

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

SPECIAL INVESTIGATION REPORT

OF

ECHO HOUSING CORPORATION

VANDERBURGH COUNTY, INDIANA

January 1, 2015 to February 28, 2018



FILED
02/04/2019

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STATE OF INDIANA
AN EQUAL OPPORTUNITY EMPLOYER

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TO: THE OFFICIALS OF THE ECHO HOUSING CORPORATION, VANDERBURGH COUNTY, INDIANA

This is a special investigation report for the ECHO Housing Corporation (ECHO), for the period of January 1, 2015 to February 28, 2018, and is in addition to any other report for ECHO as required under Indiana Code 5-11-1. All reports pertaining to ECHO may be found at www.in.gov/sboa/.

We performed procedures to determine compliance with applicable Indiana laws and uniform compliance guidelines established by the Indiana State Board of Accounts. The Results and Comments contained herein describe the identified reportable instances of noncompliance found as a result of these procedures. Our tests were not designed to identify all instances of noncompliance; therefore, noncompliance may exist that is unidentified.

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

Paul D. Joyce
Paul D. Joyce, CPA
State Examiner

December 31, 2018

ECHO HOUSING CORPORATION RESULTS AND COMMENTS

BACKGROUND

Echo Housing Corporation (ECHO) officials became aware that there were improper disbursements and unauthorized uses of ECHO funds by Stephanie TenBarge (TenBarge), former Executive Director. ECHO received governmental funding from the City of Evansville, U.S. Department of Housing and Urban Development, U.S. Department of Labor, U.S. Department of Justice, and the Indiana Housing and Community Development Authority.

The Indiana State Board of Accounts was notified by Evansville Police Department of the suspected loss. The Indiana State Board of Accounts examined the records and reviewed the accounting procedures of ECHO. The following describes noncompliance with statutes or the *Uniform Compliance Guidelines for Examination of Entities Receiving Financial Assistance from Governmental Sources*.

OVERPAYMENT OF COMPENSATION

In 2016, TenBarge received a payroll check without taxes being withheld resulting in an overpayment of \$255.

In 2017, TenBarge received three payroll checks, totaling \$9,760.29, in addition to the 24 regular payroll checks she was to receive on the 15th and 30th of each month. Of the 3 additional checks, 2 were not included in the payroll system and were not included on TenBarge's Internal Revenue Service Wage and Tax Statement (Form W-2).

The *Uniform Compliance Guidelines for Examination of Entities Receiving Financial Assistance from Governmental Sources*, Section H, states in part:

"Entities receiving financial assistance from state or local governments are subject to the following general requirements: . . .

Retention of financial records, supporting documents, statistical records and all other records pertinent to the agreements for a period of at least three years.

Maintaining a financial management system that provides:

- a. Accurate, current and complete disclosure of the financial results of each government sponsored project or program.
- b. Records that adequately identify the source and application of funds for government sponsored activities. Records shall contain information pertaining to awards, authorizations, obligations, unobligated balances, assets, outlays and income.
- c. Effective control over and accountability for all funds, property and other assets.
- d. Procedures for determining the reasonableness, allowability and allocability of costs in accordance with the provisions of the applicable cost principles and the terms of the grant or other agreement.
- e. Accounting records that are supported by source documentation.

ECHO HOUSING CORPORATION
RESULTS AND COMMENTS
(Continued)

f. Compliance with annual reporting requirements of the Secretary of State and the State Board of Accounts.

g. Compliance with rules, regulations, guidelines, and directives of the Internal Revenue Service and the Indiana Department of Revenue. All questions concerning taxes should be directed to these agencies.

h. Adequate fidelity bonding and insurance coverage if required by the funding agency."

We requested that TenBarge reimburse ECHO in the amount of \$10,015.29 for the overpayment of compensation. (See Summary of Charges, page 14)

UNAUTHORIZED PERSONAL DISBURSEMENTS

Records presented indicated several disbursements made for unauthorized purchases by TenBarge as follows:

- Disbursements to a lawn care business for mowing at TenBarge's personal residence totaling \$4,680.
- A disbursement to the Vanderburgh County Treasurer for personal property taxes in November 2017 with TenBarge's home address and name located on the tax statement in the amount of \$1,918.38.
- A disbursement to a heating and air company on June 3, 2016, for a 1.5 ton heat pump installed at TenBarge's personal residence in the amount of \$4,350.
- Disbursements to two ECHO contractual employees who performed work at TenBarge's personal residence that totaled \$845.50 and \$936.67, respectively. The hours worked at TenBarge's residence were documented with the hours worked for ECHO and were all paid by ECHO.

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ECHO HOUSING CORPORATION
RESULTS AND COMMENTS
(Continued)

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- e. Accounting records that are supported by source documentation.
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- g. Compliance with rules, regulations, guidelines, and directives of the Internal Revenue Service and the Indiana Department of Revenue. All questions concerning taxes should be directed to these agencies.
- h. Adequate fidelity bonding and insurance coverage if required by the funding agency."

We requested that TenBarge reimburse ECHO in the amount of \$12,730.55 for unauthorized personal disbursements. (See Summary of Charges, page 14)

UNAUTHORIZED REIMBURSEMENTS TO TENBARGE

From January 1, 2015 to February 28, 2018, TenBarge received \$83,997.48 in reimbursements. Of that amount, \$71,529 was reimbursed through 109 checks and the remaining \$12,468.48 was reimbursed through 9 of TenBarge's payroll checks.

Documentation was provided from a local accountant that verified \$17,816.83 in ECHO expenses paid for by TenBarge. In addition, TenBarge provided documentation for \$16,940.95 in ECHO expenses that she personally paid for.

The remaining \$49,239.70 could not be verified as ECHO expenses and are considered unauthorized reimbursements to TenBarge.

The *Uniform Compliance Guidelines for Examination of Entities Receiving Financial Assistance from Governmental Sources*, Section H, states in part:

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ECHO HOUSING CORPORATION
RESULTS AND COMMENTS
(Continued)

- c. Effective control over and accountability for all funds, property and other assets.
- d. Procedures for determining the reasonableness, allowability and allocability of costs in accordance with the provisions of the applicable cost principles and the terms of the grant or other agreement.
- e. Accounting records that are supported by source documentation. . . ."

We requested that TenBarge reimburse ECHO in the amount of \$49,239.70 for unauthorized reimbursements to TenBarge. (See Summary of Charges, page 14)

UNDOCUMENTED HEALTH REIMBURSEMENT PAYMENTS

ECHO paid a third-party vendor to administer their Health Reimbursement Program (HRP). The HRP allowed ECHO employees to file claims with the third-party vendor and receive reimbursement for their paid health insurance premiums. The allowable amounts for reimbursement were tiered and were based on the employee's position and longevity.

Each employee was responsible for filing claims with the supporting documentation with the third-party vendor for reimbursement. The third-party vendor reviewed the submitted claims and supporting documentation and would notify ECHO when a claim had been approved to be reimbursed. ECHO would add the HRP reimbursement to the employee's next pay check.

TenBarge submitted HRP claims with the company in 2014, totaling \$2,464.26, of which \$2,108.04 were approved. From January 1, 2015 to February 28, 2018, there were no claims filed by TenBarge with the company and, therefore, no claims were approved for reimbursement. However, TenBarge received \$12,660, \$14,400, \$15,000, and \$1,800 in HRP reimbursements in 2015, 2016, 2017, and 2018, respectively.

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ECHO HOUSING CORPORATION
RESULTS AND COMMENTS
(Continued)

d. Procedures for determining the reasonableness, allowability and allocability of costs in accordance with the provisions of the applicable cost principles and the terms of the grant or other agreement.

e. Accounting records that are supported by source documentation.

f. Compliance with annual reporting requirements of the Secretary of State and the State Board of Accounts.

g. Compliance with rules, regulations, guidelines, and directives of the Internal Revenue Service and the Indiana Department of Revenue. All questions concerning taxes should be directed to these agencies.

h. Adequate fidelity bonding and insurance coverage if required by the funding agency."

We requested that TenBarge reimburse ECHO in the amount of \$43,860 for the undocumented health reimbursement payments. (See Summary of Charges, page 14)

PENALTIES, INTEREST, AND OTHER CHARGES

From January 1, 2015 to February 28, 2018, TenBarge did not properly and timely remit federal taxes and file returns, timely pay credit card and vendor bills, and ensure that fees and service charges were not incurred on ECHO's bank accounts. TenBarge was responsible by virtue of her position as Executive Director to remit taxes and pay bills timely. Because of this, the following penalties, interest, and other charges were paid by ECHO:

Years	Internal Revenue Taxes			Credit Card			Vendors	Bank Accounts				Totals
	Penalty	Interest	Totals	Other Charges	Finance Charges	Totals		Overdraft Fees	Return Item Fees	Service Charge	Totals	
2015	\$ -	\$ -	\$ -	\$ 78.00	\$ 989.25	\$ 1,067.25	\$ 766.55	\$ 777.00	\$ 148.00	\$ 63.00	\$ 988.00	\$ 2,821.80
2016	6,236.16	37.73	6,273.89	-	370.03	370.03	1,027.51	852.00	629.00	25.00	1,506.00	9,177.43
2017	8,296.90	161.46	8,458.36	117.00	627.02	744.02	729.95	152.00	-	230.35	382.35	10,314.68
2018	5,643.72	65.84	5,709.56	-	101.10	101.10	-	76.00	-	-	76.00	5,886.66
	\$ 20,176.78	\$ 265.03	\$ 20,441.81	\$ 195.00	\$ 2,087.40	\$ 2,282.40	\$ 2,524.01	\$ 1,857.00	\$ 777.00	\$ 318.35	\$ 2,952.35	\$ 28,200.57

The *Uniform Compliance Guidelines for Examination of Entities Receiving Financial Assistance from Governmental Sources*, Section H, states in part:

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a. Accurate, current and complete disclosure of the financial results of each government sponsored project or program.

b. Records that adequately identify the source and application of funds for government sponsored activities. Records shall contain information pertaining to awards, authorizations, obligations, unobligated balances, assets, outlays and income.

ECHO HOUSING CORPORATION
RESULTS AND COMMENTS
(Continued)

- c. Effective control over and accountability for all funds, property and other assets.
- d. Procedures for determining the reasonableness, allowability and allocability of costs in accordance with the provisions of the applicable cost principles and the terms of the grant or other agreement.
- e. Accounting records that are supported by source documentation.
- f. Compliance with annual reporting requirements of the Secretary of State and the State Board of Accounts.
- g. Compliance with rules, regulations, guidelines, and directives of the Internal Revenue Service and the Indiana Department of Revenue. All questions concerning taxes should be directed to these agencies.
- h. Adequate fidelity bonding and insurance coverage if required by the funding agency."

We requested that TenBarge reimburse ECHO in the amount of \$28,200.57 for penalties, interest, and other charges. (See Summary of Charges, page 14)

UNAUTHORIZED BENEFITS TO CONTRACTOR

TenBarge allowed a contractor to live in an ECHO rental without paying rent and utilities beginning in May 2017. There was no written agreement between ECHO and the contractor during TenBarge's term of employment. In addition, the Board of Directors were not aware that the contractor was living in the rental property without paying rent or utilities. After TenBarge left employment, the new Executive Director entered into a lease agreement with the contractor for the rental property for the term April 1, 2018 to March 31, 2019. The contractor currently pays \$200 per month rent plus utilities. From January 5, 2015 to February 2, 2018, the contractor also received \$135,127.42 in contractual payments from ECHO.

ECHO's lost rental revenue for the period May 1, 2017 to March 31, 2018, totaled \$2,200 using the current rent amount paid by the contractor. The amount of utilities ECHO paid on behalf of the contractor totaled \$680.92.

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ECHO HOUSING CORPORATION
RESULTS AND COMMENTS
(Continued)

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- g. Compliance with rules, regulations, guidelines, and directives of the Internal Revenue Service and the Indiana Department of Revenue. All questions concerning taxes should be directed to these agencies.
- h. Adequate fidelity bonding and insurance coverage if required by the funding agency."

We requested that TenBarge reimburse ECHO in the amount of \$2,880.92 for unauthorized benefits to a contractor. (See Summary of Charges, page 14)

UNAUTHORIZED PAYMENTS TO CONTRACTOR

An event planning company was hired by ECHO to plan the annual gala for 2014, 2015, and 2016. The contract we were provided stated a service fee of 8 percent of the total budget was to be paid to the company for the event. According to ECHO records, the 2015 expenses were \$24,497.75; therefore, the service fee calculated to \$1,959.82. Checks written to the company for the 2015 gala totaled \$4,951, resulting in an overpayment of \$2,991.18.

Shortly after the 2015 gala, ECHO paid the company \$2,000 in advance for the 2016 event. An additional \$4,275 was paid to the company from December 2015 to February 2016. The 2016 event never occurred. The company stated the total \$6,275 paid by ECHO was nonrefundable; however, the fee schedule obtained from ECHO stated only the required deposit of \$150 was nonrefundable. The result is an overpayment of \$6,125 for an event that never occurred.

We recommended that ECHO seek reimbursement for the overpayments on the contracts totaling \$9,116.18.

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ECHO HOUSING CORPORATION
RESULTS AND COMMENTS
(Continued)

- b. Records that adequately identify the source and application of funds for government sponsored activities. Records shall contain information pertaining to awards, authorizations, obligations, unobligated balances, assets, outlays and income.
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- h. Adequate fidelity bonding and insurance coverage if required by the funding agency."

SPECIAL INVESTIGATION COSTS

The State of Indiana incurred additional costs in the investigation of ECHO.

We requested that TenBarge reimburse the State of Indiana \$47,727.05 for special investigation costs. (See Summary of Charges, page 14)

PROMISSORY NOTE

A promissory note was signed by TenBarge to pay Echo \$19,008.76 plus \$2,000 attorneys' fees on March 13, 2018, due to ECHO filing a complaint against TenBarge in Vanderburgh Superior Court. This amount consisted of property taxes, lawn services, health care insurance, and forensic accounting. As of December 31, 2018, TenBarge had made payments totalling \$14,647.41 on the note. (See Summary of Charges, page 14)

INTERNAL CONTROLS

Internal control weaknesses existed that contributed to TenBarge's ability to receive overpayments of compensation, make unauthorized payments to vendors, receive unauthorized reimbursements, and give unauthorized benefits and payments to contractors. TenBarge was the sole individual in charge of initiating disbursements, approving disbursements and issuing payments.

According to ECHO's Accounting Procedures Office Manual effective January 2013 and November 2016, all checks exceeding the amount of \$600 required two signatures. The Executive Director and two officers of the Board of Directors, the President of the Board, and the Board Treasurer were authorized to sign checks on behalf of the Corporation. Currently the Executive Director also serves as the Board Secretary (non-voting member). The Executive Director was to sign all checks under the amount of \$600.

ECHO HOUSING CORPORATION
RESULTS AND COMMENTS
(Continued)

We noted several checks over \$600 with only TenBarge's signature and several cases where multiple checks were written to the same vendor on the same day to bypass the two signature requirement. In addition, TenBarge posted all the fund transactions and reconciled the monthly bank statement transactions.

ECHO's Accounting Procedures Office Manual, effective January 2013, addressed Board of Director oversight. It stated that the Board Treasurer was to reconcile all bank statements, a Board member who is a CPA was to perform a mini-audit of the statements, and the Board President was to review Paycor monthly/quarterly reports. ECHO's Accounting Procedures Office Manual, effective November 2016, stated that the Executive Director and the President of the Board were to meet weekly to go over financial requirements. The President of the Board was to monitor and maintain the Lines of Credit and handle all requests for funds transfer for short term cash needs. The Board Treasurer was to reconcile all bank statements, and the Board was trying to recruit a member who was a CPA who would review all statements previous to being sent to auditor. The Board member was to perform a mini-audit.

There was no evidence indicating the policies for the Board of Director oversight were followed. The weaknesses in internal controls allowed the misappropriations to go undetected.

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Maintaining a financial management system that provides: . . .

c. Effective control over and accountability for all funds, property and other assets. . . ."

CRIME INSURANCE COVERAGE

The following is information regarding crime insurance obtained by ECHO:

<u>Period</u>	<u>Amount</u>
12-12-14 to 12-12-15	\$ 5,000
12-12-15 to 12-12-16	10,000
12-12-16 to 12-12-17	10,000
12-12-17 to 12-12-18	10,000

INVESTIGATION BY LAW ENFORCEMENT AGENCIES

An investigation into the misappropriation of funds by TenBarge has also been conducted by the Evansville Police Department and the Federal Bureau of Investigations.

ECHO HOUSING CORPORATION
EXIT CONFERENCE

The contents of this report were discussed on December 31, 2018, with Chris Metz, Executive Director; Karen Woodard, Office Administrator; Dane Chandler, President of the Board; Rev. Gerald C. Arnold, Board member; and Jason M. Fisher, Board member.



414 Baker Avenue
Evansville, Indiana 47710
Phone: 812.423.8422
Fax: 812.423.8108

January 10, 2019

ECHO Housing Corporation is in agreement with the conclusions of the SBOA report as it relates to the various amounts of funds that were allegedly misappropriated by our former director. We would note that as a result of this incident, we have implemented a new system of internal controls that is designed to provide the maximum amount of oversight, transparency and financial accountability. Our revised Accounting Policies and Procedures, created in partnership with a consultant, sets forth processes that are designed to mitigate any potential future misuse or misappropriation of funds.

We would also note that our Board of Directors diligently attempted to adhere to existing oversight policies by regularly reviewing balance sheets, profit and loss statements, expense reports, and other financial documents. However, with the benefit of hindsight we acknowledge the information contained in those reports was intentionally misleading. As a result, the Board of Directors was subjected to misinformation distributed by the former director, which in turn diluted the overall ability of the Board to effectively execute organizational oversight.

ECHO HOUSING CORPORATION
SUMMARY OF CHARGES
(Due to Malfeasance, Misfeasance, or Nonfeasance)

	<u>Charges</u>	<u>Credits</u>	<u>Balance Due</u>
Stephanie TenBarge, former Executive Director:			
Overpayment of Compensation, pages 3 and 4	\$ 10,015.29	\$ -	\$ 10,015.29
Unauthorized Personal Disbursements, pages 4 and 5	12,730.55	-	12,730.55
Unauthorized Reimbursements to TenBarge, pages 5 and 6	49,239.70	-	49,239.70
Undocumented Health Reimbursement Payments, pages 6 and 7	43,860.00	-	43,860.00
Penalties, Interest, and Other Charges, pages 7 and 8	28,200.57	-	28,200.57
Unauthorized Benefits to Contractor, pages 8 and 9	2,880.92	-	2,880.92
Promissory Note, page 10		14,647.41	(14,647.41)
	<u>146,927.03</u>	<u>14,647.41</u>	<u>132,279.62</u>
Subtotals			
	<u>146,927.03</u>	<u>14,647.41</u>	<u>132,279.62</u>
Special Investigation Costs, page 10	47,727.05	-	47,727.05
	<u>47,727.05</u>	<u>-</u>	<u>47,727.05</u>
Totals	<u>\$ 194,654.08</u>	<u>\$ 14,647.41</u>	<u>\$ 180,006.67</u>

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

AFFIDAVIT

STATE OF INDIANA)
)
Owen COUNTY)

We, Lynne Spencer and Gina Gambaiani, Field Examiners, being duly sworn on our oaths, state that the foregoing report based on the official records of the Echo Housing Corporation, Vanderburgh County, Indiana, for the period from January 1, 2015 to February 28, 2018, is true and correct to the best of our knowledge and belief.

Lynne Spencer

Gina Gambaiani
Field Examiners

Subscribed and sworn to before me this 29 day of January, 2019

Callie C. Jennings
Notary Public

My Commission Expires: _____

County of Residence: _____

