

Early Learning Coalition of Broward County, Inc. Retirement Plan

Financial Statements
For the Year Ended December 31, 2022



Early Learning Coalition of Broward County, Inc. Retirement Plan

Financial Statements
For the Year Ended December 31, 2022

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INDEPENDENT AUDITOR'S REPORT

To the Plan Administrator
Early Learning Coalition of Broward County, Inc. Retirement Plan

Scope and Nature of the ERISA Section 103(a)(3)(C) Audit

We have performed audits of the accompanying financial statements of Early Learning Coalition of Broward County, Inc. Retirement Plan (the "Plan"), an employee benefit plan subject to the Employee Retirement Income Security Act of 1974 (ERISA), as permitted by ERISA Section 103(a)(3)(C) (ERISA Section 103(a)(3)(C) audit). The financial statements comprise the statements of net assets available for benefits as of December 31, 2022 and 2021, and the related statement of changes in net assets available for benefits for the year ended December 31, 2022, and the related notes to the financial statements.

Management, having determined it is permissible in the circumstances, has elected to have the audits of Plan's financial statements performed in accordance with ERISA Section 103(a)(3)(C) pursuant to 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA. As permitted by ERISA Section 103(a)(3)(C), our audits need not extend to any statements or information related to assets held for investment of the plan (investment information) by a bank or similar institution or insurance carrier that is regulated, supervised, and subject to periodic examination by a state or federal agency, provided that the statements or information regarding assets so held are prepared and certified to by the bank or similar institution or insurance carrier in accordance with 29 CFR 2520.103-5 of the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA (qualified institution).

Management has obtained certifications from a qualified institution as of December 31, 2022 and 2021, and for the year ended December 31, 2022, stating that the certified investment information, as described in Note 3 to the financial statements, is complete and accurate.

Opinion

In our opinion, based on our audits and on the procedures performed as described in the Auditor's Responsibilities for the Audit of the Financial Statements section:

- the amounts and disclosures in the financial statements referred to above, other than those agreed to or derived from the certified investment information, are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America.
- the information in the financial statements referred to above related to assets held by and certified to by a qualified institution agrees to, or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

Basis for Opinion

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Plan and to meet our other ethical responsibilities in accordance with the relevant ethical requirements relating to our audits. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our ERISA Section 103(a)(3)(C) audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error. Management's election of the ERISA Section 103(a)(3)(C) audit does not affect management's responsibility for the financial statements.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about Plan's ability to continue as a going concern for one year after the date the financial statements are available to be issued.

Management is also responsible for maintaining a current plan instrument, including all plan amendments; administering the plan; and determining that the plan's transactions that are presented and disclosed in the financial statements are in conformity with the plan's provisions, including maintaining sufficient records with respect to each of the participants, to determine the benefits due or which may become due to such participants.

Auditor's Responsibilities for the Audit of the Financial Statements

Except as described in the Scope and Nature of the ERISA Section 103(a)(3)(C) Audit section of our report, our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. 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 generally accepted auditing standards will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, 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 the amounts and disclosures in the financial statements.

Early Learning Coalition of Broward County, Inc. Retirement Plan

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of Plan's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about Plan's ability to continue as a going concern for a reasonable period of time.

Our audits did not extend to the certified investment information, except for obtaining and reading the certification, comparing the certified investment information with the related information presented and disclosed in the financial statements, and reading the disclosures relating to the certified investment information to assess whether they are in accordance with the presentation and disclosure requirements of accounting principles generally accepted in the United States of America.

Accordingly, the objective of an ERISA Section 103(a)(3)(C) audit is not to express an opinion about whether the financial statements as a whole are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Supplemental Schedule Required by ERISA

The supplemental schedule of schedule of assets (held at end of year) as of December 31, 2022, is presented for purposes of additional analysis and is not a required part of the financial statements but is supplementary information required by the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA. 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 included in the supplemental schedule, other than that agreed to or derived from the certified investment information, has been subjected to auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with generally accepted auditing standards. For information included in the supplemental schedule that agreed to or is derived from the certified investment information, we compared such information to the related certified investment information.

In forming our opinion on the supplemental schedule, we evaluated whether the supplemental schedule, other than the information agreed to or derived from the certified investment information, including their form and content, is presented in conformity with the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA.

In our opinion:

- the form and content of the supplemental schedule, other than the information in the supplemental schedule that agreed to or is derived from the certified investment information, are presented, in all material respects, in conformity with the Department of Labor's Rules and Regulations for Reporting and Disclosure under ERISA.

Early Learning Coalition of Broward County, Inc. Retirement Plan

- the information in the supplemental schedule related to assets held by and certified to by a qualified institution agrees to or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

Keefe McCullough

KEEFE McCULLOUGH

Fort Lauderdale, Florida
October 1, 2023

**Early Learning Coalition of Broward County, Inc. Retirement Plan
Statements of Net Assets Available for Benefits
December 31, 2022 and 2021**

	<u>2022</u>	<u>2021</u>
Assets:		
Investments at fair value:		
Variable annuity contracts - separate accounts	\$ 3,879,213	\$ 4,042,452
Investments at contract value:		
Fixed annuity contracts, fully benefit responsive	<u>354,375</u>	<u>391,945</u>
Total investments	<u>4,233,588</u>	<u>4,434,397</u>
Other assets:		
Employer contribution receivable	33,447	-
Employee contribution receivable	19,942	-
Notes receivable from participants	<u>185,864</u>	<u>85,886</u>
Total assets	<u>4,472,841</u>	<u>4,520,283</u>
Liabilities:	<u>-</u>	<u>-</u>
Net Assets Available for Benefits	\$ <u><u>4,472,841</u></u>	\$ <u><u>4,520,283</u></u>

The accompanying notes to financial statements are an integral part of these statements.

**Early Learning Coalition of Broward County, Inc. Retirement Plan
Statement of Changes in Net Assets Available for Benefits
For the Year Ended December 31, 2022**

Additions to Net Assets Attributed to:

Investment income (loss):	
Net depreciation in fair value of investments	\$ (712,119)
Dividend and interest income	<u>6,012</u>
Total investment income (loss)	<u>(706,107)</u>
Interest on notes receivable from participants	<u>2,330</u>
Contributions:	
Participant	522,795
Employer	306,054
Rollover	<u>96,002</u>
Total contributions	<u>924,851</u>
Total additions	<u>221,074</u>

Deductions from Net Assets Attributed to:

Benefits paid to participants	240,691
Deemed distribution	18,698
Administrative expenses	<u>9,127</u>
Total deductions	<u>268,516</u>
Net increase (decrease) in net assets available for benefits	(47,442)

Net Assets Available for Benefits, January 1, 2022	<u>4,520,283</u>
Net Assets Available for Benefits, December 31, 2022	<u>\$ 4,472,841</u>

The accompanying notes to financial statements are an integral part of these statements.

Note 1 - Description of the Plan

The following description of Early Learning Coalition of Broward County, Inc. Retirement Plan (the "Plan") provides only general information. A more complete description of the Plan's provisions may be found in the Summary Plan Description, which has been distributed to participants, and also in the Plan Document, which is available to Plan participants upon request.

General and eligibility: The Plan is a defined contribution plan established in 2002 by Early Learning of Broward County, Inc. (the "Sponsor/Organization") to provide benefits to eligible employees of the Sponsor, as defined by the Plan. The Plan was amended in 2022 to designate compliance testing methodologies. The Plan is subject to the provisions of the Employee Retirement Income Security Act of 1974 (ERISA).

Employees are eligible to make salary reduction contributions to the Plan and to receive employer contributions immediately upon employment.

Plan administration: The Plan's assets are held by The Variable Annuity Life Insurance Company ("VALIC"), custodian of the Plan. Contributions to the Plan are held and managed by the custodian who invests contributions and investment income and makes distributions to participants.

Contributions: Each year, eligible participants may contribute a portion of their annual compensation, subject to the Internal Revenue Service regulations and other limitations specified in the Plan. Contributions are pre-tax, which are deductible from gross income for federal income tax purposes. In addition, the Plan allows for rollover contributions from other plans under certain conditions.

As determined annually by the Organization's management, the Sponsor may make a discretionary contribution, which is allocated based on a percentage of Plan compensation, for the following allocation groups:

- Tier 1: Participants enrolled prior to October 1, 2017
- Tier 2: Participants enrolled on or after October 1, 2017

For the year ended December 31, 2022, discretionary contributions to the plan totaled approximately \$ 293,000.

Participant accounts (self-directed): Each participant's account is credited with the participant's contributions, an allocation of the Organization's contribution, Plan earnings (losses), and charged with the participant's withdrawals and an allocation of administrative expenses. Allocations are based on participant contributions, eligible compensation, participant account balance, or specific participant transactions, as defined by the Plan. The earnings or losses, including fair value adjustments, on a participant's account are based on the performance of the investment funds. In addition, interest charged on individual participant loans is credited directly to the respective participant's account. The benefit to which a participant is entitled is the benefit that can be provided from the participant's vested account.

Vesting: Participants are immediately 100% vested in their contributions plus actual earnings thereon. Vesting in the Organizations discretionary contributions is based on years of service. Participants are fully vested in discretionary contributions after completion of one year of service.

Note 1 - Description of the Plan (continued)

Notes receivable from participants: Participants may borrow a minimum of \$ 1,000 up to a maximum, which is the lesser of \$ 50,000 or 50% of their vested account balance. The loans are secured by the balance in the participant's account and bear interest at the prevailing rate at the time of the request; ranging from 2.50% to 4.50% at December 31, 2022. Principal and interest are paid ratably through payroll deductions. As of December 31, 2022 and 2021, notes receivable totaled approximately \$ 186,000 and \$ 86,000, respectively.

Payment of benefits: Benefit payments and distributions of a participant's account are made upon the normal retirement age of 65, termination from service with the Organization, death or disability. In service distributions can be made only if the participant has attained age 59½. In addition, the Plan allows for hardship distributions. Distributions may be made in lump-sum, partial payments, installment payments, or annuity contracts. In addition, the Plan allows for automatic distribution of participant account balances that do not exceed \$ 5,000.

Forfeitures: Any non-vested account balance after distribution of a terminated participant's vested account balance is forfeited. Forfeitures may be used to reduce future employer contributions, pay Plan expenses, or be allocated to participants. At December 31, 2022 and 2021, there were no forfeiture balances.

Note 2 - Summary of Significant Accounting Policies

Basis of accounting: The financial statements of the Plan are prepared under the accrual basis of accounting in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP). Consequently, additions to net assets are recognized when earned and deductions from net assets are recognized when the obligation is incurred.

Investment valuation and income recognition: The Plan investments are held in various non-fully benefit responsive variable annuity contracts and a fixed annuity. Investments are reported at estimated fair value, except for fully benefit responsive investment contracts, which are reported at contract value. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The net appreciation or depreciation in the fair value of investments includes realized and unrealized gains and losses on the fair value of investments held by the Plan. Purchases and sales of investments are recorded on a settlement date basis. Interest income is accrued as it is earned, and dividends are recorded as of the ex-dividend date. The Plan's management determines the Plan's valuation policies utilizing information provided by the trustee.

Notes receivable from participants: Notes receivable from participants are measured at their unpaid principal balance plus any accrued but unpaid interest. Interest income is recorded as earned. Related fees are charged directly to the borrowing participant's accounts and are included in administrative expenses when incurred. If a participant does not make loan repayments and the plan administrator considers the participant loan to be in default, the loan balance is reduced, and the delinquent participant note receivable is recorded as a benefit payment based on the terms of the Plan document.

Payment of benefits: Benefits are recorded when paid.

Administrative expenses: Certain administrative expenses are paid directly from Plan assets. These amounts, if any, are reflected as deductions from net assets in the accompanying statement of changes in net assets available for benefits. The Sponsor pays all other administrative expenses.

Note 2 - Summary of Significant Accounting Policies (continued)

Use of estimates: The preparation of financial statements in conformity with U.S. GAAP requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and changes therein, and disclosures in the financial statements and the reported amounts of additions to and reductions from net assets during the reporting period. Accordingly, actual results could differ from those estimates.

Date of management's review: Subsequent events have been evaluated by management through October 1, 2023, which is the date the financial statements were available to be issued.

Note 3 - Information Certified by the Plan's Custodian

The Plan Administrator has elected the method of compliance permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulation for Reporting and Disclosure under ERISA.

Accordingly, The Variable Annuity Life Insurance Company ("VALIC") the custodian of the Plan assets, has certified to the completeness and accuracy of all investments, including notes receivable from participants, reflected on the accompanying statements of net assets available for benefits as of December 31, 2022 and 2021; the related investment activity reflected in the accompanying statement of changes in net assets available for benefits for the year ended December 31, 2022; and the information reflected on the accompanying supplemental schedule of assets (held at end of year) as of December 31, 2022.

Note 4 - Fair Value Measurements

In accordance with the Financial Accounting Standards Board in its Accounting Standards Codification, (ASC) No. 820, *Fair Value Measurements and Disclosures*, the Plan follows an established framework for measuring fair value and expanded disclosures about fair value measurements. Various inputs are used in determining the value of the Plan's investments. These inputs are summarized in three levels listed below:

- Level 1 - inputs are quoted market prices (unadjusted) in active markets for identical investments that the reporting entity can access at the measurement date.
- Level 2 - inputs are other than quoted prices included within Level 1 that are observable for the investments, either directly or indirectly (e.g. quoted prices in active markets for similar securities, securities valuations based on commonly quoted benchmarks, interest rates and yield curves, and/or securities indices).
- Level 3 - inputs are significant unobservable inputs (e.g. information about assumptions, including risk, market participants would use in pricing a security).

Note 4 - Fair Value Measurements (continued)

The inputs or methodology used for valuing securities are not necessarily an indication of the risks associated with investing in those securities.

Non-fully benefit responsive variable annuity contracts - separate accounts are reported at fair value, as approximated by contract value. The contract value equals accumulated cash contributions and interest credited to the Plan’s contracts, less withdrawals. The variable annuity contracts - separate accounts include only mutual fund investments; investments in the funds are valued at the net asset value per share at the close of each business day as reported by each fund adjusted for dividends and certain fees.

Fair values of investments held by the Plan are classified at December 31, 2022, and 2021 are as follows:

	<u>Level 1</u>	<u>Level 2</u>	<u>Level 3</u>	<u>Total</u>
At December 31, 2022:				
Variable annuity contracts - separate accounts	\$ <u>3,879,213</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>3,879,213</u>
At December 31, 2021:				
Variable annuity contracts - separate accounts	\$ <u>4,042,452</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>4,042,452</u>

Note 5 - Guaranteed Return Accounts

Previously, the Plan entered into fully benefit-responsive investment contracts with The Variable Annuity Life Insurance Company (“VALIC”). VALIC maintains the contributions as general accounts, which are credited with earnings (at an established rate) on the underlying investments, and charged for participant withdrawals and administrative expenses. The crediting interest rate is agreed upon with the issuer, on a portfolio basis. Such interest rate is reviewed periodically for resetting. At December 31, 2022 and 2021, such investments were approximately to \$ 354,000 and \$ 392,000, respectively.

Because the investment contracts are fully benefit-responsive, contract value is the relevant measurement for that portion of the net assets available for benefits. This investment option is presented on the face of the statements of net assets available for benefits at contract value which approximates fair value in arriving at net assets available for benefits. Contract value, as reported to the Plan by VALIC, represents contributions made under the contract, plus guaranteed earnings, less participant withdrawals and administrative expenses. Participants may ordinarily direct the withdrawal or transfer of all or a portion of their investment at contract value. Certain transactions may be restricted for up to six months in the event of full and immediate surrender of the contract.

The Plan’s ability to receive amounts due in accordance with fully benefit-responsive investment contracts is dependent on the third-party issuer’s ability to meet its financial obligations. The issuer’s ability to meet its contractual obligations may be affected by future economic and regulatory developments.

Note 5 - Guaranteed Return Accounts (continued)

Certain events might limit the ability of the Plan to transact at contract value with the issuer. Such events may include (1) amendments to the Plan documents (including complete or partial Plan termination or merger with another plan), (2) changes to the Plan's prohibition on competing investment options or deletion of equity wash provisions, (3) bankruptcy of the Plan sponsor or other Plan sponsor events (for example, divestitures or spin-offs of a subsidiary) that cause a significant withdrawal from the Plan, (4) the failure of the trust to qualify for exemption from federal income taxes or any required prohibited transaction exemption under ERISA, or (5) premature termination of the contract. Per management, no events are probable of occurring that might limit the ability of the Plan to transact at contract value with the contract issuers and that also would limit the ability of the Plan to transact at contract value with the participants.

In addition, certain events may allow the issuer to terminate the contract with the Plan and settle at an amount different from contract value. Such events may include (1) an uncured violation of the Plan's investment guidelines, (2) a breach of material obligation under the contract, (3) a material misrepresentation, or (4) a material amendment to the agreement without the consent of the issuers.

Note 6 - Cash Receipts and Payments

All contributions, excluding contributions receivable, to the Plan have been placed in investments referred to in Notes 4 and 5. In addition, there have been benefit and individual payments of approximately \$ 259,000 to Plan participants during the year ended December 31, 2022.

Note 7 - Tax Status

The Plan obtained its latest determination letter dated April 5, 2018, in which the IRS stated that the plan, a Prototype Standardized Profit-Sharing Plan with CODA, was designed in accordance with the applicable sections of the Internal Revenue Code (IRC). The Plan Administrator believes that the Plan is designed and is currently being operated in compliance with the applicable requirements of the IRC. The Trust is, therefore, exempt from federal income tax.

The Plan Administrator has evaluated the tax positions taken by the Plan and does not believe the Plan has any uncertain tax positions that require disclosure or adjustment to the financial statements. The Plan is subject to routine audits by tax authorities; however, there are currently no audits for any tax periods in progress.

Note 8 - Parties in Interest

Section 3(14) of ERISA defines a party-in-interest to include, fiduciaries or employees of the Plan, any person who provides services to the Plan or an employer whose employees are covered by the Plan. Certain administrative functions are performed by the officers or employees of the Company. No such officer or employee receives compensation from the Plan. Notes receivable from participants also reflect party-in-interest transactions.

Certain Plan investments are managed and held by VALIC and its affiliates, the trustee and custodian of the Plan, therefore these transactions and fee payments to VALIC and its affiliates qualify as party-in-interest transactions.

These party-in-interest transactions are exempt from the prohibited transaction rules of ERISA.

Note 9 - Risks and Uncertainties

The Plan's investment securities are exposed to various risks such as interest rate, market, and credit risks. Due to the level of risk associated with certain investment securities, it is at least reasonably possible that changes in the value of investment securities, will occur in the near term and that such changes could materially affect participant's account balances and the amounts reported on the statements of net assets available for benefits.

Note 10 - Plan Termination

Although it has not expressed any intent to do so, the Organization has the right under the Plan to discontinue its contributions and/or to terminate the Plan at any time subject to the provisions of ERISA. In the event of Plan termination, participants will become one hundred percent (100%) vested in their allocation of any previous employer contributions.

**Early Learning Coalition of Broward County, Inc. Retirement Plan
Schedule of Assets (Held at End of Year)
December 31, 2022**

Form 5500
Schedule H
Line 4i, Schedule of Assets (Held at End of Year)

EIN - 65-1060848
Plan #002

(a) Party-in- Interest	(b) Identity of Issue, Borrower, Lessor, or Similar Party	(c) Description of Investment Including Maturity Date, Interest Rate, Collateral, Par, or Maturity Value	(d) Cost	(e) Current Value
*	VALIC	Aggressive Growth Lifestyle (Variable Annuity)	**	\$ 61,071
*	VALIC	Ariel Fund (Variable Annuity)	**	14,748
*	VALIC	Blue Chip Growth Fund (Variable Annuity)	**	128,709
*	VALIC	Core Bond Fund (Variable Annuity)	**	76,824
*	VALIC	Dividend Value (Variable Annuity)	**	56,473
*	VALIC	Emerging Economies (Variable Annuity)	**	129,247
*	VALIC	Global Real Estate Fund (Variable Annuity)	**	42,747
*	VALIC	Gs Vit Gov Money Mkt Fund (Variable Annuity)	**	546,070
*	VALIC	High Yield Bond Fund (Variable Annuity)	**	28,897
*	VALIC	Inflation Protected Fund (Variable Annuity)	**	41,384
*	VALIC	International Government Bond (Variable Annuity)	**	1,923
*	VALIC	International Growth Fund (Variable Annuity)	**	11,938
*	VALIC	International Value Fund (Variable Annuity)	**	98,553
*	VALIC	International Equities Index Fund (Variable Annuity)	**	221,393
*	VALIC	Intl Opportunities (Variable Annuity)	**	96,635
*	VALIC	Intl Socially Responsible Fund (Variable Annuity)	**	19,953
*	VALIC	Large Capital Growth (Variable Annuity)	**	35,995
*	VALIC	Mid Cap Index Fund (Variable Annuity)	**	221,943
*	VALIC	Mid Cap Growth Fund (Variable Annuity)	**	60,388
*	VALIC	Mid Cap Value Fund (Variable Annuity)	**	204,921
*	VALIC	Moderate Growth Lifestyle (Variable Annuity)	**	145,718
*	VALIC	Nasdaq-100(R) Index Fund (Variable Annuity)	**	103,755
*	VALIC	Science & Technology Fund (Variable Annuity)	**	66,289
*	VALIC	Small Cap Growth Fund (Variable Annuity)	**	19,783
*	VALIC	Small Cap Index Fund (Variable Annuity)	**	39,658
*	VALIC	Small Cap Special Value Fund (Variable Annuity)	**	15,755
*	VALIC	Small Cap Value Fund (Variable Annuity)	**	76,835
*	VALIC	Stock Index Fund (Variable Annuity)	**	166,274
*	VALIC	Systematic Core Fund (Variable Annuity)	**	49,944
*	VALIC	Systematic Value (Variable Annuity)	**	103,193
*	VALIC	T Rowe Price Retirement 2020 Adv (Variable Annuity)	**	13,937
*	VALIC	T Rowe Price Retirement 2030 Adv (Variable Annuity)	**	105,456
*	VALIC	T Rowe Price Retirement 2035 Adv (Variable Annuity)	**	179,356
*	VALIC	T Rowe Price Retirement 2045 Adv (Variable Annuity)	**	6,679
*	VALIC	T Rowe Price Retirement 2050 Adv (Variable Annuity)	**	287
*	VALIC	US Socially Responsible Fund (Variable Annuity)	**	129,780
*	VALIC	Vanguard Lifestrategy Growth (Variable Annuity)	**	46,204
*	VALIC	Vanguard Lifestrategy Modera (Variable Annuity)	**	4,191
*	VALIC	Vanguard Lt Inv-Grade Fund (Variable Annuity)	**	2,220
*	VALIC	Vanguard Wellington Fund Inc (Variable Annuity)	**	123,155
*	VALIC	Vanguard Windsor II (Variable Annuity)	**	269,497

Early Learning Coalition of Broward County, Inc. Retirement Plan
 Schedule of Assets (Held at End of Year)
 (Continued)
 December 31, 2022

Form 5500
 Schedule H, Part IV
 Line 4i, Schedule of Assets (Held at End of Year)

EIN - 65-1060848
 Plan #002

(a) Party-in-Interest	(b) Identity of Issue, Borrower, Lessor, or Similar Party	(c) Description of Investment Including Maturity Date, Interest Rate, Collateral, Par, or Maturity Value	(d) Cost	(e) Current Value
*	VALIC	VC I Capital Appreciation (Variable Annuity)	**	105,884
*	VALIC	VC I Conserve Growth Lifestyle (Variable Annuity)	**	5,551
*	VALIC	Fixed Account Plus	**	329,260
*	VALIC	Short Term Fixed Account	**	<u>25,115</u>
		Subtotal		4,233,588
*	Notes receivable from participants	Notes receivable with interest rates ranging from 2.50% to 4.50%		<u>185,864</u>
				<u>\$ 4,419,452</u>

* Represents party-in-interest.

** Cost omitted for participant directed investments.

Note: The information presented has been prepared and certified by The Variable Annuity Life Insurance Company ("VALIC") as permitted by 29 CFR 2520.103-8 of the Department of Labor's Rules and Regulations for Reporting and Disclosure.

October 1, 2023

To the Plan Administrator
Early Learning Coalition of Broward County, Inc. Retirement Plan

We have audited the financial statements of Early Learning Coalition of Broward County, Inc. Retirement Plan (the “Plan”), an employee benefit plan subject to the Employee Retirement Income Security Act of 1974 (ERISA), as permitted by ERISA Section 103(a)(3)(C) (ERISA Section 103(a)(3)(C) audit) for the year ended December 31, 2022 and have issued our report thereon dated October 1, 2023. As permitted by ERISA Section 103(a)(3)(C), our audit did not extend to any statements or information related to assets held for investment of the Plan (investment information) by Voya Retirement Insurance and Annuity Company, the trustee, which is a bank or similar institution or insurance carrier that is regulated, supervised, and subject to periodic examination by a state or federal agency, that prepared and certified the statements or information regarding assets so held in accordance with 29 CFR 2520.103-5. Our audit did not extend to the certified investment information, except for obtaining and reading the certification, comparing the certified investment information with the related information presented and disclosed in the financial statements and ERISA-required supplemental schedule, and reading the disclosures relating to the certified investment information to assess whether they are in accordance with the presentation and disclosure requirements of accounting principles generally accepted in the United States (U.S. GAAP). Accordingly, the objective of an ERISA Section 103(a)(3)(C) audit is not to express an opinion about whether the financial statements as a whole are presented fairly, in all material respects, in accordance with U.S. GAAP. Professional standards require that we provide you with information about our responsibilities under generally accepted auditing standards, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our letter to you dated May 8, 2023. Professional standards also require that we communicate to you the following information related to our audit.

Significant Audit Matters

Qualitative Aspects of Accounting Practices

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by the Plan are described in Note 2 to the financial statements. No new accounting policies were adopted and the application of existing policies was not changed during the year ended December 31, 2022. We noted no transactions entered into by the Plan during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the financial statements in the proper period.

Accounting estimates are an integral part of the financial statements prepared by management and are based on management’s knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected.

The most sensitive estimate affecting the financial statements was:

- The determination of the fair and contract value of the investments held by the Plan. All investment information was obtained or derived from the information supplied to the plan administrator and certified as complete and accurate by The Variable Annuity Life Insurance Company, the custodian of the Plan, at December 31, 2022. Additional information related to the investments held by the Plan is disclosed in Notes 4 and 5 to the financial statements.

The financial statements disclosures are neutral, consistent, and clear.

Form 5500 Procedures

We are required to obtain and read a substantially complete draft of Form 5500 prior to dating our auditor's report. The purpose of this procedure is to identify any material inconsistencies between the draft Form 5500 and the Plan's financial statements. We identified no material inconsistencies in performing and completing our audit.

Difficulties Encountered in Performing the Audit

We encountered no significant difficulties in dealing with management in performing and completing our audit.

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. Management has corrected all such misstatements. In addition, none of the misstatements detected as a result of audit procedures and corrected by management were material, either individually or in aggregate, to the financial statements as a whole. A detailed list of audit journal entries was provided to management and is available upon request.

Reportable Findings

For purposes of this letter, a reportable finding is a matter that includes one or more of the following: (1) noncompliance or suspected noncompliance with laws and regulations, (2) a finding that in our professional judgment is significant and relevant to you regarding your responsibility to oversee the financial reporting process, and (3) an indication of internal control deficiencies identified during the audit that have not been previously communicated to management by other parties and that we determined are sufficiently important to merit management's attention. We identified certain matters that are communicated to management in a separate letter dated October 1, 2023.

Disagreements with Management

For purposes of this letter, a disagreement with management is a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditor's report. We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations

We have requested certain representations from management that are included in the management representation letter dated October 1, 2023.

Management Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a “second opinion” on certain situations. If a consultation involves application of an accounting principle to the Plan’s financial statements or a determination of the type of auditor’s opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

Other Audit Findings or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Plan’s auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

Other Matters

Our responsibility for the ERISA-required supplemental schedule accompanying the financial statements is to perform adequate procedures to evaluate whether the form and content of the ERISA-required supplemental schedule, other than that agreed to or derived from the certified investment information, is presented in compliance with the DOL’s Rules and Regulations for Reporting and Disclosure under ERISA, and whether the information in the supplemental schedule related to assets held by and certified to by a qualified institution agrees to, or is derived from, in all material respects, the information prepared and certified by an institution that management determined meets the requirements of ERISA Section 103(a)(3)(C).

This information is intended solely for the use of the Plan Administrator, Sponsor, Trustees, and others within the management of the Plan Sponsor and is not intended to be, and should not be, used by anyone other than these specified parties.

Very truly yours,



KEEFE McCULLOUGH

Early Learning Coalition of
Broward County, Inc. Retirement Plan

Report to Management
For the Year Ended December 31, 2022



To the Board of Directors
Early Learning Coalition of Broward County, Inc. Retirement Plan

Except as discussed in the following paragraph, in planning and performing our audit of the financial statements of Early Learning Coalition of Broward County, Inc. Retirement Plan (the “Plan”) as of and for the year ended December 31, 2022, in accordance with auditing standards generally accepted in the United States of America, we considered the Plan’s internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of issuing our report on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Plan’s internal control. Accordingly, we do not express an opinion on the effectiveness of the Plan’s internal control.

We were engaged to perform an audit of the Plan as permitted by ERISA Section 103(a)(3)(C) pursuant to 29 CFR 2520.103-8 of the Department of Labor’s Rules and Regulations for Reporting and Disclosure under the ERISA Income Security Act of 1974 (ERISA). Our audit did not include all of the procedures required by auditing standards generally accepted in the United States of America and did not include a consideration of internal control relating to the information summarized in Note 3 to those financial statements.

Our consideration of internal control was for the limited purpose described in the preceding paragraphs and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we identified certain deficiencies in internal control that we consider to be material weaknesses.

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 Plan’s financial statements will not be prevented, or detected and corrected, on a timely basis. We consider the deficiencies in the Plan’s internal control, discussed on the accompanying memorandum, to be material weaknesses.

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.

We will review the status of these comments during our next audit engagement. We have already discussed this comment and suggestion with various Plan personnel, and we will be pleased to discuss these comments in further detail at your convenience, to perform any additional study of these matters, or to assist you in implementing the recommendations.

CPAs + Trusted Advisors

Early Learning Coalition of Broward County, Inc. Retirement Plan

This communication is intended solely for the information and use of Plan management, the Plan Administrator, Trustees, and others within the management of the Plan Sponsor, and is not intended to be, and should not be, used by anyone other than these specified parties.

Keefe McCullough

KEEFE McCULLOUGH

Fort Lauderdale, Florida
October 1, 2023

**Early Learning Coalition of Broward County, Inc. Retirement Plan
Internal Control Comments and Recommendations
December 31, 2022**

Status of Prior Year Internal Control Comments and Recommendations

	STILL APPLICABLE	IMPLEMENTED OR NO LONGER RELEVANT
2020-01: Plan Administration	X	
2020-02: Documentation contained in personnel files		X

Prior Year Internal Control Comments and Recommendations:

2020-01: Plan Administration: It was noted during our audit procedures, that the Plan is self-administered. Due to the complex and specialized nature of employee benefit plans subject to ERISA, certain required compliance tests were not performed timely. The Plan was also not operating under a fully adopted plan document. In addition, the Plan had several other compliance failures and is in the process of submitting a plan to the IRS’s Voluntary Compliance Program (VCP) to correct compliance failures in the Plan.

2022 update/status:

During the 2022 audit, we noted that the VCP had been filed with the IRS and management was in the process of preparing a RFP for third-party administrative and compliance services for the Plan. We recommend that management continue to expedite the process to ensure the Plan’s compliance with the most recent IRS regulations.

Management’s Response:

Management agrees. The decision to self-administer the Plan was made at the time the Coalition was formed in 2002 when the organization had less than 10 employees. However, no internal Plan Administration policies or procedures were developed for the Coalition until staff began making ERISA compliance inquiries with Plan Sponsor Valic in 2016. In 2017, when significant compliance failures dating back to 2009 came to light, staff began consulting with ELC’s external auditors and Valic staff to identify the full scope of the problems and formulate a plan for corrective action. Staff also began a search for a Broward-based attorney that specialized in ERISA law to shepherd the agency through the necessary corrective action filings and procedures. In 2020, ELC engaged an attorney specializing in retirement plan compliance to prepare the voluntary correction plan that has now been submitted to the IRS. While we wait for the IRS to accept and approve the Coalition’s corrections, staff are preparing to release a Request for Proposals solicitation to procure a qualified, specialized third party administrator for the Plan to handle all administrative transactions and ensure ERISA compliance going forward.

Current Year Internal Control Comments and Recommendations:

2022-01: Defaulted Participant Loans: During our audit, we noted that there were several participant loans that were in default. Per IRS guidelines, uncured defaults cause the loans to become “deemed” distributions for tax purposes. Management was unable to obtain evidence from the service provider VALIC to determine if the defaulted loans had been properly treated as deemed distributions and reported on Form 1099-R in accordance with the Plan’s loan policy. We recommend that management review the IRS Self Correction Program and Voluntary Correction Program to correct any failures.

**Early Learning Coalition of Broward County, Inc. Retirement Plan
Internal Control Comments and Recommendations
December 31, 2022**

Current Year Internal Control Comments and Recommendations (continued):

Management's Response:

The service provider for the Plan has undergone multiple ownership changes in the last several years and it has become increasingly difficult to resolve open issues timely. Staff will continue to follow up to secure the documentation required while also pursuing the procurement strategy for a new service provider described above.