



CIRCUIT ENGINEERING DISTRICT #6

Operational Audit

For the Period of July 1, 2019 through June 30, 2020



State Auditor & Inspector

CIRCUIT ENGINEERING DISTRICT #6 OPERATIONAL AUDIT FOR THE PERIOD OF JULY 1, 2019 THROUGH JUNE 30, 2020

This publication, issued by the Oklahoma State Auditor and Inspector's Office as authorized by <u>69 O.S. § 687.1</u>, has not been printed, but is available on the agency's website (<u>www.sai.ok.gov</u>) and in the Oklahoma Department of Libraries Publications Clearinghouse Digital Prairie Collection (<u>http://digitalprairie.ok.gov/cdm/search/collection/audits/</u>) pursuant to 65 O.S. § 3-114.



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August 23, 2021

TO THE BOARD OF THE CIRCUIT ENGINEERING DISTRICT #6

We present the audit report of the Circuit Engineering District #6 for the period of July 1, 2019 through June 30, 2020. The goal of the State Auditor and Inspector is to promote accountability and fiscal integrity in state and local government. Maintaining our independence as we provide this service to the taxpayers of Oklahoma is of utmost importance.

We wish to take this opportunity to express our appreciation for the assistance and cooperation extended to our office during our engagement.

This report is a public document pursuant to the Oklahoma Open Records Act (51 O.S. § 24A.1 et seq.) and shall be open to any person for inspection and copying.

Sincerely,

ndi Byrd

CINDY BYRD, CPA OKLAHOMA STATE AUDITOR & INSPECTOR



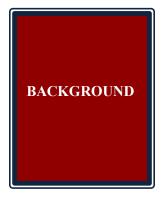
CIRCUIT ENGINEERING DISTRICT #6 FOR THE PERIOD OF JULY 1, 2019 THROUGH JUNE 30, 2020

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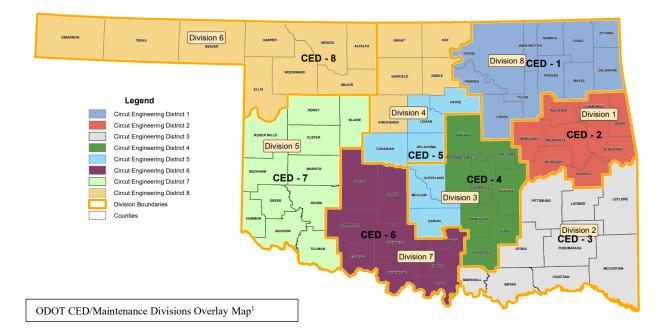
Pursuant to 69 O.S. § 687.1, counties may "create a circuit engineering district with any other county or counties" to allow county governments to "make the most efficient use of their powers [...] that will accord best with geographic, economic, population and other factors influencing the needs and development of county government." The District is considered a political subdivision of the state.

The circuit engineering district provides project-focused assistance for its member counties, a shared engineer between counties in an advisory capacity, engineering expertise that counties could not afford alone, help for small, rural counties, and help with a county five-year construction work plan.

Each participating county in the District has an appointed county commissioner to serve as members from the District's respective county seats. Each District then elects officers from the members as follows: President, Vice-President, and Secretary/Treasurer.

Ty Phillips Benny Bowling Linda Hyman Jerry Alvord Alvin Cargill Ricky Vardell Kirk Painter Kent McKinley Russell Morgan President, Jefferson County Vice-President, Caddo County Secretary/Treasurer, Love County Carter County Comanche County Cotton County Grady County Murray County Stephens County

CIRCUIT ENGINEERING DISTRICT #6 DISTRICT AREA AND SERVICES FOR THE PERIOD OF JULY 1, 2019 THROUGH JUNE 30, 2020

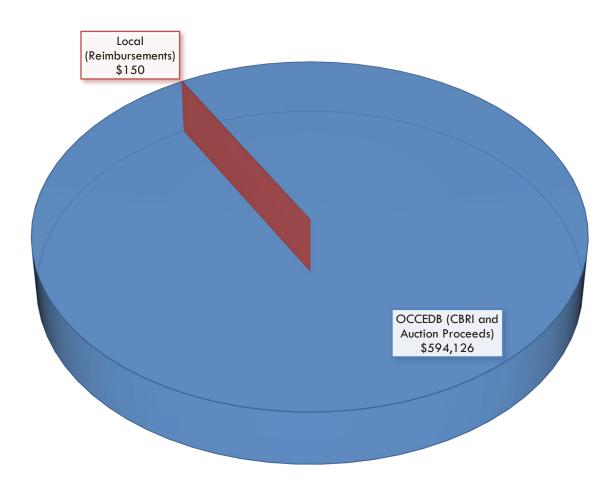


Circuit Engineering District #6 (the District) is comprised of a nine-county region in the south central/western part of the state including: Caddo, Carter, Comanche, Cotton, Grady, Jefferson, Love, Murray, and Stephens counties¹.

¹Map <u>https://www.odot.org/cirb/pdfs/cirb_engr-dist.pdf</u>

The District is funded by state and local revenues. The chart below summarizes the revenue sources.

REVENUE BY SOURCE



During the period the District collected \$594,276 in total revenue.

CIRCUIT ENGINEERING DISTRICT #6 PROJECT HIGHLIGHTS FY 2020 FOR THE PERIOD OF JULY 1, 2019 THROUGH JUNE 30, 2020

Circuit Engineering District #6 (CED #6) was established in 1999 as a cooperative and provides efficiencies that are not available to an individual county. CED #6 acts as a political sub-division of the State managed by the counties it represents: Caddo, Carter, Comanche, Cotton, Grady, Jefferson, Love, Murray, and Stephens.

HB1176, the County Improvements for Roads and Bridges Fund, has been utilized with all nine counties approving the CIRB 5-Year transportation plan annually. The plan includes projects from all nine counties with the primary focus on structurally deficient bridges that the counties could not afford to construct with previous funding sources.

In November 2014, Caddo County let a project to construct a new 265' 3-span bridge over the Washita River just west of Anadarko to replace a structurally deficient bridge with an estimated cost of \$1,875,418.



East Cow Creek, Stephens County



Washita River, Caddo County

In April 2019, Stephens County let a project to construct a new 137' 3-span bridge to replace a structurally deficient bridge that wasalso fracture critical and load posted. Estimated cost for this project was \$1,161,540.

In Fiscal Year 2020, CED #6 let 8 new construction projects for a combined total of \$7,853,570 while 15 construction projects were completed for a total of \$26,651,774.56.

Source: Information provided by Circuit Engineering District #6 (presented for informational purposes).

CIRCUIT ENGINEERING DISTRICT #6 PRESENTATION OF REVENUES, EXPENDITURES, AND FUND BALANCES OF DISTRICT FUNDS FOR THE PERIOD OF JULY 1, 2019 THROUGH JUNE 30, 2020

Presentation of District #6 Funds for the Period of July 1, 2019 through June 30, 2020

	General Fund
Beginning Cash Balance, July 1	\$ 394,112
Revenues:	
Oklahoma Cooperative CED Board	594,126
Reimbursement	150
Total Revenues	594,276
Expenditures:	
Auto Expense	3,374
Computer & IT Support	1,149
Dues & Subscriptions	720
Insurance - General	4,348
Insurance - Health	7,814
Meetings & Conferences	134
Meals	2,488
Outside Services	17,371
Retirement Plan Expenses	11,550
Salaries	70,000
Supplies	586
Payroll Taxes	5,578
Travel	1,817
Project Allocations	540,000
Total Expenditures	666,929
Ending Cash Balance, June 30	\$ 321,459

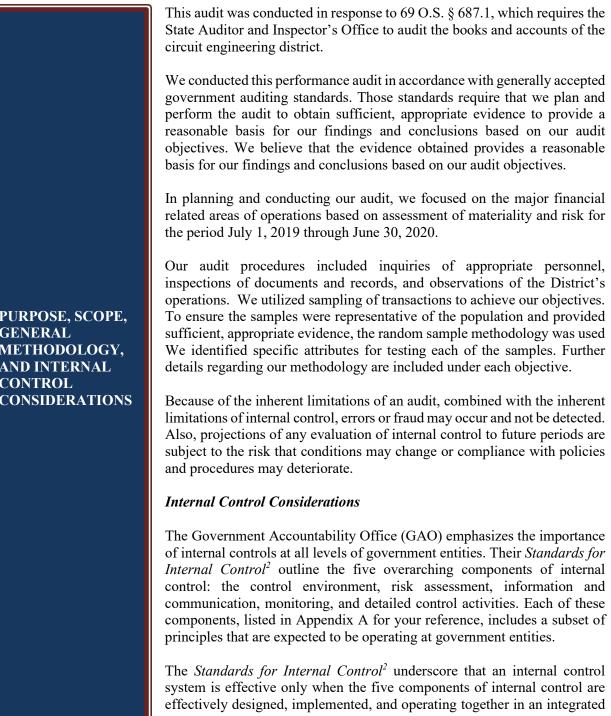
Source: District's Financial Report (presented for informational purposes).

Description of the District's Funds

The District uses funds to report on revenues, expenditures, and fund balances. Fund accounting is designed to demonstrate legal compliance and to aid financial management by segregating transactions related to certain government functions or activities.

Following are descriptions of the District's funds within the Presentation of Revenues, Expenditures, and Fund Balances of District Funds:

<u>Circuit Engineering District #6 General Fund</u> - the General Fund is the primary operating fund of the District and is used to account for all activities.



PURPOSE, SCOPE, GENERAL METHODOLOGY. AND INTERNAL CONTROL **CONSIDERATIONS**

CIRCUIT ENGINEERING DISTRICT #6 PURPOSE, SCOPE, GENERAL METHODOLOGY, AND INTERNAL CONTROL CONSIDERATIONS FOR THE PERIOD OF JULY 1, 2019 THROUGH JUNE 30, 2020

manner. As required by *Government Auditing Standards*³, we have identified the aspects of internal control components and underlying principles significant to each audit objective in this engagement and our assessments are detailed in Appendix A.

Any internal control deficiencies are documented in the findings included under each objective in this report. Because our audit was limited to the internal control components and underlying principles deemed significant to our audit objectives, it may not have disclosed all internal control deficiencies that may have existed at the time of the audit.

²-Standards for Internal Control in the Federal Government, or the "Green Book," sets standards and the overall framework for an effective internal control system in federal agencies and is treated as best practices for other levels of government. Last update 2014, accessible online at https://www.gao.gov/products/GAO-14-704G

³ *Government Auditing Standards*, or the "Yellow Book," also promulgated by the GAO, guides our performance and operational audits. Last version 2018, accessible online at <u>https://www.gao.gov/products/GAO-18-568G</u>.

Objective 1: To determine the District's revenues, expenditures, and fund balances are accurately presented on the District's financial reports for the period.

Conclusion: With respect to the items reconciled and reviewed; the District's revenues, expenditures, and fund balances were accurately presented on the District's financial reports for the period.

Objective 1 Methodology: To accomplish objective 1, we performed the following:

- Documented our understanding of the processes for preparing the District's monthly financial reports. Evaluated those processes and identified significant internal controls related to the preparation of the District's monthly financial reports.
- Compared those processes to governmental internal control standards outlined in the GAO *Standards for Internal Control.*
- Reviewed a random sample of three (3) monthly financial reports (25% of the total monthly reports in the population tested) to ensure monthly reports were reviewed and approved by someone other than the preparer and correctly reconciled to the general ledger and bank statement.
- Reviewed a random sample of three (3) bank statements and related bank reconciliations (25% of the total bank statements in the population tested) to ensure bank reconciliations were reviewed and approved by someone other than the preparer and correctly reconciled to the bank statement.
- Confirmed \$594,036 in monies (99.96% of total monies) received from the Oklahoma Cooperative Circuit Engineering Districts Board (OCCEDB) and determined these monies were entered into the accounting system in the proper amount.
- Prepared a general ledger schedule of cash and investments at June 30th to ensure the schedule reconciled to the District's monthly financial reports.
- Confirmed all cash and investment balances at June 30th.
- Re-performed the June 30 bank reconciliation and confirmed reconciling items.
- Reviewed bank balances of all accounts at June 30th on the District's general ledger to ensure that investments were adequately secured as required by 62 O.S. § 517.4.

FINDINGS AND RECOMMENDATIONS

No findings were noted as a result of the procedures performed.

Objective 2: To determine whether the District's expenditures (including payroll) are supported by adequate documentation and for the allowable operations of the District.

Conclusion: With respect to the items tested, the District's expenditures (including payroll) are for the allowable operations of the District. However, we noted some deficiencies regarding adequate documentation and internal controls in the expenditure process.

Objective 2 Methodology: To accomplish objective 2, we performed the following:

- Documented our understanding of the expenditure process including payroll. Evaluated those processes and identified significant internal controls related to expenditures.
- Compared those processes to governmental internal control standards outlined in the GAO *Standards for Internal Control.*
- Reviewed a random sample of expenditures (excluding payroll) totaling \$121,937 (21.32% of expenditures in the population tested) to ensure:
 - The expenditure was supported by adequate documentation,
 - The expenditure was made for the appropriate amount, and
 - The expenditure was for allowable operations of the District.
- Reviewed a random sample of \$5,833 payroll expenditures (9.17% of payroll expenditures in the population tested) to ensure:
 - The District Board reviewed and approved the payroll expenditures.

FINDINGS AND RECOMMENDATIONS

Finding 2020-002 – Internal Controls Over the District's Payroll Expenditures

Condition: The control deficiencies noted include:

- Timesheets are not submitted for review or approval of the Board.
- Payroll checks are prepared and distributed in advance of the payroll period.
- The sick leave ledger is not reviewed or approved by the Board.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure:

- The District's payroll expenditures are supported by adequate documentation including timesheets.
- Payroll checks are disbursed at end of pay period.
- The sick leave ledger is reviewed and approved.

Effect of Condition: These conditions could result in unrecorded transactions, misstated financial reports, clerical errors, or misappropriation of funds not being detected in a timely manner.

Recommendation: OSAI recommends that the District:

• Maintain and submit timesheets to the Board for review and approval.

- Disburse paychecks on or after the last day in the payroll period.
- Review and approve the sick leave ledger.

Management Response:

CED Board Chairman: The District is developing policies and procedures to implement auditor's recommendations.

Criteria: The United States Government Accountability Office's *Standards for Internal Control in the Federal Government* (2014 version)⁴ aided in guiding our assessments and conclusion.

The GAO Standards – Section 2 – Objectives of an Entity - OV2.24 states:

Safeguarding of Assets

A subset of the three categories of objectives is the safeguarding of assets. Management designs an internal control system to provide reasonable assurance regarding prevention or prompt detection and correction of unauthorized acquisition, use, or disposition of an entity's assets.

Further, GAO Standards – Principle 2 – Exercise Oversight Responsibility - 2.10 states:

Oversight for the Internal Control System

These responsibilities are supported by the organizational structure that management establishes. The oversight body oversees management's design, implementation, and operation of the entity's organizational structure so that the processes necessary to enable the oversight body to fulfill its responsibilities exist and are operating effectively.

Also, GAO Standards – Principle 10 – Design Control Activities - 10.03 states in part:

Design of Appropriate Types of Control Activities

Management designs appropriate types of control activities for the entity's internal control system. Control activities help management fulfill responsibilities and address identified risk responses in the internal control system. The common control activity categories listed in figure 6 are meant only to illustrate the range and variety of control activities that may be useful to management. The list is not all inclusive and may not include particular control activities that an entity may need.

⁴Although this publication (GAO Standards) addresses controls in the federal government, this criterion can be treated as best practices and may be applied as a framework for an internal control system for state, local, and quasi-governmental entities.

Management divides or segregates key duties and responsibilities among different people to reduce the risk of error, misuse, or fraud. This includes separating the responsibilities for authorizing transactions, processing and recording them, reviewing the transactions, and handling any related assets so that no one individual controls all key aspects of a transaction or event.

Additionally, GAO Standards – Principle 12 – Implement Control Activities - 12.02 through 12.04 states:

Documentation of Responsibilities through Policies

Management documents in policies the internal control responsibilities of the organization. Management documents in policies for each unit its responsibility for an operational process's objectives and related risks, and control activity design, implementation, and operating effectiveness. Each unit, with guidance from management, determines the policies necessary to operate the process based on the objectives and related risks for the operational process. Each unit also documents policies in the appropriate level of detail to allow management to effectively monitor the control activity Management communicates to personnel the policies and procedures so that personnel can implement the control activities for their assigned responsibilities.

Objective 3: To determine whether the District established a process to evaluate proposed projects when using County Improvements for Roads and Bridges (CIRB) funds, prioritized those projects, and that they were submitted in the District's 5 Year Construction Work Plan to ensure compliance with 69 O.S. § 507 B and Administrative Code 730:10-23-5 and 730:10-23-7.

Conclusion: The District did submit the District's Five-Year Construction Work Plan to the Department of Transportation. However, with respect to the items reviewed, the District has not complied with 69 O.S. § 507 B, Administrative Code 730:10-23-5 and Administrative Code 730:10-23-7, which required the District to establish a process to evaluate proposed projects when using County Improvements for Roads and Bridges (CIRB) funds and prioritize those projects.

Objective 3 Methodology: To accomplish objective 3, we performed the following:

- Determined the District has established a process to evaluate proposed projects for conformance to the intent of the program and the project evaluation criteria prior to compiling the District's Five-Year Construction Work Plan.
- Determine the District has established a process for determining the level of priority for projects and has compiled a prioritized list of recommended projects.
- Determined the District submitted a prioritized list of recommended projects to the Department of Transportation for the District's Five-Year Construction Work Plan.

FINDINGS AND RECOMMENDATIONS

Finding 2020-003 – Internal Controls Over the District's Five-Year Construction Work Plan

Condition: Upon inquiry, observation, and review of records, we noted the following:

- The CED has not established a process to evaluate proposed projects for conformance to the intent of the program and to project evaluation criteria used to compile the District's Five-Year Construction Work Plan.
- The CED has not established a process for determining the level of priority for projects to include on the list of recommended projects.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure proposed projects are prioritized and evaluated to determine the conformance with intent of program and project evaluation criteria.

Effect of Condition: These conditions resulted in noncompliance with state statute and Administrative Codes.

Recommendation: OSAI recommends that the CED establish an evaluation process for proposed projects to determine the conformance with intent of the program and project evaluation criteria Further, OSAI recommends the CED establish a process to assign priority levels to each project to be considered for the District's Five-Year Construction Work Plan.

Management Response:

CED Board Chairman: The District is developing policies and procedures to implement auditor's recommendations.

Criteria: Title 69 O.S. § 507 B. states in part "The funds shall be used for the sole purpose of construction or reconstruction of county roads or bridges on the county highway system that are of the highest priority as defined by the Transportation Commission. Counties may accumulate annual funding for a period of up to five (5) years for a specific project, with such funding to be held by the Transportation Commission to the credit of the county project. The Transportation Commission shall promulgate rules for the administration of the process and the development of criteria for determining the level of priority for projects and include such projects in a five-year construction plan that will be updated annually. Projects in the five-year construction plan shall be contracted as provided by law and awarded by the Transportation Commission."

Administrative Code 730:10-23-5. Project eligibility and approval

Projects shall be considered and approved for inclusion in the five year construction work plan annually by the Department of Transportation on the basis of specific project evaluation criteria. These criteria shall generally consider factors including the ability of

the county to effect the improvements through the utilization of other resources and funding mechanisms, the priority of the project as established by the Circuit Engineering District, project feasibility and cost including the ability of the county to participate, existing phase of project development, anticipated safety and mobility benefits realized by the traveling public and commerce, and the extent the project will improve the overall level of service and longevity of the county transportation system in the area.

Administrative Code 730:10-23-7 Project selection

Upon determination of the conformance of a proposed project with the intent of the program and the project evaluation criteria, the coordinating Circuit Engineering District will compile a prioritized list of recommended projects occurring within the District to be transmitted for further consideration by the Department of Transportation. In the absence of an acceptable project recommendation from any CED, the Department reserves the authority to select and recommend projects to the Transportation Commission as determined appropriate.

Objective 4: To determine if the District's internal controls provide reasonable assurance that fixed assets and consumable inventories are accurately reported in the accounting records.

Conclusion: The District's internal controls provide reasonable assurance that fixed assets inventory and consumable inventories are accurately reported in the accounting records.

Objective 4 Methodology: To accomplish objective 4, we performed the following:

- Documented our understanding of the processes related to fixed assets, which included reviewing fixed assets records to determine periodic verifications were performed.
- Documented our understanding of the processes related to consumable inventories, which included reviewing consumable inventories records to determine periodic verifications were performed.
- Compared those processes to governmental internal control standards outlined in the GAO *Standards for Internal Control.*

FINDINGS AND RECOMMENDATIONS

No findings were noted as a result of the procedures performed.

Work Related to Internal Controls

OSAI considered several factors, including the subject matter of the project, to determine whether internal controls were significant to the audit objective. Based on its consideration, OSAI determined that internal controls were significant for this audit. OSAI then considered the components of internal control and the underlying principles included in the Standards for Internal Control in the Federal Government. According to the Government Accountability Office, considering internal controls in the context of a comprehensive framework can help auditors to determine whether underlying deficiencies exist.

Overall Conclusion for the Internal Control Components and Principles Identified as Significant

The table below outlines the components and principles of internal control, identifies those considered significant to our specific objective in this engagement, and notes whether those principles were found to be operating effectively. For those not operating effectively, further discussion and related recommendations are included in the report.

As recommended by GAO Standards section 9.32, the full outline of the fundamental components of internal control and their underlying principles is included for your reference.

	ernal Control nponent/Principle	Audit Objective 1	Operating Effectively?	Audit Objective 2	Operating Effectively?	Audit Objective 3	Audit Objective 4	Operating Effectively?
				Control Environment Component – Foundation that provides processes and structure to help an entity set expectations and achieve its objectives.				
1.	The oversight body and management should demonstrate a commitment to integrity and ethical values.							
2.	The oversight body should oversee the entity's internal control system.	4	Yes	4	NO		4	Yes
3.	Management should establish an organizational structure, assign responsibility, and delegate authority							

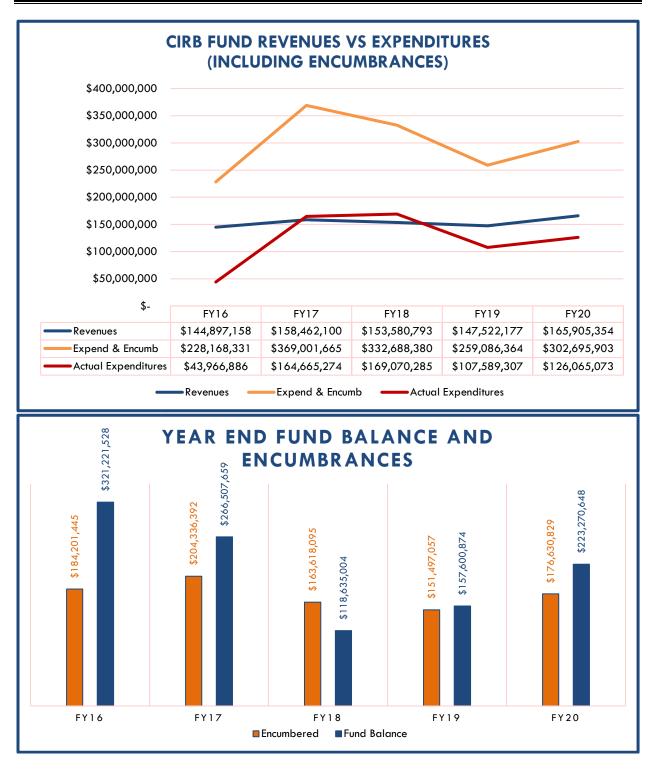
				-	-	-	
	to achieve the						
	entity's objectives.						
4.	Management						
	should demonstrate						
	a commitment to						
	recruit, develop,						
	and retain						
	competent						
	individuals.						
5.	Management						
5.	should evaluate						
	performance and						
	hold individuals						
	accountable for						
	their internal						
	control						
	responsibilities.						
	1	Risk Assess	nent Compone	ent – Dynamic	process of ide	ntifving analy	zing and
			ks facing the e			iting ing, anary	zing, und
6.	Management						
	should define						
	objectives clearly						
	to enable the						
	identification of						
	risks and define						
	risk tolerances.						
7.	Management						
	should identify,						
	analyze, and						
	respond to risks						
	related to achieving						
	the defined						
	objectives.						
8.	Management						
	should consider the						
	potential for fraud						
	when identifying,						
	analyzing, and						
	responding to risks.						
9.	Management should						
	identify, analyze,						
	and respond to						
	significant changes						
	that could impact the						
	internal control						
	system.						

		Control Activities Component – Actions management establishes through policies					
		and procedures to protect against risks.					
10. Management should design control activities to achieve objectives and respond to risks.	4	Yes	4	NO		4	Yes
11. Management should design the entity's information system and related control activities to achieve objectives & respond to risks.							
12. Management should implement control activities through policies.	1	Yes	1	NO		4	Yes
		Information and Communication Component – Quality information communicated and used to support the internal control system.					
13. Management should use quality information to achieve the entity's objectives.							
14. Management should internally communicate the necessary quality information to achieve the entity's objectives.							
15. Management should externally communicate the necessary quality information to achieve the entity's objectives.							
		Monitoring Component – Activities to assess the quality of performance and promptly correct any deficiencies.					
16. Management should establish and operate monitoring							

activities to monitor the internal control system and evaluate the results.				
17. Management should remediate identified internal control deficiencies on a timely basis.				

The GAO emphasizes that each of the five components of internal control must be effectively designed, implemented, and operating; for an internal control system to be effective, the components must operate together in an integrated manner. They further stress that documentation is a necessary part of an effective internal control system. The level and nature of documentation vary based on the size of the entity and the complexity of the operational processes the entity performs. Documentation is required to demonstrate the design, implementation, and operating effectiveness of an entity's internal control system.

CIRCUIT ENGINEERING DISTRICT #6 APPENDIX B: STATEWIDE CIRB FUND ANALYSIS FOR THE PERIOD OF JULY 1, 2019 THROUGH JUNE 30, 2020



Source: Information provided from the Statewide Accounting System- Summary of Receipts and Disbursement reports and Allotment Budget and Available Cash reports (*presented for informational purposes*).





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