is a repeat finding from the immediately prior audit report. The prior audit finding number was 2020-001.

Condition and Context

The School Corporation had not established effective internal controls over the federal award information entered into 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 failed to properly review the federal grant information prepared and submitted in Gateway. Although one employee prepared and entered the federal award information into Gateway, and another employee reviewed and approved the information entered, the internal controls was not effective and did not detect and allow correction of errors prior to submission.

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

- 1. The Child Nutrition Cluster expenditures were misstated. The School Breakfast Program expenditures were overstated by \$900,693. The National School Lunch Program expenditures were overstated by \$3,667,599. The Summer Food Service Program for Children expenditures were understated by \$4,675,697.
- 2. Several additional grants had individually immaterial errors that overstated expenditures by \$136,824.
- 3. Other errors included incorrect 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 . . . "

2 CFR 200.1 states in part:

"... Internal controls for non-Federal entities means:

- (1) Processes designed and implemented by non-Federal entities to provide reasonable assurance regarding the achievement of objectives in the following categories:
  - (i) Effectiveness and efficiency of operations;
  - (ii) Reliability of reporting for internal and external use; . . . "

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. . . . "

#### 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. 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 award year separately. At a minimum, the schedule must:

- (1) List individual Federal programs by Federal agency. For a cluster of programs, provide the cluster name, list individual Federal programs within a cluster of programs, and provide the applicable Federal agency name. For R&D, total Federal awards expended must be shown either by individual Federal award or by Federal agency and major subdivision within the Federal agency. For example, the National Institutes of Health is a major subdivision in the Department of Health and Human Services.
- (2) For Federal awards received as a subrecipient, the name of the pass-through entity and identifying number assigned by the pass-through entity must be included.
- (3) Provide total Federal awards expended for each individual Federal program and the Assistance Listings Number or other identifying number when the Assistance Listings 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(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."

# 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 included 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 2022-002**

Subject: Special Education Cluster (IDEA) - Activities Allowed

or Unallowed, Allowable Costs/Cost Principles

Federal Agency: Department of Education

Federal Programs: Special Education Grants to States, Special Education Preschool Grants

Assistance Listings Numbers: 84.027, 84.173

Federal Award Numbers and Years (or Other Identifying Numbers): 19611-021-PN01, 20611-021PN01,

20619-021-PN01, 21611-021-N01,

21619-021-PN01

Pass-Through Entity: Indiana Department of Education

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

Audit Finding: Material Weakness

#### Condition and Context

The School Corporation is a member of the Greater Lafayette Area Special Services Cooperative (Cooperative). During fiscal year 2020-2021, the Cooperative operated the special education programs and spent the federal money on behalf of all its members. As the grant agreements were between the Indiana Department of Education and each member school, the School Corporation was responsible for ensuring and providing oversight of the Cooperative. However, there was inadequate oversight performed by the School Corporation in order to ensure compliance with the Activities Allowed or Unallowed and the Allowable Costs/Cost Principles compliance requirements.

The Cooperative was a planning district whose purpose was to provide free appropriate public education to students identified as disabled in accordance with state statute who were legal residents and/or have been accepted through means of open enrollment, or other legal means of transfer to the participating member school corporations in Tippecanoe County.

The School Corporation did not have internal controls in place to ensure that the Cooperative complied with the grant agreement and the Activities Allowed or Unallowed and the Allowable Costs/Cost Principles compliance requirements. The Cooperative did not have adequate internal controls in place to ensure all activities and costs were allowed.

One Cooperative employee prepared the payroll benefit disbursements without oversight or review.

The lack of internal controls was isolated to the 2020-2021 fiscal year.

#### 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 would have ensured compliance with the grant agreement and the Activities Allowed or Unallowed and the Allowable Costs/Cost Principles compliance requirements.

#### Effect

The failure to establish an effective internal controls system placed the School Corporation at risk of noncompliance with the grant agreement and the Activities Allowed or Unallowed and the Allowable Costs/Cost Principles compliance requirements.

#### **Questioned Costs**

There were no questioned costs identified.

#### Recommendation

We recommended that the School Corporation's management establish internal controls to ensure compliance with the grant agreement and the Activities Allowed or Unallowed and the Allowable Costs/Cost Principles 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 2022-003**

Subject: Special Education Cluster (IDEA) - Suspension and Debarment

Federal Agency: Department of Education

Federal Programs: Special Education Grants to States, Special Education Preschool Grants

Assistance Listings Numbers: 84.027, 84.173

Federal Award Numbers and Years (or Other Identifying Numbers): 19611-021-PN01, 20611-021-PN01,

20619-021-PN01, 21611-021-PN01,

21619-021-PN01

Pass-Through Entity: Indiana Department of Education

Compliance Requirement: Procurement and Suspension and Debarment

Audit Findings: Material Weakness, Other Matters

#### Condition and Context

The School Corporation is a member of the Greater Lafayette Area Special Services Cooperative (Cooperative). During fiscal year 2020-2021, the Cooperative operated the special education programs and spent the federal money on behalf of all its members. As the grant agreements were between the Indiana Department of Education and each member school, the School Corporation was responsible for ensuring and providing oversight of the Cooperative. However, there was inadequate oversight performed by the School Corporation in order to ensure compliance with the Procurement and Suspension and Debarment compliance requirement.

The Cooperative was a planning district whose purpose was to provide free appropriate public education to students identified as disabled in accordance with state statute who were legal residents and/or have been accepted through means of open enrollment, or other legal means of transfer to the participating member school corporations in Tippecanoe County.

The School Corporation did not have internal controls in place to ensure compliance with the suspension and debarment requirement. The Cooperative did not have adequate internal controls in place to ensure all applicable vendors were not suspended or debarred. Therefore, vendors with contracts over \$25,000 were not verified to ensure they were not excluded or disqualified from participation in federal awards programs.

The lack of effective internal controls and noncompliance were systemic issues isolated to the 2020-2021 fiscal year.

#### 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 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 grant agreement and the Procurement and Suspension and Debarment compliance requirement.

#### Effect

The failure to establish an effective system of internal controls enabled material noncompliance to go undetected. Noncompliance with the grant agreement and the Procurement and Suspension and Debarment 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 a system of internal controls to ensure compliance and comply with 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.

#### **FINDING 2022-004**

Subject: Special Education Cluster - Earmarking Federal Agency: Department of Education

Federal Program: Special Education Grants to States, Special Education Preschool Grants

Assistance Listings Numbers: 84.027, 84.173

Federal Award Numbers and Years (or Other Identifying Numbers): 19611-021-PN01, 20611-21-PN01,

20619-21-PN01

Pass-Through Entity: Indiana Department of Education

Compliance Requirement: Matching, Level of Effort, Earmarking

Audit Findings: Material Weakness, Modified Opinion

#### Condition and Context

The School Corporation is a member of the Greater Lafayette Area Special Services Cooperative (Cooperative). During fiscal years 2020-2021 and 2021-2022, the Cooperative operated the special education programs and spent the federal money on behalf of all its members. As the grant agreements were between the Indiana Department of Education (IDOE) and each member school, the School Corporation was responsible for ensuring and providing oversight of the Cooperative. However, there was inadequate oversight performed by the School Corporation in order to ensure compliance with the Matching, Level of Effort, Earmarking compliance requirement.

The Cooperative was a planning district whose purpose was to provide free appropriate public education to students identified as disabled in accordance with state statute who were legal residents and/or have been accepted through means of open enrollment, or other legal means of transfer to the participating member school corporations in Tippecanoe County.

The School Corporation did not have internal controls in place to ensure that the Cooperative complied with the earmarking requirements. The Cooperative did not have adequate procedures in place to ensure that the required level of expenditures for non-public school students with disabilities was met for each member school. The Cooperative did not have effective internal controls to ensure non-public school expenditures were appropriately identified and reported.

The Non-Public Proportionate Share expenditures for the 19611-21-PN01, 20611-21-PN01, and 20619-21-PN01 grant awards could not be verified for the individual member schools. The non-public school share funds for all member schools were comingled and the aggregate amount of expenditures was then allocated to the member schools on a percentage basis. These allocations were the amounts reported to the IDOE. As such, we were unable to identify which expenditures were for each school in order to verify the minimum amount per the grant award was expended and properly reported to the IDOE as required.

The lack of internal controls and noncompliance were isolated to the 19611-21-PN01, 20611-21-PN01, and 20619-21-PN01 grant awards.

#### 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 200.403 states in part:

"Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards: . . .

(g) Be adequately documented. . . . "

2 CFR 200.208(b) states in part: "The Federal awarding agency or pass-through entity may adjust specific Federal award conditions as needed . . ."

511 IAC 7-34-7(b) states:

"The public agency, in providing special education and related services to students in nonpublic schools must expend at least an amount that is the same proportion of the public agency total subgrant under 20 U.S.C. 1411(f) as the number of nonpublic school students with disabilities, who are enrolled by their parents in nonpublic schools within its boundaries, is to the total number of students with disabilities of the same age range."

#### Cause

The School Corporation's management had not developed an effective system of internal controls that would have ensured compliance with the grant agreement and the earmarking requirements of the Matching, Level of Effort, Earmarking compliance requirement.

#### Effect

The failure to establish an effective internal control system, as well as adequately document costs of federal awards, prevented the determination of the School Corporation's compliance with the earmarking requirements of the Matching, Level of Effort, Earmarking compliance requirement.

# **Questioned Costs**

There were no questioned costs identified.

#### Recommendation

We recommended that the School Corporation's management establish an effective system of internal controls, as well as appropriately document and identify federal award expenditures to ensure compliance with the Matching, Level of Effort, Earmarking 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	
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# SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

#### SECTION II FINDINGS

#### **FINDING 2020-001**

Fiscal year in which finding initially occurred: 2020-2021

Status of Audit Finding: Partially Corrected

TSC has a system of internal controls in place to prevent and detect errors and misstatements on the Schedule of Expenditures of Federal Awards. Additional education has been ascertained to ensure the Business Office understands what items are to be included on the Schedule of Expenditures of Federal Awards. Our corrective action plan included the following items.

- 1. Two individuals from our Business office prepare and complete the annual SEFA. The Chief Financial Officer prepares the SEFA. The Deputy Treasurer reviews the SEFA for accuracy.
- 2. Training has been ascertained to understand what is required for each section of the SEFA so that it is prepared correctly.
- 3. All documentation to support the SEFA is retained in a separate file for review at a later date by external auditors.
- 4. Signatures of the preparer, reviewer, and submitter have been included on the final SEFA submission as well as each report of supporting documentation.

Internal controls were implemented prior to June 30, 2022. However, our internal controls procedures need to be further amended to provide for additional training, guidance, and communication on what needs to be included/excluded from the SEFA report. The continuation of training has not been completed and is still a work in progress.

# SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

#### SECTION III FINDINGS

#### **FINDING 2020-002**

Fiscal year in which finding initially occurred: 2019-2020, 2020-2021

Status of Audit Finding: Corrected

TSC has implemented a vendor application system in which all vendors must annually be reapproved to do business with the school corporation. The following measures were taken.

- 1) We hired a summer intern to check all current active vendors against SAMS.gov for suspension/debarment. Any new vendors were checked against SAMS.gov prior to allowing any purchases. All information found on SAMS.gov was notated either in our financial management system and/or a separate vendor log. This was completed at the end of 2021.
- Beginning in the summer of 2022 a vendor application was created that included a certification for vendors to acknowledge if they are suspended or debarred from doing business with the US Federal government.
- 3) All vendors were sent the application and had to complete the application in order to be able to be an applicable vendor with the TSC.
- 4) Annually we will require all new vendors to certify that they are not suspended or debarred from doing business with the US Federal Government.
- 5) Any agreements/contracts that are entered into with the school corporation must contain language that requires certification of non-suspension or debarment.

Item number 1 was completed at the end of 2021; the remainder of the items 2-5 were completed by the end of summer 2022.

#### CORRECTIVE ACTION PLAN

#### FINDING 2022-001

Contact Person Responsible for Corrective Action: Amanda M. Brackett, Chief Financial Officer

**Contact Phone Number:** (765) 269-8218

Views of Responsible Official: We agree with the findings identified.

# **Description of Corrective Action Plan:**

In order to mitigate future findings regarding the Schedule of Federal Awards preparation, Tippecanoe School Corporation's corrective action plan will include following best practices for ensuring internal controls are met, including segregation of duties, additional training, and communication with state and federal agencies implementing changes.

The changes proposed will prevent future issues with the SEFA from occurring by allowing multiple reviews of the documents before being submitted. The Chief Financial Officer will monitor the progress of the Corrective Action Plan to ensure that we fulfill our requirements of the CAP.

Anticipated Completion Date: May 1, 2023 - We will make these amendments to the 2020-2021 SEFA.

#### FINDING 2022-002

Contact Person Responsible for Corrective Action: Amanda M. Brackett, Chief Financial Officer

**Contact Phone Number:** (765) 269-8218

Views of Responsible Official: We agree with the findings identified.

# **Description of Corrective Action Plan:**

In order to mitigate future findings regarding activities allowed and allowable costs within the Greater Lafayette Area Special Services cooperative, the TSC will implement procedures to ensure better internal controls which includes monitoring.

The Chief Financial Officer will monitor the progress of the Corrective Action Plan to ensure that we fulfill our requirements of the CAP.

Anticipated Completion Date: July 2021. Completion of this has been remedied an only affected year 1 of the audit period.

# FINDING 2022-003

Contact Person Responsible for Corrective Action: Amanda M. Brackett, Chief Financial Officer

**Contact Phone Number:** (765) 269-8218

Views of Responsible Official: We agree with the findings identified.

# **Description of Corrective Action Plan:**

In order to mitigate future findings regarding suspension and debarment within the Greater Lafayette Area Special Services cooperative, the TSC will implement procedures to ensure better internal controls which includes monitoring.

The Chief Financial Officer will monitor the progress of the Corrective Action Plan to ensure that we fulfill our requirements of the CAP.

Anticipated Completion Date: July 2021. Completion of this has been remedied an only affected year 1 of the audit period.

# FINDING 2022-004

Contact Person Responsible for Corrective Action: Amanda M. Brackett, Chief Financial Officer

**Contact Phone Number:** (765) 269-8218

Views of Responsible Official: We agree with the findings identified.

# **Description of Corrective Action Plan:**

In order to mitigate future findings regarding earmarking within the Greater Lafayette Area Special Services cooperative, the TSC will implement procedures to ensure better internal controls which includes monitoring.

The Chief Financial Officer will monitor the progress of the Corrective Action Plan to ensure that we fulfill our requirements of the CAP.

**Anticipated Completion Date:** Summer 2023.

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: <a href="http://www.in.gov/sboa/">http://www.in.gov/sboa/</a> .
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