COUNTY AUDIT

COTTON COUNTY

For the fiscal year ended June 30, 2010





Oklahoma State Auditor & Inspector Gary A. Jones, CPA, CFE COTTON COUNTY, OKLAHOMA FINANCIAL STATEMENT AND INDEPENDENT AUDITOR'S REPORT FOR THE FISCAL YEAR ENDED JUNE 30, 2010

This publication, issued by the Oklahoma State Auditor and Inspector's Office as authorized by 19 O.S. § 171, has not been printed, but is available on the agency's website (www.sai.ok.gov) and in the Oklahoma Department of Libraries Publications Clearinghouse Digital Collection, pursuant to 74 O.S. § 3105.B.

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February 5, 2014

TO THE CITIZENS OF COTTON COUNTY, OKLAHOMA

Transmitted herewith is the audit of Cotton County, Oklahoma for the fiscal year ended June 30, 2010. The audit was conducted in accordance with 19 O.S. § 171.

A report of this type can be critical in nature. Failure to report commendable features in the accounting and operating procedures of the entity should not be interpreted to mean that they do not exist.

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.

Sincerely,

GARY A. JONES, CPA, CFE

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OKLAHOMA STATE AUDITOR & INSPECTOR

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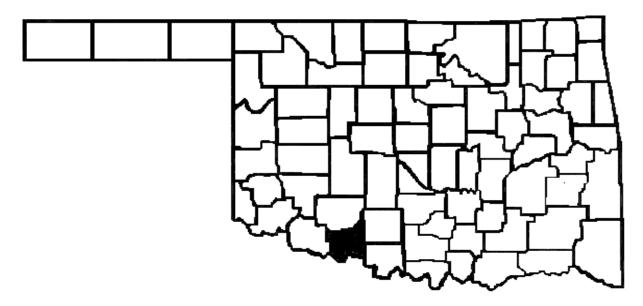
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Cotton County is composed of land belonging at one time to Quapaws, Choctaws, and Chickasaws, the Comanche Reservation, and the Big Pasture. Part of it was created from the southern portion of Comanche County, and was formed as result of a vote of its residents on August 22, 1912, after statehood.

Agriculture has long been important to the economic base of the county. Principal crops include wheat and cotton. Livestock is also considered significant. Oil and gas production, begun in 1917, rose to nearly 800 producing wells by 1952, when it ranked ninth in the state in oil production. Walters, the county seat, is the home of the Cotton County Electric Cooperative, the largest rural electric cooperative in Oklahoma.

Annual events held in Walters include the Walters Car Cruz, Walters Round-Up Club Rodeo in July, the Cotton County Free Fair in September, and the Gallery on the Green Art Show in May. Sultan Park, north of Walters, is a recreational area and is the site of Comanche Indian powwows that are also held in July.

For additional county information, call the county clerk's office at 580-875-3026.

County Seat - Walters

Area – 641.94 Square Miles

County Population – 6,299 (2007 est.)

Farms - 517

Land in Farms – 366,651 Acres

Primary Source: Oklahoma Almanac 2009-2010

Board of County Commissioners

District 1 – Buddy Hilbert

District 2 – Chris Lipscomb District 3 – Greg Powell

E

County Assessor

Debbie Sturdivant

County Clerk

Nikki Vardell

County Sheriff

Paul Jeffrey

County Treasurer

Tammy Morris

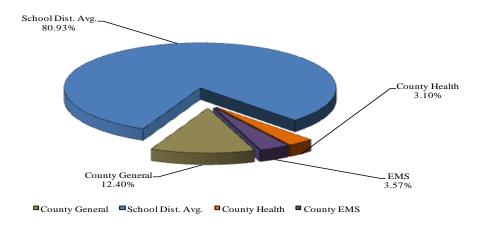
Court Clerk

Debbie Hodnefield

District Attorney

Fred C. Smith

Property taxes are calculated by applying a millage rate to the assessed valuation of property. Millage rates are established by the Oklahoma Constitution. One mill equals one-thousandth of a dollar. For example, if the assessed value of a property is \$1,000.00 and the millage rate is 1.00, then the tax on that property is \$1.00. This chart shows the different entities of the County and their share of the various millages as authorized by the Constitution.



County-Wide Mill	lages	School District Millages								
							Career			
County General	10.40		_	Gen.	Bldg.	Skg.	Tech	Common	Total	
County Health	2.60	Walters	I-1	36.42	5.20	-	12.49	4.16	58.27	
County EMS	3.00	Temple	I-101	36.62	5.23	11.32	12.49	4.16	69.82	
		Big Pasture	Jt I-333	36.43	5.20	-	14.44	4.16	60.23	
		Comanche/Geronimo	Jt I-4	35.75	5.11	25.67	14.44	4.16	85.13	
		Stephens/Empire	Jt I-21	36.54	5.22	15.92	12.49	4.16	74.33	
		Jeffers on/Waurika	Jt I-23	35.00	5.00	-	12.49	4.16	56.65	
		Comanche/Chattanooga	Jt I-132	35.42	5.06	19.40	14.44	4.16	78.48	
		Tillman/Grandfield	Jt I-249	36.38	5.20	-	14.44	4.16	60.18	

COTTON COUNTY, OKLAHOMA ASSESSED VALUE OF PROPERTY TREND ANALYSIS FOR THE FISCAL YEAR ENDED JUNE 30, 2010

Valuation	D 1	Public	Real	Homestead	N. W. I.	Estimated Fair Market
Date	Personal	Service	Estate	Exemption	Net Value	Value
1/1/2009	\$3,074,420	\$5,683,043	\$27,194,097	\$1,628,713	\$34,322,847	\$278,069,655
1/1/2008	\$3,035,115	\$5,553,431	\$26,156,509	\$1,630,839	\$33,114,216	\$268,506,402
1/1/2007	\$2,733,115	\$5,952,300	\$23,749,538	\$1,647,391	\$30,787,562	\$256,333,392
1/1/2006	\$2,729,297	\$6,355,036	\$22,565,182	\$1,461,284	\$30,188,231	\$247,763,965
1/1/2005	\$2,688,023	\$6,344,149	\$21,565,414	\$1,551,698	\$29,045,888	\$238,663,780

\$290,000,000

\$280,000,000

\$270,000,000

\$260,000,000

\$250,000,000

\$240,000,000

\$230,000,000

\$220,000,000

\$210,000,000

1/1/2005

1/1/2006

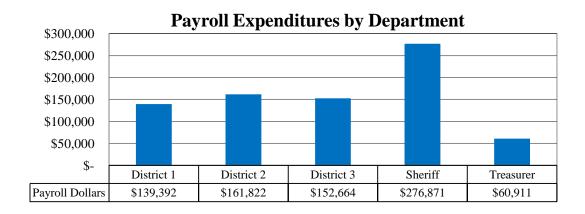
Estimated Fair Market Value \$278,069,655 \$268,506,402 \$247,763,965 \$238,663,780

1/1/2007

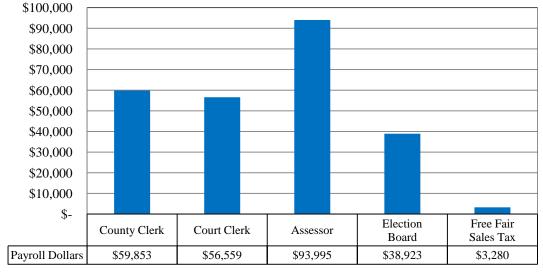
1/1/2008

1/1/2009

County officers' salaries are based upon the assessed valuation and population of the counties. State statutes provide guidelines for establishing elected officers' salaries. The Board of County Commissioners sets the salaries for all elected county officials within the limits set by the statutes. The designated deputy or assistant's salary cannot exceed the principal officer's salary. Salaries for other deputies or assistants cannot exceed the principal officer's salary. The information presented below is for the fiscal year ended June 30, 2010.

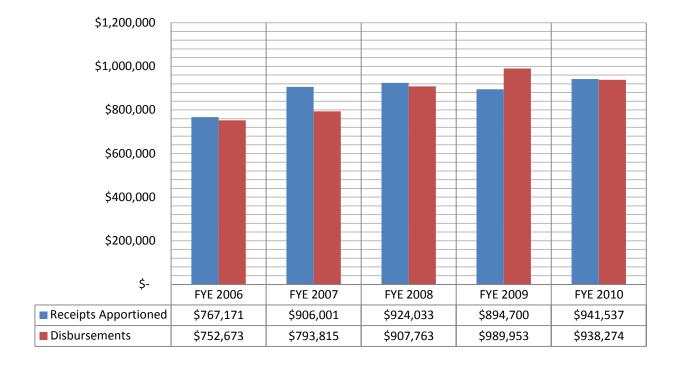






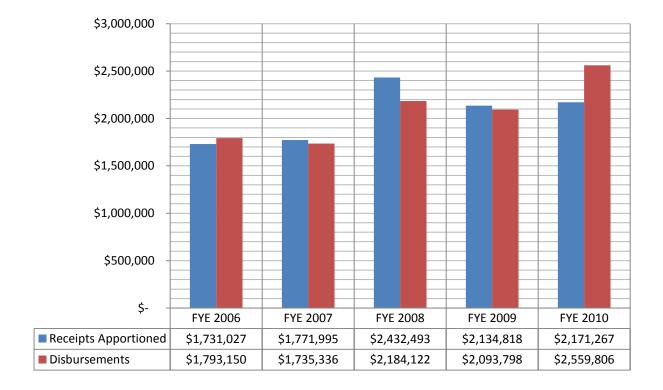
County General Fund

The Oklahoma Constitution and the Oklahoma Statutes authorize counties to create a County General Fund, which is the county's primary source of operating revenue. The County General Fund is typically used for county employees' salaries plus many expenses for county maintenance and operation. It also provides revenue for various budget accounts and accounts that support special services and programs. The Board of County Commissioners must review and approve all expenditures made from the County General Fund. The primary revenue source for the County General Fund is usually the county's ad valorem tax collected on real, personal (if applicable), and public service property. Smaller amounts of revenue can come from other sources such as fees, sales tax, use tax, state transfer payments, in-lieu taxes, and reimbursements. The chart below summarizes receipts and disbursements of the County's General Fund for the last five fiscal years.



County Highway Fund

The County receives major funding for roads and highways from a state imposed fuel tax. Taxes are collected by the Oklahoma Tax Commission. Taxes are imposed on all gasoline, diesel, and special fuel sales statewide. The County's share is determined on formulas based on the County population, road miles, and land area and is remitted to the County monthly. These funds are earmarked for roads and highways only and are accounted for in the County Highway Fund. The chart below summarizes receipts and disbursements of the County's Highway Fund for the last five fiscal years.





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Independent Auditor's Report

TO THE OFFICERS OF COTTON COUNTY, OKLAHOMA

We have audited the combined total—all county funds on the accompanying regulatory basis Statement of Receipts, Disbursements, and Changes in Cash Balances of Cotton County, Oklahoma, as of and for the year ended June 30, 2010, listed in the table of contents as the financial statement. This financial statement is the responsibility of Cotton County's management. Our responsibility is to express an opinion on the combined total—all county funds on this financial statement based on our audit.

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

As described in Note 1, this financial statement was prepared using accounting practices prescribed or permitted by Oklahoma state law, which practices differ from accounting principles generally accepted in the United States of America. The differences between this regulatory basis of accounting and accounting principles generally accepted in the United States of America are also described in Note 1.

In our opinion, because of the effects of the matter discussed in the preceding paragraph, the financial statement referred to above does not present fairly, in conformity with accounting principles generally accepted in the United States of America, the financial position of Cotton County as of June 30, 2010, or changes in its financial position for the year then ended.

In our opinion, the financial statement referred to above presents fairly, in all material respects, the combined total of receipts, disbursements, and changes in cash balances for all county funds of Cotton County, for the year ended June 30, 2010, on the basis of accounting described in Note 1.

In accordance with *Government Auditing Standards*, we have also issued our report dated January 21, 2014, on our consideration of Cotton County's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of our audit.

Our audit was conducted for the purpose of forming an opinion on the combined total of all county funds on the financial statement. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, and is not a required part of the financial statement. The remaining Other Supplementary Information, as listed in the table of contents, is presented for purposes of additional analysis, and is not a required part of the financial statement. Such supplementary information has been subjected to the auditing procedures applied in the audit of the combined total—all county funds on the regulatory basis Statement of Receipts, Disbursements and Changes in Cash Balances and, in our opinion, is fairly stated, in all material respects, in relation to the combined total—all county funds. The information listed in the table of contents under Introductory Section has not been audited by us, and accordingly, we express no opinion on it.

GARY A. JONES, CPA, CFE

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OKLAHOMA STATE AUDITOR & INSPECTOR

January 21, 2014



COTTON COUNTY, OKLAHOMA STATEMENT OF RECEIPTS, DISBURSEMENTS, AND CHANGES IN CASH BALANCES—REGULATORY BASIS (WITH COMBINING INFORMATION)—MAJOR FUNDS FOR THE FISCAL YEAR ENDED JUNE 30, 2010

	Beginning Cash Balances July 1, 2009		Receipts Apportioned		Disbursements		Ending Cash Balances June 30, 2010	
Combining Information:								
Major Funds:								
County General Fund	\$	206,855	\$	941,537	\$	938,274	\$	210,118
County Highway		1,892,314		2,171,267		2,559,806		1,503,775
County Health Department		70,266		90,431		52,537		108,160
Sheriff Service Fees		35,651		56,911		76,857		15,705
Sheriff Board of Prisoners		72,644		216,652		238,711		50,585
REAP Grant		110,489		224,848		335,274		63
Remaining Aggregate Funds		235,856		105,134		192,538		148,452
Combined Total - All County Funds	\$	2,624,075	\$	3,806,780	\$	4,393,997	\$	2,036,858

1. Summary of Significant Accounting Policies

A. Reporting Entity

Cotton County is a subdivision of the State of Oklahoma created by the Oklahoma Constitution and regulated by Oklahoma Statutes.

The accompanying financial statement presents the receipts, disbursements, and changes in cash balances of the total of all funds under the control of the primary government. The general fund is the County's general operating fund, accounting for all financial resources except those required to be accounted for in another fund, where its use is restricted for a specified purpose. Other funds established by statute and under the control of the primary government are also presented.

The County Treasurer collects and remits material amounts of intergovernmental revenues and ad valorem tax revenue for other budgetary entities, including emergency medical districts, libraries, school districts, and cities and towns. The cash receipts and disbursements attributable to those other entities do not appear in funds on the County's financial statement; those funds play no part in the County's operations. Any trust or agency funds maintained by the County are not included in this presentation.

B. Fund Accounting

The County uses funds to report on receipts, disbursements, and changes in cash 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 county funds included as combining information within the financial statement:

County General Fund - accounts for the general operations of the government.

<u>County Highway</u> - accounts for state, local and miscellaneous receipts and disbursements for the purpose of constructing and maintaining county roads and bridges.

<u>County Health Department</u> - accounts for monies collected on behalf of the county health department from ad valorem taxes and state and local revenues.

<u>Sheriff Service Fees</u> - accounts for the collection and disbursement of sheriff process service fees as restricted by statute.

<u>Sheriff Board of Prisoners</u> - accounts for the collection of state miscellaneous receipts and disbursements for the purpose of maintaining the jail.

<u>REAP Grant</u> - accounts for the collection of state grant monies and disbursed as restricted by grant agreements.

C. Basis of Accounting

The financial statement is prepared on a basis of accounting wherein amounts are recognized when received or disbursed. This basis of accounting differs from accounting principles generally accepted in the United States of America, which require revenues to be recognized when they become available and measurable or when they are earned, and expenditures or expenses to be recognized when the related liabilities are incurred. This regulatory basis financial presentation is not a comprehensive measure of economic condition or changes therein.

Title 19 O.S. § 171 specifies the format and presentation for Oklahoma counties to present their financial statement on a regulatory basis. County governments (primary only) are required to present their financial statements on a fund basis format with, at a minimum, the general fund and all other county funds, which represent ten percent or greater of total county revenue. All other funds included in the audit shall be presented in the aggregate in a combining statement.

D. Budget

Under current Oklahoma Statutes, a general fund and a county health department fund are the only funds required to adopt a formal budget. On or before the first Monday in July of each year, each officer or department head submits an estimate of needs to the governing body. The budget is approved for the respective fund by office, or department and object. The County Board of Commissioners may approve changes of appropriations within the fund by office or department and object. To increase or decrease the budget by fund requires approval by the County Excise Board.

E. Cash and Investments

For the purposes of financial reporting, "Ending Cash Balances, June 30" includes cash and cash equivalents and investments as allowed by statutes. The County pools the cash of its various funds in maintaining its bank accounts. However, cash applicable to a particular fund is readily identifiable on the County's books. The balance in the pooled cash accounts is available to meet current operating requirements.

State statutes require financial institutions with which the County maintains funds to deposit collateral securities to secure the County's deposits. The amount of collateral securities to be pledged is established by the County Treasurer; this amount must be at least the amount of the deposit to be secured, less the amount insured (by, for example, the FDIC).

The County Treasurer has been authorized by the County's governing board to make investments. Allowable investments are outlined in statutes 62 O.S. § 348.1 and § 348.3.

All investments must be backed by the full faith and credit of the United States Government, the Oklahoma State Government, fully collateralized, or fully insured. All investments as classified by state statute are nonnegotiable certificates of deposit. Nonnegotiable certificates of deposit are not subject to interest rate risk or credit risk.

2. Ad Valorem Tax

The County's property tax is levied each October 1 on the assessed value listed as of January 1 of the same year for all real and personal property located in the County, except certain exempt property. Assessed values are established by the County Assessor within the prescribed guidelines established by the Oklahoma Tax Commission and the State Equalization Board. Title 68 O.S. § 2820.A. states, ". . . Each assessor shall thereafter maintain an active and systematic program of visual inspection on a continuous basis and shall establish an inspection schedule which will result in the individual visual inspection of all taxable property within the county at least once each four (4) years."

Taxes are due on November 1 following the levy date, although they may be paid in two equal installments. If the first half is paid prior to January 1, the second half is not delinquent until April 1. Unpaid real property taxes become a lien upon said property on October 1 of each year.

3. Other Information

A. Pension Plan

<u>Plan Description</u>. The County contributes to the Oklahoma Public Employees Retirement Plan (the Plan), a cost-sharing, multiple-employer defined benefit pension plan administered by the Oklahoma Public Employees Retirement System (OPERS). Benefit provisions are established and amended by the Oklahoma Legislature. The Plan provides retirement, disability, and death benefits to Plan members and beneficiaries. Title 74, Sections 901 through 943, as amended, establishes the provisions of the Plan. OPERS issues a publicly available financial report that includes financial statements and supplementary information. That report may be obtained by writing OPERS, P.O. Box 53007, Oklahoma City, Oklahoma 73105 or by calling 1-800-733-9008.

<u>Funding Policy</u>. The contribution rates for each member category are established by the Oklahoma Legislature and are based on an actuarial calculation which is performed to determine the adequacy of contribution rates.

B. Other Post Employment Benefits (OPEB)

In addition to the pension benefits described in the Pension Plan note, OPERS provides postretirement health care benefits of up to \$105 each for retirees who are members of an eligible group plan. These benefits are funded on a pay-as-you-go basis as part of the overall retirement benefit. OPEB expenditure and participant information is available for the state as a whole; however, information specific to the County is not available nor can it be reasonably estimated.

C. Contingent Liabilities

Amounts received or receivable from grantor agencies are subject to audit and adjustment by grantor agencies, primarily the federal government. Any disallowed claims, including amounts already collected, may constitute a liability of the applicable fund. The amount, if any, of expenditures which may be disallowed by the grantor cannot be determined at this time; although, the County expects such amounts, if any, to be immaterial.

As of the end of the fiscal year, there were no claims or judgments that would have a material adverse effect on the financial condition of the County; however, the outcome of any lawsuit would not be determinable.

D. Sales Tax

The voters of Cotton County approved a one percent sales tax for general operations and county roads on February 7, 1984. The sales tax is for an unlimited duration and became effective March 1, 1984.

On February 11, 2003, via special election, Cotton County voters approved a quarter of one percent sales tax for maintaining the county's portion of the cost for the Cotton County Cooperative Extension Center (OSU). The sales tax became effective July 1, 2003 for the duration of five years. This sales tax was to expire June 30, 2008, but was renewed by county voters on February 5, 2008. At that time, voters also approved one eighth of the one quarter percent to be used to maintain the Cotton County Free Fair Board and the Cotton County Ag Arena and Expo Center, effective July 1, 2008, for the duration of an additional five years. These funds are accounted for within the General Fund.



COTTON COUNTY, OKLAHOMA COMPARATIVE SCHEDULE OF RECEIPTS, EXPENDITURES, AND CHANGES IN CASH BALANCES—BUDGET AND ACTUAL—BUDGETARY BASIS— GENERAL FUND

FOR THE FISCAL YEAR ENDED JUNE 30, 2010

	General Fund					
	Budget			Actual	V	ariance
Beginning Cash Balances	\$	206,854	\$	206,855	\$	1
Less: Prior Year Outstanding Warrants		(65,873)		(65,853)		20
Less: Prior Year Encumbrances		(18,275)		(12,833)		5,442
Beginning Cash Balances, Budgetary Basis		122,706		128,169		5,463
Receipts:						
Ad Valorem Taxes		313,080		344,483		31,403
Sales Tax		217,251		217,677		426
Charges for Services		23,874		24,254		380
Intergovernmental Revenues		296,066		280,901		(15,165)
Miscellaneous Revenues		51,699		74,222		22,523
Total Receipts, Budgetary Basis		901,970		941,537		39,567
Expenditures:						
County Sheriff		228,315		225,080		3,235
County Treasurer		75,879		75,623		256
County Commissioners - OSU Extension		96,621		56,969		39,652
County Clerk		49,491		47,380		2,111
Court Clerk		63,228		63,228		-
County Assessor		66,029		65,796		233
Revaluation of Real Property		78,949		73,588		5,361
General Government		57,557		42,677		14,880
Excise - Equalization Board		2,850		2,053		797
County Election Board		48,491		46,932		1,559
Insurance - Benefits		236,772		216,955		19,817
County Audit Budget Account		4,000		-		4,000
Free Fair Budget		1,012		439		573
Free Fair Improvement		15,482		4,881		10,601
Total Expenditures, Budgetary Basis		1,024,676		921,601		103,075
Excess of Receipts and Beginning Cash						
Balances Over Expenditures, Budgetary Basis	\$			148,105	\$	148,105
Reconciliation to Statement of Receipts,						
Disbursements, and Changes in Cash Balances						
Add: Current Year Outstanding Warrants				51,069		
Add: Current Year Encumbrances				10,944		
Ending Cash Balance			\$	210,118		

COTTON COUNTY, OKLAHOMA COMPARATIVE SCHEDULE OF RECEIPTS, EXPENDITURES, AND CHANGES IN CASH BALANCES—BUDGET AND ACTUAL—BUDGETARY BASIS— COUNTY HEALTH DEPARTMENT FUND FOR THE FISCAL YEAR ENDED JUNE 30, 2010

	County Health Department Fund					nd
	Budg	get	A	Actual	V	ariance
Beginning Cash Balances),265	\$	70,266	\$	1
Less: Prior Year Encumbrances	(1	1,600)		(889)		711
Beginning Cash Balances, Budgetary Basis	68	3,665		69,377		712
Receipts:						
Ad Valorem Taxes	78	3,270		86,083		7,813
Charges for Services	3	3,473		3,473		-
Intergovernmental		-		863		863
Miscellaneous Revenues		-		12		12
Total Receipts, Budgetary Basis	81	1,743		90,431		8,688
Expenditures:						
Health and Welfare	150),408		53,377		97,031
Total Expenditures, Budgetary Basis	150),408		53,377		97,031
Excess of Receipts and Beginning Cash						
Balances Over Expenditures,						
Budgetary Basis	\$			106,431	\$	106,431
Reconciliation to Statement of Receipts,						
Disbursements, and Changes in Cash Balances						
Add: Current Year Encumbrances				1,729		
Ending Cash Balance			\$	108,160		

COTTON COUNTY, OKLAHOMA COMBINING STATEMENT OF RECEIPTS, DISBURSEMENTS, AND CHANGES IN CASH BALANCES—REGULATORY BASIS— REMAINING AGGREGATE FUNDS FOR THE FISCAL YEAR ENDED JUNE 30, 2010

	Beginning Cash Balances July 1, 2009	Receipts Apportioned	Disbursements	Ending Cash Balances June 30, 2010
Remaining Aggregate Funds:				
Free Fair Building Fund	\$ 10,860	\$ 585	\$ 4,467	\$ 6,978
Sheriff Forfeiture Fund	720	-	679	41
Sheriff Dare Fund	75	-	-	75
Visual Inspection Reimbursement Fund	2,216	-	-	2,216
Assessor Revolving Cash Account	4,922	1,838	1,395	5,365
Sheriff Reserves Fund	807	-	618	189
Resale Property Fund	27,077	32,736	25,941	33,872
Mortgage Certification Fee Fund	3,104	1,520	2,363	2,261
County Clerk Lien Fee Fund	8,734	3,199	1,018	10,915
Glessner Fund	58,678	8,650	4,863	62,465
Free Fair Premiums	3,987	2,365	1,451	4,901
Sheriff Equipment and Training Fund	42	-	-	42
Sheriff Commissary Fund	6,358	19,052	19,823	5,587
Sheriff Donations Fund	751	18,346	16,487	2,610
Trash Cop Grant	-	4,800	4,388	412
Free Fair Donations Fund	1,203	4,375	4,415	1,163
Sheriff Drug Fund	24	-	-	24
County Clerk Records Management Fund	14,175	7,618	12,526	9,267
CDBG Grant	92,123	-	92,104	19
Littering Reward Fund		50	_	50
Combined Total - Remaining Aggregate Funds	\$ 235,856	\$ 105,134	\$ 192,538	\$ 148,452

1. Budgetary Schedules

The Comparative Schedules of Receipts, Expenditures, and Changes in Cash Balances—Budget and Actual—Budgetary Basis for the General Fund and the County Health Department Fund present comparisons of the legally adopted budget with actual data. The "actual" data, as presented in the comparison of budget and actual, will differ from the data as presented in the Combined Statement of Receipts, Disbursements, and Changes in Cash Balances with Combining Information because of adopting certain aspects of the budgetary basis of accounting and the adjusting of encumbrances and outstanding warrants to their related budget year.

Encumbrance accounting, under which purchase orders, contracts, and other commitments for the expenditure of monies are recorded in order to reserve that portion of the applicable appropriation, is employed as an extension of formal budgetary integration in these funds. At the end of the year unencumbered appropriations lapse.

2. Remaining County Funds

Remaining aggregate funds as presented on the financial statement are as follows:

<u>Free Fair Building Fund</u> – accounts for insurance reimbursements, federal funds, and other miscellaneous revenue to repair the free fair building.

<u>Sheriff Forfeiture Fund</u> – accounts for money seized and forfeited as a result of drug enforcement.

<u>Sheriff Dare Fund</u> – accounts for donations disbursed for the purpose of drug education and drug awareness.

<u>Visual Inspection Reimbursement Fund</u> – accounts for the collection and expenditure of monies by the Assessor as restricted by state statute for the visual inspection program.

<u>Assessor Revolving Cash Account</u> – accounts for the collection of fees for copies restricted by state statute.

<u>Sheriff Reserves Fund</u> – accounts for the collection and disbursement of donations to the Sheriff's reserve deputies.

<u>Resale Property Fund</u> – accounts for the collection of interest and penalties on delinquent taxes and the disposition of same as restricted by statute.

<u>Mortgage Certification Fee Fund</u> – accounts for the collection of revenues from a fee for certifying mortgages. Disbursements are for any lawful expense of the Treasurer's office.

COTTON COUNTY, OKLAHOMA NOTES TO OTHER SUPPLEMENTARY FOR THE FISCAL YEAR ENDED JUNE 30, 2010

<u>County Clerk Lien Fee Fund</u> – accounts for the collection of revenues from a fee charged by the County Clerk for filing liens. Disbursements are for any lawful expense of the County Clerk's office.

<u>Glessner Fund</u> – accounts for the collection of rental revenue of farms donated to the County and disbursements for the needy of the County as determined by the Board of County Commissioners.

<u>Free Fair Premiums</u> – accounts for monies collected from donations for the payment of premiums to livestock and 4H project participants.

<u>Sheriff Equipment and Training Fund</u> – accounts for the collection and disbursement of money supplied to the Sheriff's office for the training of officers.

<u>Sheriff Commissary Fund</u> – accounts for the collection from the sale of items to inmates and disbursements to purchase commissary goods from the vendor and can be used for maintenance and operation of the jail.

<u>Sheriff Donations Fund</u> – accounts for collection of donations used for training, equipment and supplies.

<u>Trash Cop Grant</u> – accounts for the receipt of donations for deputies to patrol roads to control illegal trash dumping.

<u>Free Fair Donations Fund</u> – accounts for the collection of donations and rentals of the Expo building and the disbursements associated with maintaining the Expo building.

<u>Sheriff Drug Fund</u> – accounts for collection of donations used for training, equipment and supplies.

<u>County Clerk Records Management Fund</u> – accounts for fees collected for instruments filed in the Registrar of Deeds as restricted by statute for preservation of records.

<u>CDBG Grant</u> – accounts for federal funding for the purchase and installation of energy efficient heating and air units in the Courthouse.

<u>Littering Reward Fund</u> – accounts for a portion of Court Clerk fine collections for the payment of rewards to persons providing information to law enforcement regarding illegal dumping.

COTTON COUNTY, OKLAHOMA SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE FISCAL YEAR ENDED JUNE 30, 2010

	Federal	Pass-Through	F 1 1
Federal Grantor/Pass-Through	CFDA	Grantor's	Federal
Grantor/Program Title	Number	Number	Expenditures
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT			
Passed Through State Department of Commerce:			
and Non-Entitlement Grants in Hawaii	14.228		\$ 92,105
Total U.S. Department of Housing and Urban Development			92,105
U.S. DEPARTMENT OF TRANSPORTATION			
Passed Through the Bureau of Indian Affairs:			
Highway Planning and Construction - Emergency Relief Project # 25176	20.205		45,082
Passed Through the Okahoma Highway Safety Office:			
State and Community Highway Safety Projects	20.600		4,000
Total U.S. Department of Transportation			49,082
U.S. DEPARTMENT OF HOMELAND SECURITY			
Passed Through the Oklahoma Department of Emergency Management:			
Disaster Grants - Public Assistance (Presidentially Declared Disasters)	97.036		547,107
Hazard Mitigation Grant	97.039		4,388
Total U.S. Department of Homeland Security			551,495
Total Expenditures of Federal Awards			\$ 692,682

COTTON COUNTY, OKLAHOMA NOTE TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE FISCAL YEAR ENDED JUNE 30, 2010

Basis of Presentation

The schedule of expenditures of federal awards includes the federal grant activity of Cotton County, and is presented on the *cash basis of accounting*. The information in this schedule is presented in accordance with the requirements of OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*.



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Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance With Government Auditing Standards

TO THE OFFICERS OF COTTON COUNTY, OKLAHOMA

We have audited the combined totals—all funds of the accompanying Combined Statement of Receipts, Disbursements, and Changes in Cash Balances of Cotton County, Oklahoma, as of and for the year ended June 30, 2010, which comprises Cotton County's basic financial statement, prepared using accounting practices prescribed or permitted by Oklahoma state law, and have issued our report thereon dated January 21, 2014. Our report on the basic financial statement was adverse because the statement is not a presentation in conformity with accounting principles generally accepted in the United States of America. However, our report also included our opinion that the financial statement does present fairly, in all material respects, the receipts, disbursements, and changes in cash balances – regulatory basis of the County for the year ended June 30, 2010, on the basis of accounting prescribed by Oklahoma state law, described in Note 1. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered Cotton County's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statement, but not for the purpose of expressing an opinion on the effectiveness of Cotton County's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of Cotton County's internal control over financial reporting.

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over financial reporting that might be significant deficiencies or material weaknesses, and therefore, there can be no assurance that all deficiencies, significant deficiencies, or material weaknesses have been identified. However, as described in the accompanying schedule of findings and questioned costs, we identified certain deficiencies in internal control over financial reporting that we consider to be material weaknesses and other deficiencies that we consider to be significant deficiencies.

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 combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. We consider the deficiencies in internal control described in the accompanying schedule of findings and questioned costs to be material weaknesses in internal control over financial reporting. 2010-1, 2010-2, 2010-5, and 2010-6.

A significant deficiency is a deficiency, or 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 consider the deficiencies in internal control described in the accompanying schedule of findings and questioned costs to be significant deficiencies in internal control over financial reporting. 2010-7, 2010-8, 2010-14, 2010-16, and 2010-18.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether Cotton County's financial statement is free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the accompanying schedule of findings and questioned costs as items 2010-7 and 2010-8.

We noted certain matters that we reported to the management of Cotton County, which are included in Section 4 of the schedule of findings and questioned costs contained in this report.

Cotton County's responses to the findings identified in our audit are described in the accompanying schedule of findings and questioned costs. We did not audit Cotton County's responses and, accordingly, we express no opinion on the responses.

This report is intended solely for the information and use of management, those charged with governance, others within the entity, and is not intended to be and should not be used by anyone other than the specified parties. This report is also a public document pursuant to the Oklahoma Open Records Act (51 O.S., section 24A.1 et seq.), and shall be open to any person for inspection and copying.

GARY A. JONES, CPA, CFE

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OKLAHOMA STATE AUDITOR & INSPECTOR

January 21, 2014

2300 N. Lincoln Blvd. • State Capitol, Room 100 • Oklahoma City, OK 73105 • Phone: 405.521.3495 • Fax: 405.521.3426

Independent Auditors Report on Compliance with Requirements That Could Have a Direct and
Material Effect on Each Major Program
and Internal Control Over Compliance in Accordance With
OMB Circular A-133

TO THE OFFICERS OF COTTON COUNTY, OKLAHOMA

Compliance

We have audited the compliance of Cotton County, Oklahoma, with the types of compliance requirements described in the U.S. Office of Management and Budget (OMB) *Circular A-133 Compliance Supplement* that could have a direct and material effect on Cotton County's major federal program for the year ended June 30, 2010. Cotton County's major federal program is identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts, and grants applicable to its major federal program is the responsibility of Cotton County's management. Our responsibility is to express an opinion on Cotton County's compliance based on our audit.

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

In our opinion, Cotton County, complied, in all material respects, with the requirements referred to above that could have a direct and material effect on its major federal program for the year ended June 30, 2010.

Internal Control Over Compliance

Management of Cotton County is responsible for establishing and maintaining effective internal control over compliance with the requirements of laws, regulations, contracts, and grants applicable to federal programs. In planning and performing our audit, we considered Cotton County's internal control over compliance with the requirements that could have a direct and material effect on a major federal program to determine the auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of Cotton County's internal control over compliance.

Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over compliance that might be significant deficiencies or material weaknesses and therefore, there can be no assurance that all deficiencies, significant deficiencies, or material weaknesses have been identified. However, as discussed below, we identified certain deficiencies in internal control over compliance that we consider to be material weaknesses.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 2010-19 and 2010-20 to be material weaknesses.

We noted certain matters that we reported to the management of Cotton County, which are included in Section 4 of the schedule of findings and questioned costs contained in this report.

Cotton County's responses to the findings identified in our audit are described in the accompanying schedule of findings and questioned costs. We did not audit Cotton County's responses and, accordingly, we express no opinion on the responses.

This report is intended solely for the information and use of management, those charged with governance, others within the entity, and is not intended to be and should not be used by anyone other than the specified parties. This report is also a public document pursuant to the Oklahoma Open Records Act (51 O.S., section 24A.1 et seq.), and shall be open to any person for inspection and copying.

GARY A. JONES, CPA, CFE

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OKLAHOMA STATE AUDITOR & INSPECTOR

January 21, 2014

SECTION 1—Summary of Auditor's Results

Financial Statements	
Type of auditor's report issued:Adverse as to GAA	AP; unqualified as to statutory presentation
Internal control over financial reporting:	
Material weakness(es) identified?	Yes
Significant deficiency(ies) identified?	Yes
Noncompliance material to financial statements noted?	Yes
Federal Awards Internal control over major programs:	
Material weakness(es) identified?	Yes
Significant deficiency(ies) identified?	
Type of auditor's report issued on compliance for major programs:	Unqualified
Any audit findings disclosed that are required to be reported in accordance with section 510(a) of Circular A-133?	Yes
Identification of Major Programs	
CFDA Number(s) 97.036	Name of Federal Program or Cluster Disaster Grants - Public Assistance (Presidentially Declared Disasters)
Dollar threshold used to distinguish between Type A and Type B programs:	\$300,000
Auditee qualified as low-risk auditee?	No

SECTION 2—Findings related to the Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance With Government Auditing Standards

Finding 2010-1—Inadequate County-Wide Controls

Condition: County-wide controls regarding Risk Management and Monitoring have not been designed.

Cause of Condition: Procedures have not been designed to address risks of the County.

Effect of Condition: This condition could result in unrecorded transactions, undetected errors, or misappropriation of funds.

Recommendation: The Oklahoma State Auditor & Inspector's Office (OSAI) recommends that the County design procedures to identify and address risks. OSAI also recommends that the County design monitoring procedures to assess the quality of performance over time. These procedures should be written policies and procedures and could be included in the County's policies and procedures handbook.

Management Response:

BOCC Chairman, County Clerk, and County Treasurer: We will meet quarterly in the County Commissioners' meeting, with all elected officials, to discuss and take action regarding risk management and monitoring.

Criteria: Internal control is an integral component of an organization's management that provides reasonable assurance that the objectives of effectiveness and efficiency of operations, reliability of financial reporting and compliance with laws and regulations are being made. Internal control comprises the plans, methods, and procedures used to meet missions, goals, and objectives. Internal control also serves as the first line of defense in safeguarding assets and preventing and detecting errors and fraud. County management is responsible for designing a county-wide internal control system comprised of Risk Assessment and Monitoring for the achievement of these goals.

Risk Assessment is a component of internal control which should provide for an assessment of the risks the County faces from both internal and external sources. Once risks have been identified, they should be analyzed for their possible effect. Management then has to formulate an approach for risk management and decide upon the internal control activities required to mitigate those risks and achieve the internal control objectives.

Monitoring is a component of internal control which should assess the quality of performance over time and ensure that the findings of audits and other reviews are promptly resolved. Ongoing monitoring occurs during normal operations and includes regular management and supervisory activities, comparisons, reconciliations, and other actions people take in performing their duties. It includes ensuring that management know their responsibilities for internal control and the need to make control monitoring part of their regular operating process.

Finding 2010-2—Inadequate Internal Controls Over Segregation of Duties - County Treasurer

Condition: The County Treasurer has segregated the duties of preparing/reviewing deposits and performing bank reconciliations; however, the employees who perform these duties also issue receipts and prepare journal entries. In addition, all employees work from the same cash drawer. For mail-in payments, all employees can open the mail and issue receipts. A daily mail log is not maintained.

Cause of Condition: In order to provide prompt services to the citizens of Cotton County and for ease of operations, the County Treasurer's office utilizes all employees to issue receipts. Additionally, due to the limited number of personnel, one individual is sometimes responsible for all key functions of the office.

Effect of Condition: These conditions could result in unrecorded transactions, misstated financial reports, undetected errors, or misappropriation of funds.

Recommendation: OSAI recommends the following key accounting functions of the Treasurer's office be adequately segregated:

- Issuing receipts.
- Preparing/reviewing deposits and taking them to the bank.
- Maintaining accounting ledgers and reconciling bank statements.

In addition, OSAI recommends establishing a system of internal controls to adequately protect the collections of the Treasurer's office, which include but are not limited to the following:

- Establish separate cash drawers for all employees receiving cash.
- A daily log of mailed in payments should be compiled.

In the event that segregation of duties is not possible due to limited personnel, OSAI recommends implementing compensating internal controls to mitigate the risks involved with a concentration of duties. Compensating internal controls would include separating key processes and/or critical functions of the office, and having management review and approve accounting functions.

Management Response:

County Treasurer: Bank statements are segregated somewhat, as we do not allow the employee making the deposits to the General Fund to reconcile the General Fund bank statement, nor do we allow the employee that does the Official Deposit to reconcile the Official Depository bank statement. After bank statements are balanced, they are reviewed and will be approved by the County Treasurer. We are reviewing our options at this time in order to decide the most efficient way to establish separate cash drawers, and prepare a daily mail log.

Criteria: Effective internal controls require that key functions within a process be adequately segregated to allow for prevention and detection of errors and possible misappropriation of funds.

Finding 2010-5—Inadequate Internal Controls Over Segregation of Duties - Purchasing

Condition: The County Clerk has segregated the duties of encumbering funds and posting to the ledgers from the printing and distribution of payments; however, in addition to encumbering funds and posting to the ledgers, the Purchasing Agent also prepares the purchase orders, reviews for accuracy, and certifies that the purchase orders are ready for payment.

Cause of Condition: Policies and procedures have not been designed with regard to segregation of duties and/or compensating controls of the purchasing process.

Effect of Condition: This condition could result in unrecorded transactions, misstated financial reports, undetected errors, and misappropriation of funds.

Recommendation: OSAI recommends management be aware of this condition and determine if duties can be properly segregated. In the event that segregation of duties is not possible due to limited personnel, OSAI recommends implementing compensating controls to mitigate the risk involved with a concentration of duties. Compensating controls would include separating key processes and/or critical functions of the office, and having management review and approve accounting functions.

Management Response:

County Clerk: Management is aware of this condition and will work to implement compensating controls to mitigate the risk involved with a concentration of duties.

Criteria: Accountability and stewardship are overall goals of management in the accounting of funds. Internal controls should be designed to analyze and check accuracy, completeness, and authorization of disbursements and/or transactions. To help ensure a proper accounting of funds, the duties of processing, authorizing, and distribution should be segregated.

Finding 2010-6—Inadequate Internal Controls Over Segregation of Duties – Payroll

Condition: Although the County Clerk's Second Deputy and the Payroll Clerk are cross-trained in the payroll process, the duties of enrolling new hires, making payroll changes, running verification reports, printing payroll checks, distributing payroll checks, and maintaining personnel files are not formally segregated.

Cause of Condition: Policies and procedures have not been designed with regard to segregation of duties and/or compensating internal controls of the payroll process.

Effect of Condition: This condition could result in unrecorded transactions, misstated financial reports, undetected errors, and misappropriation of funds.

Recommendation: OSAI recommends management be aware of these conditions and determine if duties can be properly segregated. In the event that segregation of duties is not possible due to limited

personnel, OSAI recommends implementing compensating controls to mitigate the risks involved with a concentration of duties. Compensating controls would include separating key processes and/or critical functions of the office, and having management review and approve accounting functions.

Management Response:

County Clerk: Compensating controls will be implemented. The key payroll processes will be separated where possible. All reviews will be documented and dated.

Criteria: Accountability and stewardship are overall goals of management in the accounting of funds. Internal controls should be designed to analyze and check accuracy, completeness, and authorization of payroll calculations and/or transactions. To help ensure a proper accounting of funds, the duties of processing, authorizing, and payroll distribution should be segregated.

Finding 2010-7—Inadequate Internal Controls Over Purchasing and Noncompliance with State Statute

Condition: While testing seventy-six purchase orders, we noted the following:

- Sixteen were not supported by a receiving report.
- Two were not timely encumbered.

Cause of Condition: The County did not follow the policies and procedures designed by statute regarding the purchasing process.

Effect of Condition: These conditions resulted in noncompliance with state statute, laws, regulations, or legislative intent, and could result in inaccurate records, incomplete information, or misappropriation of assets.

Recommendation: OSAI recommends that the County adhere to state purchasing guidelines. Purchase orders should be encumbered before goods or services are ordered and receiving reports should be completed, authorized, and attached to the purchase order.

Management Response:

BOCC Chairman: Purchase orders will have proper documents attached and properly encumbered or a letter from our legal counsel will be obtained prior to BOCC approval of purchase orders.

County Clerk: All purchase orders that do not comply with purchasing guidelines will be marked as "Does not comply with purchasing guidelines" prior to being submitted to the BOCC for approval.

Criteria: Title 19 O.S. § 1505 prescribes the procedures established for the requisition, purchase, lease-purchase, rental, and receipt of supplies, material, and equipment for maintenance, operation, and capital expenditures of county government.

Further, effective internal controls would include all supporting documentation related to disbursements be attached to the purchase order prior to approval for payment.

Finding 2010-8—Inadequate Internal Controls Over Pledged Collateral and Noncompliance with State Statute

Condition: Based upon inquiry of the County Treasurer's staff and observation of records, we noted the following:

- Pledged collateral amounts are not monitored to daily bank balances to ensure that county funds are adequately secured.
- County funds were not adequately secured with pledged collateral at a financial institution for three of the twelve days tested for the fiscal year. On December 30, 2009, county funds were undercollateralized in the amount of \$167,648.63. On December 31, 2009, county funds were undercollateralized in the amount of \$122, 943.24. On January 4, 2010, county funds were undercollateralized in the amount of \$122,943.24.

Cause of Condition: Procedures performed to ensure daily bank deposits are adequately secured are not properly designed.

Effect of Condition: Failure to properly monitor pledged collateral amounts resulted in noncompliance and unsecured county funds and could result in possible loss of county funds.

Recommendation: OSAI recommends the County Treasurer use the end of day bank balance to compare to collateral amounts to ensure adequate collateralization. Documentation for this daily procedure should be maintained.

Management Response:

County Treasurer: The County Treasurer's office will maintain a ledger to monitor pledged collateral on a daily basis.

Criteria: Title 62 O.S. § 517.4(A) states, "A treasurer of a public entity shall require that financial institutions deposit collateral securities or instruments to secure the deposits of the public entity in each such institution. The amount of collateral securities or instruments to be pledged for the security of public deposits shall be established by the treasurer of the public entity consistent with the provisions of the Security for Local Public Deposits Act; provided, such amount shall not be less than the amount of the deposit to be secured, less the amount insured."

Further, effective internal controls would include monitoring the daily bank balances to the amount of securities pledged to protect the County against loss of investments.

Finding 2010-14—Disaster Recovery Plan

Condition: The offices of County Treasurer, County Assessor, County Sheriff, Court Clerk, and the Board of County Commissioners (BOCC) do not have a written Disaster Recovery Plan.

Cause of Condition: A formal, written Disaster Recovery Plan with regard to the accounting and records was not designed due to the County being unaware for the need of such a procedure.

Effect of Condition: The failure to have a current formal Disaster Recovery Plan could result in the County being unable to function in the event of a disaster. The lack of a formal plan could cause significant problems in ensuring county business could continue uninterrupted.

Recommendation: OSAI recommends that each elected official develop a Disaster Recovery Plan that addresses how critical information and systems within their offices would be restored in the event of a disaster. The Plan should include the following:

- Current names, addresses, contact numbers of key county personnel and their roles and responsibilities of information services function.
- Listing of contracted service providers.
- Information on location of key resources, including back-up site for recovery operating system, application, data files, operating manuals and program/system/user documentation.
- Alternative work locations once IT resources are available.

Management Response:

County Commissioner District 1, District 2, and District 3: The BOCC will work to create a Disaster Recovery Plan for each District and work with all officials to ensure that each office has a Disaster Recovery Plan and that they are all filed with the County Clerk.

County Treasurer: The County Treasurer and staff are working on a Disaster Recovery Plan at this time, and when completed, will give copies of this plan to the BOCC and the County Treasurer will store a copy off-site.

County Assessor: I intend to complete a Disaster Recovery Plan for the Assessor's office.

County Sheriff: The Cotton County Sheriff's Office will develop a Disaster Recovery Plan for the safeguarding of assets and to ensure that business could continue as usual in the event of a disaster. The Disaster Recovery Plan will encompass the following items:

- Current names, addresses, contact numbers of key county personnel and their roles and responsibilities of information services function.
- Listing of contracted service providers.
- Information on location of key resources, including back-up site for recovering operating system, application, data files, operating manuals, and program/system/user documentation.
- Alternative work locations once IT resources are available.

Court Clerk: In response to a Disaster Recovery Plan, I will devise a plan for my office.

Criteria: An important aspect of internal control is the safeguarding of assets which includes adequate Disaster Recovery Plans. Internal controls over safeguarding of assets constitute a process, affected by an entity's governing body, management, and other personnel, designed to provide reasonable assurance regarding prevention in a County being unable to function in the event of a disaster. Disaster Recovery Plan(s) are an integral part of county operations to ensure that business can be continued as usual in the event of a disaster. Each office or the county as a whole should have a current, detailed Disaster Recovery Plan on file and should be aware of its content.

According to the standards of the Information Systems Audit and Control Association (CobiT, Deliver and Support 4), information services function management should ensure that a written Disaster Recovery Plan is documented and contains guidelines and instructions for the County to follow in the event of a disaster.

Finding 2010-16—Inadequate Internal Controls Over Information Systems Security – County Clerk and County Treasurer

Condition: Upon review of the computer systems within the County Treasurer and the County Clerk's office, it was noted that there does not appear to be adequate controls in place to safeguard data from unauthorized modification, loss, or disclosure. The following was noted:

- Passwords are not required to be changed periodically in the County Clerk's or the County Treasurer's office.
- User roles are not being used in the County Clerk's or the County Treasurer's computer programs to segregate duties and responsibilities effectively. All users have full administrative rights.
- The audit log is not being utilized as a form of management oversight.

Cause of Condition: Procedures have not been designed to address security management over information systems.

Effect of Condition: This condition could result in compromised security for the computers, computer programs, and data.

Recommendation: OSAI recommends the County work with IT personnel or in conjunction with software vendors to setup password requirements for length, character and an expiration of a minimum of at least every ninety days. In addition, OSAI recommends passwords not be shared and access to servers be limited.

Management Response:

County Treasurer: The County Treasurer's office will begin changing passwords every 90 days and check with the software vendor about installing the audit log.

County Clerk: The County Clerk will check with the software vendor to determine what levels of security are in place and will double-check password protection.

Criteria: According to the standards of the Information Systems Audit and Control Association (CobiT, Deliver and Support DS5), the need to maintain the integrity of information and protect IT assets requires a security management process. This process includes establishing and maintaining IT security roles and responsibilities, policies, standards, and procedures. Security management also includes performing security monitoring and periodic testing and implementing corrective actions for identified security weaknesses or incidents. Effective security management protects all IT assets to minimize the business impact of security vulnerabilities and incidents.

Finding 2010-18—Sales Tax Appropriations and Noncompliance with State Statute

Condition: The County sales tax is accounted for within the County General Fund. For the fiscal year ending June 30, 2010, sales tax was not appropriated in accordance with the sales tax ballot. The following exceptions were noted:

	Sales Tax Collections Plus Prior Year's Unexpended	Sales Tax	<under></under>
Account/Fund	Balance	Appropriated	Appropriated
OSU Extension	\$91,193.29	\$96,621.00	\$5,427.82
Free Fair/Ag Arena/Expo Center	\$7,965.95	\$1,012.00	<\$6,953.95>

Cause of Condition: Policies and procedures have not been designed to ensure compliance with state statute 68 O.S. § 1370E.

Effect of Condition: These conditions resulted in noncompliance with state statute. Sales tax was not appropriated in accordance with sales tax ballot(s).

Recommendation: OSAI recommends that the excess sales tax collections be apportioned and appropriated in accordance with the sales tax ballot(s).

Management Response:

BOCC: We have discussed this issue with the budget maker. This was an oversight and corrective measures will be taken.

Criteria: Title 68 O.S. § 1370E requires the sales tax collections to be deposited in the general revenue or sales tax revolving fund of the County and be used only for the purpose for which such sales tax was designated.

SECTION 3—Independent Auditor's Report on Compliance With Requirements That Could Have a Direct and Material Effect on Each Major Program and Internal Control Over Compliance in Accordance With OMB Circular A-133

Finding 2010-19—Lack of Internal Controls over Federal Compliance Requirements

PASS-THROUGH GRANTOR: Oklahoma Department of Emergency Management

FEDERAL AGENCY: United States Department of Homeland Security

CFDA NO: 97.036

FEDERAL PROGRAM NAME: Disaster Grants - Public Assistance (Presidentially Declared Disasters)

FEDERAL AWARD NUMBER: 1678, 1712, 1876, and 1883

FEDERAL AWARD YEAR: 2010

CONTROL CATEGORY: Activities Allowed or Unallowed; Allowable Costs/Cost Principles; Cash Management; Matching, Level of Effort, Earmarking; Period of Availability of Federal Funds; Procurement and Suspension and Debarment; and Special Tests and Provisions

of rectain and Suspension and Devarinent, and Special Tests and

QUESTIONED COSTS: -\$0-

Condition: During the process of documenting the County's internal controls regarding federal disbursements, we noted that Cotton County has not established procedures to ensure compliance with the following compliance requirements: Activities Allowed or Unallowed; Allowable Costs/Cost Principles; Cash Management; Matching, Level of Effort, Earmarking; Period of Availability of Federal Funds; Procurement and Suspension and Debarment; and Special Tests and Provisions.

Cause of Condition: Procedures have not been designed to ensure federal expenditures are made in accordance with federal compliance requirements.

Effect of Condition: This condition could result in noncompliance to grant requirements and loss of federal funds to the County.

Recommendation: OSAI recommends the County gain an understanding of requirements for these programs and implement internal control procedures to ensure compliance with requirements.

Management Response:

BOCC: The Board of County Commissioners' Administrative Assistant reviews any changes made to grants and these changes are communicated to the Board. The Board reviews these changes and responds accordingly. We will work with all County officials to go over all grants and federal monies that Cotton County receives to ensure that proper internal controls are implemented.

Criteria: *OMB A-133*, *Subpart C*, § .300 reads as follows:

Subpart C—Auditees

§____.300 Auditee responsibilities.

The auditee shall:

(b) Maintain internal controls over Federal programs that provides reasonable assurance that the auditee is managing Federal awards in compliance with laws, regulations, and the

provisions of contracts or grant agreements that could have material effect on each of its Federal programs.

Further, accountability and stewardship should be overall goals in management's accounting of federal funds. Internal controls should be designed to monitor compliance with laws and regulations pertaining to grant contracts.

Finding 2010-20—County-Wide Controls Over Major Programs – FEMA

PASS-THROUGH GRANTOR: Oklahoma Department of Emergency Management

FEDERAL AGENCY: United States Department of Homeland Security

CFDA NO: 97.036

FEDERAL PROGRAM NAME: Disaster Grants – Public Assistance (Presidentially Declared Disasters)

FEDERAL AWARD NUMBER: 1678, 1712, 1876, and 1883

FEDERAL AWARD YEAR: 2010

CONTROL CATEGORY: Activities Allowed or Unallowed; Allowable Costs/Cost Principles; Cash Management; Matching, Level of Effort, Earmarking; Period of Availability of Federal Funds; Procurement and Suspension and Debarment; and Special Tests and Provisions

OUESTIONED COSTS: \$-0-

Condition: County-wide controls regarding Control Environment, Risk Assessment, Information and Communication, and Monitoring have not been designed.

Cause of Condition: Procedures have not been designed to ensure the County is in compliance with grant requirements.

Effect of Condition: This condition could result in noncompliance to grant requirements.

Recommendation: OSAI recommends that the County implement a system of internal controls to ensure compliance with grant requirements.

Management Response:

County Commissioner District 1, 2, and 3: We will work to implement a risk management plan. We will implement controls to help make sure we are in compliance with all grant requirements and that federal funds are expended in accordance with grant agreements and in a timely manner. We will ensure that employees have the current and correct compliance supplement to work from. Furthermore, we will work with the County Treasurer and County Clerk's office to ensure that all checks and balances are done correctly.

Criteria: Internal control is an integral component of an organization's management that provides reasonable assurance that the objectives of effectiveness and efficiency of operations, reliability of financial reporting and compliance with laws and regulations are being made. Internal control comprises the plans, methods, and procedures used to meet missions, goals, and objectives. Internal control also

serves as the first line of defense in safeguarding assets and preventing and detecting errors and fraud. County management is responsible for designing a county-wide internal control system comprised of Control Environment, Risk Assessment, Information and Communication, and Monitoring for the achievement of these goals.

SECTION 4—This section contains certain matters not required to be reported in accordance with *Government Auditing Standards*. However, we believe these matters are significant enough to bring to management's attention. We recommend that management consider these matters and take appropriate corrective action.

Finding 2010-9—Inadequate Internal Controls Over the Court Clerk Revolving Fund and Court Fund Expenditure Process

Condition: Upon inquiry and observation of the Court Clerk Revolving Fund and the Court Fund expenditure process, it was noted that the Court Clerk and the First Deputy performs key duties with no independent verification of accuracy. The Court Clerk initiates and prepares the claim, signs the claim along with the District Judge, and prepares and signs checks.

Cause of Condition: Policies and procedures have not been designed and implemented to address the lack of segregation of duties over expending Court Clerk Revolving Fund and Court Fund monies.

Effect of Condition: A single person having responsibility for more than one area of recording, authorization, custody of assets, and execution of transactions 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 management be aware of these conditions and determine if duties can be properly segregated. In the event that segregation of duties is not possible due to limited personnel, OSAI recommends implementing compensating controls to mitigate the risk involved with a concentration of duties. Compensating controls would include separating key processes and/or critical functions of the office, and having management review and approve accounting functions.

Management Response:

Court Clerk: We will implement compensating controls to mitigate the risks involved with a concentration of duties. I will have the First Deputy verify the claims and have the Treasurer sign and date the end of the month report.

Criteria: Accountability and stewardship are overall goals of management in the accounting of funds. To help ensure a proper accounting of funds, the duties of preparing the claim, attaching and agreeing supporting documentation, certifying receipt of goods/services, signing the claim, and preparing and signing the checks should be segregated.

Finding 2010-10—Inadequate Internal Controls and Noncompliance Over the Inmate Trust and Sheriff Commissary

Condition: An examination of the Inmate Trust and Sheriff Commissary funds reflected the following:

- One employee performs all of the daily activity in the Inmate Trust Fund such as issuing receipts, balancing the cash drawer, preparing deposit slips, and posting payments to inmate records. In addition, this employee has custody of the bank statements.
- Expenditures are being made from the Inmate Trust Fund rather than the Sheriff Commissary Fund.
- All receipts are not issued in numerical order.
- Collections are not deposited daily.
- Two authorized signatures are not required on Inmate Trust Fund checks.
- Bank statement reconciliations are performed; however, they are not reconciled to inmate ledgers. Also, there is an outstanding deposit of \$850.38 that has been carried as a reconciling item since November 3, 2009.
- The Sheriff's office does not file an annual report for the Sheriff Commissary Fund with the Board of County Commissioners by January 15, of each year.
- All expenditures are made from the Inmate Trust Fund and are not filed with and allowed by the Board of County Commissioners.

Cause of Condition: Policies and procedures have not been designed regarding the Inmate Trust and Sheriff Commissary Funds.

Effect of Condition: These conditions resulted in noncompliance with state statutes, laws, regulations, or legislative intent. Also, without proper accounting and safeguarding of the Inmate Trust Fund, there is an increased risk of misappropriation of funds.

Recommendation: OSAI recommends the following:

- Key duties and responsibilities should be segregated among different individuals to reduce the risk of error or fraud. No one individual should have the ability to authorize transactions, have physical custody of assets, and record transactions.
- Expenditures should be made from the Sheriff Commissary Fund in accordance with 19 O.S. § 180.43.
- All receipts should be issued in numerical order.
- All collections should be deposited daily.
- All checks from the Inmate Trust Fund should have two authorized signatures.
- Inmate Trust Fund monies should be maintained in a manner that reflects all Inmate Trust deposits, disbursements, and account balances. The Inmate Trust Fund balances should be reconciled to the bank statements each month.
- The Sheriff should file an annual commissary report with the County Commissioners by January 15, of each year.

Management Response:

County Sheriff:

- 1. The Cotton County Sheriff's Office will assure the segregation among different individuals in the handling of funds for the Inmate Trust and Sheriff Commissary Funds. This will be accomplished by having a separation of individuals counting the funds, receipting the funds, and depositing the funds.
- 2. All expenditures from the Inmate Trust and Sheriff Commissary Funds will be made in accordance with 19 O.S. § 180.43.
- 3. All receipts will be issued in numerical order.
- 4. All collections will be deposited daily.
- 5. All checks from the Inmate Trust Fund shall have two authorized signatures.
- 6. The Inmate Trust Fund shall be maintained in a manner that reflects all Inmate Trust deposits, disbursements, and account balances. The Inmate Trust Fund balances will be reconciled to the bank statement each month.
- 7. The Sheriff will file with the Board of County Commissioners, an annual report on the Sheriff's Commissary by January 15th of each year.

Criteria: The overall goal of effective internal controls is to demonstrate accountability and stewardship. To help ensure a proper accounting of funds, no one individual should have the ability to authorize transactions, have physical custody of assets, and record transactions. All collections should be receipted in sequential order and deposited daily, two authorized signatures should be required on all Inmate Trust Fund checks, bank reconciliations should be performed each month, and contracts should be approved by the Board of County Commissioners, contain all pertinent information, and be on file with the County.

Title 19 O.S. §180.43(D) states in part, "Any funds received pursuant to said operations shall be the funds of the county where the persons are incarcerated and shall be deposited in the Sheriff's Commissary Account. The sheriff shall be permitted to expend the funds to improve or provide jail services. The sheriff shall be permitted to expend any surplus in the Sheriff's Commissary Account for administering expenses for training equipment, travel, or for capital expenditures. The claims for expenses shall be filed with and allowed by the board of county commissioners in the same manner as other claims. The Sheriff shall receive no compensation for the operation of said commissary. The sheriff shall file an annual report on any said commissary under his or her operation no later than January 15 of each year."

Title 19 O.S. § 531(A) states in part, "The county sheriff may establish a checking account, to be designated the "Inmate Trust Checking Account." The county sheriff shall deposit all monies collected from inmates incarcerated in the county jail into this checking account and may write checks to the Sheriff's Commissary Account for purchases made by the inmate during his or her incarceration and to the inmate from unencumbered balances due the inmate upon his or her discharge."

Finding 2010-12—Inadequate Internal Controls and Noncompliance Over Fixed Assets and Consumable Inventories

Condition: Upon inquiry and observation of fixed assets and consumable inventory records, the following weaknesses were noted:

• **District 1, 2 and 3:** The consumable inventory process is not adequately segregated. One individual is verifies the goods were received, records the items on the inventory cards, and performs a visual verification of the items on hand.

Also, of the 14 consumable items tested, the following was noted:

District Office	Description	Amount on Inventory	Amount Visually Verified
District 1	12" x 20' Spiral Tinhorn	6	5
District 3	48" x 40' Spiral Tinhorn	0	3
District 3	18" Plastic Pipe	0	100'

Additionally, our test of 90 fixed assets noted that the following 34 items were not visibly marked with county identification numbers and/or "Property of Cotton County:"

County ID Number	Description of Item	County Office
201-24	Typewriter	Treasurer
205-004	Copier	Treasurer
205-005	Copier	Treasurer
214-005	Time/Date Stamp	Treasurer
238-47	Computer	Treasurer
239-10	Printer	Treasurer
239-53	Printer	Treasurer
299-28	Computer	Treasurer
238-51	Computer Fingerprinter	Sheriff
238-54	ID Maker	Sheriff
331-22	1994 Van	Sheriff
331-32	2005 Ford Crown Victoria	Sheriff
331-37	2006 Dodge Charger	Sheriff
331-38	2006 Dodge Charger	Sheriff
640-17	Refrigerator	Sheriff
640-20	Freezer	Sheriff
105-04	Desk	County Clerk
214-04	Time/Date Stamp	County Clerk

County ID Number	Description of Item	County Office
219-35	Shredder	County Clerk
238-38	Computer	County Clerk
238-39	Computer	County Clerk
205-14	Copier	Assessor
219-3	Laminator	Assessor
239-19	Printer	Assessor
241-1	Server	Assessor
348-16	Trailer	District #1
431-5	Rotary Cutter	District #1
301-20	Pickup	District #3
304-22	Tractor	District #3
345-07	Loader	District #3

Cause of Condition: Procedures have not been designed and implemented by county officers for the accurate reporting of fixed assets and consumable inventories, as well as procedures to ensure the properly marking of equipment.

Effect of Condition: These conditions resulted in noncompliance with state statutes. Opportunities for loss and misappropriation of county assets may be more likely to occur when the County does not have procedures in place to account for fixed assets and consumable inventories.

Recommendation: OSAI recommends the County adopt policies and procedures to implement a system of internal controls over the fixed assets and consumable inventory records. These controls would include that all offices:

- Perform an annual inventory count.
- Retain documentation to verify the physical inventory counts are performed.
- Inventory count should be performed by someone other than the receiving officer or inventory officer.

Further, OSAI recommends the County comply with 19 O.S. § 178.1 by maintaining inventory records and properly marking assets with county identification numbers, and performing and documenting a periodic inventory of fixed assets. The verification should be performed by an individual independent of the fixed asset recordkeeping process. Additionally, OSAI recommends the County comply with 69 O.S. § 645 by designing procedures to ensure that all equipment is properly marked with county identification numbers and "Property of Cotton County."

Management Response:

County Assessor: We will maintain documentation of the physical inventory in the future. We will also work to ensure that all items are properly marked with county identification numbers.

County Clerk: We will maintain documentation of the physical inventory in the future. We will also work to ensure that all items are properly marked with county identification numbers.

County Commissioner District 1: We will perform an annual inventory count and retain documentation. We will also work to ensure that all items are properly marked with county identification numbers.

County Commissioner District 2: We will perform an annual inventory count and retain documentation.

County Commissioner District 3: We will perform an annual inventory count and retain documentation. We will also work to ensure that all items are properly marked with county identification numbers.

County Sheriff: We will perform an annual inventory count and retain documentation. We will also work to ensure that all items are properly marked with county identification numbers.

County Treasurer: We will maintain documentation of the physical inventory in the future, and ensure that all items are properly marked with county identification numbers.

Court Clerk: We will maintain documentation of the physical inventory in the future.

Criteria: An important aspect of internal controls is the safeguarding of assets. Internal controls constitute a process affected by an entity's governing body, management and other personnel, designed to provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use or disposition of fixed assets, and safeguarding consumable items from loss, damage, or misappropriation.



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