

EFFINGHAM COUNTY, ILLINOIS
SINGLE AUDIT REPORT
YEAR ENDED NOVEMBER 30, 2022



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

Chairman and Members of the County Board
Effingham County, Illinois
Effingham, Illinois

We have audited, in accordance with the 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 modified cash basis financial statements of the governmental activities, the discretely presented component unit, each major fund, and the aggregate remaining fund information of Effingham County, Illinois, as of and for the year ended November 30, 2022, and the related notes to the financial statements, which collectively comprise the Effingham's basic financial statements, and have issued our report thereon dated August 29, 2023. Our report includes a reference to other auditors who audited the financial statements of Emergency Telephone System Board (ETSB), as described in our report on Effingham County, Illinois's financial statements. This report does not include the results of other auditors' testing on internal control over financial reporting or compliance or other matters that are reported separately by those auditors. The financial statements of ETSB were not audited in accordance with *Government Auditing Standards*.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered Effingham County, Illinois'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 opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of Effingham County, Illinois's internal control. Accordingly, we do not express an opinion on the effectiveness of Effingham County, Illinois'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 a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency* is a deficiency, or a 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 identified certain deficiencies in internal control, described in the accompanying schedule of findings and questioned costs as items 2022-001, 2022-002, 2022-003, 2022-004, and 2022-005 that we consider to be material weaknesses.

Chairman and Members of the County Board
Effingham County, Illinois

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether Effingham County, Illinois's financial statements are free from 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 financial statements. 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 no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Effingham County, Illinois's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the Effingham County, Illinois's response to the findings identified in our audit and described in the accompanying schedule of findings and questioned costs. Effingham County, Illinois's response was not subjected to the other auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on the response.

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



CliftonLarsonAllen LLP

Champaign, Illinois
August 29, 2023



**INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH MAJOR
FEDERAL PROGRAM, REPORT ON INTERNAL CONTROL OVER COMPLIANCE,
AND REPORT ON THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
REQUIRED BY THE UNIFORM GUIDANCE**

Chairman and Members of the County Board
Effingham County, Illinois
Effingham, Illinois

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited Effingham County, Illinois's compliance with the types of compliance requirements identified as subject to audit in the OMB *Compliance Supplement* that could have a direct and material effect on each of Effingham County, Illinois's major federal programs for the year ended November 30, 2022. Effingham County, Illinois's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

In our opinion, Effingham County, Illinois complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended November 30, 2022.

Basis for Opinion on Each Major Federal Program

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; 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 Auditors' Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of Effingham County, Illinois 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 Effingham County, Illinois's compliance with the compliance requirements referred to above.

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 Effingham County, Illinois's federal programs.

Auditors' 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 Effingham County, Illinois'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 Effingham County, Illinois'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 Effingham County, Illinois'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 Effingham County, Illinois'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 Effingham County, Illinois'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.

Other Matters

The results of our auditing procedures disclosed an instance of noncompliance, which is required to be reported in accordance with the Uniform Guidance and which is described in the accompanying schedule of findings and questioned costs as item 2022-006. Our opinion on each major federal program is not modified with respect to this matter.

Government Auditing Standards requires the auditor to perform limited procedures on Effingham County, Illinois's response to the noncompliance finding identified in our compliance audit described in the accompanying schedule of findings and questioned costs. Effingham County, Illinois'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.

Report on Internal Control Over Compliance

Our consideration of internal control over compliance was for the limited purpose described in the Auditors' 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 a certain deficiency in internal control over compliance that we consider to be a material weakness.

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 a 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 deficiency in internal control over compliance described in the accompanying schedule of findings and questioned costs as item 2022-006 to be a material weakness.

A significant deficiency in internal control over compliance is a deficiency, or a 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.

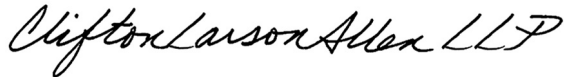
Government Auditing Standards requires the auditor to perform limited procedures on Effingham County, Illinois's response to the internal control over compliance findings identified in our audit described in the accompanying schedule of findings and questioned costs. Effingham County, Illinois's response 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.

Chairman and Members of the County Board
Effingham County, Illinois

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

We have audited the modified cash basis financial statements of the governmental activities, the discretely presented component unit, each major fund, and the aggregate remaining fund information of Effingham County, Illinois as of and for the year ended November 30, 2022, and the related notes to the financial statements, which collectively comprise Effingham County, Illinois’s basic financial statements. We have issued our report thereon, dated August 29, 2023, which contained unmodified opinions on those financial statements. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. 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 basic financial statements. 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 basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, 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 basic financial statements as a whole.



CliftonLarsonAllen LLP

Champaign, Illinois
August 29, 2023

EFFINGHAM COUNTY, ILLINOIS
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
YEAR ENDED NOVEMBER 30, 2022

Federal Grantor/Pass-Through Grantor/ Program or Cluster Title	Assistance Listing Number	Pass-Through Grantor's Number	Passed Through to Subrecipients	Total Federal Expenditures
U.S. Department of Agriculture				
<i>Passed through Illinois Department of Human Services:</i>				
Supplemental Nutrition Program for Women, Infants, and Children (WIC) - Administration	10.557	2FCSAQ05419	\$ -	\$ 57,640
Supplemental Nutrition Program for Women, Infants, and Children (WIC) - Administration	10.557	2FCSAQ05443	-	9,604
Supplemental Nutrition Program for Women, Infants, and Children (WIC) - Administration	10.557	3FCSBQ05419	-	47,172
Supplemental Nutrition Program for Women, Infants, and Children (WIC) - Administration	10.557	3FCSBQ05443	-	7,556
Total U.S. Department of Agriculture			-	121,972
U.S. Department of Justice				
Equitable Sharing Program	16.922	N/A	-	1,462
Total U.S. Department of Justice			-	1,462
U.S. Department of Transportation				
<i>Passed through Illinois Department of Transportation:</i>				
Formula Grants for Rural Areas and Tribal Transit Program	20.509	22-0338-27902	90,817	94,512
Formula Grants for Rural Areas and Tribal Transit Program - CARES	20.509	2410-21001	286,762	286,762
Subtotal for 20.509			377,579	381,274
Airport Improvement Program, COVID-19 Airports Programs, and Infrastructure Investment and Jobs Act Programs	20.106	2421-19818	-	45,103
Total U.S. Department of Transportation			377,579	426,377
U.S. Department of Treasury				
Direct - Coronavirus State and Local Fiscal Recovery Funds	21.027	N/A	-	767,686
Total U.S. Department of Treasury			-	767,686
U.S. Department of Health and Human Services				
<i>Passed through Illinois Department of Human Services:</i>				
Family Case Mgmt/H	93.667	FCSAU06084	-	9,373
Family Case Mgmt/HRIF	93.667	FCSBU06084	-	10,531
FY21 Donated Funds Initiative - Title XX	93.667	FCSBJ04005	7,617	7,617
FY21 Donated Funds Initiative - Title XX	93.667	FCSVJ04005	104	104
FY21 Donated Funds Initiative - Title XX	93.667	FCSAJ04005	30,467	30,467
Subtotal for 93.667			38,188	58,092
Epidemiology and Laboratory Capacity for Infectious Diseases (ELC) *	93.323	28180525J	-	165,521
<i>Passed through Illinois Department of Public Health:</i>				
Public Health Emergency Preparedness	93.069	17180025I	-	28,068
Public Health Emergency Preparedness	93.069	27180025J	-	3,316
Subtotal for 93.069			-	31,384
Immunization Cooperative Agreements	93.268	25080026J	-	745
Public Health Emergency Response	93.354	27680025J	-	22,333
Immunization Cooperative Agreements	93.268	15080625I	-	111,723
Epidemiology and Laboratory Capacity for Infectious Diseases (ELC)*	93.323	05180125H	-	110,127
<i>Passed through Heluna Health:</i>				
ARISE Grant	93.268	20180049J	-	6,823
Total U.S. Department of Health and Human Services			38,188	506,748
U.S. Department of Homeland Security				
<i>Passed through Illinois Emergency Management Agency:</i>				
2021 Emergency Management Performance Reallotment	97.042	22EMAEFFIN	-	22,396
Total U.S. Department of Homeland Security			-	22,396
Total Expenditures of Federal Awards			\$ 415,767	\$ 1,846,641

* subtotal for 93.323 is \$278,648

See accompanying Notes to Schedule of Expenditures of Federal Awards.

EFFINGHAM COUNTY, ILLINOIS
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
NOVEMBER 30, 2022

NOTE 1 BASIS OF PRESENTATION

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of Effingham County, Illinois (the County) under programs of the federal government for the year ended November 30, 2022. The information in this Schedule is presented in accordance with the requirements of 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)*. Because the Schedule presents only a selected portion of the operations of the County, it is not intended to and does not present the financial position, changes in net assets, or cash flows of Effingham County.

NOTE 2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Expenditures reported on the Schedule are reported on the modified cash basis of accounting. Expenditures are recorded when paid. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. Negative amounts shown on the Schedule represent adjustments or credits made in the normal course of business to amounts reported as expenditures in prior years.

NOTE 3 INDIRECT COST

Effingham County has elected to use the 10 percent de minimis indirect cost rate as allowed under the Uniform Guidance.

NOTE 4 FEDERAL LOANS

Effingham County had no federal loans or loan guarantees outstanding at year-end.

**EFFINGHAM COUNTY, ILLINOIS
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
YEAR ENDED NOVEMBER 30, 2022**

Section I – Summary of Auditors’ Results

Financial Statements

1. Type of auditors’ report issued: Unmodified
2. Internal control over financial reporting:
- Material weakness(es) identified? x yes no
 - Significant deficiency(ies) identified? yes x none reported
3. Noncompliance material to financial statements noted? yes x no

Federal Awards

1. Internal control over major federal programs:
- Material weakness(es) identified? x yes no
 - Significant deficiency(ies) identified? yes x none reported
2. Type of auditors’ report issued on compliance for major federal programs: Unmodified
3. Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)? x yes no

Identification of Major Federal Programs

Assistance Listing Number(s)	Name of Federal Program or Cluster
21.027	Coronavirus State and Local Fiscal Recovery Funds

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

Auditee qualified as low-risk auditee? yes x no

**EFFINGHAM COUNTY, ILLINOIS
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
YEAR ENDED NOVEMBER 30, 2022**

Section II – Financial Statement Findings

2022 – 001 – Financial Statement Preparation

Type of Finding:

- Material Weakness in Internal Control over Financial Reporting

Condition: While it is acceptable to outsource various accounting functions, the responsibility for internal control cannot be outsourced. The County engages CliftonLarsonAllen LLP (CLA) to assist in preparing its financial statements and accompanying disclosures. As independent auditors, CLA cannot be considered part of the County’s internal control system. Management does review and approve the financial statements, including related footnotes and supplementary information.

Criteria or specific requirement: The Effingham County Board and management are responsible for establishing and maintaining internal controls and for the fair presentation of the financial statements, including the related disclosures, in accordance with the modified cash basis of accounting, and Government Accounting Standards Board (GASB), where applicable to modified cash basis accounting.

Effect: The potential exists that a material misstatement of the annual financial statement could occur and not be prevented or detected by the County’s internal controls.

Cause: The County lacks sufficient resources to prepare the financial statements, related footnote disclosures.

Repeat Finding: The finding is a repeat of a finding in the prior year. The prior year finding number was 2021-001.

Recommendation: Management should continue to evaluate their internal staff capacity to determine if an internal control policy over the annual financial reporting is beneficial.

Views of responsible officials and planned corrective actions: There is no disagreement with this finding. The County accepts the degree of risk associated with this condition because the additional expense to hire and/or train accounting personnel to prepare and/or review the financial statements would take away from the funds available to provide service for County residents. The County will continue to review, approve, and accept responsibility for the audit adjustments, financial statements, and related notes provided by the auditors.

**EFFINGHAM COUNTY, ILLINOIS
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
YEAR ENDED NOVEMBER 30, 2022**

Section II – Financial Statement Findings (Continued)

2022 – 002 – Fiduciary Funds

Type of Finding:

- Material Weakness in Internal Control over Financial Reporting

Condition: The remaining balance in the Collector Fund at November 30, 2021 was reported as net position in the prior year financial statements, however this should have been reported as a liability. Two fiduciary funds, Township Motor Fuel Tax Fund and Township Bridge Fund, were reported as private-purpose trust funds in the prior year financial statements, however there is no trust associated with these. The beginning balances for each of these funds was restated in the November 30, 2022 financial statements.

Criteria or specific requirement: GASB 84, *Fiduciary Activities*, requires funds with resources being held in a trust to be shown as a private purpose trust funds. In addition, a liability should be recognized in a fiduciary fund when an event occurs that compels the government to disburse fiduciary resources (taxes collected for other governments that are not distributed until a specified time, is not considered an event, but rather just timing, and therefore should be recognized as a liability).

Effect: Beginning net position of these three funds were classified improperly and required restatement.

Cause: This was a complex new standard implemented last year.

Repeat Finding: N/A

Recommendation: We recommend close review of the financial statements by the County to ensure new GASB standards are properly implemented.

Views of responsible officials and planned corrective actions: There is no disagreement with this finding. Corrective action taken per new GASB standards. In the future, additional review will be added over the financial statements related to new GASB standards.

**EFFINGHAM COUNTY, ILLINOIS
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
YEAR ENDED NOVEMBER 30, 2022**

Section II – Financial Statement Findings (Continued)

2022 – 003 – Preparation of the Schedule of Expenditures of Federal Awards (SEFA)

Type of Finding:

- Material Weakness in Internal Control over Financial Reporting

Condition: The expenditures of two federal programs were not included on the initial SEFA provided, and one Assistance Listing Number was incorrect.

Criteria or specific requirement: The Effingham County Board and management are responsible for establishing and maintaining internal controls and for the fair presentation of the SEFA in accordance with Uniform Grant Guidance.

Effect: Failure to establish an effective internal control can enable material misstatements to occur in the SEFA, including the determination and testing of incorrect major programs.

Cause: ARPA funding was new and unique and was based on lost revenue. Additionally, a new health department pass-through program was inadvertently missed and an incorrect assistance listing number.

Repeat Finding: N/A

Recommendation: We recommend the County strengthen its process for reviewing the SEFA to ensure compliance with Uniform Grant Guidance, including close communication with the Health Department.

Views of responsible officials and planned corrective actions: There is no disagreement with this finding. County Board Administrator will work closely and communicate with all County departments when preparing the SEFA for the annual audit.

**EFFINGHAM COUNTY, ILLINOIS
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
YEAR ENDED NOVEMBER 30, 2022**

Section II – Financial Statement Findings (Continued)

2022 – 004 – Bank Reconciliations

Type of Finding:

- Material Weakness in Internal Control over Financial Reporting

Condition: During the fiscal year an error was made in the posting of a transfer from the County Motor Fuel Tax fund checking account to the County Motor Fuel Tax fund money market account, causing the bank reconciliations to not agree with the ledger. There were also entries made between the County Highway Department funds money market accounts and checking account which were not properly shown on the bank reconciliation, causing differences between the bank reconciliation and ledger. We also noted several other accounts with differences between the bank reconciliations and ledger. Additionally, there is no documented review of completed bank reconciliations by an individual other than the preparer.

Criteria or specific requirement: Management is responsible for establishing and maintaining internal controls over the bank reconciliation process to ensure proper recording of financial activity.

Effect: Errors or irregularities on bank reconciliations may occur and not be detected on a timely basis. In addition, misstatements could occur in financial reporting and not be prevented or detected by the internal controls designed.

Cause: Lack of adequate review procedures.

Repeat Finding: N/A (prior year management letter finding only)

Recommendation: We recommend that all bank reconciliations reconcile to the proper ledger account. In addition, the reconciliations should be reviewed on a timely basis by someone other than the preparer. This review should be documented by the reviewer's signature or initials and dated.

Views of responsible officials and planned corrective actions: There is no disagreement with this finding. The Treasurer's Office will implement a new procedure to ensure bank reconciliations are signed and dated by both the preparer and the individual responsible for the second review.

**EFFINGHAM COUNTY, ILLINOIS
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
YEAR ENDED NOVEMBER 30, 2022**

Section II – Financial Statement Findings (Continued)

2022 – 005 – Timely Distribution of Custodial Fund Receipts

Type of Finding:

- Material Weakness in Internal Control over Financial Reporting

Condition: As of November 30, 2022, the County Recorder held funds of approximately \$240,000 for May through November receipts that had not been distributed to the treasurer. In addition, personal property replacement tax receipts of approximately \$780,000 are being held by the collector and not disbursed to the proper County funds.

Criteria or specific requirement: Timely disbursement of funds held in a custodial manner is a prudent use of government resources and a good business practice.

Effect: County funds collected by the Recorder and Collector are not available for County use.

Cause: Lack of current review of this disbursement process.

Repeat Finding: This finding is a repeat of a finding in the prior year. The prior year finding number was 2021-002

Recommendation: We recommend all fees and personal property replacement taxes be disbursed on a monthly basis.

Views of responsible officials and planned corrective actions: There is no disagreement with this finding. The Recorder's Office will distribute funds due to the Effingham County Treasurer by the end of the month following collection. The Treasurer's Office will review procedures for the disbursement of the personal property replacement tax upon receipt of said tax.

**EFFINGHAM COUNTY, ILLINOIS
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
YEAR ENDED NOVEMBER 30, 2022**

Section III – Findings and Questioned Costs – Major Federal Programs

2022 – 006

Federal Department of Treasury

Federal Program Name: Coronavirus State and Local Fiscal Recovery Funds (ARPA)

Assistance Listing Number: 21.027

Federal Award Identification Number and Year: N/A

Pass-Through Agency: N/A

Pass-Through Number(s): N/A

Award Period: March 3, 2021 – December 31, 2024

Type of Finding:

- Material Weakness in Internal Control over Compliance
- Other Matters

Criteria or specific requirement: Uniform Grant Guidance (2 CFR 200.318) requires the non-federal entity to maintain records sufficient to detail the history of procurement. In the case of an emergency or sole source purchase, proper documentation of this must be maintained. Additionally, federal guidelines require the entity to have procedures documented to verify the vendor of a covered transaction (over \$25,000) is not debarred, suspended, or otherwise excluded from participating in the transaction, prior to entering into a covered transaction.

Condition: Purchases deemed “sole source” purchases were not adequately documented supporting the lack of traditional procurement processes being required. Additionally, the County did not complete suspension and debarment procedures for covered transactions.

Questioned costs: None.

Context: In the testing of 5 of 6 procurement transactions, the County did not maintain appropriate documentation to support why they were noncompetitive purchases. Additionally, in the testing of 5 of 6 suspension and debarment eligible transactions, the County did not complete the required suspension and debarment procedures required for covered transactions.

Cause: With new federal funding opportunities arising due to the COVID-19 pandemic, and new guidance related to those grants, grant personnel were not aware of these requirements.

Effect: Lack of internal control procedures can lead to noncompliance with grant requirements.

Repeat Finding: N/A

**EFFINGHAM COUNTY, ILLINOIS
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
YEAR ENDED NOVEMBER 30, 2022**

Section III – Findings and Questioned Costs – Major Federal Programs (Continued)

2022 – 006 (Continued)

Recommendation: We recommend ensuring procurement procedures are complete and in accordance with Uniform Grant Guidance for any federal purchases, and available for all departments. This procedure should include verifying vendors or contractors are not suspended or debarred from doing business, prior to contracting them, and maintaining documentation of this. The County should consider adding a Federal Procurement Checklist that covers the applicable Uniform Guidance requirements that should be completed when making purchases, and retained with other procurement documents.

Views of responsible officials: There is no disagreement with the audit finding.



CLA (CliftonLarsonAllen LLP) is a network member of CLA Global. See CLAGlobal.com/disclaimer. Investment advisory services are offered through CliftonLarsonAllen Wealth Advisors, LLC, an SEC-registered investment advisor.