

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

COMPLIANCE REPORT

OF

TOWN OF HUDSON

STEBEN COUNTY, INDIANA

January 1, 2016 to December 31, 2020



FILED
05/22/2023

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SCHEDULE OF OFFICIALS

<u>Office</u>	<u>Official</u>	<u>Term</u>
Clerk-Treasurer	Carla Olson	01-01-16 to 12-31-23
President of the Town Council	Rick Bailer	01-01-16 to 12-31-18
	Joshua Odom	01-01-19 to 12-31-23
Superintendent of Utilities	Ed Miller	01-01-16 to 12-31-17
	Christopher Sanders	01-01-18 to 12-31-19
	Brian Jones	01-01-20 to 12-31-23



STATE OF INDIANA
AN EQUAL OPPORTUNITY EMPLOYER

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TO: THE OFFICIALS OF THE TOWN OF HUDSON, STEUBEN COUNTY, INDIANA

As authorized under Indiana Code 5-11-1, we performed certain procedures to the accounting records and related documents of the Town of Hudson (Town) for the period of January 1, 2016 to December 31, 2020, to determine compliance with applicable Indiana laws and uniform compliance guidelines established by the Indiana State Board of Accounts.

The Results and Comments contained herein describe the identified reportable instances of non-compliance found as a result of these procedures. Our procedures were not designed to identify all instances of noncompliance; therefore, noncompliance may exist that is unidentified.

The Town's Annual Financial Report information can be found on the Indiana Gateway for Government Units financial reporting system website: <https://gateway.ifionline.org> and has not been subjected to any audit procedures.

Any Official Response to the Results and Comments, incorporated within this report, was not verified for accuracy.

Beth Kelley, CPA, CFE
Deputy State Examiner

April 26, 2023

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CLERK-TREASURER
TOWN OF HUDSON

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS

BACKGROUND

Per Indiana Code 5-11-1-9, the Indiana State Board of Account (SBoA) examines ". . . public funds, taxes and other sources of public expenses . . ." to determine the financial condition of each unit and whether the unit complies with state and federal guidelines. To fulfill the duty given to the SBoA, the same Indiana Code further states that SBoA may "examine any books, papers, documents, or electronically stored information . . ." which includes cash retained by the fiscal officer and any public depositories that retain money on behalf of the unit. The SBoA typically audits Towns on a four-year rotation. The prior examination was issued in 2017 for years 2012-2015.

In February 2020, a Field Examiner was assigned to audit the Town and contacted the Clerk-Treasurer for records. Although the Town office has published hours of operation, the Clerk-Treasurer's presence did not match the hours of operation and proved impossible to predict. After numerous attempts to open a channel of communication, a meeting time and date was set for March 5, 2020, for the Field Examiner to pick up the documents to audit the financial statements of the Town. The Field Examiner arrived at the mutually agreed-upon meeting and waited over four hours for the Clerk-Treasurer to arrive. After the four-hour mark and several attempts to reach the Clerk-Treasurer, the Field Examiner left without any of the records to audit. Periodic attempts to communicate after the visit were left unanswered, so the Field Examiner requested that two other nearby fiscal officers contact the Clerk-Treasurer to verify the legitimacy of the audit request and help re-establish communication to complete the audit. The attempts by the fiscal officers also went unanswered.

In August 2021, the audit was reassigned to two different Field Examiners who used various forms of communication to attempt to reconnect with the Clerk-Treasurer. These efforts were unsuccessful. It was determined the best way to obtain the Town records was to go to the Town for impromptu visits in hopes that the Clerk-Treasurer would be present at the town hall. The Field Examiners were able to obtain multiple years' worth of documents that were thrown haphazardly into boxes, physically damaged, and incomplete. The availability of documentation and communication with the Clerk-Treasurer was lacking throughout the duration of the audit. The audit team encountered inefficiencies and significant financial errors that were systemic and pervasive throughout the audit period. It was determined by the Deputy State Examiner that the team was unable to obtain sufficient audit evidence to provide a basis for an audit opinion on the financial statements presented by the Town; therefore, a compliance report was the only acceptable method to convey the systemic issues to the users of the financial statements.

Carla Olson (Olson) was elected as the Clerk-Treasurer with her term beginning January 1, 2016, and her second term runs through December 31, 2024. Per Indiana Code 36-5-6-6, duties of the Clerk-Treasurer include:

- " . . . (1) Receive and care for all town money and pay the money out only on order of the town legislative body.
- (2) Keep accounts showing when and from what sources the clerk-treasurer has received town money and when and to whom the clerk-treasurer has paid out town money.
- (3) Prescribe payroll and account forms for all town offices.
- (4) Prescribe the manner in which creditors, officers, and employees shall be paid.
- (5) Manage the finances and accounts of the town and make investments of town money.

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

- (6) Prepare for the legislative body the budget estimates of miscellaneous revenue, financial statements, and the proposed tax rate.
- (7) Maintain custody of the town seal and the records of the legislative body.
- (8) Issue all licenses authorized by statute and collect the fees fixed by ordinance.
- (9) Serve as clerk of the legislative body by attending its meetings and recording its proceedings.
- (10) Administer oaths, take depositions, and take acknowledgment of instruments that are required by statute to be acknowledged, without charging a fee.
- (11) Serve as clerk of the town court under [IC 33-35-3-2](#), if the judge of the court does not serve as clerk of the court or appoint a clerk of the court under [IC 33-35-3-1](#).
- (12) Perform all other duties prescribed by statute."

Indiana Code 36-5-6-7 states:

"(a) The clerk-treasurer shall appoint the number of deputies and employees needed for the effective operation of the office, with the approval of the town legislative body. The clerk-treasurer's deputies and employees serve at the clerk-treasurer's pleasure.

(b) If a town owns a utility and the clerk-treasurer is directly responsible for the billing and collection of that utility's rates and charges, the clerk-treasurer shall appoint those employees who are also responsible for that billing and collection. These employees serve at the clerk-treasurer's pleasure."

Indiana Code 36-5-6-10 states:

"(a) As used in this section, 'training courses' refers to training courses, workshops, training institutes authorized by [IC 5-11-14](#), formal academies, special seminars, and other in-service training related to an office described in section 2 of this chapter that are developed or offered under the rubric of a generally accepted professional association, association of governments or a state agency or department, or public university or affiliated center.

(b) An individual elected to the office described in section 2 of this chapter on or after November 5, 2019, shall complete at least:

- (1) fourteen (14) hours of training courses within one (1) year; and
- (2) thirty-six (36) hours of training courses within three (3) years;

after the individual is elected to the office described in section 2 of this chapter.

(c) A training course that an individual completes:

- (1) after being elected to the office described in section 2 of this chapter; and

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

(2) before the individual begins serving in the office described in section 2 of this chapter;
shall be counted toward the requirements under subsection (b).

(d) An individual shall fulfill the training requirements established by subsection (b) for each term to which the individual is elected to the office described in section 2 of this chapter.

(e) This subsection applies only to an individual appointed to fill a vacancy in the office described in section 2 of this chapter. An individual described in this subsection may, but is not required to, take training courses required by subsection (b). If an individual described in this subsection takes a training course required by subsection (b) for an individual elected to the office described in section 2 of this chapter, the town shall pay for the training course as if the individual had been elected to the office described in section 2 of this chapter.

(f) The:

(1) town executive;

(2) town legislative body; and

(3) individual who holds the office described in section 2 of this chapter;

shall use all reasonable means to ensure that the individual who holds the office described in section 2 of this chapter complies with the training requirements established by this section.

(g) The individual who holds the office described in section 2 of this chapter shall maintain written documentation of the training courses that the individual completes toward the requirements of this section.

(h) If a town reorganizes under [IC 36-1.5](#), the individual who performs the functions of the office described in section 2 of this chapter for the town shall comply with the training requirements established by this section for the reorganized political subdivision."

Towns are typically audited every four years; however, all attempts made to initiate normal audit procedures by the Indiana State Board of Accounts (SBoA) in 2019 and 2020 were unanswered. In 2021, the SBoA reached out again to perform the audit. By this time, there were also multiple citizen complaints of incorrect customer billings, including random charges, application of payments, abnormal meter readings, and availability to pay utility bills. The SBoA found that the Clerk-Treasurer was unresponsive to email and phone, and did not have consistent working hours. The SBoA found that there were no internal controls in place over all significant audit areas. The SBoA was unable to verify the amounts reported in the Annual Financial Report.

The following comments describe noncompliance with statutes or the *Accounting and Uniform Compliance Guidelines Manual for Cities and Towns*.

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

SUPPORTING DOCUMENTATION

Condition and Context

During the course of the audit, the Clerk-Treasurer's response to the SBoA's request for supporting documentation for receipts and disbursements was sporadic and insufficient. The SBoA inspected every box and document provided for audit to ensure completeness of Town's records. Record conditions included water damaged documents, payment vouchers without purchase orders or invoices attached, receipts, and various documents were intermingled into the piles of payment vouchers and mixed with other years. The records were materially incomplete, which rendered the ability to provide an opinion of the accuracy of the financial statements impossible. A list of missing supporting documentation was provided to the Clerk-Treasurer and numerous attempts were made over a four-month period by the SBoA Field Examiners to get the Clerk-Treasurer to obtain copies of the missing documentation. The Clerk-Treasurer did attempt to contact vendors to obtain documentation for items on the SBoA's list of missing supporting documentation, but ultimately was only able to provide documents for a few. The Clerk-Treasurer provided a large stack of documents, mostly duplicates, of documentation that the audit team already possessed. After factoring in the efforts of the Clerk-Treasurer, the missing supporting documentation for vendor disbursements totaled \$568,268.23 as noted below:

	2016	2017	2018	2019	2020	Totals
Accounting Software	\$ 875.00	\$ -	\$ -	\$ -	\$ -	\$ 875.00
Overpayment on Construction project	-	-	-	2,000.00	-	2,000.00
County Fees	126.81	-	50.00	25.00	-	201.81
Credit Cards	878.77	1,390.90	473.10	1,749.06	2,872.54	7,364.37
Insurance	-	-	-	18,164.50	-	18,164.50
Misc	4,241.80	3,986.15	987.37	620.33	5,836.17	15,671.82
Bank to Bank Transfer to set up new account	300,000.00	-	-	-	-	300,000.00
Unexplained Bank Activity	17,332.12	-	-	-	-	17,332.12
Debt Payments	-	2,400.00	-	-	-	2,400.00
Misc Bank Transactions	547.35	334.49	425.56	-	391.75	1,699.15
Postage	353.12	490.00	114.00	-	165.00	1,122.12
Safety	516.73	-	-	-	-	516.73
Supplies & Maintenance	2,450.00	852.91	5,296.00	-	7,141.74	15,740.65
Taxes	30,831.82	30,402.87	31,659.26	21,609.41	46,438.80	160,942.16
Training	-	140.00	205.00	-	-	345.00
Utilities	5,683.90	3,584.20	2,473.71	3,045.93	8,012.30	22,800.04
Vehicle Maintenance	-	72.86	-	-	1,019.90	1,092.76
Totals	<u>\$ 363,837.42</u>	<u>\$ 43,654.38</u>	<u>\$ 41,684.00</u>	<u>\$ 47,214.23</u>	<u>\$ 71,878.20</u>	<u>\$ 568,268.23</u>

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

Transactions such as utility payments, bank transfers, purchase of checks from the bank for Town use, maintenance, insurance, and supplies are expenses that typically appear on Town disbursement ledgers. Through inspection of check images, correspondence with bank officials, and correspondence with other third parties, the audit team was able to determine that many of the transactions appeared to be within the normal course of business. Of the total missing supporting documentation, \$58,014.94 of these missing documents did not appear to benefit the Town through the ordinary course of business. These items include, but are not limited to, overpayments for a construction project with charges that did not reflect the invoice, and general overpayments to vendors for taxes and utilities. The following items will be charged as noted below:

	2016	2017	2018	2019	2020	Totals
Overpayment on Construction project	\$ -	\$ -	\$ -	\$ 2,000.00	\$ -	2,000.00
Credit Cards	844.10	939.03	335.39	1,371.65	2,164.79	5,654.96
Misc	2,037.79	2,451.70	987.37	620.33	5,836.17	11,933.36
Unexplained Bank Activity	17,332.12	-	-	-	-	17,332.12
Supplies and Maintenance	2,450.00	151.01	5,296.00	-	4,441.74	12,338.75
Overpayment of Taxes	7,646.85	-	-	-	-	7,646.85
Overpayment of Utilities	-	-	-	-	89.00	89.00
Vehicle Maintenance	-	-	-	-	1,019.90	1,019.90
	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>1,019.90</u>	<u>1,019.90</u>
Totals	<u>\$ 30,310.86</u>	<u>\$ 3,541.74</u>	<u>\$ 6,618.76</u>	<u>\$ 3,991.98</u>	<u>\$ 13,551.60</u>	<u>\$ 58,014.94</u>

Criteria

Supporting documentation such as receipts, canceled checks, tickets, invoices, bills, contracts, and other public records must be available for examination to provide supporting information for the validity and accountability of monies disbursed. Payments without supporting documentation may be the personal obligation of the responsible official or employee. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

The SBOA will not take exception to the use of credit cards by a unit provided the following criteria are observed:

1. The governing board must authorize credit card use through an ordinance /resolution, which has been approved in a meeting and documented in the minutes.
2. Issuance and use must be handled by an official or employee designated by the governing body.
3. The purposes for which the credit card may be used must be specifically stated in the ordinance/resolution.
4. When the purpose for which the credit card has been issued has been accomplished, the card must be returned to the custody of the responsible person.

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

5. The designated responsible official or employee must maintain an accounting system or log which would include the names of individuals requesting usage of the cards, their position, estimated amounts to be charged, fund and account numbers to be charged, date the card is issued and returned.
6. Credit cards must not be used to bypass the accounting system. One reason that purchase orders are issued is to provide the fiscal officer with the means to encumber and track appropriations to provide the governing body and other officials with timely and accurate accounting information and monitoring of the accounting system.
7. Payment cannot be made on the basis of a statement or a credit card slip only. Procedures for payments must be no different than for any other claim. Supporting documents such as paid bills and receipts must be available. Additionally, any interest or penalty incurred due to late filing or furnishing of documentation by an officer or employee may be the personal obligation of the responsible officer or employee.
8. If authorized, an annual fee may be paid.

(Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

We requested Olson to reimburse the Town in the amount of \$58,014.94 for missing supporting documentation. (See Summary of Charges, page 33)

PENALTIES, INTEREST, AND OTHER CHARGES

Condition and Context

The Town paid penalties, interest, and other charges as noted in the table below:

Vendor	Type	Amount of Penalties and Interest
Indiana Department of Revenue	Sales Tax	\$ 1,617.43
Indiana Department of Revenue	Payroll Withholding Tax	1,176.08
Indiana Department of Workforce Development	Unemployment Filing	50.00
Internal Revenue Service	Federal Payroll Withholding Tax	2,960.70
Vendors	Late Payments	<u>1,572.04</u>
Total Penalties and Interest Paid		<u><u>\$ 7,376.25</u></u>

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

Criteria

Officials and employees have the duty to pay claims and remit taxes in a timely fashion. Failure to pay claims or remit taxes in a timely manner could be an indicator of serious financial problems which should be investigated by the unit. Additionally, officials and employees have a responsibility to perform duties in a manner which would not result in any unreasonable fees being assessed against the unit. Any penalties, interest, or other charges paid by the unit may be the personal obligation of the responsible official or employee. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

We requested Olson to reimburse the Town in the amount of \$7,376.25 for penalties, interest, and other charges. (See Summary of Charges, page 33)

CONDITION OF RECORDS

A similar comment also appeared in prior Report B47948, entitled *CONDITION OF RECORDS*.

Condition and Context

We observed the following deficiencies related to recordkeeping during our audit:

1. Bank accounts were opened and closed without documented approval of the Town Council. The Clerk-Treasurer was unable to specify the number of bank accounts held at various banks and the purpose of those accounts.
2. The Town's accounting software was highly manipulable. No internal controls within the software existed to prevent intentional or unintentional changes to data entries. All changes made within the system could be completed without creating an audit trail. The Clerk-Treasurer did not understand how to utilize the software to provide documentation or print reports.
3. Deposits of cash and checks into the bank were routinely late.
4. Individual bank deposits were frequently lumped together and receipted into the Town's accounting software months after the initial deposit and the receipts were often miscalculated.
5. The utility receipts appeared to be batched and it was difficult to determine which deposit tickets matched the ledger postings.
6. There were two instances where a customer's check did not clear the bank, but the customer was given credit on their account in the utility billing software.
7. Receipts and disbursements were posted in the ledger without corresponding bank activity and the reciprocal activity was noted during the audit period where bank activity in the bank statements did not have a corresponding posting to the ledger.
8. The Town improperly receipted money into the incorrect funds. Local distributions were receipted into the General Fund instead of the applicable funds.
9. The Clerk-Treasurer received goods at her home address without evidence to verify the goods were moved to the Town hall.

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

10. Payroll was input in the ledger by gross amount instead of broken down between net payroll and vendor. This prevented adequate reconcilements from the ledger to the bank and did not adequately reflect tax payments.
11. No sequential check order was utilized for either bank during the audit period. Handwritten checks and printed checks were both utilized in 2020.
12. Most vendors were labeled on the disbursement ledgers as "MISC."
13. Unable to provide ordinances mentioned in Town Council minutes.
14. Accounts Payable Vouchers were not attached to invoices and in some instances were not created at all.
15. Records such as employee W-2s, employee payroll reports, ordinances, and IRS notifications were kept by Clerk-Treasurer at her house.
16. Records, such as a court order, supporting the amount to be withheld for Child Support payments were not maintained by the unit.

Criteria

At all times, the manual and/or computerized records, subsidiary ledgers, control ledger, and reconciled bank balance must agree. If the reconciled bank balance is less than the subsidiary or control ledgers, the amount needed to balance may be the personal obligation of the responsible official or employee. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

All financial transactions pertaining to the unit must be recorded in the records of the unit at the time of the transaction. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

Audit costs incurred because of poor records, nonexistent records, or any other inadequate bookkeeping practices, or because of theft or a shortage may be the personal obligation of the responsible official or employee. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

Indiana Code 5-13-6-1(d) states in part:

"Except as provided in subsection (g), a city . . . or a town shall deposit funds not later than the next business day following the receipt of the funds in depositories:

- (1) selected by the city or town as provided in an ordinance adopted by the city or the town; and
- (2) approved as depositories of state funds."

Indiana Code 5-13-6-1(g) states in part:

"The following are not required to deposit funds on the business day following receipt if the funds on hand do not exceed five hundred dollars (\$500): . . .

- (2) A local officer of a political subdivision required to deposit funds under subsection (c) other than a township trustee.

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

(3) A city or a town required to deposit funds under subsection (d)."

ERRORS ON CLAIMS

Condition and Context

Error on claims have been noted as follows:

1. Accounts Payable Vouchers were not attached to invoices and in some instances were not created at all.
2. Electronic Funds Transfers (EFTs) did not have supporting Accounts Payable Vouchers (APV) and were not approved through the Town Council.
3. Most vendors were labeled as "MISC" in the software system.
4. Invoiced amounts differed from amounts paid out and/or entered into the software system.
5. The Town Council approved all vendor and payroll claims after payments were already made. The Town did not adopt an ordinance to allow payments of claims prior to Town Council approval.
6. Expenditures for retirement dinners and gifts were paid with Utility funds.
7. One vendor payment tested was for a construction project. The vendor contacted the Town and informed them of the price to pay, which was more than the original invoice. The Town did not follow proper procedures for change orders and no supporting documentation was provided for the extra payment.

Criteria

Indiana Code 5-11-10-1.6 states in part:

". . . (b) As used in this section, 'claim' means a bill or an invoice submitted to a governmental entity for goods or services.

(c) The fiscal officer of a governmental entity may not draw a warrant or check for payment of a claim unless:

- (1) there is a fully itemized invoice or bill for the claim;
- (2) the invoice or bill is approved by the officer or person receiving the goods and services;
- (3) the invoice or bill is filed with the governmental entity's fiscal officer;
- (4) the fiscal officer audits and certifies before payment that the invoice or bill is true and correct; and
- (5) payment of the claim is allowed by the governmental entity's legislative body or the board or official having jurisdiction over allowance of payment of the claim. . . ."

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

Indiana Code 36-5-4-12 states:

"(a) The legislative body of a town may adopt an ordinance allowing money to be disbursed under this section for lawful town purposes.

(b) Notwithstanding [IC 5-11-10](#), with the prior written approval of the board having jurisdiction over allowance of the claim, a town fiscal officer may make claim payments in advance of a board allowance for the following types of expenses if the town legislative body has adopted an ordinance under subsection (a):

(1) Property or services purchased or leased from:

(A) the United States government; or

(B) an agency or a political subdivision of the United States government.

(2) License fees or permit fees.

(3) Insurance premiums.

(4) Utility payments or utility connection charges.

(5) Federal grant programs if:

(A) advance funding is not prohibited; and

(B) the contracting party provides sufficient security for the amount advanced.

(6) Grants of state funds authorized by statute.

(7) Maintenance agreements or service agreements.

(8) Lease agreements or rental agreements.

(9) Principal and interest payments on bonds.

(10) Payroll.

(11) State, federal, or county taxes.

(12) Expenses that must be paid because of emergency circumstances.

(13) Expenses described in an ordinance.

(c) Each payment of expenses under this section must be supported by a fully itemized invoice or bill and certification by the fiscal officer.

(d) The town legislative body or the board having jurisdiction over the allowance of the claim shall review and allow the claim at the body's or board's next regular or special meeting following the preapproved."

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

Compensation and any other payments for goods and services must not be paid in advance of receipt of the goods or services unless specifically authorized by law. Payments made for goods or services which are not received may be the personal obligation of the responsible official or employee. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

LATE PAYMENTS

Condition and Context

The Town did not pay claims in a timely fashion. Some claims were paid as late as one year after the invoice was dated. This caused vendors to add penalties and interest to 107 claims paid during the audit period as referenced in the Penalties, Interest, and Other Charges comment.

Criteria

Officials and employees have the duty to pay claims and remit taxes in a timely fashion. Failure to pay claims or remit taxes in a timely manner could be an indicator of serious financial problems which should be investigated by the unit. Additionally, officials and employees have a responsibility to perform duties in a manner which would not result in any unreasonable fees being assessed against the unit. Any penalties, interest, or other charges paid by the unit may be the personal obligation of the responsible official or employee. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

BANK ACCOUNT RECONCILIATIONS

A similar comment also appeared in prior Report B47948, entitled *BANK ACCOUNT RECONCILIATIONS*.

Condition and Context

Bank account reconciliations were not prepared for any months during the audit period January 1, 2016 through December 31, 2020. Also, no bank reconciliations have been prepared after the audit period through June 2022. Due to condition of records, we were unable to conduct a bank account reconciliation for any year during the audit period.

Criteria

Indiana Code 5-13-6-1(e) states: "All local investment officers shall reconcile at least monthly the balance of public funds, as disclosed by the records of the local officers, with the balance statements provided by the respective depositories."

BAD DEBTS AND UNCOLLECTIBLE ACCOUNTS

Condition and Context

The Town does not have a policy for writing off bad debts. The Clerk-Treasurer wrote off large amounts of what appeared to be bad debts for utility customers, without supporting documentation, and would restart the service at the same address with the same account number.

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

Criteria

The governing body of a unit must have a written policy concerning a procedure for the writing off of bad debts, uncollectible accounts receivable, or any adjustments to record balance. Documentation must exist for all efforts made by the unit to collect amounts owed prior to any write-offs. Write-offs or adjustments to records which are not documented or warranted may be the personal obligation of the responsible official or employee. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

Units have a responsibility to collect amounts owed to the unit pursuant to procedures authorized by law. (Accounting and Uniform Compliance Guidelines Manual for Cities and Town, Chapter 1)

UTILITY BILLINGS

Condition and Context

The following issues were noted concerning the utility billing process:

1. The Town charged customers for utility services that the customer did not receive. For example, a customer that had been historically a sewer only customer was charged for water usage.
2. The Town purchases water and sewer treatment utilities from the Town of Ashley per utility rate ordinances of the Town of Ashley. The Town of Ashley bills the Town monthly for those services, of which, the Town does not pay timely or consistently.
3. Final charges for utility customers were egregiously different than their average usage.
4. No new customers were noted during the five-year audit period, which may be because new customers were given account numbers that already existed.
5. The Town had an ordinance concerning Water Utility delinquencies. Utility bills unpaid after the 21st day of the month shall include a collection charge of 3 percent on the balance of unpaid billings per the Town ordinance; however, the Town did not charge the correct penalty. The Town did not consistently charge the penalty for utility billings that were paid after the deadline.
6. At times, utility bills were sent out after the due date because the meter readings were being completed late and the customers were charged the late penalty fee even though they didn't receive the bill until after the due date.
7. For 24 out of 65 accounts tested, the customer billing did not reflect the accurate usage or meter reading amounts. Of the 24 accounts tested:
 - a. One customer was billed and charged for 602,125 gallons of water/wastewater usage over the five-year audit period, but the calculated usage was only 62,810 for the same period.
 - b. Another customer was billed and charged for 620,674 gallons of water/wastewater usage over the five-year audit period, but the calculated usage, with the included adjustments, was negative 21,116 gallons.

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

- c. Numerous utility customers were overbilled throughout the period reviewed and the outstanding customer account balances reflected an incorrect outstanding balance. Customers were noted to be actively striving to pay down the egregious amounts.
8. Beginning meter readings did not always agree with the prior month's ending meter readings. In some instances, the reading was incorrectly entered and in other instances usage amounts were used in place of the ending meter reading.
9. The Town did not correct the utility meter reading or billing mistakes accurately, often entering amounts that were a presumed usage amount or continuing the mistaken readings as actual readings from the meters.
10. The Town charged fees that were not approved through law or ordinance.

Criteria

Each unit is responsible for complying with the ordinances, resolutions, and policies it adopts. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

Indiana Code 36-9-23-6 states in part:

". . . (d) The board or any public utility (as defined in [IC 8-1-6-3](#)) contracting with the board for the treatment, purification, or disposal in a sanitary manner of liquid and solid waste, sewage, night soil, or industrial waste may contract with a water utility furnishing water service to users or property served in the municipality or by the public utility to do the following:

- (1) Ascertain the amount of water consumed.
- (2) Compute the amount of the charge to be billed for sewer services to each user or property served.
- (3) Bill and collect the amounts due for sewer services.
- (4) Discontinue water service to delinquent sewer users.

A contract under this subsection is enforceable without the approval of the Indiana utility regulatory commission.

(e) The procedures in [IC 36-9-25-11.5\(a\)](#) through [IC 36-9-25-11.5\(e\)](#) apply to the discontinuance of water service to a delinquent sewer user under a contract between the board and a water utility described in subsection (d)."

Fees can only be collected as specifically authorized by law or properly authorized ordinance/resolution. When a fee is NOT specified by law, but instead through the use of an ordinance/resolution, sufficient authoritative reference should be maintained. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

CAPITAL ASSETS

Condition and Context

The Town does not have a Capital Assets policy that details a threshold amount to establish which items should be considered as a Capital Asset. The Town does not maintain a detailed listing of its Capital Assets that should reflect the acquisition value, nor does the Town keep track of additions or deletions. The Town does not complete a physical inventory and does not know what land, building, and equipment that the Town owns to complete an inventory or Capital Asset listing.

Criteria

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

MOTOR VEHICLE HIGHWAY (MVH) - RESTRICTED FUND

Condition and Context

The Town did not create the Motor Vehicle Highway (MVH) - Restricted fund as directed by the State Examiner. Therefore, the Town failed to allocate or deposit at least 50 percent of the distributions from the State Motor Vehicle Highway (MVH) Account, at the time of receipt, into an MVH Restricted sub-fund. Since the MVH Restricted sub-fund had not been created, we were not able to determine if the Town used at least 50 percent for the purposes specified in Indiana Code 8-14-1-5(c).

Criteria

The purpose of this Directive is to authorize and require . . . cities, and towns that receive distributions from the State Motor Vehicle Highway Account to **create a new sub-fund within the MVH Fund** to properly manage and account for the usage restrictions that were included in House Enrolled Act 1002-2017 and House Enrolled Act 1290-2018.

The sub-fund . . . will be used to account for MVH monies which have been statutorily restricted for construction, reconstruction, and preservation purposes.

On the chart of accounts, the MVH Fund and MVH Restricted sub-fund shall be shown as follows:

...

Cities and Towns

Fund 201	MVH
Fund 203	MVH Restricted

Together, MVH and MVH Restricted shall constitute the total MVH Fund. MVH and MVH Restricted will be shown separately on the Annual Financial Report and Annual Operational Report.

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

Starting on January 1, 2019, the political subdivision must post at the time of receipt of the distribution from the State Motor Vehicle Highway Account fifty percent (50%) of the distribution to MVH Restricted. . . . (State Examiner Directive 2018-2)

Indiana Code 8-14-1-5(c) states: "For funds distributed to a city or town from the motor vehicle highway account, the city or town shall use at least fifty percent (50%) of the money for the construction, reconstruction, and preservation of the city's or town's highways."

ANNUAL FINANCIAL REPORTS

A similar comment also appeared in prior Report B47948, entitled *ANNUAL FINANCIAL REPORTS*.

Condition and Context

The Annual Financial Reports (AFR) filed for 2016 through 2020 did not match the Town's ledgers.

The Schedule of Leases and Debt, which was prepared each year using the Indiana Gateway for Government Units (Gateway) financial reporting system, contained material errors. The Town has a loan with a financial institution and did not report proper ending balances per the statements from the financial institution. The Town of Ashley holds a bond for sewage upgrades. The Town and the Town of Ashley have a shared agreement requiring the Town to pay a portion of the bonded debt. The Clerk-Treasurer used incorrect ending balances for this debt.

The Schedule of Payables and Receivables, which was prepared each year using the online Gateway presented payables and receivables that were not supported by any documentation.

The Schedule of Capital Assets, which was prepared each year using Gateway, had not been properly maintained by the Town. The Town does not maintain a complete detailed listing of capital assets owned. The capital assets totals reported in the AFR are based upon additions and deletions added to the previous year.

Criteria

Indiana Code 5-11-1-4(a) states:

"The state examiner shall require from every audited entity financial reports covering the full period of each fiscal year. These reports shall be prepared, verified, and filed with the state examiner not later than sixty (60) days after the close of each fiscal year. The reports must be in the form and content prescribed by the state examiner and filed electronically in the manner prescribed under [IC 5-14-3.8-7](#)."

CERTIFICATION ON INTERNAL CONTROL STANDARDS

Condition and Context

The Town certified in the Indiana Gateway for Government Units (Gateway) financial reporting system that it had adopted the minimum internal control standards as required by Indiana Code 5-11-1-27(g), and that all personnel defined by Indiana Code 5-11-1-27(c) had received training concerning the standards adopted. However, the Town was unable to provide documentation that the necessary personnel had completed the minimum internal control standards training.

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

Criteria

Indiana Code 5-11-1-4(a) states:

"The state examiner shall require from every audited entity financial reports covering the full period of each fiscal year. These reports shall be prepared, verified, and filed with the state examiner not later than sixty (60) days after the close of each fiscal year. The reports must be in the form and content prescribed by the state examiner and filed electronically in the manner prescribed under [IC 5-14-3.8-7](#)."

DELINQUENT UTILITY ACCOUNTS

Condition and Context

The Town did not shut off the water utility service for customers who had an aging balance of 90 days or more. Liens were not filed with the County for delinquent wastewater accounts with an aging balance of 90 days or more.

Criteria

Indiana Code 36-9-23-33 states in part:

". . . (c) Except as provided in subsection (m), the officer charged with the collection of fees and penalties assessed under this chapter shall enforce their payment. As often as the officer determines is necessary in a calendar year, the officer shall prepare either of the following:

- (1) A list of the delinquent fees and penalties that are enforceable under this section, which must include the following:
 - (A) The name or names of the owner or owners of each lot or parcel of real property on which fees are delinquent.
 - (B) A description of the premises, as shown by the records of the county auditor.
 - (C) The amount of the delinquent fees, together with the penalty.
 - (2) an individual instrument for each lot or parcel of real property on which the fees are delinquent."
- (d) The officer shall record a copy of each list or each individual instrument with the county recorder . . .
- (f) . . . Using the lists and instruments prepared under subsection (c) and recorded under subsection (d), the officer shall, not later than ten (10) days after the list or each individual instrument is recorded under subsection (d), certify to the county auditor a list of the unpaid liens for collection with the next May installment of property taxes. . . ."

Each unit is responsible for complying with the ordinances, resolutions, and policies it adopts. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

INTERNAL CONTROLS

Condition and Context

There were deficiencies in the internal control system of the Town related to financial transactions and reporting.

Cash and Investments

No attempts at bank reconciliations were made during the audit period. There was no oversight, review, or approval process to ensure that bank reconciliations were performed.

Receipts

The Clerk-Treasurer was responsible for issuing receipts for funds collected, preparing daily deposits for the bank accounts, taking the deposits to the bank, and entering receipts into the accounting software system. There were no internal controls in place, such as an oversight, review, or approval process.

Disbursements (Including Payroll)

Disbursements were paid prior to approval by the Town Council. The Clerk-Treasurer was responsible for processing vendor and payroll checks, signing checks, and inputting disbursements into the accounting software. There were no internal controls in place, such as an oversight, review, or approval process.

Financial Close and Reporting

The Clerk-Treasurer entered and submitted the financial information for the Town into the Indiana Gateway for Government Units financial reporting system, which was the source for the Annual Financial Report and financial statements. There was no evidence of an internal control, such as an oversight, review, or approval process to ensure the accuracy of the information entered and submitted.

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. . . .

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

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. . . ."

LATE SUBMISSION OF ANNUAL FINANCIAL REPORT

Condition and Context

The Town's Annual Financial Reports for 2016, 2017, 2019, and 2020 were not filed electronically until April 4, 2017, March 26, 2018, March 6, 2020, and March 18, 2021, respectively, which was 34, 25, 6, and 17 past the due date.

Criteria

Indiana Code 5-11-1-4(a) states:

"The state examiner shall require from every audited entity financial reports covering the full period of each fiscal year. These reports shall be prepared, verified, and filed with the state examiner not later than sixty (60) days after the close of each fiscal year. The reports must be in the form and content prescribed by the state examiner and filed electronically in the manner prescribed under [IC 5-14-3.8-7](#)."

TIMELY FILING OF 100R REPORT

Condition and Context

The Town did not timely file a Certified Report of Names, Addresses, Duties and Compensation of Public Employees (Form 100R) for 2019 and 2020. The Town filed the 100R for 2019 on February 4, 2020, and for 2020 on March 18, 2021, which was 4 and 46 days late, respectively.

Criteria

Indiana Code 5-11-13-1(b) states in part:

"Each audited entity shall during the month of January of each year prepare, make, and sign a certified report, correctly and completely showing the names and business addresses of the officers, employees, and agents of the audited entity. The report shall indicate the respective duties and compensation of each officer, employee, and agent of the audited entity. The audited entity shall file the report in the office of the state examiner of the state board of accounts. . . . The certification must be filed electronically in the manner prescribed under [IC 5-14-3.8-7](#)."

MONTHLY AND ANNUAL ENGAGEMENT UPLOADS

Condition and Context

The Town did not properly upload monthly engagement uploads to the Indiana Gateway for Governmental Units (Gateway) financial reporting system, as required by State Examiner Directive 2018-1. Towns are to upload files no later than 60 days after the completion of a month/year. Upon inspecting Gateway, no monthly or annual uploads were completed by the Town.

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

Criteria

The purpose of this Directive is to provide guidelines for the use of the "Indiana Gateway for Government Units" application entitled "Monthly and Annual Engagement Uploads" (Engagement Uploads). The Engagement Uploads provide a more efficient and cost-effective audit process for governmental units. . . .

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

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

(Amended State Examiner Directive 2018-1)

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

FAILURE TO FILE AND PAY UTILITY RECEIPTS TAX (URT), MONTHLY 941 REPORTS, AND FILE UNEMPLOYMENT REPORTS

Condition and Context

The Town did not pay or file the Utility Receipt Tax (URT) that the Water Utility is required to pay during the audit period January 1, 2016 through December 31, 2020.

The Town filed and paid quarterly 941 Federal tax withholdings but did not file and pay the mandatory monthly payroll Federal tax withholdings.

The Town did not file unemployment reports for any of the necessary timeframes during the audit period.

Criteria

Officials and employees have the duty to pay claims and remit taxes in a timely fashion. Failure to pay claims or remit taxes in a timely manner could be an indicator of serious financial problems which should be investigated by the unit. Additionally, officials and employees have a responsibility to perform duties in a manner which would not result in any unreasonable fees being assessed against the unit. Any penalties, interest, or other charges paid by the unit may be the personal obligation of the responsible official or employee (Accounting and Uniform Guidelines Manual for Cities and Towns, Chapter 1)

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

PRESCRIBED FORMS

Condition and Context

The Town switched their main checking account to another bank but did not use the prescribed form for checks. Checks were missing from the register of checks generated by the computer or a duplicated entry was input into the computer.

Criteria

The unit agrees to comply with the following conditions, if applicable, for any new forms installed:

- (1) The forms installed are subject to review and/or recommendations during engagements of the unit to ensure compliance with current laws and uniform compliance guidelines.
- (2) Any receipts, checks, purchase orders, or other forms that require numbering shall be either pre- numbered by an outside printing supplier or numbered by the unit's computer system with sufficient controls installed in the system to prevent unauthorized generation of the form or duplication of numbers.
- (3) All receipts must be either in duplicate or recorded in a prescribed or approved register of receipts.
- (4) All checks must be either in duplicate or recorded in a register of checks generated by the computer.
- (5) In the event a change is required due to the passage of a State or Federal law or a change in uniform compliance guidelines, the unit agrees to implement the change in a timely manner.

Officials and employees are required to use prescribed and approved forms in the manner prescribed. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

OFFICIAL BOND NOT RECORDED

Condition and Context

The Town did not file their official bonds with the County Recorder as required by Indiana Code. The Town had an official bond as shown in the table below:

Official Bond	
Period	Amount
12-31-15 to 12-31-18	\$ 30,000
12-31-18 to 12-31-19	30,000
12-31-19 to 12-31-20	30,000
12-31-20 to 12-31-21	30,000

CLERK-TREASURER
TOWN OF HUDSON
RESULTS AND COMMENTS
(Continued)

Criteria

Indiana Code 5-4-1-5.1(b) states in part:

"Every elected or appointed officer, official, deputy, employee, or contractor of a political subdivision . . . shall file the bond with the fiscal officer of the political subdivision and in the office of the county recorder in the county of office or employment of the officer, official, deputy, employee, or contractor. The county recorder and deputies and employees of the recorder shall file their bonds with the county auditor and in the office of the clerk of the circuit court."

CLERK-TREASURER
TOWN OF HUDSON
EXIT CONFERENCE

The contents of this report were discussed on April 26, 2023, with Carla Olson, Clerk-Treasurer; Joshua Odom, President of the Town Council; Bill Ebert, Vice President of the Town Council; Lyle Torrence, Town Council member; and Dustin Glick, Town Attorney.

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TOWN COUNCIL
TOWN OF HUDSON

TOWN COUNCIL
TOWN OF HUDSON
RESULTS AND COMMENTS

TRAINING ON INTERNAL CONTROL STANDARDS

Condition and Context

The Town Council did not ensure that all applicable personnel had received training concerning the internal control standards and procedures adopted by the Town.

Criteria

Indiana Code 5-11-1-27(g) states:

"After June 30, 2016, the legislative body of a political subdivision shall ensure that:

- (1) the internal control standards and procedures developed under subsection (e) are adopted by the political subdivision; and
- (2) personnel receive training concerning the internal control standards and procedures adopted by the political subdivision."

CREDIT CARD POLICY

Condition and Context

Multiple credit cards were used during the audit period; however, the Town does not have a credit card policy.

Criteria

The SBOA will not take exception to the use of credit cards by a unit provided the following criteria are observed:

1. The governing board must authorize credit card use through an ordinance /resolution, which has been approved in a meeting and documented in the minutes.

TOWN COUNCIL
TOWN OF HUDSON
RESULTS AND COMMENT
(Continued)

2. Issuance and use should be handled by an official or employee designated by the governing body.
3. The purposes for which the credit card may be used must be specifically stated in the ordinance/resolution.
4. When the purpose for which the credit card has been issued has been accomplished, the card must be returned to the custody of the responsible person.
5. The designated responsible official or employee must maintain an accounting system or log which would include the names of individuals requesting usage of the cards, their position, estimated amounts to be charged, fund and account numbers to be charged, date the card is issued and returned.
6. Credit cards must not be used to bypass the accounting system. One reason that purchase orders are issued is to provide the fiscal officer with the means to encumber and track appropriations to provide the governing body and other officials with timely and accurate accounting information and monitoring of the accounting system.
7. Payment cannot be made on the basis of a statement or a credit card slip only. Procedures for payments must be no different than for any other claim. Supporting documents such as paid bills and receipts must be available. Additionally, any interest or penalty incurred due to late filing or furnishing of documentation by an officer or employee may be the personal obligation of the responsible officer or employee.
8. If authorized, an annual fee may be paid.

(Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 1)

TOWN COUNCIL
TOWN OF HUDSON
EXIT CONFERENCE

The contents of this report were discussed on April 26, 2023, with Carla Olson, Clerk-Treasurer; Joshua Odom, President of the Town Council; Bill Ebert, Vice President of the Town Council; Lyle Torrence, Town Council member; and Dustin Glick, Town Attorney.

TOWN OF HUDSON
SUMMARY OF CHARGES
(Due to Malfeasance, Misfeasance, or Nonfeasance)

	Charges	Credits	Balance Due
Carla Olson, Clerk-Treasurer:			
Supporting Documentation, pages 9 through 11	\$ 58,014.94	\$ -	\$ 58,014.94
Penalties, Interest, and Other Charges, pages 11 and 12	7,376.25	-	7,376.25
Totals	\$ 65,391.19	\$ -	\$ 65,391.19

This report was forwarded to the Office of the Indiana Attorney General and the local prosecuting attorney.

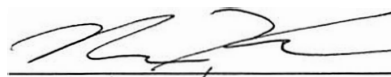
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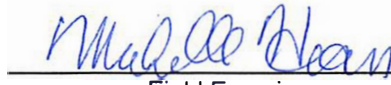
AFFIDAVIT

STATE OF INDIANA

allen COUNTY

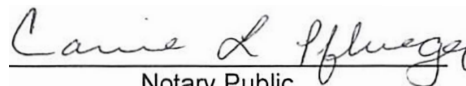
We, Nathan Kuhn and Michelle Hearn, Field Examiners, being duly sworn on our oaths, state that the foregoing report based on the official records of Town of Hudson, Steuben County, Indiana, for the period from January 1, 2016 to December 31, 2020, is true and correct to the best of our knowledge and belief.



Nathan Kuhn


Michelle Hearn
Field Examiners

Subscribed and sworn to before me this 18th day of May, 2023



Carrie L. Pflueger
Notary Public

My Commission Expires: _____

County of Residence: _____



CARRIE L. PFLUEGER, Notary Public
Allen County, State of Indiana
My Commission Expires June 29, 2024