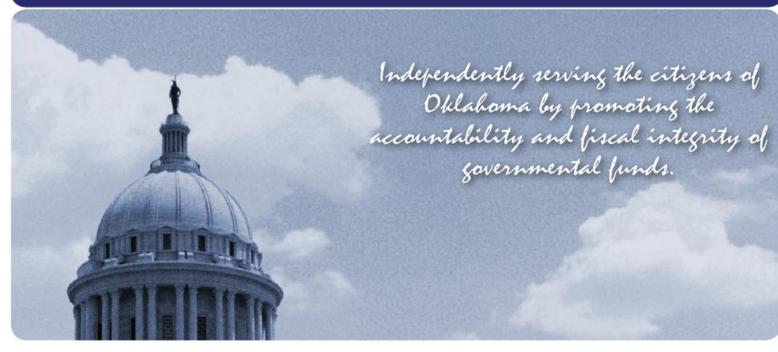
COUNTY AUDIT

MCCURTAIN COUNTY

For the fiscal year ended June 30, 2013





Oklahoma State Auditor & Inspector Gary A. Jones, CPA, CFE McCURTAIN COUNTY, OKLAHOMA FINANCIAL STATEMENT AND INDEPENDENT AUDITOR'S REPORT FOR THE FISCAL YEAR ENDED JUNE 30, 2013

Oklahoma State Auditor & Inspector

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

September 29, 2015

TO THE CITIZENS OF McCURTAIN COUNTY, OKLAHOMA

Transmitted herewith is the audit of McCurtain County, Oklahoma for the fiscal year ended June 30, 2013. 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

Say af

OKLAHOMA STATE AUDITOR & INSPECTOR

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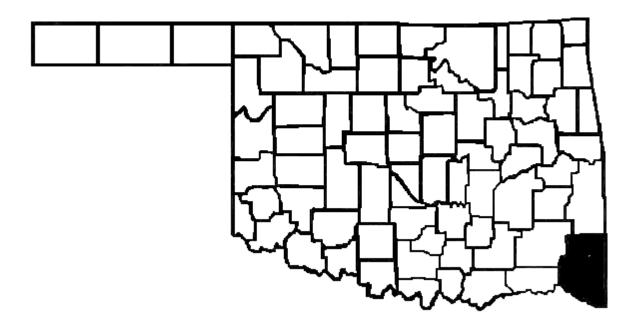
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McCURTAIN COUNTY, OKLAHOMA FOR THE FISCAL YEAR ENDED JUNE 30, 2013

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INTRODUCTORY SECTION UNAUDITED INFORMATION ON PAGES iii - ix PRESENTED FOR INFORMATIONAL PURPOSES ONLY



The topography of McCurtain County, in the southeastern corner of Oklahoma, varies from the rugged foothills of the Ouachita Mountains in the north to the fertile coastal plain in the south. The county has a unique heritage ranging from the Caddoan mound builders to the first white settlements in the early nineteenth century, including seventy-five years of Choctaw sovereignty, and finally statehood.

The county name is that of a prominent Choctaw family, several of whose members served as chiefs. The Choctaw period left such historic sites as the Wheelock Mission Church and Academy. The Dierks family developed large holdings beginning before the turn of the 20th century, and sold the land to Weyerhaueser Company in 1969.

Weyerhaueser is the largest employer and has a paper mill in Valliant. Other employers are Tyson Foods, Inc., a poultry processing plant; SETCO, a company that builds solid tires for heavy equipment and ships worldwide. Tourism is also a major industry with Beavers Bend State Resort, Museum of the Red River, hunting, fishing, and historic sites.

For more information, call the county clerk's office at 580/286-2370.

County Seat – Idabel

Area – 1,901.32 Square Miles

County Population – 33,203 (2012 est.)

Farms - 1,796

Land in Farms – 339,615 Acres

Primary Source: Oklahoma Almanac 2013-2014

Board of County Commissioners

District 1 – Jim Freeny

District 2 – Joe Coffman

District 3 – Jimmy Westbrook

County Assessor

Stan Lyles

County Clerk

Karen Bryan

County Sheriff

Johnny Tadlock

County Treasurer

Linda Laster

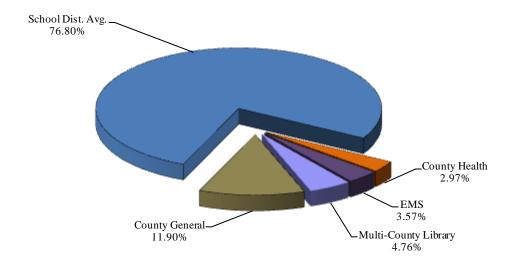
Court Clerk

Vicki Justus

District Attorney

Mark Matloff

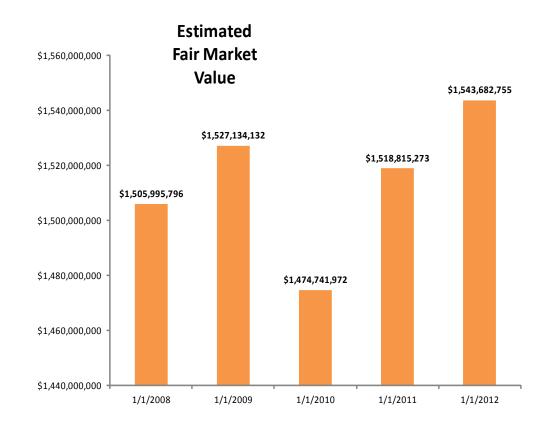
Property taxes are calculated by applying a millage rate to the assessed valuation of property. Millage rates are established by the Oklahoma Constitution. One mill equals one-thousandth of a dollar. For example, if the assessed value of a property is \$1,000.00 and the millage rate is 1.00, then the 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.



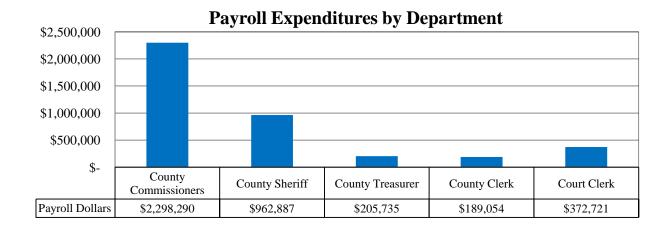
County-Wide Millage	es	School District Millages							
							Career		
County General	10.13		_	Gen.	Bldg.	Skg.	Tech	Common	Total
County Health	2.53	Forest Grove	D-1	35.88	5.13	-	12.16	4.05	57.22
Multi-County Library	4.05	Idabel	I-5	35.63	5.09	23.05	12.16	4.05	79.98
EMS	3.04	Haworth	I-6	36.23	5.18	21.65	12.16	4.05	79.27
		Lukfata	D-9	35.70	5.10	7.63	12.16	4.05	64.64
		Valliant	I-11	35.14	5.02	-	12.16	4.05	56.37
		Eagletown	I-13	35.53	5.08	12.24	12.16	4.05	69.06
		Smithville	I-14	35.56	5.08	2.86	12.16	4.05	59.71
		Glover	D-23	35.88	5.13	18.48	12.16	4.05	75.70
		Denison	D-37	35.84	5.12	-	12.16	4.05	57.17
		Wright City	I-39	35.46	5.07	-	12.16	4.05	56.74
		Battiest	I-71	35.67	5.10	_	12.16	4.05	56.98
		Holly Creek	D-72	36.51	5.22	12.41	12.16	4.05	70.35
		Broken Bow	I-74	35.46	5.07	10.38	12.16	4.05	67.12

McCURTAIN COUNTY, OKLAHOMA ASSESSED VALUE OF PROPERTY TREND ANALYSIS FOR THE FISCAL YEAR ENDED JUNE 30, 2013

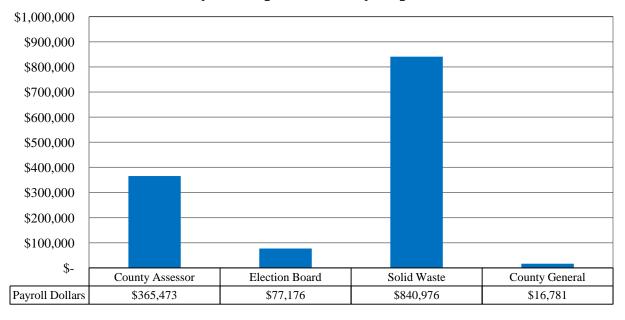
Valuation Date	Personal	Public Service	Real Estate	Homestead Exemption	Net Value	Estimated Fair Market Value
1/1/2012	\$53,776,161	\$24,869,336	\$103,594,274	\$8,424,238	\$173,815,533	\$1,543,682,755
1/1/2011	\$54,647,833	\$23,853,858	\$100,494,918	\$8,489,349	\$170,507,260	\$1,518,815,273
1/1/2010	\$52,509,538	\$23,853,858	\$97,785,150	\$8,473,795	\$165,674,751	\$1,474,741,972
1/1/2009	\$61,942,021	\$23,988,943	\$94,048,262	\$8,543,629	\$171,435,597	\$1,527,134,132
1/1/2008	\$62,020,589	\$24,401,719	\$91,438,089	\$8,437,342	\$169,423,055	\$1,505,995,796



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, 2013.

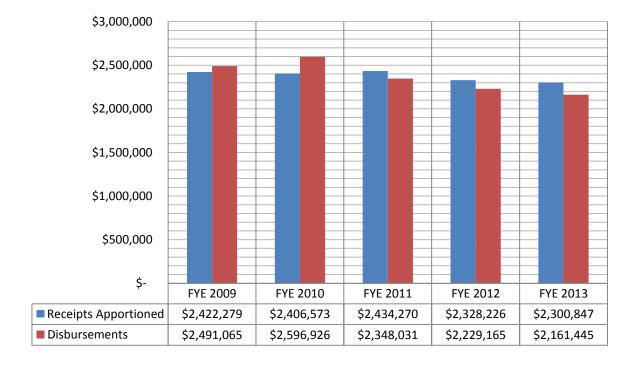


Payroll Expenditures by Department



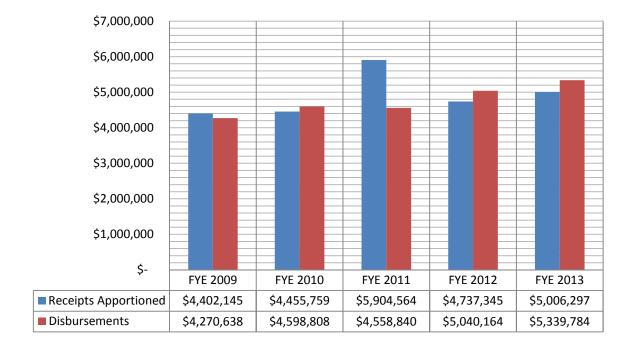
County General Fund

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.





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

Independent Auditor's Report

TO THE OFFICERS OF McCURTAIN COUNTY, OKLAHOMA

Report on the Financial Statement

We have audited the combined total—all county funds on the accompanying regulatory basis Statement of Receipts, Disbursements, and Changes in Cash Balances of McCurtain County, Oklahoma, as of and for the year ended June 30, 2013, listed in the table of contents as the financial statement.

Management's Responsibility for the Financial Statement

Management is responsible for the preparation and fair presentation of this financial statement in accordance with the regulatory basis of accounting described in Note 1, and for determining that the regulatory basis of accounting is an acceptable basis for the preparation of the financial statement in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on the 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 from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statement. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statement, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statement in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statement.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles

As described in Note 1 of the financial statement, the financial statement is prepared by McCurtain County using accounting practices prescribed or permitted by Oklahoma state law, which is a basis of accounting other than accounting principles generally accepted in the United States of America. The effects on the financial statements of the variances between the regulatory basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material.

Adverse Opinion on U.S. Generally Accepted Accounting Principles

In our opinion, because of the significance of the matter discussed in the "Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles" paragraph, the financial statement referred to above does not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of McCurtain County as of June 30, 2013, or changes in its financial position for the year then ended.

Opinion on Regulatory Basis of Accounting

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 McCurtain County, for the year ended June 30, 2013, on the basis of accounting described in Note 1.

Other Matters

Other Information

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, as required by U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, and the remaining Other Supplementary Information, as listed in the table of contents, are presented for purposes of additional analysis and are not a required part of the financial statement.

The Schedule of Expenditures of Federal Awards and the Other Supplementary Information, as listed in the table of contents, is the responsibility of management and was derived from and related directly to the underlying accounting and other records used to prepare the financial statement. Such information has been subjected to the auditing procedures applied in the audit of the financial statement and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statement or to the financial statement itself, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the Schedule of Expenditures of Federal Awards and the Other Supplementary Information, as listed in the table of contents, 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 subjected to the auditing procedures applied in the audit of the financial statement, and accordingly, we do not express an opinion or provide any assurance on it.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated September 24, 2015, on our consideration of McCurtain 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 in considering McCurtain County's internal control over financial reporting and compliance.

GARY A. JONES, CPA, CFE

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OKLAHOMA STATE AUDITOR & INSPECTOR

September 24, 2015



McCURTAIN 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, 2013

	Beginning Cash Balances July 1, 2012		s Receipts Apportioned		Transfers In		Transfers Out		Disbursements		Ending h Balances ne 30, 2013
Combining Information:											
Major Funds:											
County General Fund	\$	257,690	\$	2,300,847	\$	2,565	\$	-	\$	2,161,445	\$ 399,657
Highway Cash		1,653,270		5,006,297		84,100		46,099		5,339,784	1,357,784
Federal Forest		128,755		746		-		-		-	129,501
County Health Department		641,822		543,142		-		-		734,395	450,569
McCurtain County Tourism Authority		510,295		476,456		-		-		402,919	583,832
McCurtain County Volunteer Fire Department		1,125,460		720,727		-		-		713,858	1,132,329
McCurtain County Landfill		-		149,701		129,637		-		89,451	189,887
Solid Waste		158,520		1,439,481		-		-		1,456,102	141,899
Use Tax		362,241		358,505		46,099		131,214		307,460	328,171
McCurtain County Jail Trust		1,445,115		1,410,418		-		-		1,381,483	1,474,050
McCurtain County Fair Board		-		14,630		-		-		-	14,630
Remaining Aggregate Funds		425,895		1,461,460		-		83,823		1,355,547	 447,985
Combined Total - All County Funds	\$	6,709,063	\$	13,882,410	\$	262,401	\$	261,136	\$	13,942,444	\$ 6,650,294

1. Summary of Significant Accounting Policies

A. Reporting Entity

McCurtain 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:

<u>County General Fund</u> – accounts for ad valorem, sales tax, officers' fees, interest earnings, and miscellaneous collections of the County. Disbursements are for the general operations of the County.

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

<u>Federal Forest</u> – accounts for Schools and Roads Program Title III funds held, a federal grant program for the purpose of performing activities under the Firewise Communities program and to reimburse for emergency services performed on national forests.

<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. Disbursements are for the operation of the county health department.

<u>McCurtain County Tourism Authority</u> – accounts for the excise tax collected on lodging to be used for the promotion and development of tourism and recreational activities for McCurtain County.

<u>McCurtain County Volunteer Fire Department</u> – accounts for sales tax funds to be used for the operation of the McCurtain County Volunteer Fire Departments.

<u>McCurtain County Landfill</u> – accounts for monies received from the collection of land fill usage fees and the disbursement of funds for the environmental safety and operation of the land fill.

<u>Solid Waste</u> – accounts for the sales tax monies collected for the maintenance and operation of a solid waste system.

<u>Use Tax</u> – accounts for the use tax funds collected by the Oklahoma Tax Commission and remitted to the County. The BOCC has designated these funds to be used to help the County develop comprehensive emergency management and for the operation of the County.

<u>McCurtain County Jail Trust</u> – accounts for sales tax funds to be used for the operating, equipping, staffing, and maintaining the McCurtain County Jail.

<u>McCurtain County Fair Board</u> – accounts for collection of sales tax funds to be used for the maintenance and operation of the fair grounds.

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 in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP) or on a regulatory basis. The County has elected to present their financial statement on a regulatory basis in conformity with Title 19 O.S. § 171. 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 15, 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 post-retirement 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 McCurtain County approved a permanent one-half percent (1/2%) sales tax effective August 27, 1991. This sales tax was established to provide revenue for the maintenance and operation of a solid waste system. These funds are accounted for in the Solid Waste fund.

On November 9, 1999, the voters of McCurtain County approved a permanent one-half percent (1/2%) sales tax effective January 1, 2000. This sales tax was established to provide revenue to operate, equip, staff, and maintain the McCurtain County Jail. These funds are accounted for in the McCurtain County Jail Trust fund.

The voters of McCurtain County approved a permanent one-quarter percent (1/4%) sales tax effective January 1, 2000. This sales tax was established to provide revenue to staff and maintain the McCurtain County Sheriff's Department. These funds are accounted for in the McCurtain County Sheriff Office fund.

The voters of McCurtain County approved a three percent (3%) excise tax on public lodging receipts effective August 27, 2002, to be in effect for ten years. This excise tax was established to provide revenue for the promotion and development of tourism and recreational activities for McCurtain County Tourism Authority and to provide revenue for administrative costs for the County General Fund. These funds are accounted for in the McCurtain County Tourism Authority fund and the County General fund.

The voters of McCurtain County approved a permanent one-quarter percent (1/4%) sales tax effective January 1, 2007. This sales tax was established to provide revenue for the fire protection of the county fire departments located in Battiest, Bethel, Broken Bow, Eagletown, Garvin, Haworth, Hochatown, Holly Creek, Idabel, Millerton, Pickens, Pine Creek, Ringold, Rufe, Sherwood, Shinewell, Smithville, Tom, Valliant, Watson, and Wright City. These funds are accounted for in the McCurtain County Volunteer Fire Department fund.

The voters of McCurtain County approved a permanent renewal of a three percent (3%) excise tax upon public lodging receipts effective June 26, 2012. This excise tax was established to provide revenue for the promotion and development of tourism and recreational activities for McCurtain County Tourism Authority and to provide revenue for administrative costs for the McCurtain County General Fund and to provide revenue for the McCurtain County Fair Board. These funds are accounted for in the McCurtain County Tourism Authority Fund, General Fund, and McCurtain County Fair Board fund.

E. Interfund Transfers

During the fiscal year, the County made the following transfers between cash funds.

• \$1,265 into County General Fund from Community Relations, a trust and agency fund, to close the fund.

- \$29,675 into Highway Cash fund from K-5035 fund to reimburse Highway Cash for work performed on REAP grant K-5035.
- \$129,637 loan to the McCurtain County Landfill fund from Use Tax fund. The interfund loan was not repaid by the McCurtain County Landfill fund within the current year.
- \$46,099 into Use Tax fund from Highway Cash fund to reimburse the Use Tax fund for repayment of funds used for Highway expenditures.
- \$1,300 into County General Fund from Use Tax fund. The interfund loan was not repaid to the Use Tax fund within the current year.
- \$277 into Highway Cash fund from Use Tax fund to reimburse Highway Cash for meal expenses for county employees' safety training.
- \$27,074 into Highway Cash fund from K-6032 N4680 Road fund to reimburse Highway Cash for work performed on REAP K-6032 N4680 Road.
- \$27,074 into Highway Cash fund from K-6031 D4802 Road fund to reimburse Highway Cash for work performed on REAP K-6031 D4802 Road.



McCURTAIN 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, 2013

	General Fund							
	Budget	Actual	Variance					
Beginning Cash Balances	\$ 257,690	\$ 257,690	\$ -					
Less: Prior Year Outstanding Warrants	(52,266)	(52,266)	-					
Less: Prior Year Encumbrances	(32,457)	(31,219)	1,238					
Beginning Cash Balances, Budgetary Basis	172,967	174,205	1,238					
Residual Transfer	-	1,265	1,265					
Receipts:								
Ad Valorem Taxes	1,600,683	1,649,121	48,438					
Charges for Services	92,575	102,361	9,786					
Intergovernmental Revenues	444,727	521,203	76,476					
Miscellaneous Revenues	54,171	28,162	(26,009)					
Total Receipts, Budgetary Basis	2,192,156	2,300,847	108,691					
Expenditures:								
District Attorney	7,500	7,485	15					
County Sheriff	272,400	271,982	418					
County Treasurer	138,461	137,647	814					
County Commissioners	212,024	176,633	35,391					
OSU Extension	107,857	93,126	14,731					
County Clerk	202,637	201,963	674					
Court Clerk	118,266	117,926	340					
County Assessor	160,361	158,827	1,534					
Revaluation of Real Property	240,686	240,255	431					
Juvenile Shelter Bureau	31,300	31,280	20					
General Government	206,609	152,362	54,247					
Excise-Equalization Board	12,460	10,912	1,548					
County Election Board	116,380	96,881	19,499					
Insurance - Benerfits	494,800	444,352	50,448					
Charity	6,000	3,990	2,010					
County Audit Budget Account	17,382	180	17,202					
Free Fair Budget Account	15,000	14,994	6					
Provision for Interest on Warrants	5,000	664	4,336					
Total Expenditures, Budgetary Basis	2,365,123	2,161,459	203,664					

Continued on next page

McCURTAIN COUNTY, OKLAHOMA COMPARATIVE SCHEDULE OF RECEIPTS, EXPENDITURES, AND CHANGES IN CASH BALANCES—BUDGET AND ACTUAL—BUDGETARY BASIS— GENERAL FUND - CONTINUED FOR THE FISCAL YEAR ENDED JUNE 30, 2013

	General Fund						
Continued from previous page	Budget		Actual		Variance		
Excess of Receipts and Beginning Cash							
Balances Over Expenditures, Budgetary Basis	\$ -		314,858	\$	314,858		
Operating Transfers			1,300				
Reconciliation to Statement of Receipts,							
Disbursements, and Changes in Cash Balances							
Add: Cancelled Warrants			14,654				
Add: Current Year Outstanding Warrants			52,200				
Add: Current Year Encumbrances			16,645				
Ending Cash Balance		\$	399,657				

McCURTAIN 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, 2013

	County Health Department Fund						
		Budget		Actual	V	ariance	
Beginning Cash Balances	\$	641,822	\$	641,822	\$	-	
Less: Prior Year Outstanding Warrants		(31,071)		(31,071)		-	
Less: Prior Year Encumbrances		(44,913)		(39,481)		5,432	
Beginning Cash Balances, Budgetary Basis		565,838		571,270		5,432	
Receipts:							
Ad Valorem Taxes		399,776		411,810		12,034	
Intergovernmental Revenue		131,332		131,332		-	
Total Receipts, Budgetary Basis		531,108		543,142		12,034	
Expenditures:							
Health and Welfare		1,566,405		842,350		724,055	
Total Expenditures, Budgetary Basis		1,566,405		842,350		724,055	
Excess of Receipts and Beginning Cash Balances Over Expenditures,							
Budgetary Basis	\$	(469,459)		272,062	\$	741,521	
Reconciliation to Statement of Receipts, Disbursements, and Changes in Cash Balances							
Add: Current Year Encumbrances				172,782			
Add: Current Year Outstanding Warrants				5,725			
Ending Cash Balance			\$	450,569			

McCURTAIN COUNTY, OKLAHOMA COMBINING STATEMENT OF RECEIPTS, DISBURSEMENTS, AND CHANGES IN CASH BALANCES—REGULATORY BASIS— REMAINING AGGREGATE FUNDS FOR THE FISCAL YEAR ENDED JUNE 30, 2013

	Beginning Cash Balances July 1, 2012		Receipts Apportioned		Transfers In		Transfers Out		Disbursements		Ending Cash Balances June 30, 2013	
Remaining Aggregate Funds:												
Assessor Revolving	\$	966	\$	1,804	\$	-	\$	-	\$	1,690	\$	1,080
Assessor Visual Inspection		369		-		-		-		-		369
County Clerk Lien Fee		15,322		15,730		-		-		14,903		16,149
County Clerk Preservation		25,766		27,145		-		-		30,903		22,008
County Sinking		16		-		-		-		-		16
Federal Highway Fund		313		-		-		-		-		313
Hospital Authority		22,405		130		-		-		-		22,535
Sheriff Confiscated Drug Fund		1,756		-		-		-		-		1,756
McCurtain County Sheriff Office		77,961		731,889		-		-		719,490		90,360
Pine Creek Patrol		5,435		16,372		-		-		9,549		12,258
Sheriff Service Fee		121,793		289,170		-		-		303,226		107,737
Treasurer Mortgage Tax Certification Fee		17,151		6,500		-		-		1,405		22,246
Resale Property		78,819		195,284		-		-		179,813		94,290
Resale Payroll		57,823		71,013		-		-		71,968		56,868
K-6031 D4802 Road		-		27,074		-		27,074		-		-
K-6032 N4680 Road		-		27,074		-		27,074		-		-
K-7025 Clear Creek		-		15,000		-		-		15,000		-
K-7027 Pollard		-		7,600		-		-		7,600		-
K-5035		-		29,675		-		29,675		-		-
Combined Total - Remaining Aggregate Funds	\$	425,895	\$	1,461,460	\$	-	\$	83,823	\$	1,355,547	\$	447,985

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

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

<u>County Clerk Lien Fee</u> – accounts for lien collections and disbursements as restricted by statute.

<u>County Clerk Preservation</u> – accounts for fees collected for instruments filed in the County Clerk's office as restricted by statute for the preservation of records.

<u>County Sinking</u> – accounts for the payment of interest and principal on the matured portion of long-term bonded indebtedness and civil judgments. Debt service receipts are derived generally from a special ad valorem tax levy and from interest earned on investments of cash not immediately required for debt service payments; there is currently no long-term debt.

<u>Federal Highway Fund</u> – accounts for federal funds received from the Department of Transportation for debris removal.

<u>Hospital Authority</u> – accounts for collection of sales tax to be used for the purchase of equipment and to maintain the property of McCurtain County Hospital Authority.

<u>Sheriff Confiscated Drug Fund</u> – accounts for proceeds from forfeited drug cases. These funds are used for the intervention and prevention of narcotics use.

McCURTAIN COUNTY, OKLAHOMA NOTES TO OTHER SUPPLEMENTARY INFORMATION FOR THE FISCAL YEAR ENDED JUNE 30, 2013

<u>McCurtain County Sheriff Office</u> – accounts for sales tax monies received for the operation of the McCurtain County Sheriff's Office.

<u>Pine Creek Patrol</u> – accounts for monies received from the Corps of Engineers for patrolling services.

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

<u>Treasurer Mortgage Tax Certification Fee</u> – accounts for the collection of fees by the Treasurer for mortgage tax certificates and the disbursement of the funds as restricted by statutes.

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

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

<u>K-6031 D4802 Road</u> – accounts for state funds to be expended to oil and chip half of a mile of D4802 Road.

<u>K-6032 N4680 Road</u> – accounts for state funds to be expended to oil and chip half of a mile of N4680 Road.

<u>K-7025 Clear Creek</u> – accounts for state funds to be expended for the purchase and installation of two miles of 2 inch waterline and one mile of 4 inch water line.

<u>K-7027 Pollard</u> – accounts for state funds to be expended for the purchase and installation of two storm shelters.

 $\underline{\text{K-5035}}$ – accounts for state funds to be expended for the oil and chip patching of N4620 Road.



McCURTAIN COUNTY, OKLAHOMA SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE FISCAL YEAR ENDED JUNE 30, 2013

Federal Grantor/Pass-Through Grantor/Program Title	Federal CFDA Number	Pass-Through Grantor's Number	Federal Expenditures
U.S. DEPARTMENT OF AGRICULTURE			
Passed Through the Oklahoma State Treasurer:			
Schools and Roads - Grants to States	10.665		\$ 449,126
Total U.S. Department of Agriculture			449,126
U.S. DEPARTMENT OF JUSTICE			
Passed Through the Oklahoma State District Attorneys Council:			
Violence Against Women Formula Grants	16.588	V11-021	31,809
Violence Against Women Formula Grants	16.588	V12-037	37,221
Total U.S. Department of Justice			69,030
U.S. DEPARTMENT OF LABOR			
Passed Through the Oklahoma State Employment Security Commission:			
Unemployment Insurance	17.225		130
Total U.S. Department of Labor			130
U.S. DEPARTMENT OF HOMELAND SECURITY			
Passed Through the Oklahoma State Department of Public Safety:			
State Homeland Security Program	97.073	143.015	18,133
Total U.S. Department of Homeland Security			18,133
			
Total Expenditures of Federal Awards			\$ 536,419

McCURTAIN COUNTY, OKLAHOMA NOTE TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS FOR THE FISCAL YEAR ENDED JUNE 30, 2013

Basis of Presentation

The schedule of expenditures of federal awards includes the federal grant activity of McCurtain 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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Independent Auditor's 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 McCURTAIN COUNTY, OKLAHOMA

We have audited, in accordance with the 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, the combined total—all funds of the accompanying Combined Statement of Receipts, Disbursements, and Changes in Cash Balances of McCurtain County, Oklahoma, as of and for the year ended June 30, 2013, which comprises McCurtain County's financial statement, prepared using accounting practices prescribed or permitted by Oklahoma state law, and have issued our report thereon dated September 29, 2015.

Our report included an adverse opinion on the financial statement because the statement is prepared using accounting practices prescribed or permitted by Oklahoma state law, which is a basis of accounting other than 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, 2013, on the basis of accounting prescribed by Oklahoma state law, described in Note 1.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statement, we considered McCurtain County's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statement, but not for the purpose of expressing an opinion on the effectiveness of McCurtain County's internal control. Accordingly, we do not express an opinion on the effectiveness of McCurtain County's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as described in the accompanying schedule of findings and questioned costs, we identified certain deficiencies in internal control that we consider to be material weaknesses and 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 described in the accompanying schedule of findings and responses to be material weaknesses: 2013-1, 2013-3, 2013-4, 2013-5, 2013-6, 2013-7, 2013-9, and 2013-12.

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 described in the accompanying schedule of findings and questioned costs to be significant deficiencies: 2013-2, 2013-8, and 2013-31.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether McCurtain County's financial statement is free from 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 an instance of noncompliance or other matter that is required to be reported under *Government Auditing Standards* and which is described in the accompanying schedule of findings and questioned costs as item 2013-12.

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

McCurtain County's Responses to Findings

McCurtain County's responses to the findings identified in our audit are described in the accompanying schedule of findings and questioned costs. McCurtain County's responses were not subjected to the auditing procedures applied in the audit of the financial statement and, accordingly, we express no opinion on it the responses.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the result of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

This report is also 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.

GARY A. JONES, CPA, CFE

OKLAHOMA STATE AUDITOR & INSPECTOR

September 29, 2015

Say after

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Independent Auditor's Report on Compliance for Each Major Program and on Internal Control Over Compliance Required by OMB Circular A-133

TO THE OFFICERS OF McCURTAIN COUNTY, OKLAHOMA

Report on Compliance for Each Major Program

We have audited the compliance of McCurtain 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 McCurtain County's major federal program for the year ended June 30, 2013. McCurtain County's major federal program is identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Compliance with the requirements of laws, regulations, contracts, and grants applicable to its major federal program is the responsibility of McCurtain County's management.

Auditor's Responsbility

Our responsibility is to express an opinion on McCurtain 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 McCurtain 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 McCurtain County's compliance with those requirements.

Opinion on Each Major Federal Program

In our opinion, McCurtain 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, 2013.

Internal Control Over Compliance

Management of McCurtain 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 McCurtain 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 McCurtain 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 2013-29 and 2013-30 to be material weaknesses.

Other Matters

McCurtain 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 McCurtain 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

Say after

OKLAHOMA STATE AUDITOR & INSPECTOR

September 29, 2015

SECTION 1—Summary of Auditor's Results

Financial Statements	
Type of auditor's report issued:Adverse as to GAAP; unqualified as to stat	tutory 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?	None reported
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) Name of Federal Progr Schools and Roads - G	
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 2013-1 – Inadequate County-Wide Controls (Repeat Finding)

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

Cause of Condition: Policies and procedures have not been designed to address the Control Environment, Risk Assessment, Information and Communication, and Monitoring of the County. The County was not fully aware of the benefits gained by the implementation of procedures regarding the Control Environment, Risk Assessment, Information and Communication, and Monitoring as it relates to the strengthening of its internal control structure.

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 establish internal controls, identify and address risks, and to ensure that information is communicated effectively. 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:

Chairman of the Board of County Commissioner: We plan to implement procedures to monitor, identify, and address risks.

County Treasurer: I will work with my office and the other offices to establish and implement internal controls.

County Clerk: I will work with other management to establish and implement internal controls.

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 met. 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.

Control Environment is a component of internal control which should establish and maintain an environment throughout the organization that sets a positive and supportive attitude toward internal control and conscientious management.

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.

Information and Communication is a component of internal control in which information should be recorded and communicated to management and others within the County who need it and in a form and within a time frame that enables them to carry out their internal control and other responsibilities. For a County to run and control its operations, it must have relevant, reliable, and timely communications relating to internal as well as external events. Information is needed throughout the County to achieve all of its 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 2013-2 – Lack of Disaster Recovery Plan (Repeat Finding)

Condition: Upon inquiry, the following offices do not have a Disaster Recovery Plan:

- County Commissioners
- County Treasurer
- County Clerk
- County Assessor

Cause of Condition: Policies and procedures have not been designed and implemented to prepare a formal Disaster Recovery Plan.

Effect of Condition: The failure to have a 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 the County officials develop a Disaster Recovery Plan that addresses how critical information and systems within their offices would be restored in the event of a disaster.

Management Response:

Chairman of the Board of County Commissioner: We plan to develop and implement a Disaster Recovery Plan to allow us to restore important county information stored in our systems in the event of a disaster.

County Treasurer: I am drafting a Disaster Recovery Plan and will work toward completing the plan.

County Clerk: I am currently drafting a Disaster Recovery Plan for my office.

County Assessor: We currently have in place a remote backup for our data off-site with County Computer Assistance Program (CCAP) in Stillwater. I will get with them and get a plan in writing that details procedures to get the Assessor's office back online and working in the event of a disaster and put it on file with the County Clerk's office.

Criteria: An important aspect of internal controls 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.

According to the standards of the Information Systems Audit and Control Association (CobiT Delivery and Support 4), information services function management should ensure that a written Disaster Recovery Plan is documented and contains the following:

- Guidelines on how to use the recovery plan;
- Emergency procedures to ensure the safety of all affected staff members;
- Roles and responsibilities of information services function, vendors providing recovery services, users of services and support administrative personnel;
- Listing of systems requiring alternatives (hardware, peripherals, software);
- Listing of highest to lowest priority applications, required recovery times and expected performance norms;
- Various recovery scenarios from minor to loss of total capability and response to each in sufficient detail for step by step execution;
- Training and/or awareness of individual and group roles in continuing plan;
- Listing of contracted service providers;
- Logistical information on location of key resources, including back-up site for recovery operating system, applications, data files, operating manuals, and program/system/user documentation;
- Current names, addresses, telephone numbers of key personnel;
- Business resumption alternatives for all users for establishing alternative work locations once IT services are available.

Finding 2013-3 – Inadequate Internal Controls Over Information Technology (Repeat Finding)

Condition: Upon review of the computer systems within the office of the County Assessor, County Clerk, and the County Treasurer, 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:

- The County Treasurer's office has a lack of segregation of duties through user roles in their computer software system. The Security Officer also performs the duties of a cashier.
- The County Treasurer, County Clerk, and County Assessor offices have not designed policies and procedures to address the expectations and responsibilities of county employees in the IT function.
- The County Treasurer, County Clerk, and County Assessor office computers and software systems do not require the employee to use a password of at least eight characters in length and to change passwords every ninety days.
- The County Treasurer's software server is not in a controlled environment, with limited access.
- The County Treasurer's office rarely performs a review of the security log.

Cause of Condition: Policies and procedures have not been designed and implemented to prevent unauthorized access to data.

Effect of Condition: These conditions could result in compromised security for computers, computer programs, and data. Further, these conditions increase the risk of damage, loss of data, interruption of office operations, non-approved access attempts, non-detection of fraud, and identification of errors.

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. OSAI recommends that the security log be reviewed on a regular basis to verify that errors have not occurred, that unauthorized personnel have not gained access to critical information, and verify that fraud has not occurred. OSAI recommends that the Security Officer's duties be segregated from performed reconciliatory or cashier duties. This decreases the risk fraud and of unauthorized deletion errors and/or journal entries.

Management Response:

County Treasurer: The County Handbook now addresses Information Technology polices, and our software now requires passwords to be changed every ninety days. I will review the security log and the Security Officer's activities. At this time, it is not feasible to relocate the server but we may do so in the future.

County Clerk: Information Technology expectation and responsibilities are in the newly adopted County Handbook. I will contact the software provider regarding passwords.

County Assessor: The Assessor's office will get in contact with the Information Technology staff at CCAP and with the Oklahoma Tax Commission (OTC) to establish a more secure environment for

computer software and servers. I have disabled all former employees' access to our systems and deleted passwords, etc. The only people that can access our programs are:

- 1. Current employees
- 2. OTC field personnel
- 3. CCAP personnel

Criteria: According to the standards of the Information Systems Audit and Control Association (CobiT, Delivery 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 on monitoring and periodic testing and implementing corrective actions for indentified security weakness or incidents. Effective security management protects all IT assets to minimize the business impact of security vulnerabilities and incidents.

Finding 2013-4 – Inadequate Segregation of Duties for County Treasurer (Repeat Finding)

Condition: A concentration of duties exists in the County Treasurer's office because one person receives monies, issues receipts, reconciles monies to the receipts issued, performs reconciliations on the general bank account, and reconciles the general ledger to the daily report and monthly report.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure adequate segregation of duties in the County Treasurer's office.

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 transaction, 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 realize that a concentration of duties and responsibilities in a limited number of individuals is not desired from a control point of view. The most effective controls lie in management's oversight of office operations and a periodic review of operations. OSAI recommends that management provide segregation of duties so that no one employee is able to perform all accounting functions. 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 approval of accounting functions.

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.

Management Response:

County Treasurer: I have implemented compensating controls to mitigate the risk involved with the concentration of duties in my office. I currently review and approve reconciliations, daily reports, and monthly reports.

Criteria: Accountability and stewardship are overall goals of management in the accounting of funds. To help ensure a proper accounting of funds, 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.

Finding 2013-5 – Inadequate Segregation of Duties Over the Purchasing Process (Repeat Finding)

Condition: Based on our documentation of controls, a lack of segregation of duties exists in the County Clerk's office because one deputy performs all key purchasing processes including:

- Preparing purchase orders.
- Approving/authorizing the encumbrance.
- Reviewing purchase orders for accuracy.
- Printing warrants.
- Distributing warrants.
- Maintaining ledgers.
- Has access to make changes within the purchasing system.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure adequate segregation of duties in the County Clerk's office with regard to 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 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 approval of accounting functions.

OSAI recommends management take steps to adequately segregate the following key accounting functions:

- Preparing purchase orders.
- Encumbering purchase orders.

- Printing warrants.
- Distributing warrants.

Management Response:

County Clerk: I will implement compensating controls to mitigate the risk involved with a concentration of duties in purchasing.

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 2013-6 – Inadequate Segregation of Duties Over the Payroll Process (Repeat Finding)

Condition: Based on our documentation of controls, a lack of segregation of duties exists in the County Clerk's office because one deputy performs all key payroll processes including:

- Enrolling new employees.
- Inputting payroll information into the system.
- Maintaining personnel files.
- Processing payroll claims.
- Reviewing payroll verification reports.
- Printing payroll warrants.
- Distributing payroll warrants.
- Preparing payroll reports.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure adequate segregation of duties in the County Clerk's office with regard to 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 approval of accounting functions.

OSAI recommends management take steps to adequately segregate the following key accounting functions:

- Enrolling new employees and maintaining personnel files.
- Reviewing time records and preparing payroll.

• Distributing payroll warrants to individuals.

Management Response:

County Clerk: I will implement compensating controls to mitigate the risk involved with a concentration of duties in payroll.

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 allow for prevention and detection of errors and abuse. To help ensure a proper accounting of funds, key functions within the payroll process such as the duties of processing, authorizing, and payroll distribution should be adequately segregated.

Finding 2013-7 – Reconciliation of Appropriation Ledger to General Ledger (Repeat Finding)

Condition: Based on our documentation of controls, reconciliations are not performed between the County Clerk's appropriation ledger and the County Treasurer's general ledger.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure the reconciliation of the County Clerk's appropriation ledger to the County Treasurer's general ledger.

Effect of Condition: This condition could result in unrecorded transactions and undetected errors.

Recommendation: OSAI recommends management take steps to ensure reconciliations are performed between the funds presented on the County Clerk's appropriation ledger and the County Treasurer's general ledger monthly. Documentation of this reconciliation should be reviewed and approved by someone other than the preparer.

Management Response:

County Clerk: I will continue to work with the County Treasurer's office to reconcile my appropriation ledger to the County Treasurer's general ledger, and to investigate variances.

Criteria: To ensure a proper accounting of funds, the County Clerk's appropriation ledger should be reconciled monthly to the County Treasurer's general ledger.

Finding 2013-8 – Inadequate Internal Controls and Noncompliance Over Signature Stamp Commissioner District 3 (Repeat Finding)

Condition: Upon inquiry, observation, and review of documents, we noted the following internal control weaknesses with regard to purchasing procedures:

• The District 3 Commissioner's signature stamp is not on file with the Oklahoma Secretary of State.

• The Board of County Commissioners' secretary has physical control of the District 3 Commissioner's signature stamp; the stamp is retained in an unlocked drawer in the secretary's desk.

Cause of Condition: Management was unaware of requirements for signature stamps to be registered with the Oklahoma Secretary of State. Also, policies and procedures have not been designed to safeguard the signature stamp from unauthorized use.

Effect of Condition: This condition resulted in noncompliance with state statute and could result in unauthorized transactions and misappropriation of funds.

Recommendation: OSAI recommends signature stamps be adequately safeguarded from unauthorized use and filed with the Oklahoma Secretary of State.

Management Response:

County Commissioner District 3: Steps have been taken to ensure that the signature stamp is only taken out of the safe when I am present and at my request. All other times the stamp will remain in the safe.

Auditor Response: The signature stamp must be on file with the Secretary of State to be valid on public securities. In addition, the signature stamp is not adequately safeguarded from unauthorized use.

Criteria: An aspect of internal control is the safeguarding of assets. Internal controls over safeguarding of assets constitute a process, affected by the 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 the entity's assets from loss, damage, or misappropriation.

Title 62 O.S. § 602 requires any authorized officer to file his manual signature, certified by him under oath, with the Oklahoma Secretary of State for his facsimile signature to have the same legal effect as his manual signature.

Finding 2013-9 – Inadequate Internal Controls Over Bank Reconciliations (Repeat Finding)

Condition: Upon inquiry of the County Treasurer and observation of bank reconciliations, we noted the following:

- Monthly bank reconciliations are not being performed on five of the County's bank accounts.
- Bank reconciliations for the official depository account were not approved by someone other than the preparer.

Regarding the general bank account:

• Three Treasurer's checks, outstanding for multiple years, have not been cancelled. The County Treasurer's office was unable to provide any additional documentation of the checks.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure all accounts are reconciled and approved and that all reconciling items are documented and investigated.

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

Recommendation: OSAI recommends that bank reconciliations are performed monthly for all accounts. In addition, all bank reconciliations should be approved by someone other than the preparer and include an indication of review. Also, OSAI recommends that all reconciling items be properly documented and investigated.

Management Response:

County Treasurer: My office will perform bank reconciliations on all accounts. The official depository account reconciliation will be reviewed and approved by someone other than the preparer. The outstanding Treasurer's checks will be cancelled.

Criteria: Accountability and stewardship are overall goals of management in the accounting of funds. To help ensure a proper accounting of funds, all banks reconciliations should be performed monthly, with all reconciling items properly identified, and approved by someone other than the preparer.

Finding 2013-12 – Inadequate Internal Controls and Noncompliance Over Disbursements (Repeat Finding)

Condition: Of eighty-seven disbursements tested, the following exceptions were noted:

- Fourteen disbursements did not have receiving reports attached to the purchase orders.
- Twenty-seven disbursements were not timely encumbered.
- Two disbursements were not charged to the proper account.
- Five disbursements had no supporting documentation.
- Three disbursements were not charged to the proper period.

In addition, after a review of paid purchase orders it was determined:

- A total of \$1,823,847 in disbursements was paid less than 5 business days after presentation of payment.
- Warrants were also signed in the same Board of County Commissioners' meeting as the purchase orders presented for payment.

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

Effect of Condition: These conditions resulted in noncompliance with state statues and could result in unrecorded transaction, undetected errors, and misappropriation of funds, inaccurate records, and incomplete information.

Recommendation: OSAI recommends that the County adhere to state purchasing guidelines. Adequate supporting documentation should be attached to the purchase order. This includes invoices, haul tickets, and receiving reports. Purchase orders should be encumbered before goods or services are ordered.

Management Response:

County Clerk: We will continue to "stamp" purchase orders that are not timely encumbered. Purchase orders will not be submitted to the Board of County Commissioners for approval until all documentation is received for purchase. My office will continue to denote questionable purchases and bring them to the attention of the County Commissioners.

County Treasurer: I have implemented auditor's recommendations.

County Commissioner District 1: I will place more importance on following the state purchasing statutes.

County Commissioner District 2: I will review purchase orders more closely to make sure that the county is complying with state statutes.

County Commissioner District 3: We will make every effort to ensure that state purchasing procedures are followed.

Criteria: Title 19 O.S. § 1505 prescribes the procedures established for the requisition, purchase, lease-purchase, rental, and receipt of supplies, materials, and equipment for maintenance, operation, and capital expenditures of county government. Additionally 19 O.S. § 1505 F 1 states, "Purchase orders may be allowed and paid at the first meeting of the board of county commissioners five (5) days after presentation for payment.."

Finding 2013-31 – Inadequate Internal Controls and Noncompliance Over Payment of Purchase Orders

Condition: During a review of the County's purchases orders, it was noted that the McCurain County Landfill purchased a trash compactor. Purchase order number 6985 and warrant number 1 were approved and issued on the same day, June 17, 2013, for the trash compactor. Based on a bill of sale for the trash compactor, it was delivered on June 18, 2013 and included a delivery fee of \$1,875.00, which was not included on the purchase order and warrant for the trash compactor.

On June 18, 2013, purchase order number 7029 was issued for the delivery fee and on the same day warrant number 2 was issued for the amount of the delivery fee, \$1,875.00. The purchase order was not approved by the Board of County Commissioners (BOCC) and the warrant was obtained and signed by District 3 Commissioner, Chairman of the Board.

Based on the information, the District 3 Commissioner obtained and approved the warrant for the payment of the delivery fee on the trash compactor without it being approved by the majority of the Board of County Commissioners.

Cause of Condition: The County did not follow the policies and procedures designed by state statutes regarding the purchasing process and issuing payment.

Effect of Condition: These conditions resulted in noncompliance with state statues and could result in unrecorded transaction, undetected errors, and misappropriation of funds, inaccurate records, and incomplete information.

Recommendation: OSAI recommends that the County adhere to state purchasing guidelines. Adequate supporting documentation should be attached to the purchase order. The Chairman of the BOCC should only authorize and sign warrants after the approval of payment by the BOCC.

Management Response:

Chairman of the Board of County Commissioners: We will make every effort to ensure that state purchasing and payment procedures are followed in accordance with state statutes.

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.

Title 19 O.S. § 329 states in part, "It shall be the duty of the chairman of the board of county commissioners to preside at the meetings of said board, and he shall have the power to administer [.....] all orders made by the board of county commissioners, and all warrants drawn on the county treasurer, shall be signed by the chairman and attested by the clerk."

Title 19 O.S. § 339(A)(13) states in part, "The board of county commissioners shall have power [...] To do and perform other duties and acts that the board of county commissioners may be required by law to do and perform;"

Title 19 O.S. § 1505 F (2) states in part, "The board of county commissioners shall consider the purchase orders so presented and act upon the purchase orders, [...] The disposition of purchase orders shall be indicated by the board of county commissioners, showing the amounts allowed or disallowed and shall be signed by at least two members of the board of county commissioners. [...]"

Title 62 O.S. § 471 B states in part, "Any board of county commissioners of a county of this state may issue a negotiable instrument which will serve as both a warrant on the treasury and a check ordering payment of the warranted amount of money from the account of the treasury. This instrument shall be prepared and issued in accordance with procedures and requirements provided by law for a warrant and a check and shall be

signed by the chair of the board of county commissioners, the county clerk and the county treasurer. Printing on the instrument shall indicate that the instrument is a "warrant" of the county and a "check" drawn on the account of the county...."

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 2013-29 – Inadequate County-Wide Controls Over Major Program - Schools and Roads (Repeat Finding)

PASS-THROUGH GRANTOR: Oklahoma State Treasurer **FEDERAL AGENCY:** U.S. Department of Agriculture

CFDA NO: 10.665

FEDERAL PROGRAM NAME: Schools and Roads - Grants to States

FEDERAL AWARD YEAR: 2013

CONTROL CATEGORY: Activities Allowed/Unallowed; Allowable Costs/Cost Principles; Cash

Management; Procurement and Suspension and Debarment

QUESTIONED COSTS: \$-0-

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

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

Examples of control environment and procedures to address control environment for federal programs:

Control Environment	Procedures
The communication to employees from management of its belief that internal controls are important to meeting goals and objectives of	\mathcal{E}
federal grants.	 proper handling of federal funds. Establish a written policy with regards to reporting known or suspected misappropriation of federal funds.

Examples of risks and procedures to address risk management for federal programs:

Risks	Procedures	
Errors and misstatements in reporting	Independent review by another employee	
Fraudulent activity	Segregation of duties	
Information lost to computer crashes	Daily backups of information	
Noncompliance with laws and grant requirements	Attend workshops, ensure employees receive	
	current compliance supplements	
New employee errors	Training, attending workshops, monitoring	

Examples and procedures to address information and communication for federal programs:

Information and Communication	Procedures
The information and communication required to prepare the County's SEFA.	 Designate one person to prepare the SEFA. Each department submits a monthly summary of financial information to the designated SEFA preparer. Record significant grant activity in the BOCC minutes. Review and approve the SEFA in BOCC
	 Record significant grant activity i BOCC minutes.

Examples of activities and procedures to address monitoring of federal programs:

Monitoring	Procedures	
Communication between officers	Discussion in BOCC meetings to monitor	
	progress of grant and compliance with grant	
	requirements.	
Schedule of Expenditures of Federal Awards	Review the SEFA of the County for accuracy and	
(SEFA)	to determine all federal awards are presented.	
Audit findings	Determine audit findings are timely corrected.	
Financial status	Periodically review budgeted amounts to actual	
	amounts and resolve unexplained variances.	
Compliance with grant requirements	Ensure employees understand grant requirements	
	for federal program and are provided with the	
	latest version of the compliance supplement.	

Management Response:

Chairman of the Board of County Commissioners: We plan to develop and implement procedures to ensure compliance with grant requirements.

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 met. 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.

The Control Environment is the foundation for all other components of internal control. When management believes that internal controls are important to meeting its goals and objectives and communicates this belief to its employees at all levels, internal controls are more likely to be functioning well. However, if management views internal controls as unrelated to achieving its goals and objectives, or even as an obstacle, it is almost a certainty that this attitude will be held by all employees, despite official statements or policies to the contrary. This understanding by management of the importance of internal controls and the communication of this importance to its employees are key elements of the control environment.

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 of efficient and effective operations, reliable financial reporting, and compliance with laws and regulations.

Information and Communication is a component of internal control which should provide for a county to run and control its operations. It must have relevant, reliable information, both financial and nonfinancial. That information should be recorded and communicated to management and others within the County who need it and in a form and within a time frame that enables them to carry out their internal control and operational responsibilities. In addition, the county needs to make sure that the forms of communications are broad-based and that information technology management assures useful, reliable, and continuous communications.

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 2013-30 – Inadequate Internal Controls Activities Over Major Federal Program - Schools and Roads (Repeat Finding)

PASS-THROUGH GRANTOR: Oklahoma State Treasurer **FEDERAL AGENCY:** U.S. Department of Agriculture

CFDA NO: 10.665

FEDERAL PROGRAM NAME: Schools and Roads - Grants to States

FEDERAL AWARD YEAR: 2013

CONTROL CATEGORY: Activities Allowed/Unallowed; Allowable Costs/Cost Principles; Cash

Management; Procurement and Suspension and Debarment

QUESTIONED COSTS: \$-0-

Condition: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure compliance with the following compliance requirements: Activities Allowed; Allowable Costs/Cost Principles; Cash Management; Procurement and Suspension and Debarment.

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

Chairman of the Board of County Commissioners: We plan to develop and implement procedures to ensure compliance with grant requirements.

Criteria: Circular A-133 § .300 (b) states that the auditee shall:

Maintain internal control 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.

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 2013-15 – Inadequate Internal Controls and Noncompliance Over Safety Awards

Condition: While performing Risk Assessment procedures on the County Clerk's information technology, it was noted that the County gave safety awards to employees. The County did not withhold taxes and the amount was not included on the employees' W-2.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure that taxes are withheld from safety awards.

Effect of Condition: This condition resulted in benefits received by employees which were not properly reported to the Internal Revenue Service (IRS).

Recommendation: OSAI recommends that the County withhold taxes on compensation in accordance with IRS regulations.

Management Response:

County Clerk: We will withhold taxes from any future safety awards.

Criteria: The Internal Revenue Service requires all non exempt compensation to employees to be taxed.

Finding 2013-18 – Internal Controls Over Court Clerk Reconciliation of District Court Case Balance Summary (Repeat Finding)

Condition: While performing a reconciliation of the District Court Fund, we noted the following:

- There is no documentation of the reconciliation of the Court Clerk's District Court case balance summary report to the County Treasurer's official depository ledger.
- A variance of \$6,198.51 was noted when comparing the Court Clerk's District Court case balance summary report to the County Treasurer's official depository ledger.

Cause of Condition: Policies and procedures regarding a monthly reconciliation have not been designed and implemented to ensure the Court Clerk's reports reconcile to the County Treasurer's official depository ledger.

Effect of Condition: This condition could result in unrecorded transactions, undetected errors, misappropriation of funds, or clerical errors that are not detected in a timely manner.

Recommendation: OSAI recommends that the Court Clerk's District Court case balance summary report be reconciled monthly to the County Treasurer's official depository ledger, and documentation of this process maintained.

Management Response:

Court Clerk: I will begin reconciling the District Court case balances with the County Treasurer.

Criteria: Safeguarding controls are an aspect on internal controls. Safeguarding controls relate to the prevention or timely detection of unauthorized transactions and unauthorized access to assets. Failure to perform tasks that are part of internal controls, such as reconciliations not prepared or timely prepared, are deficiencies in internal control. Further, reconciliations should be performed and maintained on a monthly basis.

Finding 2013-21 – Inadequate Internal Controls and Noncompliance Over Court Clerk Revolving Fund Disbursements (Repeat Finding)

Condition: During our test of ten Court Clerk Revolving Fund vouchers and claims, the following was noted:

- One claim did not have an invoice or supporting documentation.
- Three claims had amounts that did not agree to the invoice or the voucher amount.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure Court Clerk Revolving Fund disbursements have proper documentation, and are reviewed for accuracy.

Effect of Condition: This condition could result in unrecorded transactions, undetected errors, misappropriation of funds, or clerical errors that are not detected in a timely manner.

Recommendation: OSAI recommends that more emphasis be placed on verifying that disbursements have invoices and supporting documentation, and are mathematically accurate.

Management Response:

Court Clerk: I will ensure disbursements are properly supported.

Criteria: Accountability and stewardship are overall goals of management in the accounting of funds. Effective procedures are necessary to ensure stewardship and accountability of public funds. An aspect of effective accounting procedures includes maintaining supporting documentation for expenditures, verifying that amounts indicated on the documentation are mathematically correct, and having proper approval by a majority of the Court Fund Board.

Finding 2013-23 – Inadequate Segregation of Duties Over Court Clerk Court Fund and Court Clerk Revolving Fund (Repeat Finding)

Condition: A concentration of duties exists in the Court Clerk's office due to the following:

Receipts/Deposits:

- All employees receive monies, issue receipts, and reconcile their cash drawer.
- All employees rotate the duties of reconciling total receipts to the deposit ticket and taking the deposit to the Treasurer.

Disbursements/Reconciling:

- For the Court Fund, the Court Clerk performs the duties of preparing claims, issues vouchers, approves vouchers and claims, prepares reports, and reconciles with the County Treasurer.
- For the Court Clerk Revolving Fund, the Court Clerk performs the duties of preparing claims, approving claims, preparing reports, and reconciling with the County Treasurer.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure adequate segregation of duties in the Court Clerk's office.

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 transaction, 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 realize that a concentration of duties and responsibilities in a limited number of individuals is not desired from a control point of view. The most effective controls lie in management's oversight of office operations and a periodic review of operations. OSAI recommends that management provide segregation of duties so that no one employee is able to perform all accounting functions. 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 approval of accounting functions.

OSAI recommends the following key accounting functions of the Court Clerk's office be adequately segregated:

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

Management Response:

Court Clerk: I agree with the auditor's recommendations, but due to limited personnel I will continue to perform the disbursements and reconciliation functions of the Court Fund and Court Clerk Revolving Fund.

Auditor Response: Although the office is limited in staff, mitigating controls such as reviewing work of others could be implemented to reduce the risks of error and fraud. Evidence of the review should be noted with initials and dates.

Criteria: Accountability and stewardship are overall goals of management in the accounting of funds. To help ensure a proper accounting of funds, 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.

Finding 2013-24 - Inadequate Internal Controls and Noncompliance Over Consumable Inventories

Condition: We noted the following while gaining an understanding of internal controls and testing compliance with state statute over consumable inventories:

District 1:

- Documentation was not maintained to ensure review of consumable inventories was performed.
- The District does not maintain fuel logs for their satellite fuel tanks.

District 2:

- Documentation was not maintained to ensure review of consumable inventories was performed.
- The District does maintain a fuel log. However, the fuel record does not contain a balance that the District reconciles to the actual fuel on hand.
- We noted the following variances in the amount of fuel on hand at the District Barn.
 - Diesel 284 gallons short.
 - Unleaded 253 gallons short.
- The District does not maintain fuel logs for their satellite fuel tanks.

District 3:

• Documentation was not maintained to ensure review of consumable inventories was performed.

Garvin Volunteer Fire Department:

• The department does not maintain a consumable fuel record with a balance that can be reconciled to the actual fuel on hand.

Solid Waste:

• Solid Waste does not prepare and maintain a consumable inventories record for tires.

Cause of Condition: Policies and procedures have not been designed and implemented with regard to effective internal controls over safeguarding of consumable inventories by performing physical inventory counts, maintaining of the consumable inventory records, and performing of reconciliation between fuel records and the actual fuel on hand.

Effect of Condition: Failure to maintain accurate records of consumable inventories and to perform a periodic physical inventory of consumable inventories could result in inaccurate records, unauthorized use of consumable inventories, or misappropriation of consumable inventories.

Recommendation: OSAI recommends that each District perform and maintain documentation of verification and reconciliation of consumable inventories on hand, to consumable records, at a minimum of twice annually. OSAI also recommends that consumable inventory cards be maintained and updated continuously for all consumable items that are purchased in lots of \$500 or more. OSAI recommends that a fuel record with a balance be maintained and reconciliation to the actual fuel on hand be performed weekly. The fuel log and reconciliation should be performed for every tank.

Management Response:

County Commissioner District 1: My District will maintain documentation for the verification of consumable inventories. Fuel adjustments will be made to reconcile the fuel on hand. I will monitor the fuel usage for the satellite fuel tanks. I will discuss with the Board regarding how we will ensure that the

other county departments perform and maintain documentations for consumable inventories including fuel.

County Commissioner District 2: I will ensure documentation is maintained for the verification of consumable inventories. The fuel logs will be maintain properly and reconcile with fuel on hand. All variance noted when reconciling fuel on hand will be investigated. I will recommend that the fire departments maintain and reconcile fuel logs. In addition, I will recommend that the solid waste department document and perform a review consumable inventory records.

County Commissioner District 3: We will make every effort to ensure a verification of consumable inventories is performed and documented in accordance with state statutes.

Criteria: Title 19 O.S. § 1504 (A) states in part, "A receiving officer shall receive all supplies, materials and equipment purchased, lease-purchased or rented by his department and shall identify such items received in a manner prescribed by the county road and bridge inventory officer or board of county commissioners or designee. The receiving officer shall also maintain a record of all supplies, materials and equipment received, disbursed, stored and consumed by his department."

Furthermore, an important aspect of internal control is the safeguarding of assets. 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 or timely detection of unauthorized acquisition, use, or disposition of the entities consumable inventory, and safeguarding consumable inventory from loss, damage, or misappropriation.

Finding 2013-25 – Inadequate Internal Controls and Noncompliance Over Fixed Assets Records

Condition: While gaining an understanding of internal controls and testing compliance with state statutes over fixed assets, we noted the following:

• The County has not set forth procedures to perform and document an annual physical inventory to ensure compliance with 19 O.S. § 178.1 for the following offices: County Commissioner District 1, County Commissioner District 2, County Commissioner District 3, County Clerk, County Treasurer, County Assessor, County Sheriff, Election Board, Health Department, OSU Extension Office, Garvin Volunteer Fire Department, Hollycreek Volunteer Fire Department, Valliant Volunteer Fire Department, Eagletown Volunteer Fire Department, Idabel Volunteer Fire Department, Emergency Management, and Solid Waste.

Cause of Condition: Policies and procedures have not been designed and implemented with regard to effective internal controls over safeguarding of fixed assets by performing an annual physical inventory count, and maintaining the fixed assets inventory record with the County Clerk.

Effect of Condition: This condition resulted in noncompliance with state statutes and could result in inaccurate, incorrect information or loss of assets.

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

- Perform an annual inventory count.
- Retain documentation to verify the physical inventory counts were performed.
- Perform inventory verification by someone other than the receiving officer or inventory officer.
- File inventory list with the County Clerk annually.

Management Response:

County Commissioner District 1: My District will perform and document a review of fixed assets each year, and file with the County Clerk's office. Inventory records will be updated in a timely manner in the County Clerk's office. I will discuss with the Board regarding how we will ensure that the other county departments perform and maintain documentations for fixed assets.

County Commissioner District 2: I will ensure documentation is maintained for the review of fixed assets. We will update our inventory records in the County Clerk's Office. I will recommend that the fire departments maintain and reconcile fuel logs. In addition, I will recommend that the County offices and departments document and perform a review of fixed assets.

County Commissioner District 3: We will make every effort to ensure the fixed assets inventory is reviewed and documentation is filed with County Clerk in accordance with state statutes.

County Clerk: A review of fixed assets will be performed and documented each year.

County Treasurer: We will perform and document an annual review of fixed assets.

County Sheriff: My office is currently performing a review of fixed assets to correct this issue.

County Assessor: The Assessor's office will perform and maintain an inventory log for fixed assets and file it with the County Clerk's office.

Criteria: Title 19 O.S. § 178.2 states, "It shall be and is hereby made the duty of every county officer, board, commission, or department, and by record directive of the board of county commissioners may be made the duty of any employee of the board of county commissioners subject to summary discharge and removal by the board, to conform in all respects and be amenable to all uniform resolutions adopted by their respective boards of county commissioners directing the taking, recording, maintaining and reporting inventories of properties in their respective custody in accordance with the provisions of this act. It shall be the duty and responsibility of each elected county official to create and maintain inventory records of said office. Such inventory shall be filed with the county clerk."

Title 19 O.S. § 178.1 states in part, "The board of county commissioners in each county of this state shall take, or cause to be taken, an inventory of all working tools, apparatus, machinery and equipment belonging to the county or leased or otherwise let to it or to any department thereof, other than that which is affixed to and made a part of lands and buildings, the cost of which as to each complete working unit thereof is more than Five Hundred Dollars (\$500.00), and therefore maintain or cause to be maintained a continuous inventory record thereof and of like tools, apparatus, machinery and equipment purchased, leased, or otherwise coming into custody of the county or of any office, board, department, commission or any either thereof, and the disposition thereof whether sold, exchanged, leased, or let where authorized by statute, junked, strayed or stolen, and annually thereafter..."

Furthermore, an important aspect of internal control is the safeguarding of assets. 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 or timely detection of unauthorized acquisition, use, or disposition of the entities fixed assets inventory, and safeguarding fixed assets inventory from loss, damage, or misappropriation.

Finding 2013-36 – Estimate of Needs – County Health Department

Condition: Upon review of the County's Estimate of Needs for the fiscal year ending June 30, 2013, it was noted that the County Health Department's budgeted appropriations exceeded the their budgeted revenues and cash balance in the amount of \$469,459.

Cause of Condition: Policies and procedures have not been designed and implemented to ensure that the Estimate of Needs is accurately completed.

Effect of Condition: This condition resulted in noncompliance with state statute and the County Health Department's budgeted appropriations exceeding the budgeted revenues and beginning cash balance. Further, this condition could result in misstated financial reports, undetected errors, and misappropriation of funds.

Recommendation: We recommend the County review the Estimate of Needs prior to approval to ensure the budgeted appropriations do not exceed budgeted revenues and beginning cash balance. We further recommend that the County budget for all re-occurring and probable revenue.

Management Response:

Chairman Board of County Commissioners: We will review the Estimate of Needs to ensure it is accurate and complete.

Criteria: Title 68 O.S. § 3002(A) states, "Notwithstanding the provisions of the School District Budget Act, each board of county commissioners and the board of education of each school district, shall, prior to October 1 of each year, make, in writing, a financial

statement, showing the true fiscal condition of their respective political subdivisions as of the close of the previous fiscal year ended June 30th, and shall make a written itemized statement of estimated needs and probable income from all sources including ad valorem tax for the current fiscal year. Such financial statement shall be supported by schedules or exhibits showing, by classes, the amount of all receipts and disbursements, and shall be sworn to as being true and correct. The statement of estimated needs shall be itemized so as to show, by classes: first, the several amounts necessary for the current expenses of the political subdivision and each officer and department thereof as submitted in compliance with the provisions of Section 3004 of this title; second, the amount required by law to be provided for sinking fund purposes; third, the probable income that will be received from all sources, including interest income and ad valorem taxes; and shall be detailed in form and amount so as to disclose the several items for which the excise board is authorized and required, by this article, to approve estimates and make appropriations."

Finding 2012-29 – Inadequate County-Wide Controls - Schools and Roads (Repeat Finding)

Pass-Through Grantor: Oklahoma State Treasurer

Federal Agency: United States Department of Agriculture

CFDA No: 10.665

Federal Program Name: Schools and Roads - Grants to States

Federal Award Year: 2012

Control Category: Activities Allowed/Unallowed; Allowable Costs/Cost Principles; Cash Management;

Procurement and Suspension and Debarment

Questioned Costs: \$-0-

Finding Summary: County-wide controls regarding Control Environment, Risk Assessment, Information

and Communication, and Monitoring have not been designed.

Status: No corrective action has been taken.

Finding 2012-30 – Inadequate Internal Controls Activities Over Major Federal Program - Schools and Roads

Pass-Through Grantor: Oklahoma State Treasurer

Federal Agency: United States Department of Agriculture

CFDA No: 10.665

Federal Program Name: Schools and Roads - Grants to States

Federal Award Year: 2012

Control Category: Activities Allowed/Unallowed; Allowable Costs/Cost Principles; Cash Management;

Procurement and Suspension and Debarment

Questioned Costs: \$-0-

Finding Summary: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure compliance with the following compliance requirements: Activities Allowed/Unallowed; Allowable Costs/Cost Principles; Cash Management; Procurement and Suspension and Debarment.

Status: No corrective action has been taken.

Finding 2011-22 – County-Wide Controls Schools and Roads (Repeat Finding)

Pass-Through Grantor: Oklahoma State Treasurer

FEDERAL AGENCY: United States Department of Agriculture

CFDA NO: 10.665

FEDERAL PROGRAM NAME: Schools and Roads - Grants to States

FEDERAL AWARD YEAR: 2011

CONTROL CATEGORY: Activities Allowed/Unallowed; Allowable Costs/Cost Principles; Cash

Management; Procurement and Suspension and Debarment

QUESTIONED COSTS: \$-0-

Finding Summary: County-wide controls regarding Control Environment, Risk Assessment,

Information and Communication, and Monitoring have not been designed.

Status: No corrective action has been taken.

Finding 2011-23 – Internal Controls Activities Allowed and Allowable Cost for Schools and Roads (Repeat Finding)

Pass-Through Grantor: Oklahoma State Treasurer **Federal Agency:** United States Department of Agriculture

CFDA No: 10.665

Federal Program Name: Schools and Roads - Grants to States

Federal Award Year: 2011

Control Category: Activities Allowed/Unallowed; Allowable Costs/Cost Principles

Questioned Costs: \$-0-

Finding Summary: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure compliance with the following compliance requirements: Activities Allowed/Unallowed; Allowable

Costs/Cost Principles.

Status: No corrective action has been taken.

Finding 2011-24 – Internal Controls Cash Management for Schools and Roads (Repeat Finding)

PASS-THROUGH GRANTOR: Oklahoma State Treasurer **FEDERAL AGENCY:** United States Department of Agriculture

CFDA NO: 10.665

FEDERAL PROGRAM NAME: Schools and Roads - Grants to States

FEDERAL AWARD YEAR: 2011

CONTROL CATEGORY: Cash Management

QUESTIONED COSTS: \$-0-

Finding Summary: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure compliance with the following compliance requirement: Cash Management.

In addition, McCurtain County does not maintain a ledger for interest earned on the Schools and Roads - Grants to States program. The County earned approximately \$10,485.84 on this fund during the fiscal year. The interest earned on this fund was apportioned to other funds.

Status: No corrective action has been taken.

Finding 2011-25 – Internal Controls Procurement for Schools and Roads (Repeat Finding)

Pass-Through Grantor: Oklahoma State Treasurer **Federal Agency:** United States Department of Agriculture

CFDA No: 10.665

Federal Program Name: Schools and Roads - Grants to States

Federal Award Year: 2011

Control Category: Procurement and Suspension and Debarment

Questioned Costs: \$-0-

Finding Summary: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure compliance with the following compliance requirement: Procurement and Suspension and Debarment. We tested 12 expenditures of the Schools and Roads - Grants to States and determined 6 expenditures totaling \$65,140.59 did not meet attributes for Compliance Requirement I – Procurement due to not encumbering the cost of goods prior to purchasing. In addition, one expenditure totaling \$450.66 did not meet attributes for Compliance Requirement I – Procurement due to proper documentation not attached to claim.

Status: No corrective action has been taken.

Finding 2010-23 - County-Wide Controls Schools and Roads

CFDA: 10.665

Federal Program Name: Schools and Roads - Grants to States **Federal Agency:** United States Department of Agriculture

Finding Summary: County-wide controls regarding Control Environment, Risk Assessment, Information

and Communication, and Monitoring have not been designed.

Status: We do not believe this finding warrants further action because the Federal agency or pass-through

entity is not currently following up with the County on this finding.

Finding 2010-24 – County-Wide Controls Disaster Grants

CFDA: 97.036

Federal Program Name: Disaster Grants - Public Assistance (Presidentially Declared Disasters)

Federal Agency: United States Department of Homeland Security

Finding Summary: County-wide controls regarding Control Environment, Risk Assessment, Information

and Communication, and Monitoring have not been designed.

Status: We do not believe this finding warrants further action because the Federal agency or pass-through

entity is not currently following up with the County on this finding.

Finding 2010-25 - Internal Controls Activities Allowed and Allowable Cost for Schools and Roads

CFDA: 10.665

Federal Program Name: Schools and Roads - Grants to States **Federal Agency:** United States Department of Agriculture

Finding Summary: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure compliance with the following compliance requirements: Activities Allowed; Allowable Costs.

Status: We do not believe this finding warrants further action because the Federal agency or pass-through entity is not currently following up with the County on this finding.

Finding 2010-26 - Internal Controls Cash Management for Schools and Roads

CFDA: 10.665

Federal Program Name: Schools and Roads - Grants to States Federal Agency: United States Department of Agriculture

Finding Summary: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure compliance with the following compliance requirement: Cash Management. In addition, McCurtain County does not maintain a ledger for interest earned on the Schools and Roads - Grants to States program. The County earned approximately \$12,157.82 on this fund during the fiscal year. The interest earned on this fund was apportioned to other funds.

Status: We do not believe this finding warrants further action because the Federal agency or pass-through entity is not currently following up with the County on this finding.

Finding 2010-27 - Internal Controls Procurement for Schools and Roads

CFDA: 10.665

Federal Program Name: Schools and Roads - Grants to States **Federal Agency:** United States Department of Agriculture

Finding Summary: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure compliance with the following compliance requirement: Procurement and Suspension and Debarment. We tested 13 expenditures of the Schools and Roads - Grants to States and determined 10 expenditures totaling \$168,743.99 did not meet attributes for Compliance Requirement I – Procurement due to not encumbering the cost of goods prior to purchasing.

Status: We do not believe this finding warrants further action because the Federal agency or pass-through entity is not currently following up with the County on this finding.

Finding 2010-28 – Internal Controls over Compliance Requirements – FEMA

CFDA: 97.036

Federal Program Name: Disaster Grants - Public Assistance (Presidentially Declared Disasters)

Federal Agency: United States Department of Homeland Security

Finding Summary: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure

compliance with the following compliance requirements: Activities Allowed/Unallowed; Cash Management; Matching Level of Effort/Earmarking; Period of Availability; and Special Tests and Provisions.

Status: We do not believe this finding warrants further action because the Federal agency or pass-through entity is not currently following up with the County on this finding.

Finding 2010-29 – Internal Controls Allowable Cost for Disaster Grants

CFDA: 97.036

Federal Program Name: Disaster Grants - Public Assistance (Presidentially Declared Disasters)

Federal Agency: United States Department of Homeland Security

Finding Summary: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure compliance with the following compliance requirement: Allowable Costs/Cost Principles. In addition, we tested four projects and determined that a total of \$15,345.53 was charged for ineligible labor and equipment due to lack of adequate documentation.

Status: We do not believe this finding warrants further action because the Federal agency or pass-through entity is not currently following up with the County on this finding.

Finding 2010-30 - Internal Controls Procurement for Disaster Grants

CFDA: 97.036

Federal Program Name: Disaster Grants - Public Assistance (Presidentially Declared Disasters)

Federal Agency: United States Department of Homeland Security

Finding Summary: During the process of documenting the County's internal controls regarding federal disbursements, we noted that McCurtain County has not established internal controls to ensure compliance with the following compliance requirement: Procurement and Suspension and Debarment. In addition, we tested four projects and determined that expenditures totaling \$46,154.95 did not meet attributes for Compliance Requirement I – Procurement due to not encumbering the cost of goods prior to purchasing.

Status: We do not believe this finding warrants further action because the Federal agency or pass-through entity is not currently following up with the County on this finding.



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