



OHIO AUDITOR OF STATE  
**KEITH FABER**







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## INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES

Washington Township  
Shelby County  
1700 Aiken Road  
Piqua, Ohio 45356

We have performed the procedures enumerated below on Washington Township's (the Township) receipts, disbursements and balances recorded in the cash basis accounting records for the years ended December 31, 2024 and 2023 and certain compliance requirements related to those transactions and balances, included in the information provided to us by the management of the Township. The Township is responsible for the receipts, disbursements and balances recorded in the cash basis accounting records for the years ended December 31, 2024 and 2023 and certain compliance requirements related to these transactions and balances included in the information provided to us by the Township.

The Board of Trustees and the management of the Township have agreed to and acknowledged that the procedures performed are appropriate to meet the intended purpose of providing assistance in the evaluation of the Township's receipts, disbursements and balances recorded in their cash-basis accounting records for the years ended December 31, 2024 and 2023, and certain compliance requirements related to these transactions and balances. No other party acknowledged the appropriateness of the procedures. This report may not be suitable for any other purpose. The procedures performed may not address all the items of interest to a user of the report and may not meet the needs of all users of the report and, as such, users are responsible for determining whether the procedures performed are appropriate for their purposes. The sufficiency of the procedures is solely the responsibility of the parties specified in the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

For the purposes of performing these procedures, this report only describes exceptions exceeding \$10.

The procedures and the associated findings are as follows:

### Cash and Investments

1. We recalculated the December 31, 2024 and December 31, 2023 bank reconciliations. We found no exceptions.
2. We agreed the January 1, 2023 beginning fund balances for each fund recorded in the Fund Status Report to the December 31, 2022 balances in the documentation in the prior year Agreed-Upon Procedures working papers. We found no exceptions. We also agreed the January 1, 2024 beginning fund balances for each fund recorded in the Fund Status Report to the December 31, 2023 balances in the Fund Status Report. We found no exceptions.
3. We agreed the 2024 and 2023 Bank Reconciliation as of December 31, 2024 and 2023 to the total fund cash balances reported in the Fund Status Report and the financial statements filed by the Township in the Hinkle System. The amounts agreed.

### **Cash and Investments (Continued)**

4. We observed the year-end bank balances on the financial institution's website. The balances agreed. We also agreed the confirmed balances to the amounts appearing in the December 31, 2024 bank reconciliation without exception.
5. We selected 5 reconciling debits (such as outstanding checks) from the December 31, 2024 bank reconciliation:
  - a. We traced each debit to the subsequent January bank statement. We found no exceptions.
  - b. We traced the amounts and dates to the check register, and determined the debits were dated prior to December 31. We found no exceptions.
6. We inspected investments held at December 31, 2024 and December 31, 2023 to determine that they:
  - a. Were of a type authorized by Ohio Rev. Code §§ 135.13, 135.14, 135.144 or 135.145. We found no exceptions
  - b. Mature within the prescribed time limits noted in Ohio Rev. Code § 135.13 or 135.14. We identified that one certificate of deposit (CD) held by the Township at December 31, 2024 and both CDs held by the Township at December 31, 2023 had a maturity of ten years rather than the required maturity of no more than five years.

### **Property Taxes and Intergovernmental Cash Receipts**

1. We selected a total of 5 receipts from the *Statement of Semiannual Apportionment of Taxes*, State Distribution Transaction Lists (DTL), and the Shelby County Expense Audit Trail Report for 2024 and a total of 5 from 2023:
  - a. We compared the amount from the above named reports to the amount recorded in the Receipt Detail Report. The amounts agreed.
  - b. We inspected the Receipt Detail Report to determine these receipts were allocated to the proper funds as required by Ohio Rev. Code §§ 5705.05 and 5705.10. We found no exceptions.
  - c. We inspected the Receipt Detail Report to determine whether the receipt was recorded in the proper year. The receipt was recorded in the proper year. We found no exceptions.
2. We inspected the Receipt Detail Report to determine whether it included 2 real estate tax receipts for 2024 and 2023. The Receipt Detail Report included the proper number of tax receipts for each year. We found no exceptions.

### **Debt**

1. The prior agreed-upon procedures documentation disclosed no debt outstanding as of December 31, 2022.
2. We inquired of management and inspected the Receipt Detail Report and Payment Register Detail Report for evidence of debt issued during 2024 or 2023 or debt payment activity during 2024 or 2023. There were no new debt issuances, nor any debt payment activity during 2024 or 2023.

### **Payroll Cash Disbursements**

1. We selected 1 payroll check for 5 employees from 2024 and 1 payroll check for 5 employees from 2023 from the Payment Register Detail Report and:
  - a. We compared the hours and pay rate, or salary recorded in the Payment Register Detail Report to supporting documentation (legislatively or approved salary). We found no exceptions.

### Payroll Cash Disbursements (Continued)

- b. We recomputed gross and net pay and agreed it to the amount recorded in the Payment Register Detail Report. We found no exceptions.
  - c. We inspected the fund and account codes to which the check was posted to determine the posting was allowable based on the employees' duties as documented in the minute record. We found no exceptions.
  - d. We confirmed the payment was posted to the proper year. We found no exceptions.
2. We selected 3 new employees and Board of Trustees from 2024 and:
  - a. We inspected the employees'/Board of Trustees' personnel files for the retirement system, federal, state and local income tax withholding authorization.
  - b. We agreed the items in a above to the Payment Register Detail Report.

We identified that the Township did not have the proper withholding authorization forms on file for the three new employees selected to support the withholdings that were made as there was only one Ohio Public Employees Retirement System form and no forms to support school district income tax withholdings for the three employees.
3. We inspected the last remittance of tax and retirement withholdings for the year ended December 31, 2024 to confirm remittances were timely paid, and if the amounts paid agreed to the amounts withheld, plus the employer's share where applicable, during the final withholding period of 2024. We observed the following:

Withholding (plus employer share, where applicable)	Date Due	Date Paid	Amount Due	Amount Paid
Federal income taxes and Medicare	January 31, 2025	December 19, 2024	\$2,261.50	\$2,261.50
School district income tax	January 30, 2025	December 19, 2024	\$140.13	\$140.13
OPERS retirement	January 30, 2025	December 20, 2024	\$1,309.68	\$1,309.68

We found no exceptions.

- a. Recomputed the allocation of the Fiscal Officer's and Boards of Trustees' salary to the General, Gasoline Tax, and Cemetery Funds per the Payment Register Detail Report.
  - b. Traced the Fiscal Officer's and Board of Trustees' pay for time or services performed to supporting certifications the Revised Code requires.

We identified an exception with a Trustee's payroll allocation for the pay period ended April 2024. The Payment Register Detail Report identified that 55% of the applicable salary was charged to the General Fund and 45% of the applicable salary was charged to the Gasoline Tax Fund. However, the signed certification identified that 15% of the applicable time was related to the General Fund, 45% of the applicable time was related to the Gasoline Tax Fund, and 40% of the applicable time was related to the Cemetery Fund.
5. We compared total gross pay for the fiscal officer and each board of trustees member for 2024 and 2023 to the compensation permitted by Ohio Rev. Code §§ 507.09 and 505.24, respectively. Their pay did not exceed the Ohio Rev. Code §§ 507.09 and 505.24 permitted amounts.

### Non-Payroll Cash Disbursements

We selected 10 disbursements from the Payment Register Detail Report for the year ended December 31, 2024 and 10 from the year ended 2023 and determined whether:

- a. The disbursements were for a proper public purpose. We found no exceptions.
- b. The check number, date, payee name and amount recorded on the returned, canceled check and information from the bank statement for electronic payments agreed to the check number, date, payee name and amount recorded in the Payment Register Detail Report and to the names and amounts on the supporting invoices. We found no exceptions.
- c. The payment was posted to a fund consistent with the restricted purpose for which the fund's cash can be used. We found no exceptions.
- d. The fiscal officer certified disbursements requiring certification or issued a *Then and Now Certificate*, as required by Ohio Rev. Code § 5705.41(D). We identified 4 instances in 2024 and 5 instances in 2023 where the certification date was after the vendor invoice date, and there was also no evidence that a *Then and Now Certificate* was issued. Ohio Rev. Code § 5705.41(D) requires certifying at the time of a commitment, which should be on or before the invoice date, unless a *Then and Now Certificate* is used. Because we did not inspect all disbursements requiring certification, our report provides no assurance whether or not additional similar errors occurred

### Compliance – Budgetary

1. Ohio Rev. Code § 5705.41(B) prohibits expenditures (disbursements plus contract commitments including outstanding encumbrances) from exceeding appropriations. We compared total expenditures to total approved appropriations (Ohio Rev. Code §§ 5705.38 and 5705.40) plus any carryover appropriations for the General, Cemetery, and Public Works Commission Projects Funds for the year ended December 31, 2024, and General, Gasoline Tax, and Cemetery Funds for the year ended December 31, 2023 as recorded in the Appropriation Status Report. Expenditures did not exceed appropriations.
2. We inspected the Cash Summary by Fund Report for the years ended December 31, 2024 and 2023 for negative cash fund balances. Ohio Rev. Code § 5705.10 (I) provides that money paid into a fund must be used for the purposes for which such fund is established. As a result, a negative fund cash balance indicates that money from one fund was used to cover the expenses of another. No funds had a negative cash fund balance.

### Sunshine Law Compliance

1. We obtained and inspected the Township's Public Records Policy to determine the policy was in accordance with Ohio Rev. Code §§ 149.43(E)(2) and 149.43(B)(7(c)) and did not limit the number of responses that may be made to a particular person, limit the number of responses during a specified period of time, or establish a fixed period of time before it will respond unless that period is less than eight hours. We found no exceptions.
2.
  - a. We inquired with Township management and determined that the Township did not have any completed public records requests during the engagement period.
  - b. The Township did not have any denied public records requests during the engagement period.
  - c. The Township did not have any public records requests with redactions during the engagement period.

### **Sunshine Law Compliance (Continued)**

3. We inquired whether the Township had a records retention schedule and observed that it was readily available to the public as required by Ohio Rev. Code § 149.43(B)(2). We found no exceptions.
4. We determined if written evidence that the Public Records Policy was provided to the records custodian/manager as required by Ohio Rev. Code § 149.43(E)(2). There was no written evidence that the Public Record Policy was provided to the records custodian as required.
5. We inspected the Township's policy manual and determined the public records policy was included as required by Ohio Rev. Code § 149.43(E)(2). We found no exceptions.
6. We observed that the Township's poster describing their Public Records Policy was displayed conspicuously in all branches of the Township as required by Ohio Rev. Code § 149.43(E)(2). We found no exceptions.
7. We inquired with Township management and determined that the Township did not have any applications for record disposal submitted to the Records Commission during the engagement period.
8. We inspected individual proof of attendance and determined whether each elected official in accordance with Ohio Rev. Code § 149.43(E)(1) (or his/her designee) successfully attended a certified three-hour Public Records Training for each term of office as required by Ohio Rev. Code § 109.43(B). We identified that the terms for two elected officials ended during the period, but there was no evidence of these officials, or their designee, completing the required Public Records Training during their terms of office.
9. We inspected the public notices for the public meetings held during the engagement period and determined the Township notified the general public and news media of when and where meetings during the engagement period were to be held as required by Ohio Rev. Code § 121.22(F). We found no exceptions.
10. We inspected the minutes of public meetings during the engagement period in accordance with Ohio Rev. Code § 121.22(C) and determined whether they were:
  - a. Prepared – a file is created following the date of the meeting
  - b. Filed – placed with similar documents in an organized manner
  - c. Maintained - retained, at a minimum, for the engagement period
  - d. Open to public inspection – available for public viewing or request.We found no exceptions.
11. We inspected the minutes from the engagement period in accordance with Ohio Rev. Code § 121.22(G) and determined formal governing board actions were adopted in open meetings. We found no exceptions.

### **Contract Compliance**

1. We inspected the Minutes and Payment Register Detail report and identified the Township had expenditures subject to competitive bidding. We found no exceptions.
2. We selected 1 contract subject to competitive bidding requirements for 2024 and 1 for 2023 and
  - a. We inspected the contract and other bids for the contracted expenditure and determined:
    - i. The Township accepted the lowest bid and met the requirements of Ohio Rev. Code § 5575.01.

### Contract Compliance (Continued)

- ii. No bid splitting occurred
- iii. No deliberate attempts to evade bid limitations occurred, such as successive contracts just under the bid amount, occurred.
- iv. No apparent interest in the contract by a public official occurred.

We determined that there are potential exceptions related to the 2024 contract that was reviewed. For the applicable contract, a contractor that bid on the road resurfacing project was in attendance at the Board of Trustees meeting when the bids were opened on September 19, 2024. During the meeting and after bids had been opened, the contractor made a suggestion related to additional work to supplement the project that was bid and provided a quote/bid for this additional/supplemental work in the amount of \$34,320. The Trustees then approved to accept this additional work and cost. With the additional work, the total cost of the project exceeded the competitive bidding threshold of \$105,000. However, the Trustees did not request additional bids even though the scope of the project was expanded and exceeded the competitive bidding threshold. The Trustees also approved to accept the contractor's bid for the applicable road resurfacing project despite this not being the lowest bid. This all occurred during the September 19, 2024 board meeting. As a result, there are potential exceptions related to the full project being bid, bid splitting, and accepting the lowest bid.

### Other Compliance

1. Ohio Rev. Code § 117.38 requires townships to file their financial information in the Hinkle System within 60 days after the close of the fiscal year. This statute also permits the Auditor of State to extend the deadline for filing a financial report and establish terms and conditions for any such extension. Auditor of State established policies regarding the filing of complete financial statements, as defined in AOS Bulletin 2015-007 in the Hinkle System. We confirmed if the Township filed their complete financial statements, as defined by AOS Bulletin 2015-007 and Auditor of State established policy, within the allotted timeframe for the years ended December 31, 2024 and 2023 in the Hinkle System. We found no exceptions with the 2024 annual financial report filing. However, the annual financial report for 2023 was filed April 5, 2024, but was required to be filed no later than February 29, 2024.
2. We inquired of the fiscal officer and inspected the Fiscal Integrity Act Portal (<http://www.ohioauditor.gov/fiscalintegrity/default.html>) to determine whether the fiscal officer obtained the training required by Ohio Rev. Code §§ 507.12 and 733.81. The term of the Township's former Fiscal Officer ended March 31, 2024; however, there was no evidence available to support that the former fiscal officer obtained any of the required training hours during the applicable term.
3. The Township provided out-of-pocket insurance reimbursements in lieu of providing coverage to all employees.
  - a. We inspected the resolution authorizing reimbursements and determined it met the following documentation requirements for Ohio Rev. Code § 505.601.
    1. The Township has not chosen to procure a health plan,
    2. The Township has chosen to reimburse its officers and employees for each out-of-pocket premium,
    3. It provides for a maximum uniform monthly or yearly payment amount for each officer and employee, and
    4. It lists only the specific benefits allowed under Ohio Rev. Code § 505.60A that will be reimbursed.We found no exceptions.



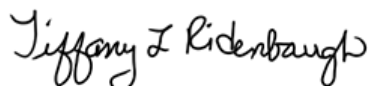
## Related Party Transactions

1. We inquired with management in order to identify any related party transactions and confirm if the required elected officials abstained from voting. We identified the following:
  - a. During 2024, the brother of Township Trustee Randy Schwable was paid in four instances for a total of \$1,000 for cemetery burials. For each of these payments, Trustee Schwable approved the applicable payment, along with the other Township Trustees, within a list of bills paid that were presented at the applicable Board of Township Trustees meeting.
  - b. During 2024, the wife of Township Trustee Wyatt Mohler was paid in three instances for a total of \$480 for mowing. For each of these payments, Trustee Mohler approved the applicable payment, along with the other Township Trustees, within a list of bills paid that were presented at the applicable Board of Township Trustees meeting.
  - c. During 2023, the wife of Township Trustee Douglas Stangel was paid in 29 instances for a total of \$21,039 for being the Township's Fiscal Officer, healthcare reimbursements, and other cost reimbursements. For each of these payments, Trustee Stangel approved the applicable payment, along with the other Township Trustees, within a list of bills paid that were presented at the applicable Board of Township Trustees meeting.Other than the applicable Township Trustee approving to pay the applicable expenditure, we found no exceptions.
2. We confirmed the transactions with the signed contracts and Shelby County Board of Elections website. We found no exceptions.
3. We obtained supporting evidence for the related party transactions identified in procedure 1. We found no exceptions.

We were engaged by the Township to perform this agreed-upon procedures engagement and conducted our engagement in accordance with the attestation standards established by the AICPA and the Comptroller General of the United States' *Government Auditing Standards*. We were not engaged to, and did not conduct an examination or review engagement, the objective of which would be the expression of an opinion or conclusion, respectively, on the Township's receipts, disbursements, balances and compliance with certain laws and regulations. Accordingly, we do not express an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Township and to meet our ethical responsibilities, in accordance with the ethical requirements established by the Comptroller General of the United States' *Government Auditing Standards* related to our agreed upon procedures engagement.

KEITH FABER  
Ohio Auditor of State



Tiffany L. Ridenbaugh, CPA, CFE, CGFM  
Chief Deputy Auditor

September 29, 2025

# OHIO AUDITOR OF STATE KEITH FABER



**WASHINGTON TOWNSHIP**

**SHELBY COUNTY**

## **AUDITOR OF STATE OF OHIO CERTIFICATION**

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



**Certified for Release 10/16/2025**

65 East State Street, Columbus, Ohio 43215  
Phone: 614-466-4514 or 800-282-0370

This report is a matter of public record and is available online at  
[www.ohioauditor.gov](http://www.ohioauditor.gov)