Howard County Public School System Single Audit Report June 30, 2022



<u>Index</u>

	<u>Page</u>
Independent Auditor's Report on Compliance for Each Major Federal Program; Report on Internal Control over Compliance; and Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance	2
Schedule of Expenditures of Federal Awards	5
Notes to Schedule of Expenditures of Federal Awards	9
Schedule of Findings and Questioned Costs	11



Independent Auditor's Report on Compliance for Each Major Federal Program; Report on Internal Control over Compliance; and Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

To the Board of Education Howard County, Maryland

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited the Howard County Public School System's ("HCPSS") 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 HCPSS's major federal programs for the year ended June 30, 2022. HCPSS's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

In our opinion, HCPSS 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 June 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 ("Government Auditing Standards"); and the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance"). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of HCPSS 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 HCPSS'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 HCPSS's major federal programs.



Auditor's Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and to express an opinion on HCPSS'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 HCPSS'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 HCPSS'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 HCPSS'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 HCPSS'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.

Report on Internal Control over Compliance

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or 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. 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 consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

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.

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.

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

We have audited the financial statements of the governmental activities, the business-type activities, each major fund, and the aggregate remaining fund information of HCPSS, as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise HCPSS's basic financial statements. We issued our report thereon, dated September 30, 2022, 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 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.

Baltimore, Maryland January 27, 2023

CohnReynickZZF

Federal grantor/pass-through grantor/program or cluster title	Federal assistance listing number	Pass-through entity identifying number	Passed through to subrecipients	Total federal expenditures
U.S. Department of Agriculture				
Passed Through Maryland State Department of Education Child Nutrition Cluster School Breakfast Program	10.553	None provided	N/A	\$ 5,085,764
· ·		·		
National School Lunch Program National School Lunch Program - Non-Cash Commodities	10.555 10.555	None provided None provided	N/A N/A	21,795,901 1,472,419
Total National School Lunch Program				23,268,320
Summer Food Service Program for Children	10.559	None provided	N/A	757,730
Total Child Nutrition Cluster				29,111,814
Child and Adult Care Food Program	10.558	None provided	N/A	109,309
Total U.S. Department of Agriculture				29,221,123
U.S. Department of the Treasury				
Passed Through Howard County, Maryland COVID-19 - Coronavirus Relief Fund	21.019	21130008	N/A	500,293
Passed Through Howard County, Maryland Coronavirus State and Local Fiscal Recovery Funds COVID-19 - FY 22 ARP SLRF	21.027	22130021	N/A	9,999,988
Passed Through Maryland State Department of Education Coronavirus State and Local Fiscal Recovery Funds COVID-19 - FY21 ARP Supplemental School Reopening COVID-19 - FY21 ARP Trauma & Behavioral Health COVID-19 - FY21 ARP Supplemental Summer School (inactive) COVID-19 - FY22 ARP Supplemental Instruction and Tutoring	21.027 21.027 21.027 21.027	21179201 21180301 21182801 21184501	N/A N/A N/A N/A	569,901 117,293 639,681 221,695
Total Coronavirus State and Local Fiscal Recovery Funds				11,548,558
Total U.S. Department of the Treasury				12,048,851
U.S. Department of Education				
Passed Through Maryland State Department of Education Title 1 Grants to Local Educational Agencies FY 20 Title I FY 21 Title I FY 22 Title I	84.010 84.010 84.010	20099601 21111301 22156401	N/A N/A N/A	172 2,909,844 2,480,367
Total Title 1 Grants to Local Educational Agencies				5,390,383
Passed Through Maryland State Department of Education Special Education Cluster (IDEA) Special Education - Grants to States				
FY20 PPPS Passthrough FY20 Part B 611 CCEIS FY20 AEP LIR FY20 Secondary Transition LIR FY21 Passthrough FY21 Part B 611 CCEIS FY21 SECAC FY21 Part B 611 FY22 Early Childhood LIR FY21 Secondary Transition LIR FY21 AEP Reading FY22 CLIG Part B 611 FY22 Passthrough FY22 Part B 611 CCEIS FY22 Part B 611 FAMILY Support System FY22 ARP Part B 611 Passthrough	84.027 84.027 84.027 84.027 84.027 84.027 84.027 84.027 84.027 84.027 84.027 84.027 84.027 84.027 84.027	20027802 20027803 20117302 20117303 21027001 21027003 21027004 21028701 21121001 21121002 21121003 22014801 22040601 22040603 22040604 22040605 22119201	N/A N/A N/A N/A N/A N/A N/A N/A N/A N/A	50 424,057 85,477 87,093 1,073,532 732,464 525 100,784 (763) 61,640 107,834 88,079 7,171,806 30,860 1,280 16,145 897,466
Total Special Education - Grants to States				10,878,329

Federal grantor/pass-through grantor/program or cluster title	Federal assistance listing number	Pass-through entity identifying number	Passed through to subrecipients	Total federal expenditures
Special Education - Preschool Grants				
FY19 PPPS Passthrough (inactive)	84.173	19026602	N/A	2
FY20 Preschool Passthrough (inactive)	84.173	20026601	N/A	40,190
FY20 CCEIS Preschool (inactive)	84.173	20026603	N/A	41,117
FY21 I&T Part B 619 Extended (inactive)	84.173	20185702	N/A	511
FY21 Preschool Passthrough FY21 PPPS Preschool	84.173 84.173	21040601 21040602	N/A N/A	86,295 1
FY22 Part B 619 Preschool Passthrough	84.173	22036501	N/A	134,786
FY22 Part B 619 Preschool Passthrough PPPSS	84.173	22036502	N/A	4,593
FY22 Part B 619 Discretionary	84.173	22051301	N/A	9,000
FY22 Part B 619 Extended	84.173	22051302	N/A	2,863
FY22 ARP Part B 619 Preschool Passthrough	84.173	22118901	N/A	88,760
FY22 ARP Part B 619 Preschool Passthrough PPPSS	84.173	22118902	N/A	3,358
Total Special Education - Preschool Grants				411,476
Total Special Education Cluster				11,289,805
Passed Through Maryland State Department of Education				
Special Education - Grants for Infants and Families				
FY21 I&T Part C	84.181	21030901	N/A	65,992
FY21 I&T Part C Discretionary	84.181	21030902	N/A	45,832
FY22 CLIG Part C FY22 Part C SSIP	84.181 84.181	22032801 22032802	N/A N/A	218,786 14,027
FY22 IDEA-ARP Extended IFSP Readiness	84.181	22175201	N/A	2,328
Total Special Education - Grants for Infants and Families				346,965
Passed Through Maryland State Department of Education				
Career and Technical Education - Basic Grants to States	04.040	04054004	N1/A	440.007
FY21 Perkins FY22 Perkins	84.048 84.048	21054201 22052301	N/A N/A	113,397 305,007
Total Career and Technical Education Pagin				
Total Career and Technical Education - Basic Grants to States				418,404
Passed Through Maryland State Department of Education				
Education for Homeless Children and Youth				
FY21 Homeless Education Assistance Program	84.196	21131901	N/A	71,825
FY22 Homeless Education Assistance Program	84.196	22157801	N/A	17,554
Total Education for Homeless Children and Youth				89,379
Passed Through Maryland State Department of Education				
Twenty-First Century Community Learning Centers				
FY21 Bridges to Success	84.287	21080301	N/A	122,446
FY21 Bridges to Higher Learning	84.287	21080601	N/A	46,697
FY22 Bridges to Higher Learning	84.287	22088701	N/A	399,958
FY22 Bridges to Success	84.287	22089701	N/A	399,979
Total Twenty-First Century Community Learning Centers				969,080
Passed Through Maryland State Department of Education				
English Language Acquisition State Grants	04.00=	00070404	N1/A	440.000
FY20 ELA	84.365	20073401	N/A	116,908
FY20 ELA Immigrant FY21 Title III ELA Grant	84.365 84.365	20073402 21047001	N/A N/A	9,819 113,986
FY22 Title III ELA GIAIR	84.365	22066601	N/A	10,877
Total English Language Acquisition State Grants				251,590

Federal grantor/pass-through grantor/program or cluster title	Federal assistance listing number	Pass-through entity identifying number	Passed through to subrecipients	Total federal expenditures
Passed Through Maryland State Department of Education				
Supporting Effective Instruction State Grants	0.4.00=	40407404	N1/A	00.004
FY19 Title IIA Teacher Development	84.367	19137401	N/A	93,801
FY20 Title IIA FY21 Title IIA Teacher Development	84.367	20105701	N/A N/A	814,028
FY22 Title IIA Supporting Effective Instruction	84.367 84.367	21079701 22105701	N/A N/A	445,329 71,828
Total Supporting Effective Instruction State Grants				1,424,986
Passed Through Maryland State Department of Education				
Comprehensive Literacy Development	04.074	20124701	NI/A	101.011
FY20 Striving Readers Comprehensive Literacy	84.371	20124701	N/A	184,914
Total Comprehensive Literacy Development				184,914
Passed Through Maryland State Department of Education				
Student Support and Academic Enrichment Program				
FY20 Title IV, Part A	84.424	20157401	N/A	248,819
FY21 Title IV, Part A	84.424	21137201	N/A	323,508
FY22 Lead Higher Project FY22 Title IV, Part A	84.424 84.424	22084801 22152301	N/A N/A	50,000 10,400
1 122 THE IV, I dit A	04.424	22132301	IN/A	10,400
Total Student Support and Academic Enrichment Program				632,727
Passed Through Maryland State Department of Education				
Education Stabilization Fund COVID-19 - FY20 ESSER	84.425D	20179601	N/A	161,691
COVID-19 - 1 120 ESSER COVID-19 - GEER Fund	84.425C	20179001	N/A	14,071
COVID-19 - FY21 GEER Competitive Grant	84.425C	20201801	N/A	209,284
COVID-19 - FY21 ESSER Reopening	84.425D	20203701	N/A	351,230
COVID-19 - FY21 ESSER II Grant	84.425D	20223501	N/A	6,984,580
COVID-19 - FY21 Achieving Academic Equity for Black Boys	84.425D	21173001	N/A	92,044
COVID-19 - FY22 ESSER III	84.425D	21193701	N/A	15,866,303
COVID-19 - FY22 ARP Homeless Children and Youth Part I	84.425D	22157901	N/A	1,535
COVID-19 - FY22 Expanding AP Opportunities for Low Income Students	84.425D	22159401	N/A	35,579
Total Education Stabilization Fund				23,716,317
Impact Aid	84.041	N/A	N/A	145,107
Total U.S. Department of Education				44,859,657

Federal grantor/pass-through grantor/program or cluster title	Federal assistance listing number	Pass-through entity identifying number	Passed through to subrecipients	Total federal expenditures
U.S. Department of Health and Human Services Passed Through Maryland State Department of Education Every Student Succeeds Act/Preschool Development Grants FY21 I&T PDG	93.434	21145801	N/A	9,208
Passed Through US Health Resources & Services Administration COVID-19 - Provider Relief Fund and American Rescue Plan (ARP) Rural Distribution	93.498	21130021	N/A	53,296
CCDF Cluster Child Care and Development Block Grant FY22 I&T Blueprint for MD Future	93.575	22023702	N/A	192,692
Public Health Emergency Response: Cooperative Agreement for Emergency Response: Public Health Crisis Response COVID-19 - FY23 HCHD Covid-19 Public Health Workforce Supplemental	93.354	23130001	N/A	100,424
Total U.S. Department of Health and Human Services				355,620
U.S. Department of Justice				
STOP School Violence FY20 STOP School Violence	16.839	20130034	N/A	31,344
Federal Communications Commission FY22 Emergency Connectivity Fund Program	32.009	None provided	N/A	8,408,291
Passed Through the Governor's Office of Crime Control and Prevention Coronavirus Emergency Supplemental Funding Program COVID-19 - FY21 HCPSS Coronavirus Emergency Program	16.034	21130022	N/A	63,892
U.S. Department of Defense - Direct Awards Language Grant Program				
FY22 STARTALK Summer Grant FY22 STARTALK Pilot	12.900 12.900	None provided None provided	N/A N/A	78,439 25,458
Total Language Grant Program				103,897
GenCyber Grants Program FY21 GenCyber - PVMS	12.903	None provided	N/A	5,356
Total U.S. Department of Defense				109,253
Total Expenditures of Federal Awards				\$ 95,098,031

Notes to Schedule of Expenditures of Federal Awards June 30, 2022

Note 1 - Reporting entity

The accompanying schedule of expenditures of federal awards (the "Schedule") includes the federal award activity of the Howard County Public School System ("HCPSS"), a component unit of Howard County, Maryland, under programs of the federal government for the year ended June 30, 2022.

Note 2 - Summary of significant accounting policies

The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("Uniform Guidance"). Expenditures reported on the Schedule are reported on the modified accrual basis of accounting. This basis of accounting is fully described in the Summary of Significant Accounting Policies to HCPSS's financial statements. 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. Because the Schedule presents only a selected portion of operations of HCPSS, it is not intended to and does not present the financial position, changes in net position, or cash flows of HCPSS.

The value of food commodities donated by the United States Department of Agriculture (the "Department") is determined by the Department and is included in revenues and expenditures in the year received.

Note 3 - Relation to the financial statements and federal financial reports

Amounts reported in the Schedule agree with amounts reported in HCPSS's basic financial statements and the related federal financial reports submitted by HCPSS, except as indicated below.

Federal revenues per the financial statements are reconciled to the Schedule as follows:

Total federal revenues per financial statements	\$ 95,251,991
Federal revenues reported as local intergovernmental revenue on financial statements	692,984
Provider Relief Funds reported in the Schedule but recorded as prior year revenue	20,775
Federal revenues not included in the Schedule Medical assistance revenue U.S. ROTC revenue	 (640,826) (226,893)
Total federal revenues per Schedule of Expenditures of Federal Awards	\$ 95,098,031

Notes to Schedule of Expenditures of Federal Awards June 30, 2022

Note 4 - COVID-19 Provider Relief Fund and American Rescue Plan ("ARP") Rural Distribution - Assistance Listing Number 93.498

For the U.S. Department of Health and Human Services ("HHS") awards related to the Provider Relief Fund ("PRF") and American Rescue Plan ("ARP") Rural Distribution program, HHS has indicated that the amounts on the schedule be reported corresponding to reporting requirements of the HRSA PRF Reporting Portal. Payments from HHS for PRF are assigned to 'Payment Received Periods' (each, a Period) based upon the date each payment from the PRF was received. Each Period has a specified Period of Availability and timing of reporting requirements. Entities report into the HRSA PRF Reporting Portal after each Period's deadline to use the funds (i.e., after the end of the Period of Availability).

The Schedule includes \$20,775 received from HHS between July 1, 2020 through December 31, 2020. In accordance with guidance from HHS, this amount is considered Period 2 funding. Such amounts were recognized in the fiscal year ended June 30, 2021 as grant revenue in the year expensed in the financial statements.

The Schedule includes \$32,521 received from HHS between January 1, 2021 through June 30, 2021. In accordance with guidance from HHS, this amount is considered Period 3 funding. Such amounts were recognized in the fiscal year ended June 30, 2022 as grant revenue in the year expensed in the financial statements.

Provider Relief Funds of \$20,775 related to Period 2 were included on the 2021 Schedule of Expenditures of Federal Awards ("SEFA"). Per guidance released by HHS in July 2021, recipients of Provider Relief Funds for Period 2 with a June year-end should have included those amounts in the 2022 SEFA only.

Note 5 - Indirect cost rate

HCPSS has not elected to use the 10-percent de minimis indirect cost rate allowed under the Uniform Guidance.

Schedule of Findings and Questioned Costs Year Ended June 30, 2022

A. Summary of Auditor's Results

Finan	cial Statements						
• •	of auditor's report issued on whether the find ments audited were prepared in accordance				Unmod	ified	opinion
Intern	al control over financial reporting:						
•	Material weakness(es) identified?	X	Yes		_ No		
•	Significant deficiency(ies) identified?		Yes	X	_ None re	porte	ed
Nonco noted	ompliance material to financial statements?		Yes	X_	_ No		
Fede	ral Awards						
Intern	al control over major programs:						
•	Material weakness(es) identified?		Yes	X	_ No		
•	Significant deficiency(ies) identified?		Yes	X	_ None reported		
Type progra	of auditor's report issued on compliance fo ams:	r majo	or federa	al	Unmod	ified	opinion
be rep	nudit findings disclosed that are required to corted in accordance with 2 CFR 16(a)?		_ Yes	X	_ No		
Identi	fication of major programs:						
	Name of federal program or cluster		_		eral ance umbers	e	Federal xpenditures
Educ	ration Stabilization Fund			<u>g</u>	84.425	\$	23,716,317
							, ,
	navirus State and Local Fiscal Recovery Fu	unas			21.027	\$	11,548,558
Emei	rgency Connectivity Fund Program				32.009	\$	8,408,291
Dollar progra	r threshold used to distinguish between Tyր ams:	oe A a	nd Typ	e B	\$2,	852,	941
Audite	ee qualified as low-risk auditee:		Yes	Х	No		

Schedule of Findings and Questioned Costs Year Ended June 30, 2022

B. Findings - Financial Statement Audit

2022-001 - Revenue Recognition

Statement of Condition: During the year end closing process, HCPSS recorded inaccurate adjustments to revenue in the Restricted Programs Fund.

Criteria: Internal controls over financial reporting should exist to ensure that material misstatements are prevented or detected and corrected by management in a timely manner.

Cause: Management did not have a sufficient review process in place over the adjustments related to revenue in the Restricted Programs Fund.

Effect: Management may produce interim or annual financial statements that are materially misstated.

Recommendation: We have the following recommendation related to the internal control processes that impact revenue recognition in the Restricted Programs Fund:

 We recommend that HCPSS provide proper oversight and review of the recording and approval processes related to revenue recognition. HCPSS needs to ensure that they have multiple levels of resources that have a sufficient understanding of the laws, agreements, and accounting principles pertinent to the grants and similar programs associated with the fund.

View of Responsible Officials Pertaining to 2022-001

 HCPSS is in the process of reengineering its internal processes for the accounting of its Restricted Programs Fund. This includes two additional hires - a grant budget analyst and grant accountant - who will support the Restricted Programs Fund in providing enhanced oversight and compliance with generally accepted accounting principles throughout the year.

C. Findings and Questioned Costs - Major Federal Award Programs Audit

No matters were reported.



Independent Member of Nexia International cohnreznick.com