

Independent Auditor's Report

Comanche County Educational Facilities Authority

Year Ended June 30, 2021

COMANCHE COUNTY EDUCATIONAL FACILITIES AUTHORITY
LAWTON, OKLAHOMA
June 30, 2021

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INDEPENDENT AUDITOR'S REPORT

The Honorable Board of Trustees
Comanche County Educational Facilities Authority
Lawton, Oklahoma

Report on the Financial Statements

We have audited the accompanying modified cash basis financial statements of the business-type activities of Comanche County Educational Facilities Authority, Lawton, Oklahoma, a component unit of Comanche County as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with the modified cash basis of accounting described in Note 1; this includes determining that the modified cash basis of accounting is an acceptable basis for preparation of the financial statements 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 these financial statements 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 the 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 statements are free of material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, 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 statements 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 statements.

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

Opinion

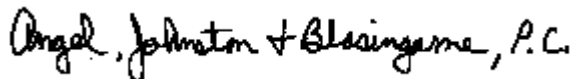
In our opinion, the financial statements referred to above present fairly, in all material respects, the modified cash basis financial position of the business-type activities of the Comanche County Educational Facilities Authority, Lawton, Oklahoma as of June 30, 2021, and the changes in modified cash basis financial position, and cash flows thereof for the year then ended in accordance with the modified cash basis of accounting described in Note 1.

Basis of Accounting

We draw attention to Note 1 of the financial statements, which describes the basis of accounting. The financial statements are prepared on the modified cash basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to this matter.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated December 6, 2021, on our consideration of the Authority'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 solely 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 effectiveness of the Authority's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Authority's internal control over financial reporting and compliance.



Chickasha, Oklahoma
December 6, 2021

COMANCHE COUNTY EDUCATIONAL FACILITIES AUTHORITY
Statement of Net Position
Modified Cash Basis
June 30, 2021

ASSETS

Current Assets

Cash and cash equivalents	\$ 349,269
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<i>Total Assets</i>	<u>349,269</u>
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LIABILITIES

<i>Total Liabilities</i>	<u>0</u>
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NET POSITION

Unrestricted	<u>349,269</u>
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<i>Total Net Position</i>	<u>\$ 349,269</u>
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The accompanying notes are an integral part of the financial statements.

COMANCHE COUNTY EDUCATIONAL FACILITIES AUTHORITY
Statement of Revenues, Expenses and Changes in Net Position
Modified Cash Basis
For the Year Ended June 30, 2021

Operating Revenues

Administration Acceptance Fees	\$ 157,210
<i>Total Operating Revenues</i>	<u>157,210</u>

Operating Expenses

Professional Fees	4,100
<i>Total Operating Expenses</i>	<u>4,100</u>

<i>Operating Income (Loss)</i>	<u>153,110</u>
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Non-Operating Revenues (Expenses)

<i>Total Non-Operating Revenues (Expenses)</i>	<u>-</u>
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<i>Change in Net Position</i>	<u>153,110</u>
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<i>Net Position - Beginning of Year</i>	<u>196,159</u>
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<i>Net Position - End of Year</i>	<u><u>\$ 349,269</u></u>
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The accompanying notes are an integral part of the financial statements.

COMANCHE COUNTY EDUCATIONAL FACILITIES AUTHORITY
Statement of Cash Flows
Modified Cash Basis
For the Year Ended June 30, 2021

Cash flows from operating activities

Receipts from administration acceptance fees	\$ 157,210
Payment to vendors	<u>(4,100)</u>
<i>Net cash provided (used) by operating activities</i>	<u>153,110</u>
 <i>Net increase (decrease) in cash and cash equivalents</i>	 153,110
<i>Cash and cash equivalents at beginning of year</i>	<i>196,159</i>
<i>Cash and cash equivalents at end of year</i>	<u><u>\$ 349,269</u></u>

**Reconciliation of operating income (loss) to net cash
provided (used) by operating activities**

Operating income (loss)	\$ <u>153,110</u>
 <i>Net cash provided by (used for) operating activities</i>	 <u><u>\$ 153,110</u></u>

The accompanying notes are an integral part of the financial statements.

COMANCHE COUNTY EDUCATIONAL FACILITIES AUTHORITY

Notes to Basic Financial Statements For the Year Ended June 30, 2021

Note 1 – Summary of Significant Accounting Policies

1.A. Reporting Entity

Comanche County Educational Facilities Authority, a public trust, was organized to function as an educational trust for the benefit of Comanche County, Oklahoma, the State of Oklahoma, Governmental Agencies, municipalities and private entities, agencies and citizens in its charitable, scientific, literary or educational purposes and in making the most efficient use of all of their economic resources and powers in accordance with the needs and benefit of the Beneficiary and Comanche County in order to lessen the burdens on government and to promote charitable, scientific, literary or educational economic growth and development of Comanche County. The Authority accomplishes its mission through various educational development trusts. The Authority is empowered to borrow money and to pledge assets, properties and revenue as security against its borrowings.

Comanche County Educational Facilities Authority generally does not acquire any assets or incur any liability when it issues bonds for eligible entities. It may earn and collect administrative fees and must be informed of the unpaid balances. If however, Comanche County Educational Facilities Authority manages the assets and liabilities and does not assign them, the assets and liabilities would be recognized. Note 3 – Conduit Debt Obligations, discloses the outstanding obligation, which the Authority has facilitated.

Related Organizations

Comanche County - Comanche County Educational Facilities Authority is a public trust, organized March 20, 2006. Comanche County is the beneficiary of the trust. The elected Comanche County commissioners are the Authority's trustees. Therefore the Authority is considered to be a component unit of Comanche County.

The accompanying financial statements include all functions and activities over which the Authority exercises financial accountability. Comanche County Educational Facilities Authority is a component unit of the governmental entity of Comanche County, Oklahoma. Comanche County's financial information is not presented in these financial statements. Comanche County financial audits are readily obtainable at, www.sai.ok.gov, the State Auditor's website.

1.B. Basis of Presentation

The Authority's fund is an enterprise fund. Enterprise funds are proprietary funds used to account for business-like activities provided to the general public. All the activities of the Authority are business type activities. These activities are financed primarily by user charges and the measurement of financial activity focuses on net income measurement similar to the private sector.

COMANCHE COUNTY EDUCATIONAL FACILITIES AUTHORITY

Notes to Basic Financial Statements

For the Year Ended June 30, 2021

Note 1 – Summary of Significant Accounting Policies, (continued)

1.C. Measurement Focus and Basis of Accounting

Measurement focus refers to how transactions are recorded within the various financial statements. Basis of accounting refers to when transactions are recorded regardless of the measurement focus applied.

The Authority's financial statements use the economic resources measurement focus and are presented on the modified cash basis of accounting. Revenues are recognized when they are received and expenses are recorded when paid.

This basis is a basis of accounting other than accounting principles generally accepted in the United States of America. If the Authority utilized the basis of accounting recognized as generally accepted, the financial statements would use the accrual basis of accounting. Under the accrual basis of accounting, revenues are recognized when earned and expenses are recorded when the liability is incurred.

1.D. Assets, Liabilities and Net Position

Cash & Cash Equivalents –The Authority considers all cash on hand, demand deposits, interest bearing checking accounts and time deposit accounts including certificates of deposit and U.S. Treasury bills with maturities of three months or less to be cash and cash equivalents.

Net Position – Net Position is divided into three components:

- a. *Net Investment in Capital Assets* – Consists of capital assets including restricted capital assets, net of accumulated depreciation and reduced by the outstanding balances of any bonds, mortgages, notes, or other borrowings that are attributed to the acquisition, construction, or improvements of those assets.
- b. *Restricted net position* – Consists of net assets with constraints placed on the use either by 1) external groups such as creditors, grantors, contributors, or laws and regulations of other governments, or 2) law through constitutional provisions or enabling legislation.
- c. *Unrestricted net position* – All other net assets that do not meet the definition of “restricted” or “net investment in capital assets.”

It is the Authority's policy to first use restricted net position prior to the use of unrestricted net position when an expense is incurred for purposes for which both restricted and unrestricted net position are available.

COMANCHE COUNTY EDUCATIONAL FACILITIES AUTHORITY

Notes to Basic Financial Statements

For the Year Ended June 30, 2021

Note 1 – Summary of Significant Accounting Policies, (continued)

1.E. Revenues and Expenses

Operating and Non-operating Revenues - Operating revenues are considered those whose cash flows are related to operating activities, while revenues related to financing, capital and investing activities are reported as non-operating.

Expenses - The Authority reports expenses relating to the use of economic resources.

Note 2 – Deposits, Investments and Collateral

Deposits and Investments - The Authority does not have a written investment policy that limits its investment choices. Investments are limited by State Statute and declaration of trust.

Custodial Credit Risk - Deposits - Custodial credit risk is the risk that in the event of a bank failure, the Authority's deposits may not be returned to it. The Authority does not have a written policy for custodial risk, but *Oklahoma Statutes* require collateral for all uninsured deposits of public trust funds in financial institutions. At June 30, 2021 the Authority was not exposed to custodial credit risk.

Note 3 – Conduit Debt Obligations

CCEFA- Conduit Debt – The Comanche County Educational Facilities Authority has the following conduit debt outstanding at June 30, 2021, in the form of Lease Revenue Bonds:

	<u>Original Issue</u>	<u>Outstanding June 30, 2021</u>
CCEFA- Elgin Public Schools (2017A)	25,840,000	25,840,000
CCEFA- Elgin Public Schools (2017B)	520,000	520,000
CCEFA- Lawton Public Schools (2018)	<u>55,000,000</u>	<u>42,020,000</u>
Total	<u>\$81,360,000</u>	<u>\$ 68,380,000</u>

This debt is considered non-commitment debt to the Authority since debt payments are made solely by the schools. Payments are made directly by Elgin Public Schools and Lawton Public Schools to the Trustee bank. In the event of default by the schools, the Authority has no obligation, in substance, to make any payments on the debt since the note receivable, financing agreements and mortgages on the property with the school are the only security for the debt. As a result of the non-commitment determination, the Authority's indebtedness and related receivables from the school are not recorded in the financial statements. Total conduit debt on June 30, 2021 was \$68,380,000.

COMANCHE COUNTY EDUCATIONAL FACILITIES AUTHORITY

Notes to Basic Financial Statements

For the Year Ended June 30, 2021

Note 4 - Commitments and Contingencies.

The Authority is dependent upon repayment of bonds solely from the beneficiary (school) of the bond issues. If the beneficiary (school) defaulted on the bond payments it would not have a significant impact on the Authority's financial condition. Conduit debt is non-recourse debt.

Note 5 – Subsequent Events.

Management has evaluated subsequent events through the date of the audit report, which is the date the financial statements were available to be issued, and has determined that no additional information needs to be added to the financial statements.

Report on Internal Control and Compliance

**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***

The Honorable Board of Trustees
Comanche County Educational Facilities Authority
Lawton, 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 modified cash basis financial statements of the business-type activities of the Comanche County Educational Facilities Authority, Lawton, Oklahoma, a component unit of Comanche County, as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements and have issued our report thereon dated, December 6, 2021. Our report on the financial statements disclosed, that, as described in Note 1 to the financial statements, the Authority prepares its financial statements on a modified cash basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements, we considered Comanche County Educational Facilities Authority, Lawton, Oklahoma's internal control over financial reporting (internal control) as a basis for designing the audit procedures that are appropriate in the circumstances for the purpose of expressing an opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did

not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

Compliance and Other Matters

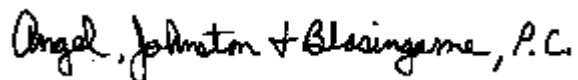
As part of obtaining reasonable assurance about whether Comanche County Educational Facilities Authority, Lawton, Oklahoma's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the accompanying schedule of findings and responses as items 2021-001.

Comanche County Educational Facilities Authority, Lawton, Oklahoma's, Response to Findings

Comanche County Educational Facilities Authority, Lawton, Oklahoma's response to the findings identified in our audit is described in the attached corrective action plan. The Authority's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

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 results 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.



Chickasha, Oklahoma
December 6, 2021

COMANCHE COUNTY EDUCATIONAL FACILITIES AUTHORITY

Schedule of Findings and Responses

For the Year Ended June 30, 2021

2021-001 *Criteria* – In accordance with State Statutes (O.S. 60-176(H)) Public Trusts created pursuant to this section shall file annually, with their respective beneficiaries, copies of financial documents and reports sufficient to demonstrate the fiscal activity of such trust, including, but not limited to, budgets, financial reports, bond indentures, and audits.

Condition – The Authority did not file annual budgets with Comanche County.

Cause – Oversight by management.

Effect or Potential Effect – The Authority is in violation of State Statutes.

Recommendation – The Authority trustees should ensure budgets are filed annually with the County.

Management Response – See Corrective Action Plan.

COMANCHE COUNTY EDUCATIONAL FACILITIES AUTHORITY
Schedule of Prior Year Audit Findings
For the Year Ended June 30, 2021

There were no findings for the 2019 – 2020 year audit.

AUTHORITY'S CORRECTIVE ACTION PLAN

**AUDIT FINDINGS
CORRECTIVE ACTION PLAN**

AUDIT YEAR 2020-2021

AUDIT FINDING REFERENCE NUMBER: 2021-001

MANAGEMENT RESPONSE: Authority trustees will ensure
budgets are filed annually with the county.



Board Chairman

December 6, 2021

Date