

**CENTENNIAL BOARD OF
COOPERATIVE EDUCATIONAL SERVICES
GREELEY, COLORADO**

SINGLE AUDIT REPORT

**For the Year Ended
June 30, 2024**

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Mayberry & Company, LLC

Certified Public Accountants

Member of the American Institute of Certified Public Accountants
Governmental Audit Quality Center
and Private Company Practice Section

Executive Board
Centennial Board of Cooperative Educational Services
Greeley, Colorado

Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance *Government Auditing Standards*

Independent Auditors' Report

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 financial statements of the governmental activities and major fund of the Centennial Board of Cooperative Educational Services (the "BOCES") as of and for the year ended June 30, 2024, and the related notes to the financial statements, which collectively comprise the BOCES' basic financial statements, and have issued our report thereon dated February 19, 2025.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the BOCES' internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the BOCES' internal control. Accordingly, we do not express an opinion on the effectiveness of the BOCES' 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.

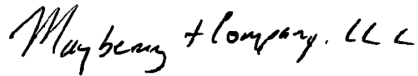
Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the BOCES' 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 determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under Government Auditing Standards.

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.

Handwritten signature in cursive script that reads "Mayberry + Company, LLC".

Englewood, Colorado
June 3, 2025

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Executive Board
Centennial Board of Cooperative Educational Services
Greeley, Colorado

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

Independent Auditors' Report

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited the Centennial Board of Cooperative Educational Services' (the "BOCES") 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 the BOCES' major federal programs for the year ended June 30, 2024. The BOCES' major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Qualified Opinion on Title I Grants to Local Educational Agencies

In our opinion, except for the noncompliance described in the Basis for Qualified and Unmodified Opinions section of our report, the BOCES complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on Title I Grants to Local Educational Agencies for the year ended June 30, 2024.

Unmodified Opinion on Each of the Other Major Federal Programs

In our opinion, the BOCES complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its other major federal programs identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs for the year ended June 30, 2024.

Basis for Qualified and Unmodified Opinions

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

We are required to be independent of the BOCES 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 qualified and unmodified opinions on compliance for each major federal program. Our audit does not provide a legal determination of the BOCES' compliance with the compliance requirements referred to above.

Matters Giving Rise to Qualified Opinion on Title I Grants to Local Educational Agencies

- As described in the accompanying schedule of findings and questioned costs, the BOCES did not comply with requirements regarding: Title I Grants to Local Educational Agencies as described in finding number 2024-001 for Costs Allowed.
- Compliance with such requirements is necessary, in our opinion, for the BOCES to comply with the requirements applicable to that program.

Responsibilities of Management for Compliance

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

Auditor's Responsibility for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the BOCES' 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 BOCES' 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 judgement 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 BOCES' compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of BOCES' 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 BOCES' 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

Government Auditing Standards requires the auditor to perform limited procedures on BOCES' response to the noncompliance findings identified in our compliance audit described in the accompanying schedule of findings and questioned costs. BOCES' 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 Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we did identify certain deficiencies in internal control over compliance that we consider to be material weaknesses and significant deficiencies.

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. We consider the deficiency in internal control over compliance described in the accompanying schedule of findings and questioned costs as item 2024-001 to be a material weakness.

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 the BOCES' response to the internal control over compliance findings identified in our compliance audit described in the accompanying schedule of findings and questioned costs. Example Entity'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.

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

We have audited the financial statements of the BOCES' as of and for the year ended June 30, 2024, and have issued our report thereon dated February 19, 2025, 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 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 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 financial statements as a whole.

Mayberry + Company, LLC

Englewood, Colorado

June 3, 2025

CENTENNIAL BOARD OF COOPERATIVE EDUCATIONAL SERVICES

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

YEAR ENDED JUNE 30, 2024

Summary of Auditors' Results

Financial Statements

Type of auditors' report issued: unmodified

Internal control over financial reporting:

- Material weakness identified? yes no
- Significant deficiencies identified that are not considered to be material weaknesses? yes no

Noncompliance material to financial statements noted?

yes no

Federal Awards

Internal control over major programs:

- Material weakness identified? yes no
- Significant deficiencies identified that are not considered to be material weaknesses? yes no

Type of auditors' report issued on compliance for major programs: qualified and unmodified

Any audit findings disclosed that are required to be reported in accordance with the Uniform Guidance?

yes no

Identification of major programs:

84.010 Title I Grants to Local Educational Agencies

Special Education Cluster

84.027 Special Education Grants to States

84.173 Special Education Preschool Grants

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

Auditee qualified as low-risk auditee? yes no

CENTENNIAL BOARD OF COOPERATIVE EDUCATIONAL SERVICES

SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued)

YEAR ENDED JUNE 30, 2024

II - Findings relating to the financial statement audit as required to be reported in accordance with generally accepted government auditing standards.

A. Material Weaknesses in Internal Control

The audit of the financial statements of the Centennial Board of Cooperative Educational Services, as of and for the year ended June 30, 2024, did not disclose any material weaknesses or significant deficiencies in internal controls over financial reporting.

B. Compliance Findings

The audit of the financial statements of the Centennial Board of Cooperative Educational Services, as of and for the year ended June 30, 2024, did not disclose any instances of noncompliance with requirements with certain provisions of laws, regulations, and grants that were material to those financial statements.

III - Findings and Questioned Costs for Federal Awards

A. Material Weaknesses in Internal Control

The audit of the major programs of the Centennial Board of Cooperative Educational Services, as of and for the year ended June 30, 2024, did disclose a material weakness in internal controls over certain provisions of laws, regulations, and grants requirements that correlate to the compliance finding described below as finding 2024-001 below.

B. Compliance Findings

The audit of the major programs of the Centennial Board of Cooperative Educational Services, as of and for the year ended June 30, 2024, did disclose instances of noncompliance with requirements with certain provisions of laws, regulations, and grants as further outlined as finding 2024-001 below.

CENTENNIAL BOARD OF COOPERATIVE EDUCATIONAL SERVICES

SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued)

YEAR ENDED JUNE 30, 2024

**84.010 TITLE I GRANTS TO LOCAL EDUCATIONAL AGENCIES – DEPARTMENT OF EDUCATION – COLORADO
DEPARTMENT OF EDUCATION PASS-THROUGH**

2024-001 ALLOWABLE COSTS

1. **Criteria:** The cost principles in 2 CFR Part 200, subpart E (Cost Principles), prescribe the cost accounting requirements associated with the administration of Federal awards by (1) States, local governments, and Indian tribes.
2. **Condition:** Multiple BOCES member districts did not provide adequate documentation to support the salary and benefit costs that they submitted for BOCES reimbursement as required by the cost accounting requirements.
3. **Context:** While the BOCES is ultimately responsible for properly accounting for grant eligible costs, the BOCES does "flowthrough" reimbursement to its member districts for salaries and benefits that are incurred directly by those districts. As such, the BOCES requires the member districts to retain proper support of Time and Effort at the district level which is to be available upon request. In multiple instances the Time and Effort documentation was either not provided or not adequate to support the allowable costs.
4. **Cause:** It appears that prior training provided by the BOCES to the member districts with regards to costs documentation is no longer being followed. As evidenced in the review of BOCES level salaries and benefits charged to other federal grants, BOCES level documentation is adequate and supports the belief that BOCES staff understands allowable costs documentation requirements. In addition, audits prior to June 30, 2023, have not reflected this level of documentation deficiency at the member districts. See Schedule of Prior Year Findings Finding 2023-002 regarding a similar issue noted for the year ended June 30, 2023.
5. **Effect:** Significant amounts of the salaries and benefits charged to the grant were not adequately supported and are therefore considered questioned costs as discussed below.
6. **Questioned Cost:** We tested member "flowthrough" costs which represented 93% of the \$1,266,027 of costs charged to the grant. We further sampled approximately 79% of those "flowthrough" expenses to determine whether the costs were allowable. Our sample included costs submitted by six member districts. We believe our sampling represents a statistically valid sample. Two of the member districts provided adequate documentation, representing approximately 75% of the total dollars sampled.

Of the remaining four districts, two districts, representing 6% of the remaining dollars sampled, submitted time and effort documentation that were for shared employees that did not include adequate time records supporting the percentage of the employees charged to the grant. One of the remaining districts, around 7% of the sampled dollars, provided detail payroll records but did not provide any time and effort documentation. The final district, representing approximately 12% of the sampled dollars, did not provide any identifiable personnel records or time and effort documentation. The only information provided by this district was a batched payroll general ledger.

In total 24.49% of the sampled costs were not deemed adequately supported. This extrapolates to an estimated \$268,488 in questioned costs for the 84.010 Title I grant.

CENTENNIAL BOARD OF COOPERATIVE EDUCATIONAL SERVICES

SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued)

YEAR ENDED JUNE 30, 2024

**84.010 TITLE I GRANTS TO LOCAL EDUCATIONAL AGENCIES – DEPARTMENT OF EDUCATION – COLORADO
DEPARTMENT OF EDUCATION PASS-THROUGH**

2024-001 ALLOWABLE COSTS

7. **Recommendation:** As time and effort documentation was noted as an issued in the prior year Single Audit for a different federal grant, we will reiterate and strengthen our recommendation. We are confident that the BOCES staff understands the documentation requirements for grant expenditures. However, the BOCES has not adequately followed up on prior training of member district staff to insure that they are also maintaining adequate documentation. As such, the BOCES will want to reiterate documentation requirements annually. The BOCES may also want to require additional support at the time that reimbursement requests are submitted to insure that the member districts are documenting their disbursements timely. We will continue to recommend that the BOCES ensure, as part of their annual grant closeout, that they have all documentation required to support grant expenditures maintained at the BOCES level in lieu of requesting that information on an as needed basis.
8. **Views of Responsible Officials:** See Corrective Action Plan on page 15-16.

CENTENNIAL BOARD OF COOPERATIVE EDUCATIONAL SERVICES

SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued)

YEAR ENDED JUNE 30, 2024

VI – Schedule of Prior Year Findings

84.011 MIGRANT EDUCATION PROGRAM – DEPARTMENT OF EDUCATION – COLORADO DEPARTMENT OF EDUCATION PASS-THROUGH

2023-001 ACTIVITIES ALLOWED

June 30, 2024 Status Update: Upon review for fiscal year 2024, it appears the BOCES has taken corrective action by amending its budget processes to correctly categorize costs as appropriate.

1. **Criteria:** - Local educational agencies use funds in accordance **with the agreement with the State educational agency** to (a) identify eligible migratory children and their needs; (b) provide instructional and support services that address the identified needs of the eligible children; and (c) to support such objectives through related activities such as, but not limited to, professional development, parental involvement, and transfer of student records. **(Emphasis added).**
2. **Condition:** The BOCES submitted a budget that was approved by the Colorado Department of Education outlining the expenditure of certain grant dollars for salaries and benefits to support their Migrant Education Program. These funds were ultimately paid to an outside contractor without an approved budget revision being submitted to the State. The costs were allowable under grant guidelines.
3. **Context:** The BOCES coded these expenditures to salaries, benefits and supplies expense throughout the year as that was how they were being billed by the third-party contractor. Subsequent to year end, the BOCES reclassified the salary and benefit portion to purchased professional services. As this was subsequent to year end, the BOCES could not file a budget revision with the State. Based on discussions with the client they did not appear to be treating these payments similar to their “flowthrough” dollars to their member district’s rather than as an independent contractor.
4. **Cause:** The BOCES did not correctly account for the third-party activity until subsequent to year end.
5. **Effect:** The BOCES spent funds for activities that were theoretically, but not actually, approved by the State.
6. **Recommendation:** The BOCES should properly account for its activities both in the budget process and in its formal accounting. This will also help ensure that any other requirements related to contracting are also appropriately followed.
7. **Management Response:** Centennial BOCES will review the expected activities to ensure that they are appropriately listed on the budget submitted to CDE for approval and properly coded throughout the year.
8. **Auditor Followup:** Upon review for fiscal year 2024, it appears the BOCES has taken corrective action by amending its budget processes to correctly categorize costs as appropriate.

CENTENNIAL BOARD OF COOPERATIVE EDUCATIONAL SERVICES

SCHEDULE OF FINDINGS AND QUESTIONED COSTS (Continued)

YEAR ENDED JUNE 30, 2024

VI – Schedule of Prior Year Findings (Continued)

84.011 MIGRANT EDUCATION PROGRAM – DEPARTMENT OF EDUCATION – COLORADO DEPARTMENT OF EDUCATION PASS-THROUGH

2023-02 ALLOWABLE COSTS

June 30, 2024 Status Update: This finding is still applicable. Time and effort documentation at the member district level is still a cause for concern as discussed in finding 2024-001.

1. **Criteria:** The cost principles in 2 CFR Part 200, subpart E (Cost Principles), prescribe the cost accounting requirements associated with the administration of Federal awards by (1) States, local governments, and Indian tribes.
2. **Condition:** One of the BOCES member districts did not submit reasonable documentation to support the Time and Effort reporting required by the cost accounting requirements.
3. **Context:** While the BOCES is ultimately responsible for properly accounting for grant eligible costs, the BOCES does "flowthrough" reimbursement to its member districts for salaries and benefits that are incurred directly by those districts. As such, the BOCES requires the member districts to retain proper support of Time and Effort at the district level which is to be available upon request. In one instance, while the support for the Time and Effort was submitted to the BOCES when requested, auditor review of that documentation lead to questions about the nature of when that documentation was completed. While the employees in question were not subject to specific timekeeping requirements as they were not allocated employees, the actual Time and Effort certifications were not completed timely relative to the underlying grant expenditures.
4. **Cause:** The specific cause could not be identified, however, the documentation provided evidence that Time and Effort certifications were not completed timely and that both the BOCES and district internal controls did not identify this failure.
5. **Effect:** While the BOCES was able to provide Time and Effort documentation for the underlying personnel costs, the timing of those certifications is being questioned.
6. **Recommendation:** Due to the potential of ongoing staffing changes at the member district level, the BOCES will want to reiterate documentation requirements annually. The BOCES may also want to start requesting Time and Effort documentation as it is completed by the member districts to ensure that they are complying with the documentation requirements. We would recommend that the BOCES ensure, as part of their annual grant closeout, that they have all documentation required to support grant expenditures maintained at the BOCES level in lieu of requesting that information on an as needed basis.
7. **Management Response:** Centennial BOCES will begin monitoring and collecting monthly time and effort for all listed employees of subgrantees. Centennial BOCES will continue to collect time and effort documentation within Centennial BOCES staff. The BOCES will treat subgrantee employees as if they were Centennial BOCES employees regarding collection of time and effort reports following appropriate policies and procedures. At fiscal year-end a reconciliation of all documents required, including time and effort documentation, will be completed.

Centennial BOCES
Schedule of Expenditures of Federal Awards By Grant
For the Year Ended June 30, 2024

Federal Grantor/Program or Cluster Title	Federal CFDA	Pass-through Grantor and Number	Federal Expenditures
Special Education Cluster (IDEA)-Cluster			
Department of Education			
Special Education Grants to States	84.027	Colo Dept of Education,4027	\$ 1,839,649
Special Education Preschool Grants	84.173	Colo Dept of Education,4173	45,738
Total Special Education Cluster (IDEA)-Cluster			1,885,387
Other Programs			
Department of Education			
Title I Grants to Local Educational Agencies	84.010	Colo Dept of Education,4010	1,266,027
Migrant Education State Grant Program	84.011	Colo Dept of Education,4011	2,123,177
Career and Technical Education -- Basic Grants to States	84.048	State Board of Community Colleges and Occupational Education,4048	33,970
Education for Homeless Children and Youth	84.196	Colo Dept of Education,5196	65,369
English Language Acquisition State Grants			
English Language Acquisition State Grants	84.365	Colo Dept of Education,4365	128,196
English Language Acquisition State Grants	84.365	Colo Dept of Education,5365	6,457
English Language Acquisition State Grants	84.365	Colo Dept of Education,7365	5,069
Total English Language Acquisition State Grants			139,722
Supporting Effective Instruction State Grants (formerly Improving Teacher Quality State Grants)	84.367	Colo Dept of Education,4367	243,401
Student Support and Academic Enrichment Program	84.424	Colo Dept of Education,4424	111,342
Education Stabilization Fund Under The Coronavirus Aid, Relief,And Economic Security Act			
Education Stabilization Fund Under The Coronavirus Aid, Relief,And Economic Security Act	84.425	Colo Dept of Education,4418 (84.425D)	131,911
Education Stabilization Fund Under The Coronavirus Aid, Relief,And Economic Security Act	84.425	Colo Dept of Education,8425 (84.425D)	66,467
Total Education Stabilization Fund Under The Coronavirus Aid, Relief,And Economic Security Act			198,378
Total Other Programs			4,181,386
Total Expenditures of Federal Awards			\$ 6,066,773

The accompanying notes are an integral part of this schedule

CENTENNIAL BOARD OF COOPERATIVE EDUCATIONAL SERVICES

NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

YEAR ENDED JUNE 30, 2024

NOTE 1: BASIS OF PRESENTATION

The accompanying schedule of expenditures of federal awards, (the "Schedule"), includes the federal award activity of the Centennial Board of Cooperative Educational Services, (the "BOCES") under the programs of the federal government for the year ended June 30, 2024. 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). Because the Schedule presents only a selected portion of the operations of the BOCES, it is not intended to and does not present the financial position, changes in net position, or cash flows of the BOCES.

NOTE 2: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Expenditures reported on the Schedule are reported on the modified accrual basis of accounting. 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.

NOTE 3: 10% DE MINIMIS INDIRECT COST RATE

The BOCES did not utilize the 10% de minimis indirect cost rate allowed under the Uniform Guidance.

NOTE 4: SUBRECIPIENTS

There were no subrecipients that received funding from the BOCES for the fiscal year.



CENTENNIAL BOCES

Board of Cooperative Educational Services

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Date: June 3, 2025

To: Mayberry & Company, LLC

From: Erich Dorn, Chief Financial Officer, Centennial BOCES

Memo: Management Response and Corrective Action Plan, re: FY24 Single Audit

Management recognizes that there was inadequate documentation from multiple districts to support salary and benefit costs within the Title I Grants to Local Educational Agencies program. Also, Centennial BOCES recognizes, as the fiscal agent, that it is the entity responsible for compliance with the rules and regulations of the program, including for those activities taking place at each district. As a result, the Chief Financial Officer will work with the Grants Accountant that manages this program and the distribution of funds to these districts. Ultimately, corrective action will have several aspects: general training and education, targeted training and education for those districts needing more support, and follow-up with districts to ensure accountability and integrity with the rules and regulations surrounding finding # 2024-001 cited in this single audit.

The first level of corrective action will be sending resources by email to each district in our ESSA consortium. These resources will focus around the requirements of time and effort, in order to support salary and benefit costs charged to federal funds. These resources will contain informational content around time and effort requirements and citations to the Cost Principles, as well as examples and scenarios to guide districts through the proper process of documenting these costs. These emails will be to both the fiscal and program representatives at each district, and will take place in Fall 2025.

Targeted support will be provided to those districts cited by the auditors as having insufficient time and effort documentation to support the salary and benefits charged to the Title I Grants to Local Educational Agencies program. In addition to the previously named elements, this will include scheduling meetings with the district fiscal representative, district program representative, CBOCES Chief Financial Officer, and CBOCES Grants Accountant. These meetings will take place either through a phone call, Zoom, or in person. In these meetings we will go over why the district documentation was deemed insufficient, and then have a conversation around the resources provided and how we can help bring the district into compliance and sustain that compliance going forward. These meetings will be scheduled during Fall 2025.



CENTENNIAL BOCES

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As the final element of this corrective plan, CBOCES will ask districts to provide their time and effort documents that appropriately support the salary and benefits being charged during FY26. For districts with adequate documentation, we will ask for time and effort documentation at the end of the fiscal year, to support salary and benefit costs for the fiscal year. For districts with inadequate documentation, we will ask for a sample of two months of time and effort documentation during the fiscal year to monitor progress. If sufficient, no further action will be required of the district. If insufficient, CBOCES will contact the district and work to remediate any inadequacies or questions. These districts will also be required to provide time and effort documentation at the end of the fiscal year, to support salary and benefit costs for the fiscal year.

Recognizing the timing of this single audit report, Centennial BOCES will need to address the current time and effort documentation at districts for FY25. Before training activities begin in Fall 2025, CBOCES will ask districts to provide their time and effort documents that appropriately support the salary and benefits being charged during FY25. If found to be insufficient, we will work with applicable districts to correct their documentation and prepare for training activities. This work will be tailored to the specific needs of each district.

For future fiscal years beyond FY26, CBOCES will work to maintain compliance by asking each district to provide time and effort documentation at the end of the fiscal year, to support salary and benefit costs for the fiscal year. Also, new fiscal and program representatives at districts will be provided with the training and education documents named in the second paragraph of this action plan.

Sincerely,

Erich Dorn
Chief Financial Officer
Centennial BOCES