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Lucas Family and Children First Council Lucas County One Government Center, Suite 580 Toledo, Ohio 43604-2249

To Members of the Council:

As you are aware, the Auditor of State's Office (AOS) must modify the *Independent Accountants' Report* we provide on your financial statements due to a February 2, 2005 interpretation from the American Institute of Certified Public Accountants (AICPA). While AOS does not legally require your government to prepare financial statements pursuant to Generally Accepted Accounting Principles (GAAP), the AICPA interpretation requires auditors to formally acknowledge that you did not prepare your financial statements in accordance with GAAP. Our Report includes an opinion relating to GAAP presentation and measurement requirements, but does not imply the amounts the statements present are misstated under the non-GAAP basis you follow. The AOS report also includes an opinion on the financial statements you prepared using the cash basis and financial statement format the AOS permits.

Betty Montgomeny

Betty Montgomery Auditor of State

September 14, 2005

One Government Center / Room 1420 / Toledo, OH 43604-2246 Telephone: (419) 245-2811 (800) 443-9276 Fax: (419) 245-2484 www.auditor.state.oh.us This page intentionally left blank.



# INDEPENDENT ACCOUNTANTS' REPORT

Lucas Family and Children First Council Lucas County One Government Center, Suite 580 Toledo, Ohio 43604-2249

To Members of the Council:

We have audited the accompanying financial statements of Lucas Family and Children First Council, Lucas County, (the Council) as of and for the year ended December 31, 2004. These financial statements are the responsibility of the Council's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in the Comptroller General of the United States' *Government Auditing Standards*. Those standards require that we plan and perform the audit to reasonably assure whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe our audit provides a reasonable basis for our opinion.

As described more fully in Note 1, the Council has prepared these financial statements using accounting practices the Auditor of State prescribes or permits. These practices differ from accounting principles generally accepted in the United States of America (GAAP). Although we cannot reasonably determine the effects on the financial statements of the variances between these regulatory accounting practices and GAAP, we presume they are material.

Revisions to GAAP would require the Council to reformat its financial statement presentation and make other changes effective for the year ended December 31, 2004. Instead of the combined funds the accompanying financial statements present for 2004, the revisions require presenting entity wide statements and also to present its larger (i.e. major) funds separately for 2004. While the Council does not follow GAAP, generally accepted auditing standards requires us to include the following paragraph if

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the statements do not substantially conform to the new GAAP presentation requirements. The Auditor of State permits, but does not require governments to reformat their statements. The Council has elected not to reformat its statements. Since this Council does not use GAAP to measure financial statement amounts, the following paragraph does not imply the amounts reported are materially misstated under the accounting basis the Auditor of State permits. Our opinion on the fair presentation of the amounts reported pursuant to its non-GAAP basis is in the second following paragraph.

In our opinion, because of the effects of the matter discussed in the preceding two paragraphs, the financial statements referred to above for the year ended December 31, 2004 do not present fairly, in conformity with accounting principles generally accepted in the United States of America, the financial position of the Council as of December 31, 2004, or its changes in financial position for the year then ended.

Also, in our opinion, the financial statements referred to above present fairly, in all material respects, the combined fund cash balances of Family and Children First Council, Lucas County, as of December 31, 2004, and its combined cash receipts and disbursements for the years then ended on the accounting basis Note 1 describes.

The aforementioned revision to generally accepted accounting principles also requires the Council to include Management's Discussion and Analysis for the year ended December 31, 2004. The Council has not presented Management's Discussion and Analysis, which accounting principles generally accepted in the United States of America has determined is necessary to supplement, although not required to be part of, the financial statements.

In accordance with *Government Auditing Standards*, we have also issued our report dated September 14 2005, on our consideration of the Council's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. While we did not opine on the internal control over financial reporting or on compliance, that report describes the scope of our testing of internal control over financial reporting and compliance, and the results of that testing. That report is an integral part of an audit performed in accordance with *Government Auditing Standards*. You should read it in conjunction with this report in assessing the results of our audit.

We conducted our audit to opine on the financial statements that collectively comprise the Council's financial statements. The U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations* requires presenting federal awards expenditure schedule. The schedule is not a required part of the financial statements. We subjected the federal awards expenditure schedule to the auditing procedures applied in the audit of the basic financial statements. In our opinion, this information is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

Betty Montgomeny

Betty Montgomery Auditor of State

September 14, 2005

# COMBINED STATEMENT OF CASH RECEIPTS, CASH DISBURSEMENTS, AND CHANGES IN FUND CASH BALANCES ALL GOVERNMENTAL FUND TYPES FOR THE YEAR ENDED DECEMBER 31, 2004

	Governmental		
	General	Special Revenue	Totals (Memorandum Only)
Cash receipts:			
Intergovernmental Local agency contributions	\$32,677	\$2,810,535 964,600	\$2,843,212 964,600
Miscellaneous	665	1,467	2,132
Total cash receipts	33,342	3,776,602	3,809,944
Cash disbursements:			
Contract services	16,612	3,824,694	3,841,306
Administrative	49,117	41,893	91,010
Salaries and benefits	203,271	242,111	445,382
Consumer stipend	7,646	224	7,870
Total cash disbursements	276,646	4,108,922	4,385,568
Total cash disbursements over cash receipts	(243,304)	(332,320)	(575,624)
Fund cash balances, January 1	398,201	717,560	1,115,761
Fund cash balances, December 31	\$154,897	\$385,240	\$540,137

The notes to the financial statements are an integral part of this statement.

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### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2004

#### 1. DESCRIPTION OF THE ENTITY

Ohio Revised Code § 121.37 created the Ohio Family and Children First Cabinet and permitted counties to establish county family and children first. Statutory membership of a county consists of the following individuals:

- a. The director of the board of alcohol, drug addiction, and mental health services that serves the county, or, in the case of a county that has a board of alcohol and drug addiction services and a community mental health board, the directors of both boards;
- b. The health commissioner of the board of health of each city or general health Council in the county, or their designees;
- c. The director of the county department of human services;
- d. The executive director of the county agency responsible for the administration of children services pursuant to section 5153.15 of the Revised Code;
- e. The superintendent of the county board of mental retardation and developmental disabilities;
- f. The county's juvenile court judge senior in service;
- g. The superintendent of the city, exempted village, or local school Council with the largest number of pupils residing in the county, as determined by the department of education, which shall notify each county of its determination at least biennially;
- h. A school superintendent representing all other school Councils with territory in the county, as designated at a biennial meeting of the superintendents of those Councils;
- i. A representative of the largest city in the county:
- j. The chair of the board of county commissioners, or an individual designated by the board;
- k. A representative of the regional office of the department of youth services;
- I. A representative of the county's head start agencies, as defined in section 3301.31 of the Revised Code;
- Mathematical and the county's early intervention collaborative established pursuant to the federal early intervention program operated under the Education of the Handicapped Act Amendments of 1986";
- n. At least three individuals representing the interests of families in the county. Where possible, the number of members representing families shall be equal to 20 percent of the Council's remaining membership.

A county family and children first may invite any other local public or private agency or group that funds, advocates, or provides services to children to have a representative become a permanent or temporary member of the Council.

#### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2004 (Continued)

A county's statutory responsibilities include the following:

- a. Refer to the cabinet those children for whom the cannot provide adequate services;
- b. Make periodic reports to the cabinet regarding the number of children referred to the county and the progress made in meeting the needs of each child;
- c. Develop a plan that reviews and adjusts existing programs, fills service gaps where possible, or invents new approaches to achieve better results for families and children;
- d. Participate in the development of a countywide, comprehensive, coordinated, multi-disciplinary, interagency system for infants and toddlers with developmental disabilities or delays and their families, as established pursuant to federal grants received and administered by the department of health for early intervention services under the Education of the Handicapped Act Amendments of 1986";
- e. Maintain an accountability system to monitor the progress in achieving its purposes;
- f. Establish a mechanism to ensure ongoing input from a broad representation of families who are receiving services within the county system.

The Family and Children First Council, Lucas County, was established in April 1993 as one of the pilot sites of the Ohio Family and Children First Initiative. The Council is a collaborative effort focused on improving outcomes for the children and families of Lucas County. The mission of the Lucas County Family and Children First Council is "to coordinate a publicly accountable, cost effective system of services that supports health, education, and well being of our families."

# A. Council

Lucas County Family and Children First membership includes all members specified by Ohio Revised Code § 121.37, as well as additional at large members, including family representatives, advocates, community leaders, service providers and religious and union leaders. At large members serve a maximum of two successive three year terms. The purpose of the Council is to identify and support the implementation of ways which the Child serving Systems can provide services in a coordinated and collaborative manner that results in the efficient and effective provisions of services for the community's families. The Executive Director has been hired to administer all of the Council's programs and activities.

#### B. Children's Cluster

Through the Children's Cluster, the Family and Children First provides service coordination and fiscal management to ensure that children/youth, who have multi-system service needs, and their families receive essential services. Cluster representatives, at both the Executive Cluster and Services Team levels, reflect the Ohio Revised Code membership requirements. Five Cluster member systems, the Pooled Fund Group, pool funds dedicated to the funding of services for children/youth identified as eligible through the Cluster process. The primary source of revenue for operations consists of Local Agency Contributions. These are local monies contributed by Lucas County agencies, including Children Services Board, Mental Health Board, Board of Mental Retardation and Developmental Disabilities, Juvenile Court, Alcohol and Drug Addiction Services Board, Toledo Public Schools, Department of Youth Services, Department of Job and Family

#### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2004 (Continued)

Services and the United Way of Greater Toledo. The amount provided by each agency is based on the annual budget and the amount of funding needed to fulfill obligations.

The Council's believes these financial statements present all activities for which the Council is financially accountable

#### 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

#### A. Basis of Accounting

These financial statements follow the basis of accounting prescribed or permitted by the Auditor of State, which is similar to the cash receipts and disbursements basis of accounting. Receipts are recognized when received in cash rather than when earned, and disbursements are recognized when paid rather than when a liability is incurred. Budgetary presentations report budgetary expenditures when a commitment is made (i.e., when an encumbrance is approved.)

These statements include adequate disclosure of material matters, as prescribed or permitted by the Auditor of State.

#### B. Fund Accounting

The Council maintains its accounting records in accordance with the principles of fund accounting. Fund accounting is a concept developed to meet the needs of governmental entities in which legal or other restraints require the recording of specific receipts and disbursements. The transactions are reflected in a self-balancing group of accounts.

**General Fund** - the general operating fund of the Council is used to account for all financial resources, except those required by law or contract to be restricted.

The General fund had the following major sources of funding:

Intergovernmental Receipts - Funds received from the Administration Grants.

**Special Revenue Funds** - These funds are used to account for proceeds from specific sources (other than from trusts or for capital projects) that are restricted to expenditure for specific purposes.

The Council had the following significant Special Revenue Funds:

<u>Wellness Grant</u> - Federal grant to be used for programs aimed at reducing Teen Pregnancy and Child Abuse and Neglect.

<u>Help Me Grow Grant</u> - Federal grant to be used for helping families with infants aging from newly born to three.

#### C. Administrative and Fiscal Agent

The Lucas County Board of Commissioners serves as the administrative and fiscal agent for the Council. The funds are maintained in separate agency fund by the Lucas County Auditor.

#### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2004 (Continued)

#### **D. Budgetary Process**

The Ohio Revised Code requires that Council prepare an annual budget and file it with its administrative agent. This annual budget includes estimated receipts and disbursements.

The County Auditor, serving as fiscal officer for the Council, reserves (encumbers) appropriations when commitments are made. Encumbrances outstanding at year end are cancelled, and reappropriated in the subsequent year.

A summary of 2004 budgetary activity appears in Note 4.

#### E. Property, Plant, and Equipment

Acquisitions of property, plant, and equipment are recorded as disbursements when paid. These items are not reflected as assets on the accompanying financial statements.

### 3. EQUITY IN POOLED CASH

The Lucas County Treasurer maintains a cash pool used by all of the County's funds, including those of the Family and Children First. The Ohio Revised Code prescribes allowable deposits and investments. The Council's carrying amount of cash on deposit with the County at December 31, 2004 was \$540,137. The Lucas County Treasurer is responsible for maintaining adequate depository collateral for all funds in Lucas County's pooled deposit accounts.

#### 4. BUDGETARY ACTIVITY

Budgetary activity for the year ended December 31, 2004 follows:

2004 Budgeted vs. Actual Receipts						
		Budgeted Actual		Actual		
Fund Type		Receipts Receipts		Receipts		Variance
General	\$	227,094	\$	33,342	\$	(193,752)
Special Revenue		4,235,569		3,776,602		(458,967)
Total	\$	4,462,663	\$	3,809,944	\$	(652,719)

2004 Budgeted vs. Actual Budgetary Basis Expenditures							
	Appropriation		Budgetary				
Fund Type	Authority		Expenditures			Variance	
General	\$	296,059	\$	276,646	\$	19,413	
Special Revenue		4,663,680		4,108,922		554,758	
Total	\$	4,959,739	\$	4,385,568	\$	574,171	

#### NOTES TO THE FINANCIAL STATEMENTS DECEMBER 31, 2004 (Continued)

#### 5. RETIREMENT SYSTEMS

The Council's employees belong to the Ohio Public Employees Retirement System (OPERS). OPERS is a cost-sharing, multiple-employer plan. This plan provides retirement benefits, including postretirement healthcare, and survivor and disability benefits to participants as prescribed by the Ohio Revised Code.

Contribution rates are also prescribed by the Ohio Revised Code. For 2004 OPERS members contributed 8.5 percent of their gross salaries. The County contributed an amount equal to 13.55 percent of participants' gross salaries. The Board has paid all contributions required through December 31, 2004.

#### 6. RISK MANAGEMENT

The Council is insured for general liability and casualty by the Lucas County Commissioners.

#### 7. CONTINGENT LIABILITIES

Amounts received from grantor agencies are subject to audit and adjustment by the grantor, principally the federal government. Any disallowed costs may require refunding to the grantor. Amounts which may be disallowed, if any, are not presently determinable. However, based on prior experience, management believes such refunds, if any, would not be material.

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# SCHEDULE OF FEDERAL AWARDS EXPENDITURES FOR THE YEAR ENDED DECEMBER 31, 2004

FEDERAL GRANTOR Pass Through Grantor Program Title	Federal CFDA Number	Disbursements
U.S. DEPARTMENT OF EDUCATION Passed Through Ohio Department of Health:		
Special Education Grants - Infants and Families with Disabilities (Help Me Grow/Part C)	84.181A	\$459,363
Total U.S. Department of Education		459,363
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Passed Through Lucas County Jobs and Family Services: Temporary Assistance for Needy Families: Help Me Grow Wellness Block Total Temporary Assistance for Needy Families	93.558	1,826,696 461,042 2,287,738
Total U.S. Department of Health and Human Services		2,287,738
U.S. DEPARTMENT OF JUSTICE Passed Through Lucas County Juvenile Court: Research and Development (Title V)	16.540	44,897
Total U.S. Department of Justice		44,897
Total Federal Awards Expenditures		\$2,791,998

The accompanying notes are an integral part of this schedule.

#### NOTES TO THE SCHEDULE OF FEDERAL AWARDS EXPENDITURES FISCAL YEAR ENDED DECEMBER 31, 2004

### NOTE A--SIGNIFICANT ACCOUNTING POLICIES

The accompanying Schedule of Federal Awards Expenditures (the Schedule) summarizes activity of the Council's federal award programs. The schedule has been prepared on the cash basis of accounting.

### NOTE B--SUBRECIPIENTS

The Council passes-through certain Federal assistance received from the Ohio Department of Health, the Ohio Department of Jobs and Family Services, and the Lucas County Job and Family Services to other governments or not-for-profit agencies (sub recipients). As described in Note A, the Council records expenditures of Federal awards to sub recipients when paid in cash.

The sub recipient agencies have certain compliance responsibilities related to administering these Federal Programs. Under Federal Circular A-133, the Council is responsible for monitoring sub recipients to help assure that Federal awards are used for authorized purposes in compliance with laws, regulations and the provisions of contracts or grant agreements, and that performance goals are achieved.

#### NOTE C--MATCHING REQUIREMENTS

Certain Federal programs require that the Council contribute non-Federal funds (matching funds) to support the Federally-funded programs. The Council has complied with the matching requirements. The expenditure of non-Federal matching funds is not included on the Schedule.



#### INDEPENDENT ACCOUNTANTS' REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS REQUIRED BY *GOVERNMENT AUDITING STANDARDS*

Lucas Family and Children First Council Lucas County One Government Center, Suite 580 Toledo, Ohio 43604-2249

To Members of the Council:

We have audited the financial statements of the Lucas Family and Children First Council, Lucas County, (the Council) as of and for the year ended December 31, 2004, and have issued our report thereon dated September 14, 2005, wherein we noted the Council followed accounting practices the Auditor of State prescribes rather than accounting principles generally accepted in the United States of America. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in the Comptroller General of the United States' *Government Auditing Standards*.

# Internal Control Over Financial Reporting

In planning and performing our audit, we considered the Council's internal control over financial reporting to determine our auditing procedures to express our opinion on the financial statements and not to opine on the internal control over financial reporting. Our consideration of the internal control would not necessarily disclose all matters in the internal control over financial reporting that might be material weaknesses. A material weakness is a reportable condition in which the design or operation of one or more of the internal control components does not reduce to a relatively low level the risk that misstatements caused by error or fraud in amounts material to the financial statements we audited may occur and not be timely detected by employees when performing their assigned functions. We noted no matters involving the internal control over financial reporting and its operation that we consider material weaknesses. In a separate letter to the District's management dated September 14, 2005, we reported other matters involving internal control over financial reporting we did not deem reportable conditions.

# **Compliance and Other Matters**

As part of reasonably assuring whether the Council's financial statements are free of material misstatement, we tested its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could directly and materially affect the determination of financial

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statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express an opinion. The results of our tests disclosed no instances of noncompliance or other matters we must report under *Government Auditing Standards*. In a separate letter to the Council's management dated September 14, 2005, we reported a matter related to noncompliance we deemed immaterial.

We intend this report solely for the information and use of the Council management, federal awarding agencies, and pass-through entities. It is not intended for anyone other than these specified parties.

Betty Montgomeny

Betty Montgomery Auditor of State

September 14, 2005



#### INDEPENDENT ACCOUNTANTS' REPORT ON COMPLIANCE WITH REQUIREMENTS APPLICABLE TO MAJOR FEDERAL PROGRAMS AND INTERNAL CONTROL OVER COMPLIANCE IN ACCORDANCE WITH OMB CIRCULAR A-133

Lucas Family and Children First Council Lucas County One Government Center, Suite 580 Toledo, Ohio 43604-2249

To Members of the Council:

#### Compliance

We have audited the compliance of Lucas Family and Children First Council, Lucas County, (the Council) with the types of compliance requirements described in the U.S. Office of Management and Budget (OMB) Circular A-133, *Compliance Supplement* that apply to each of its major federal programs for the year ended December 31, 2004. The summary of auditor's results section of the accompanying schedule of findings identifies the Council's major federal programs. Compliance with the requirements of laws, regulations, contracts, and grants applicable to each major federal program is the responsibility of the Council's management. Our responsibility is to express an opinion on the Council's compliance based on our audit.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to reasonably assure whether noncompliance occurred with the types of compliance requirements referred to above that could directly and materially affect a major federal program. An audit includes examining, on a test basis, evidence about the Council's compliance with those requirements and performing other procedures we considered necessary in the circumstances. We believe that our audit provides a reasonable basis for our opinion. Our audit does not provide a legal determination on the Council's compliance with those requirements.

In our opinion, the Council complied, in all material respects, with the requirements referred to above that are applicable to its major federal program for the year ended December 31, 2004.

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#### **Internal Control Over Compliance**

The Council's management is responsible for establishing and maintaining effective internal control over compliance with requirements of laws, regulations, contracts, and grants applicable to federal programs. In planning and performing our audit, we considered the Council's internal control over compliance with requirements that could directly and materially affect a major federal program to determine our auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with OMB Circular A-133.

Our consideration of the internal control over compliance would not necessarily disclose all matters in the internal control that might be material weaknesses. A material weakness is a reportable condition in which the design or operation of one or more of the internal control components does not reduce to a relatively low level the risk that noncompliance with applicable requirements of laws, regulations, contracts, and grants caused by error or fraud that would be material in relation to a major federal program being audited may occur and not be timely detected by employees when performing their assigned functions. We noted no matters involving the internal control over compliance and its operation that we consider to be material weaknesses. However, we noted a matter involving the internal control over federal compliance not requiring inclusion in this report, that we reported to the Council's management in a separate letter dated September 14, 2005.

We intend this report solely for the information and use of the management, federal awarding agencies, and pass-through entities. It is not intended for anyone other than these specified parties.

Betty Montgomery

Betty Montgomery Auditor of State

September 14, 2005

### SCHEDULE OF FINDINGS OMB CIRCULAR A-133 § .505 DECEMBER 31, 2004

#### 1. SUMMARY OF AUDITOR'S RESULTS

(d)(1)(i)	Type of Financial Statement Opinion	Unqualified
(d)(1)(ii)	Were there any material control weakness conditions reported at the financial statement level (GAGAS)?	No
(d)(1)(ii)	Were there any other reportable control weakness conditions reported at the financial statement level (GAGAS)?	No
(d)(1)(iii)	Was there any reported material noncompliance at the financial statement level (GAGAS)?	No
(d)(1)(iv)	Were there any material internal control weakness conditions reported for major federal programs?	No
(d)(1)(iv)	Were there any other reportable internal control weakness conditions reported for major federal programs?	No
(d)(1)(v)	Type of Major Programs' Compliance Opinion	Unqualified
(d)(1)(vi)	Are there any reportable findings under § .510?	No
(d)(1)(vii)	Major Programs (list):	Temporary Assistance for Needy Families (TANF) CFDA # 93.558
(d)(1)(viii)	Dollar Threshold: Type A\B Programs	Type A: > \$ 300,000 Type B: all others
(d)(1)(ix)	Low Risk Auditee?	No

# 2. FINDINGS RELATED TO THE FINANCIAL STATEMENTS REQUIRED TO BE REPORTED IN ACCORDANCE WITH GAGAS

None.

3. FINDINGS FOR FEDERAL AWARDS

None.

# SCHEDULE OF PRIOR AUDIT FINDINGS OMB CIRCULAR A -133 § .315 (b) DECEMBER 31, 2004

Finding Number	Finding Summary	Fully Corrected?	Not Corrected, Partially Corrected; Significantly Different Corrective Action Taken; or Finding No Longer Valid; <i>Explain</i> :
2003-001	Failure to have single audit and remit the audit report within specified period to oversight agency.	Yes	



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# LUCAS FAMILY AND CHILDREN FIRST COUNCIL

# LUCAS COUNTY

# **CLERK'S CERTIFICATION**

This is a true and correct copy of the report which is required to be filed in the Office of the Auditor of State pursuant to Section 117.26, Revised Code, and which is filed in Columbus, Ohio.

Susan Babbett

CLERK OF THE BUREAU

CERTIFIED OCTOBER 11, 2005