

U.S. Department of Labor

Office of Inspector General—Office of Audit

SINGLE AUDIT QUALITY CONTROL REVIEW



QUALITY CONTROL REVIEW OF THE SINGLE AUDIT OF EASTER SEALS, INC. AND THE EASTER SEALS FOUNDATION FOR THE YEAR ENDED DECEMBER 31, 2024

**DATE ISSUED: JANUARY 13, 2026
REPORT NUMBER: 24-26-002-50-598**



January 13, 2026

INSPECTOR GENERAL'S REPORT

Glenda Oakley
Chief Financial Officer
Easter Seals, Inc. and the Easter Seals Foundation
141 West Jackson Boulevard, Suite 1400 A
Chicago, IL 60604

Dear Ms. Oakley:

The purpose of this report is to formally advise you of the results of a Quality Control Review (QCR) the U.S. Department of Labor (DOL) Office of Inspector General (OIG) conducted on the single audit of Easter Seals, Inc. and the Easter Seals Foundation, completed by Plante & Moran, PLLC ("the Firm") under the Office of Management and Budget's (OMB) Title 2 C.F.R. Part 200 (Uniform Guidance)¹ for the year ended December 31, 2024.

Our objective was to determine if the audit was conducted in accordance with applicable standards, including generally accepted government auditing standards (GAGAS) and generally accepted auditing standards (GAAS), and met the requirements of OMB Uniform Guidance.

We determined the single audit report and audit work performed generally met the requirements of GAGAS, GAAS, and OMB Uniform Guidance. However, we found the Firm needed to correctly report the Type A/B threshold.

Details on the results of our review are provided in the Enclosure. Since the Firm agreed with the matter identified and took the corrective action necessary to properly address it, no official management response is required of the Firm. In providing this memorandum to the Firm, the OIG considers this matter closed.

¹ Title 2 C.F.R. § 200.0 through § 200.521

We appreciate the cooperation and courtesies the Firm extended to us during the review.

Sincerely,



Laura B. Nicolosi
Assistant Inspector General for Audit

Enclosure

cc: Toni Diprizio
Partner
Plante & Moran, PLLC

Latonya Torrence
Chief, Division of Resolution and Closeout
Office of Grants Management
Employment and Training Administration

Chantel Sollers
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Enclosure

Quality Control Review
Single Audit of Easter Seals, Inc. and the Easter Seals Foundation
for the Year Ended December 31, 2024
(24-26-002-50-598)

DOL OIG conducted a QCR of the single audit of Easter Seals, Inc. and the Easter Seals Foundation for the year ended December 31, 2024. A QCR is performed to provide evidence of the reliability of the single audit to the auditors of federal agency financial statements, such as those required by the Chief Financial Officers Act of 1990. The DOL major program covered by the single audit conducted by the Firm was the Senior Community Service Employment Program (see Table 1).²

Table 1: Scope of the OIG’s QCR

DOL Major Program Sections Reviewed	Assistance Listing Number	DOL Major Funds Reported as Expended
Senior Community Service Employment Program	17.235	\$23,482,390

Source: Easter Seals, Inc. and the Easter Seals Foundation’s December 31, 2024, Schedule of Expenditures of Federal Awards

For the year ended December 31, 2024, Easter Seals, Inc. and the Easter Seals Foundation reported federal expenditures of \$26,030,888, consisting of DOL funds totaling \$23,482,390 and non-DOL funds totaling \$2,548,498. The scope of the OIG’s QCR was the Senior Community Service Employment Program, equaling the total DOL funds expended.

The single audit is an organization-wide audit or examination of a non-federal entity that expends \$750,000 or more of federal assistance received for its operations.

² Major programs are critical to the single audit process, as they are the programs for which the Firm will be performing additional internal control work on and ultimately issuing a compliance opinion on as part of the single audit.

Usually conducted annually, a single audit has three main objectives:

1. Perform an audit of the entity's financial statements and report on a separate Schedule of Expenditures of Federal Awards in relation to the entity's financial statements;
2. Conduct a compliance audit of federal awards expended during the year as a basis for issuing additional reports on compliance related to major programs and on internal control over compliance; and
3. Follow up on prior audit findings by performing procedures to assess the reasonableness of the summary schedule of prior audit findings prepared by the auditee.

RESULTS

We determined the single audit report and audit work performed generally met the requirements of GAGAS, GAAS, and OMB Uniform Guidance. However, we found the Firm needed to correctly report the Type A/B threshold.

TYPE A/B THRESHOLD INCORRECTLY REPORTED BY THE FIRM

We found the Firm incorrectly reported the Type A/B threshold as \$750,000 instead of \$780,927 in the single audit report on the Schedule of Findings and Questioned Costs and on the data collection form. This threshold is used to determine the major programs to be audited. Our review of the audit documentation found the Firm applied the correct threshold in its testing procedures despite having reported it incorrectly.

According to 2 C.F.R. § 200.518(b)(1), auditors must identify awards from the larger federal programs that exceeded the level outlined in Table 2 during the audit period. These programs must be labeled as Type A programs. The Type A/B threshold is the dollar threshold used to distinguish between Type A and Type B programs. Federal programs over the Type A/B threshold are the larger federal programs and are referred to as Type A programs. Everything less than the Type A/B threshold are referred to as Type B programs.

In addition, 2 C.F.R. § 200.518(d)(2) states “the auditor is not expected to perform risk assessments on relatively small programs. Therefore, the auditor is

only required to perform risk assessments on Type B programs that exceed twenty-five percent (.25) of the Type A/B threshold. Table 2 presents the thresholds based on the significance of Type A program funding.

Table 2: OMB Uniform Guidance Type A/B Thresholds

Total Federal Awards Expended	Type A/B Threshold
Equal to or exceed \$750,000 but less than or equal to \$25 million	\$750,000
Exceed \$25 million but less than or equal to \$100 million	Total federal awards expended times 0.03
Exceed \$100 million but less than equal to \$1 billion	\$3 million
Exceed \$1 billion but less than or equal to \$10 billion	Total federal awards expended times 0.003
Exceed \$10 billion but less than or equal to \$20 billion	\$30 million
Exceed \$20 billion	Total federal awards expended times 0.0015

Source: 2 C.F.R. § 200.518(b)(1)

Total federal awards expended by Easter Seals, Inc. and the Easter Seals Foundation of \$26,030,888 were in excess of \$25 million but less than or equal to \$100 million. Therefore, the Type A/B threshold should have been \$780,927 (\$26,030,888 times 0.03).

The Firm attributed its reporting of the incorrect threshold to an oversight. The Firm provided us with audit documentation showing it was aware of the Type A/B threshold requirements, as demonstrated by its correct calculation in the audit work papers. Although the reporting inaccuracy had no effect on the Firm's audit work, it resulted in incorrect information being maintained in the federal database that is used to analyze information from all single audits.

The Firm agreed with the matter identified and took the corrective actions necessary to properly address it. The Firm provided us with the revised single audit report and revised data collection form submitted to the Federal Audit Clearinghouse reflecting the corrected Type A/B threshold. Since the Firm has already taken corrective action, we consider this matter closed.

APPENDIX A: SCOPE AND METHODOLOGY

Scope

We performed a QCR of the Firm's single audit of the Easter Seals, Inc. and the Easter Seals Foundation's financial statements, Schedule of Expenditures of Federal Awards, reports required by GAGAS, and OMB Uniform Guidance for the year ended December 31, 2024. Our QCR of the Firm's single audit covered \$23,482,390 in DOL major program federal expenditures for the Senior Community Service Employment Program. We performed our work onsite at the Firm in Chicago, Illinois.

Methodology

We reviewed the single audit report using the Council of Inspectors General on Integrity and Efficiency's (CIGIE) "Guide for Desk Reviews of Single Audit Reports" and reviewed the supporting audit documentation using CIGIE's "Guide for Quality Control Reviews of Single Audits." These guides were developed to ensure compliance with the requirements of OMB Uniform Guidance (including the compliance supplement), GAGAS, and the American Institute of Certified Public Accountants' (AICPA) "Audit Guide on Government Auditing Standards and Single Audits."

We also reviewed the financial statements, compliance, and internal control reporting; Schedule of Expenditures of Federal Awards; and Schedule of Findings and Questioned Costs. Further, we held discussions with the Firm to accomplish the required steps.

Specifically, we reviewed:

- Auditor Qualifications,
- Independence,
- Professional Judgment/Due Professional Care,
- Quality Control,
- Fieldwork,
- Schedule of Federal Awards,
- Determination of Major Federal Programs,
- Schedule of Findings and Questioned Costs,
- Summary of Prior Audit Findings,
- Financial Statement Risk Assessment,
- Financial Statement Identification and Evaluation of Audit Findings,

- Communication of Financial Statement Audit Findings,
- Compliance with AICPA Standards,
- Considerations Related to Audit of Major Federal Program,
- Sampling - Major Federal Program (Internal Control and Compliance),
- Testing of Internal Control Over Compliance, and
- Testing for Compliance with Direct and Material Compliance Requirements.

We also reviewed the Firm's peer review applicable to the period of the audit.

Criteria

- OMB Uniform Guidance, Title 2 C.F.R. Part 200
- OMB Compliance Supplement
- AICPA Audit Guide on Government Auditing Standards and Single Audits
- Clarified Statements on Auditing Standards (AU-C)
- GAGAS

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