

**ANNUAL FINANCIAL REPORT  
COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
JULY 1, 2019 TO JUNE 30, 2020**

**AUDITED BY  
KERRY JOHN PATTEN, C.P.A.**

COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
SCHOOL DISTRICT OFFICIALS  
JUNE 30, 2020

Board of Education

President	Leslie Bissell
Vice-President	Emily Burkybile
Clerk	Jamie Johnston
Deputy Clerk	Herb Logan
Member	Adam Bruton

Superintendent of Schools

Jimmy R. Haynes

School District Treasurer

Philip Geren

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
JUNE 30, 2020**

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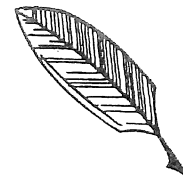
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## Independent Auditor's Report

The Honorable Board of Education  
Commerce School District No. I-18  
Ottawa County, Oklahoma

### Report on Financial Statements

I have audited the accompanying combined fund type and account group financial statements – regulatory basis of the Commerce School District No. I-18, Ottawa County, Oklahoma, as of and for the year ended June 30, 2020, and the related notes to the financial statements, which collectively comprise the district'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 financial reporting provisions of the Oklahoma State Department of Education to meet financial reporting requirements of the State of Oklahoma; this includes determining that the regulatory basis of accounting is an acceptable basis for the 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

My responsibility is to express an opinion on these financial statements based on my audit. I conducted my 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 I plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from 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 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, I 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.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my audit opinions.

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

As discussed in Note 1 (C) to the financial statements, the financial statements are prepared by the Commerce School District No. I-18, Ottawa County, Oklahoma, on the basis of the financial reporting provisions of the Oklahoma State Department of Education, which a basis of accounting other than accounting principles generally accepted in the United States of America to comply with requirements of the Oklahoma State Department of Education.

The effects on the financial statements of the variances between the regulatory basis of accounting described in Note 1 (C) 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 my 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 statements referred to in the first paragraph do not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of Commerce School District No. 1-18, Ottawa County, Oklahoma as of June 30, 2020, or the revenues, expenses, and changes in financial position for the year then ended.

### **Basis for Qualified Opinion on Regulatory Basis of Accounting**

The financial statements referred to in the first paragraph do not include the general fixed asset account group, which is a departure from the regulatory basis of accounting prescribed or permitted by the Oklahoma State Department of Education. The amount that should be recorded in the general fixed asset account group is not known.

### **Qualified Opinion on Regulatory Basis of Accounting**

In my opinion, except for the effects of the matter described in the "Basis for Qualified Opinion on Regulatory Basis of Accounting" paragraph, the financial statements referred to in the first paragraph present fairly, in all material respects, the assets, liabilities, and fund balances arising from regulatory basis transactions of each fund type and account group of Commerce School District No. 1-18, Ottawa County, Oklahoma, as of June 30, 2020, and the revenues collected and expenditures paid and encumbered for the year then ended, on the regulatory basis of accounting described in the Note 1 (C).

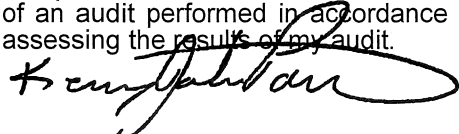
### **Other Matters Other Information**

My audit was conducted for the purpose of forming opinions on the fund type and account group financial statements within the combined financial statements. The combining fund statements-regulatory basis, and other schedules as listed in the table of contents, under supplementary information, are presented for purposes of additional analysis and are not a required part of the combined financial statements of the District. The Schedule of Expenditures of Federal Awards is presented for purposes of additional analysis as required by Title 2 U.S. Code of Federal Regulations (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, and is also not a required part of the basic financial statements.

The combining financial statements-regulatory basis, and other schedules as listed in the table of contents, under supplementary information and the Schedule of Expenditures of Federal Awards are the responsibility of management and were derived from and relate directly to the underlying accounting records used to prepare the combined financial statements. Such information has been subjected to the auditing procedures applied in the audit of the fund type and account group financial statements within the combined financial statements, and other additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the combined financial statements, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In my opinion, the supplementary information including the Schedule of Expenditures of Federal Awards are fairly stated in all material respects in relation to the combined financial statements taken as a whole on the regulatory basis of accounting described in Note 1 (C).

### **Other Reporting Required by Government Auditing Standards**

In accordance with *Government Auditing Standards*, I have also issued my report dated March 3, 2021, on my consideration of Commerce School District No. 1-18, Ottawa County, Oklahoma's, internal control over financial reporting and on my 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 my testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of my audit.



Kerry John Patten, C.P.A.  
Broken Arrow, OK  
March 3, 2021

## **COMBINED FINANCIAL STATEMENTS**

**COMMERCE SCHOOL DISTRICT NO. I-18**  
**COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES**  
**ALL FUND TYPES AND ACCOUNT GROUPS - REGULATORY BASIS**  
**JUNE 30, 2020**

	Governmental Fund Types				Fiduciary Fund Types	Account Groups	Total (Memorandum Only)
	General	Special Revenue	Debt Service	Capital Projects	Trust and Agency	General Long-term Debt	June 30, 2020
<b>ASSETS</b>							
Cash	\$ 1,515,636.70	\$ 414,637.51	\$ 577,876.86	\$ 2,541.23	\$ 169,461.16	\$ -	\$ 2,680,153.46
Investments	-	-	-	-	72,000.00	-	72,000.00
Amounts available in debt service fund	-	-	-	-	-	577,876.86	577,876.86
Amounts to be provided for retirement of general long-term debt	-	-	-	-	-	5,447,486.32	5,447,486.32
<b>Total assets</b>	<b>\$ 1,515,636.70</b>	<b>\$ 414,637.51</b>	<b>\$ 577,876.86</b>	<b>\$ 2,541.23</b>	<b>\$ 241,461.16</b>	<b>\$ 6,025,363.18</b>	<b>\$ 8,777,516.64</b>
<b>LIABILITIES AND FUND BALANCES</b>							
<b>Liabilities:</b>							
Outstanding warrants	\$ 849,756.31	\$ 2,777.66	\$ -	\$ -	\$ 25,802.41	\$ -	\$ 878,336.38
Encumbrances	27,266.14	38,110.40	-	-	-	-	65,376.54
Due to others	-	-	-	-	-	-	-
Long-term debt:							
Capitalized lease obligations payable	-	-	-	-	-	4,915,363.18	4,915,363.18
Bonds payable	-	-	-	-	-	1,110,000.00	1,110,000.00
Interest payable	-	-	-	-	-	-	-
<b>Total liabilities</b>	<b>\$ 877,022.45</b>	<b>\$ 40,888.06</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 25,802.41</b>	<b>\$ 6,025,363.18</b>	<b>\$ 6,969,076.10</b>
<b>Fund Balances</b>							
Designated for capital projects	\$ -	\$ -	\$ -	\$ 2,541.23	\$ -	\$ -	\$ 2,541.23
Designated for debt service	-	-	577,876.86	-	-	-	577,876.86
Cash fund balances	638,614.25	373,749.45	-	-	215,658.75	-	1,228,022.45
<b>Total fund balances</b>	<b>\$ 638,614.25</b>	<b>\$ 373,749.45</b>	<b>\$ 577,876.86</b>	<b>\$ 2,541.23</b>	<b>\$ 215,658.75</b>	<b>\$ -</b>	<b>\$ 1,808,440.54</b>
<b>Total liabilities and fund balances</b>	<b>\$ 1,515,636.70</b>	<b>\$ 414,637.51</b>	<b>\$ 577,876.86</b>	<b>\$ 2,541.23</b>	<b>\$ 241,461.16</b>	<b>\$ 6,025,363.18</b>	<b>\$ 8,777,516.64</b>

The notes to the financial statements are an integral part of this statement.



**COMMERCE SCHOOL DISTRICT NO. I-18**  
**COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID AND CHANGES IN FUND BALANCES**  
**ALL GOVERNMENTAL FUND TYPES - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2020**

	Governmental Fund Types				Total (Memorandum Only)
	General	Special Revenue	Debt Service	Capital Projects	June 30, 2020
<b>Revenues collected:</b>					
Local sources	\$ 909,222.10	\$ 121,950.88	\$ 593,543.00	\$ 496.14	\$ 1,625,212.12
Intermediate sources	129,112.26	-	-	-	129,112.26
State sources	5,451,751.52	-	-	-	5,451,751.52
Federal sources	1,191,076.66	16,845.42	-	-	1,207,922.08
Non-revenue sources	19,150.92	-	-	-	19,150.92
<b>Total revenues collected</b>	<b>\$ 7,700,313.46</b>	<b>\$ 138,796.30</b>	<b>\$ 593,543.00</b>	<b>\$ 496.14</b>	<b>\$ 8,433,148.90</b>
<b>Expenditures paid:</b>					
Instruction	\$ 4,666,205.68	\$ 11,760.88	\$ -	\$ -	\$ 4,677,966.56
Support services	2,376,220.41	201,981.28	-	11,509.59	2,589,711.28
Non-instructional services	651,462.19	-	-	-	651,462.19
Capital outlay	570.00	-	-	11,654.91	12,224.91
Other outlays	19,150.92	-	-	-	19,150.92
Other uses	-	-	-	-	-
Repayments	-	-	-	-	-
Debt service:					
Principal retirement	10,021.54	-	555,000.00	395,143.52	960,165.06
Interest	1,671.89	-	34,271.25	145,856.48	181,799.62
<b>Total expenditures paid</b>	<b>\$ 7,725,302.63</b>	<b>\$ 213,742.16</b>	<b>\$ 589,271.25</b>	<b>\$ 564,164.50</b>	<b>\$ 9,092,480.54</b>
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	\$ (24,989.17)	\$ (74,945.86)	\$ 4,271.75	\$ (563,668.36)	\$ (659,331.64)
<b>Adjustments to prior year encumbrances</b>	<b>\$ 3,667.32</b>	<b>\$ 285.00</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 3,952.32</b>
<b>Other financing sources (uses):</b>					
Bond sale proceeds	\$ -	\$ -	\$ -	\$ 555,000.00	\$ 555,000.00
Operating transfers in/(out)	-	-	-	-	-
Bank charges	-	-	-	-	-
<b>Total other financing sources (uses)</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 555,000.00</b>	<b>\$ 555,000.00</b>
Excess (deficiency) of revenue collected over (under) expenditures paid and other financing sources (uses)	\$ (21,321.85)	\$ (74,660.86)	\$ 4,271.75	\$ (8,668.36)	\$ (100,379.32)
<b>Fund balances, beginning of year</b>	<b>\$ 659,936.10</b>	<b>\$ 448,410.31</b>	<b>\$ 573,605.11</b>	<b>\$ 11,209.59</b>	<b>\$ 1,693,161.11</b>
<b>Fund balances, end of year</b>	<b>\$ 638,614.25</b>	<b>\$ 373,749.45</b>	<b>\$ 577,876.86</b>	<b>\$ 2,541.23</b>	<b>\$ 1,592,781.79</b>

The notes to the financial statements are an integral part of this statement.

COMMERCE SCHOOL DISTRICT NO. I-18  
 COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID AND CHANGES IN FUND BALANCES - BUDGET AND ACTUAL  
 BUDGETED GOVERNMENTAL FUND TYPES - REGULATORY BASIS  
 FOR THE YEAR ENDED JUNE 30, 2020

	General Fund			Special Revenue Fund		
	Original Budget	Final Budget	Actual	Original Budget	Final Budget	Actual
<b>Revenues collected:</b>						
Local sources	\$ 825,319.68	\$ 825,319.68	\$ 909,222.10	\$ 110,432.46	\$ 110,432.46	\$ 121,950.88
Intermediate sources	115,603.46	115,603.46	129,112.26	-	-	-
State sources	5,384,894.21	5,384,894.21	5,451,751.52	-	-	-
Federal sources	1,420,947.42	1,420,947.42	1,191,076.66	17,087.89	17,087.89	16,845.42
Non-revenue sources	-	-	19,150.92	-	-	-
<b>Total revenues collected</b>	<b>\$ 7,746,764.77</b>	<b>\$ 7,746,764.77</b>	<b>\$ 7,700,313.46</b>	<b>\$ 127,520.35</b>	<b>\$ 127,520.35</b>	<b>\$ 138,796.30</b>
<b>Expenditures paid:</b>						
Instruction	\$ 5,377,909.20	\$ 5,377,909.20	\$ 4,666,205.68	\$ 17,903.28	\$ 17,903.28	\$ 11,760.88
Support services	2,365,516.49	2,365,516.49	2,376,220.41	558,027.38	558,027.38	201,981.28
Non-instructional services	649,662.19	649,662.19	651,462.19	-	-	-
Capital outlay	570.00	570.00	570.00	-	-	-
Other outlays	13,042.99	13,042.99	19,150.92	-	-	-
Other Uses	-	-	-	-	-	-
Repayment	-	-	-	-	-	-
Debt service:						
Principal retirement	-	-	10,021.54	-	-	-
Interest	-	-	1,671.89	-	-	-
<b>Total expenditures paid</b>	<b>\$ 8,406,700.87</b>	<b>\$ 8,406,700.87</b>	<b>\$ 7,725,302.63</b>	<b>\$ 575,930.66</b>	<b>\$ 575,930.66</b>	<b>\$ 213,742.16</b>
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	\$ (659,936.10)	\$ (659,936.10)	\$ (24,989.17)	\$ (448,410.31)	\$ (448,410.31)	\$ (74,945.86)
<b>Adjustments to prior year encumbrances</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 3,667.32</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 285.00</b>
<b>Other financing sources (uses):</b>						
Operating transfers in/out	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Bank Charges	-	-	-	-	-	-
<b>Total other financing sources (uses)</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
Excess (deficiency) of revenue collected over (under) expenditures paid and other financing sources (uses)	\$ (659,936.10)	\$ (659,936.10)	\$ (21,321.85)	\$ (448,410.31)	\$ (448,410.31)	\$ (74,660.86)
<b>Fund balance, beginning of year</b>	<b>\$ 659,936.10</b>	<b>\$ 659,936.10</b>	<b>\$ 659,936.10</b>	<b>\$ 448,410.31</b>	<b>\$ 448,410.31</b>	<b>\$ 448,410.31</b>
<b>Fund balance, end of year</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 638,614.25</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 373,749.45</b>

The notes to the financial statements are an integral part of this statement.

## **NOTES TO THE FINANCIAL STATEMENTS**

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

**1. Summary of Significant Accounting Policies**

The accompanying financial statements of the Commerce School District No. I-18 (the "District") conform to the regulatory basis of accounting, which is another comprehensive basis of accounting prescribed by the Oklahoma State Department of Education and conforms to the system of accounting authorized by the State of Oklahoma. Accordingly, the accompanying financial statements are not intended to present financial position and results of operations in conformity with accounting principles generally accepted in the United States of America. The District's accounting policies are described in the following notes that are an integral part of the District's financial statements.

**A. Reporting Entity**

The District is a corporate body for public purposes created under Title 70 of the Oklahoma Statutes and, accordingly, is a separate entity for operating and financial reporting purposes. The District is part of the public school system of Oklahoma under the general direction and control of the State Board of Education and is financially dependent on the State of Oklahoma. The general operating authority for the public school system is the Oklahoma School Code contained in Title 70, Oklahoma Statutes.

The governing body of the District is the Board of Education composed of elected members. The appointed superintendent is the executive officer of the District.

In evaluating how to define the District, for financial reporting purposes, management has considered all potential component units. The decision to include a potential component unit in the reporting entity was made by applying the criteria established by the Governmental Accounting Standards Board (GASB). The basic – but not the only – criterion for including a potential component unit within the reporting entity is the governing body's ability to exercise oversight responsibility. The most significant manifestation of this ability is financial interdependency. Other manifestations of the ability to exercise oversight responsibility include, but are not limited to, the selection of governing authority, the designation of management, the ability to significantly influence operations, and accountability for fiscal matters. A second criterion used in evaluating potential component units is the scope of public service. Application of this criterion involves considering whether the activity benefits the District and/or its citizens, or whether the activity is conducted within the geographic boundaries of the District and is generally available to its patrons. A third criterion used to evaluate potential component units for inclusion or exclusion from the reporting entity is the existence of special financing relationships, regardless of whether the District is able to exercise oversight responsibilities. Based upon the application of these criteria, there are no potential component units included in the District's reporting entity. These statements present only the activities of the District.

**B. Measurement Focus**

The District uses funds and account groups to report on its financial position and the results of its operations. Fund accounting is designed to demonstrate legal compliance and to aid financial management by segregating transactions related to certain district functions or activities.

A fund is an independent accounting entity with a self-balancing set of accounts. The account groups are financial reporting devices designed to provide accountability for certain assets and liabilities that are not recorded directly in the funds.

Funds are classified into three categories: governmental, proprietary and fiduciary. Each category, in turn, is divided into separate "fund types." The District has the following fund types and account groups:

**Governmental Funds**

Governmental funds are used to account for all or most of a government's general activities, including the collection and disbursement of earmarked monies (special revenue funds), the acquisition or construction of general fixed assets (capital project funds), and the servicing of general long-term debt (debt service funds). Basis of accounting relates to the timing of the measurements made, regardless of the measurement focus applied. All governmental type funds are accounted for using the Regulatory (Statutory) basis of accounting. All revenues from all sources, including property taxes, entitlements, grants, and shared revenues are recognized when they are received, rather than earned. Expenditures are generally recognized when encumbered or reserved, rather than at the time the related liability is incurred. Unmatured interest for debt service is recognized when due and certain compensated absences and claims and judgments are recognized when the obligations are expected to be liquidated

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

**Summary of Significant Accounting Policies (continued)**

with expendable, available financial resources. Fiduciary type funds are accounted for using the regulatory basis of accounting. These practices differ from accounting principles generally accepted in the United States of America

General Fund – The general fund is used to account for all financial transactions except those required to be accounted for in another fund. Major revenue sources include local property taxes and federal and state funding. Expenditures include all costs associated with the daily operations of the schools, except for programs funded for building repairs and maintenance, school construction and debt service on bonds and other long-term debt. The general fund includes federal and state restricted monies that must be expended for specific programs.

Special Revenue Fund – The special revenue funds are used for proceeds of specific revenue sources that are legally restricted to expenditures for specified purposes.

Building Fund – The building fund consists mainly of monies derived from property taxes levied for the purpose of erecting, remodeling, repairing or maintaining school buildings and for purchasing furniture, equipment and computer software to be used on or for school property, for paying energy and utility costs, for purchasing telecommunications services, for paying fire and casualty insurance premiums for school facilities, for purchasing security systems, and for paying salaries of security personnel.

Co-op Fund – The co-op fund is established when the Boards of Education of two or more school districts enter into cooperative agreements and maintain joint programs.

Capital Projects Fund – The capital projects fund is the District's bond fund and is used to account for the proceeds of bond sales to be used exclusively for acquiring school sites, constructing and equipping new school facilities, renovating existing facilities, and acquiring transportation equipment.

Debt Service Fund – The debt service fund is the District's sinking fund and is used to account for the accumulation of financial resources for the payment of general long-term debt principal and interest. The primary revenue sources are local property taxes levied specifically for debt service and interest earnings from temporary investments.

**Fiduciary Funds**

Fiduciary funds are used to account for assets held on behalf of outside parties, including other governments or on behalf of other funds within the District. When these assets are held under the terms of a trust agreement, trust funds are used for their accounting and reporting. Agency funds generally are used to account for assets that the District holds on behalf of others as their agent and do not involve measurement of results of operations.

Agency Funds – The agency fund is the school activities fund, which is used to account for monies, collected principally through fundraising efforts of the students and District-sponsored groups. The administration is responsible, under the authority of the Board, for collecting, disbursing, and accounting for these activity funds.

Private- Purpose Trust Funds – Private-Purpose Trust Funds are used to report trust arrangements under which principal and income benefit individuals, private organizations, or other governments.

**Account Groups**

Account groups are not funds and consist of a self-balancing set of accounts used only to establish accounting control over long-term debt and general fixed assets.

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

**Summary of Significant Accounting Policies (continued)**

General Long-Term Debt Account Group – This account group was established to account for all long-term debt of the District, which is offset by the amount available in the debt service fund and the amount to be provided in future years to complete retirement of the debt principal.

General Fixed Asset Account Group – This account group is used to account for property, plant, and equipment of the school district. The District does not maintain the information necessary to include this group in its combined financial statements.

**C. Basis of Accounting and Presentation**

The District prepares its financial statements in a presentation format that is prescribed by the Oklahoma State Department of Education. This format is essentially the generally accepted form of presentation used by state and local governments prior to the effective date of GASB Statement No. 34, *Basic Financial Statements-Management's Discussion and Analysis-for State and Local Governments*. This format significantly differs from that required by GASB 34.

The basic financial statements are essentially prepared on a basis of cash receipts and disbursements modified as required by the regulations of the Oklahoma State Department of Education (OSDE) as follows:

- Encumbrances represented by purchase orders, contracts, and other commitments for the expenditure of monies and are recorded as expenditures when approved.
- Investments are recorded as assets when purchased.
- Warrants payable are recorded as liabilities when issued.
- Long-term debt is recorded when incurred.
- Compensated absences are recorded as an expenditure when the obligation is paid.
- Fixed assets are recorded in the General Fixed Asset Account Group. Fixed assets are not depreciated.

This regulatory 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 for governmental fund types; and, when revenues are earned.

**D. Budgets and Budgetary Accounting**

Prior to July 1 each year, the governing board of the school district prepares a verified application showing the needs of the school district and submits the application to the County Excise Board, who makes temporary appropriations for lawful current expenses of the school district. The temporary appropriations are merged with the annual appropriations when the annual budget for the school district is finally approved.

Prior to October 1 each year, the school Board of Education must make a financial statement, showing the true fiscal condition of the school as of the close of the previous fiscal year ended June 30, along with an itemized statement of estimated needs and probable income from all sources for the fiscal year.

A budget is legally adopted by the Board of Education for the general fund and special revenue fund(s) of the school district.

Encumbrances represent commitments to unperformed contracts for goods or services. Encumbrance accounting – under which purchase orders and other commitments of resources are recorded as expenditures of the applicable fund – is utilized in all governmental funds of the District. Under Oklahoma Law, unencumbered appropriations lapse at the end of the year.

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

**Summary of Significant Accounting Policies (continued)**

**E. Assets, Liabilities and Fund Equity**

**Memorandum Only – Total Column**

The total column on the general purpose financial statements is captioned “memorandum only” to indicate that it is presented only to facilitate financial analysis. Data in this column does not present financial position, results of operations or cash flows in conformity with generally accepted accounting principles. Neither is such data comparable to a consolidation. Interfund eliminations have not been made on the aggregation of this data.

**Cash** – Cash consists of currency and checks on hand, demand deposit accounts, with banks and other financial institutions.

**Investments** – State statutes govern the District's investment policy. Permissible investments include direct obligations of the United States Government and Agencies; certificates of deposit of savings and loan associations, and bank and trust companies; and savings accounts or savings certificates of savings and loan associations, and trust companies. Collateral is required for demand deposits and certificates of deposit for all amounts not covered by federal deposit insurance. Investments are stated at cost.

**Inventories** – Inventories consist of minimal amounts of expendable supplies held for consumption. The value of consumable inventories at year-end is not material to the District's financial statements. The costs of inventories are recorded as expenditures when encumbered and purchased, rather than when consumed.

**Compensated Absences** – Vested or accumulated vacation leave that is expected to be liquidated with expendable, available financial resources is reported as expenditure and a fund liability of the governmental fund that will pay it. There are no amounts of vested or accumulated vacation leave that are not expected to be liquidated with expendable, available financial resources.

No liability is recorded for non-vesting accumulating rights to receive such pay benefits.

**Fixed Assets** – The District has not maintained a record of its general fixed assets, and, accordingly, a General Fixed Asset Account Group is not included in the financial statements. General fixed assets purchased are recorded as expenditures in the various funds at the time of purchase.

**Long-Term Debt** – Long-term debt is recognized as a liability of a governmental fund when due or when resources have been accumulated in the debt service fund for payment early in the following year. For other long-term obligations, only that portion expected to be financed from expendable, available financial resources is reported as a fund liability of a governmental fund. The remaining portion of such obligations is reported in the general long-term debt account group.

**Cash Fund Balance** – Cash fund balance represents the funds not encumbered by purchase order, legal contracts, and outstanding warrants.

**F. Revenues, Expenses and Expenditures**

**Local Revenues** – Revenue from local sources is revenue produced within the school district, which includes ad valorem taxes. It is available for current educational expenses and for other purposes authorized by the school board.

The District is authorized by state law to levy property taxes, which consist of ad valorem taxes on real and personal property within the District. The county assessor, upon receipt of the certification of tax levies from the County Excise Board, extends the tax levies on the tax roll for submission to the county treasurer prior to October 1. The county treasurer must commence tax collection within fifteen days of receipt of the tax rolls. The first half of the tax is due prior to January 1. The second half is due prior to April 1.

If the first payment is not made timely, the entire tax becomes due and payable on January 2. Second half taxes become delinquent on April 1 of the year following the year of assessment. If taxes are delinquent and unpaid for a period of three years or more the real estate may be sold for such taxes.

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

**Summary of Significant Accounting Policies (continued)**

Intermediate Revenues – Revenue from intermediate sources is revenue from funds collected by an intermediate administrative unit or political sub-division, such as a county or municipality, and redistributed to the school district.

State Revenues – Revenue from state sources for current operations are primarily governed by the state aid formula under the provisions of Article XVIII, Title 70, Oklahoma Statutes. The State Board of Education administers the allocation of state aid funds to school districts based on information accumulated from the districts.

After review and verification of reports and supporting documentation, the State Department of Education may adjust subsequent fiscal period allocations of money for prior year errors disclosed by review. Normally, such adjustments are treated as reductions or additions of revenue of the year when the adjustment is made.

The District receives revenue from the state to administer certain categorical educational programs. State Board of Education rules require that revenue earmarked for these programs be expended only for the program for which the money is provided. These rules also require that the money not expended, as of the close of the fiscal year, be carried forward into the following year to be expended for the same categorical programs. The State Department of Education requires that categorical educational program revenues be accounted for in the general fund.

Federal Revenues – Revenue from Federal sources is money originating from the Federal government and made available to the school district either as direct grants or under various programs passed-through the State Department of Education and other State agencies.

The Federal government also makes payments to school districts whose revenues are adversely affected by the presence of Federal activities. Although these payments are made in consideration of lost property tax revenue, the Oklahoma State Department of Education advocates classifying such amounts as revenue from Federal sources.

Instruction Expenditures – Instruction expenditures include the activities dealing directly with the interaction between teachers and students. Teaching may be provided for students in a school classroom, in another location, such as a home or hospital, and in other learning situations, such as those involving co-curricular activities. It may also be provided through some other approved medium, such as television, radio, telephone and correspondence. Examples of expenditures that might be included here are the activities of teacher assistant of any type (clerks, graders, teaching machines, etc.), which assist in the instructional process. The activities of tutors, translators, and interpreters would be recorded here. Department chairpersons who teach for any portion of time are included here. Tuition/transfer fees paid to other LEAs would be included here.

Support Services Expenditures – Support services expenditures provide administrative, technical (such as guidance and health) and logistical support to facilitate and enhance instruction. These services exist as adjuncts for fulfilling the objective of instruction, community services and enterprise programs, rather than as entities within them.

Operation of Non-Instructional Services Expenditures – Activities concerned with providing non-instructional services to students, staff, and the community.

Facilities Acquisition and Construction Services Expenditures – Consist of activities involved with the acquisition of land and buildings; remodeling buildings; the construction of buildings and additions to buildings; initial installation or extension of service systems and other built-in equipment; and improvement to sites.

Other Outlays Expenditures – A number of outlays of governmental funds are not properly classified as expenditures, but still require budgetary or accounting control. These are classified as Other Outlays. These include debt service payments (principal and interest).

Other Uses Expenditures – This includes scholarships provided by private gifts and endowments; student aid and staff awards supported by outside revenue sources (i.e., foundations). Also, expenditures for self-funded employee benefit programs administered either by the District or a third party administrator.



**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

**Summary of Significant Accounting Policies (continued)**

Repayment Expenditures – Repayment expenditures represent checks/warrants issued to outside agencies for refund or restricted revenue previously received for overpayments, non-qualified expenditures, and other refunds to be repaid from District funds.

Interfund Transactions – Quasi-external transactions are accounted for as revenues, expenditures or expenses. Transactions that constitute reimbursements to a fund or expenditures/expenses initially made from it that are properly applicable to another fund, are recorded as expenditures/expenses in the fund that is reimbursed.

All other interfund transactions, except quasi-external transactions and reimbursements, are reported as transfers. Nonrecurring or nonroutine permanent transfers of equity are reported as residual equity transfers.

**Budgetary Information**

Under current Oklahoma Statutes, a formal Estimate of Needs (Budget) is required for all General and Special Revenue funds. Budgets are presented for all funds that include the originally approved budgeted appropriations for expenditures and final budgeted appropriations as adjusted for supplemental appropriations and approved transfers between budget categories. The annual Estimate of Needs, when approved by the Board and subsequently filed with the County Clerk and approved by the County Excise Board, becomes the legal budget. Supplemental appropriations, if required, were made during the year and are reflected on the budget vs. actual presentations shown included in supporting schedules.

**2. Deposit Categories of Credit Risk**

Collateral is required for demand deposits and certificates of deposit for all amounts not covered by federal deposit insurance. The District's investment policies are governed by state statute. Permissible investments include:

1. Direct obligations of the United States Government to the payment of which the full faith and credit of the government is pledged.
2. Obligations to the payment of which the full faith and credit of the state is pledged.
3. Certificates of deposits of banks when such certificates of deposits are secured by acceptable collateral as in the deposit of other public monies.
4. Savings accounts or savings certificates of savings and loan associations to the extent that such accounts or certificates are fully insured by the Federal Savings and Loan Insurance Corporation.
5. Repurchase agreements that have underlying collateral consisting of those items specified in paragraphs 1 and 2 of this section including obligations of the United States, its agencies and instrumentalities, and where collateral has been deposited with a trustee of custodian bank in an irrevocable trust or escrow account established for such purposes.
6. County, municipal or school district direct debt obligations for which an ad valorem tax may be levied or bond and revenue anticipation notes, money judgments against such county, municipality or school district ordered by a court of record or bonds or bond and revenue anticipation notes issued by a public trust for which such county, municipality or school district is a beneficiary thereof. All collateral pledged to secure public funds shall be valued at no more than market value.
7. Money market mutual funds regulated by the Securities and Exchange Commission and which investments consist of obligations of the United States, its agencies and instrumentalities, and investments in those items listed above.
8. Warrants, bonds or judgments of the school district.

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FOR THE YEAR ENDED JUNE 30, 2020**

**Deposit Categories of Credit Risk (continued)**

9. Qualified pooled investment programs, the investments of which consist of those items specified above, as well as obligations of the United States agencies and instrumentalities, regardless of the size of the district's budget. To be qualified, a pooled investment program for school funds must be governed through an Interlocal cooperative agreement formed pursuant to Title 70 Section 5-117b, and the program must competitively select its investment advisors and other professionals. Any pooled investment program must be approved by the Board of Education.

The District's investment policy instructs the treasurer to minimize risks by diversifying the investment portfolio; structuring investments so that securities mature in time to meet cash requirements; and by investing the full amount of all accounts of the District.

**Custodial Credit Risk:**

Deposits and Investments - The District's demand deposits are required by law to be collateralized by the amount that is not federally insured.

Securities pledged as collateral are held by a third party or Federal Reserve Bank. Joint custody safekeeping receipts are held in the name of the depositing institution, but are pledged to the District. The security cannot be released, substituted, or sold without the School Treasurer's approval and release of the security.

Certificates of deposit are collateralized at least by the amount not federally insured. As of June 30, 2020, the District had no deposits exposed to custodial credit risk.

The District's investments consist of direct obligations of the U.S. government and agencies' securities.

**Interest Rate Risk:**

Investments are made based upon prevailing market conditions at the time of the transaction with the intent to hold the instrument until maturity. However, the District has no formal written policy addressing interest rate risk.

**Credit Risk:**

The District has no formal written policy addressing credit risk.

At June 30, 2020, the District has no investments that are not guaranteed by the full faith and credit of the United States Government.

**3. General Long-Term Debt**

State statutes prohibit the District from becoming indebted in an amount exceeding the revenue to be received for any fiscal year without approval by the District's voters. Bond issues have been approved by the voters and issued by the District for various capital improvements. These bonds are required to be fully paid serially within 25 years from the date of issue.

General long-term debt of the District includes bonds payable and capital leases. Debt service requirements for bonds are payable solely from fund balance and future revenues of the debt service fund. Capital leases are paid from the District's Capital Projects Fund and General Fund.

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

**General Long-Term Debt (continued)**

A brief description of the outstanding general obligation bond issues at June 30, 2020, is set forth below:

	<u>Amount Outstanding</u>
School District No. I-18 Building Bonds, Series 2018, original issue \$555,000.00, interest rate of 3.45%, first and only installment of \$555,000.00 due on September 1, 2020.	\$ 555,000.00
School District No. I-18 Building Bonds, Series 2019, original issue \$555,000.00, interest rate of 2.00%, first and only installment of \$555,000.00 due on September 1, 2021.	\$ 555,000.00
Total Bonds Outstanding	\$ <u>1,110,000.00</u>

The annual debt service requirements for retirement of bond principal and payment of interest are as follows:

Year ending June 30,	Principal	Interest	Total
2021	\$ 555,000.00	\$ 26,223.75	\$ 581,223.75
2022	555,000.00	5,550.00	560,550.00
Total	\$ <u>1,110,000.00</u>	\$ <u>31,773.75</u>	\$ <u>1,141,773.75</u>

Interest expense incurred on general obligation bond debt during the current year totaled \$34,271.25.

**Lease-Purchase Agreement**

The School District's lease purchase agreements include construction of an elementary safe room, a high school safe room, and construct and equip a new middle school, in the amount of \$6,012,000.00 for a ten (10) year period beginning September 30, 2016 with an interest rate of 2.790% and LED lighting in the amount of \$56,855.000 with an interest rate of 4.09% entered into June 10, 2019. The following table is a schedule by years of future payments under these lease purchases.

Year ending June 30,	Principal	Interest	Total Requirements
2021	\$ 418,913.67	\$ 137,387.30	\$ 556,291.97
2022	431,963.29	125,627.95	557,591.24
2023	444,215.65	113,375.59	557,591.24
2024	445,678.94	100,914.40	546,593.34
2025	453,428.89	88,571.11	542,000.00
2026-2027	2,721,162.74	138,837.26	2,860,000.00
Total	\$ <u>4,915,363.18</u>	\$ <u>704,704.61</u>	\$ <u>5,620,067.79</u>

The above leases contain a clause that gives the District the ability to terminate the lease agreements at the end of each fiscal year. The District has recorded the liability for future lease payments in the General Long-Term Debt account group for these leased assets. The lease payments are appropriated annually from school district funds.

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

**General Long-Term Debt (continued)**

**Changes in Long-Term Debt**

The following is a summary of the long-term debt transactions of the District for the year ended June 30, 2020:

	Bonds Payable	Leases Payable	Total Payable
	<u>                    </u>	<u>                    </u>	<u>                    </u>
Balance, July 1, 2019	\$ 1,110,000.00	\$ 5,320,528.24	\$ 6,430,528.24
Additions	555,000.00	-	555,000.00
Retirements	<u>555,000.00</u>	<u>405,165.06</u>	<u>960,165.06</u>
Balance, June 30, 2020	\$ <u>1,110,000.00</u>	\$ <u>4,915,363.18</u>	\$ <u>6,025,363.18</u>

**4. Employee Retirement System**

**Description of Plan**

The District participates in the state-administrated Teacher's Retirement System of Oklahoma (the "system"), which is a cost-sharing multiple-employer public employee retirement system. The supervising authority for the management and operation of the System is a 13-member Board of Trustees, which acts as a fiduciary for investment of the funds and the application of plan interpretations. The System provides retirement and disability benefits, annual cost of living adjustments, death benefits and other benefits to plan members and beneficiaries. Oklahoma State Statutes establish benefit provisions and may be amended only through legislative action. The District has no responsibility or authority for the operation and administration of the system nor has it any liability, except for contribution requirements. The Oklahoma Teachers' Retirement System issues a publicly available financial report that includes financial statements and required supplementary information for the System. The report may be obtained by writing to the Oklahoma Teachers' Retirement System, P.O. Box 53624, Oklahoma City, Oklahoma 73152.

**Basis of Accounting**

The System has prepared its financial statements in accordance with accounting principles generally accepted in the United State of America and using the economic resources measurement focus. The financial statements are prepared using the accrual basis of accounting, under which expenses are recorded when the liability is incurred, revenues are recorded in the accounting period they are earned and become measurable, and investment purchase and sales are recorded as of their trade dates. Member and employer contributions are established by Oklahoma Statutes as percentage of salaries and are recognized when due, pursuant to legal requirements. Benefits and refunds are recognized when due and payable in accordance with the terms of the Oklahoma Statutes. Administrative expenses are funded through investment earnings.

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OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

**Employee Retirement System (continued)**

**Funding Policy**

The District, the State of Oklahoma, and the participating employee make contributions. The contribution rates for the District and its employees are established by and may be amended by Oklahoma Statutes. The rates are not actuarially determined. The rates are applied to the employee's earnings plus employer-paid fringe benefits. The required contribution for the participating members is 7.0% of compensation. The contribution rate for employers is 9.5%. Additionally, the State of Oklahoma contributes a percentage of its revenues from sales taxes, use taxes, corporate income taxes, individual income taxes, and lottery proceeds to the system. For the fiscal year ending June 30, 2020, the dedicated state revenue was equivalent to a contribution rate of approximately 7.0% of covered payroll. Finally, the Teacher's Retirement System receives "grant matching" contributions from employers for positions whose funding comes from federal and certain other grants. The matching contribution rate for FY 2020 is 7.7% of applicable payroll. The District is allowed by the Oklahoma Teacher's Retirement System to make the required contributions on behalf of participating members. The school is required to pay 16.5% for any compensated retired teachers already receiving retirement benefits.

**Annual Pension Cost**

The District's total contribution for 2020, 2019, and 2018 were \$771,054.27, \$744,287.29, and \$652,572.06, respectively. The District's total payroll for fiscal year 2019-20 amounted to \$4,510,707.85.

**5. Litigation**

The District is contingently liable for lawsuits and other claims in the ordinary course of its operations. The settlement of such contingencies under the budgetary process would require appropriation of revenues yet to be realized, and would not materially affect the financial position of the District at June 30, 2020.

**6. Risk Management**

The District is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; or acts of God. The District purchases commercial insurance to cover these risks including general and auto liability, property damage, and public officials liability. Settled claims resulting from these risks have not exceeded the commercial insurance coverage in any of the past three fiscal years.

The School also participates in a risk pool for Workers' Compensation coverage in which there is transfer or pooling of risks among the participants of that pool. In accordance with GASB No. 10, the School reports the required contribution to the pool, net of refunds, as insurance expense. The risk pool is the Oklahoma School Assurance Group (OSAG), an organization formed for the purpose of providing workers' compensation coverage to participating schools in the State of Oklahoma. In that capacity, OSAG is responsible for providing loss control services and certain fiscal activities, including obtaining contract arrangements for the underwriting, excess insurance agreements, claims processing, and legal defense for any and all claims submitted to them during the plan year. As a member of OSAG, the District is required to pay fees set by OSAG according to an established payment schedule. A portion of the fees paid by the

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

**Risk Management (continued)**

District goes into a loss fund for the District. The fee for the loss fund is calculated by projecting losses based on the schools losses for the last five years. OSAG provides coverage in excess of the Loss Fund, so the District's liability for claim loss is limited to the balance of the loss fund. If the District does not use their loss fund in three years, it is returned to them with no interest.

The District participates in the Oklahoma Public Schools Unemployment Compensation Account under the sponsorship of the Oklahoma State School Boards Association and the cooperative council for Oklahoma School Administration. The account was established to let school districts self-insure unemployment benefits for school employees. The funds are held in the name of each school district as reserves to pay unemployment claims. Each school district is individually liable for that portion of the benefits paid from the fund attributable to wages paid by the school district in the same manner as if no group account had been established. The reserve funds may be withdrawn from the account upon request of the school district. At June 30, 2020, the Commerce School District had reserves on deposit with the Oklahoma Public Schools Unemployment Compensation Accounting totaling \$10,856.23. This amount has not been included in the District's balance sheet at June 30, 2020.

**7. Surety Bonds**

The is Superintendent is bonded by Travelers Casualty and Surety Company, bond number 105321284, for the sum of \$100,000.00, for the term of July 1, 2019, to June 30, 2020.

The treasurer is bonded by Travelers Casualty and Surety Company, bond number 105530508, for the sum of \$75,000.00, for the term of December 1, 2019, to December 1, 2020.

The encumbrance/minutes clerk, assistant minutes clerk, activity fund custodian, co-activity fund custodian, and federal programs director are bonded by Travelers Casualty and Surety Company, bond number 105530508 for the sum of \$5,000.00, for the term of December 1, 2019, to December 1, 2020.

## **COMBINING FINANCIAL STATEMENTS**

**COMMERCE SCHOOL DISTRICT NO. I-18**  
**COMBINING STATEMENT OF ASSETS, LIABILITIES, AND FUND BALANCES**  
**ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS**  
**JUNE 30, 2020**

	<u>Building Fund</u>	<u>Coop Fund</u>	<u>Total</u>
<b><u>ASSETS:</u></b>			
Cash	\$ 407,302.28	\$ 7,335.23	\$ 414,637.51
Investments	<u>-</u>	<u>-</u>	<u>-</u>
<b>Total assets</b>	<u>\$ 407,302.28</u>	<u>\$ 7,335.23</u>	<u>\$ 414,637.51</u>
 <b><u>LIABILITIES AND FUND BALANCES:</u></b>			
<b>Liabilities:</b>			
Outstanding warrants	\$ 1,342.36	\$ 1,435.30	\$ 2,777.66
Encumbrances	<u>38,110.40</u>	<u>-</u>	<u>38,110.40</u>
<b>Total liabilities</b>	<u>\$ 39,452.76</u>	<u>\$ 1,435.30</u>	<u>\$ 40,888.06</u>
<b>Fund balances:</b>			
Cash fund balances	\$ 367,849.52	\$ 5,899.93	\$ 373,749.45
<b>Total fund balances</b>	<u>\$ 367,849.52</u>	<u>\$ 5,899.93</u>	<u>\$ 373,749.45</u>
 <b>Total liabilities and fund balances</b>	<u>\$ 407,302.28</u>	<u>\$ 7,335.23</u>	<u>\$ 414,637.51</u>



**COMMERCE SCHOOL DISTRICT NO. I-18**  
**COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID**  
**AND CHANGES IN FUND BALANCES**  
**ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2020**

	<u>Building Fund</u>	<u>Coop Fund</u>	<u>Total</u>
<b>Revenues collected:</b>			
Local sources	\$ 121,950.88	\$ -	\$ 121,950.88
Intermediate sources	-	-	-
State sources	-	-	-
Federal sources	-	16,845.42	16,845.42
Non-revenue source	-	-	-
<b>Total revenue collected</b>	<u>\$ 121,950.88</u>	<u>\$ 16,845.42</u>	<u>\$ 138,796.30</u>
<b>Expenditures paid:</b>			
Instruction	\$ -	\$ 11,760.88	\$ 11,760.88
Support services	201,981.28	-	201,981.28
Non-instructional services	-	-	-
Capital outlay	-	-	-
Other outlays	-	-	-
Other uses	-	-	-
Repayments	-	-	-
Debt service:			
Principal retirement	-	-	-
Interest	-	-	-
<b>Total expenditures paid</b>	<u>\$ 201,981.28</u>	<u>\$ 11,760.88</u>	<u>\$ 213,742.16</u>
Excess of revenues collected over (under) expenditures paid before adjustments to prior year encumbrances	<u>\$ (80,030.40)</u>	<u>\$ 5,084.54</u>	<u>\$ (74,945.86)</u>
<b>Adjustments to prior year encumbrances</b>	<u>\$ 285.00</u>	<u>\$ -</u>	<u>\$ 285.00</u>
<b>Other financing sources (uses):</b>			
Operating transfers in/(out)	\$ -	\$ -	\$ -
Bank charges	-	-	-
<b>Total other financing sources (uses)</b>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
Excess of revenues collected over (under) expenditures paid and other financing sources (uses)	<u>\$ (79,745.40)</u>	<u>\$ 5,084.54</u>	<u>\$ (74,660.86)</u>
<b>Fund balances, beginning of year</b>	<u>\$ 447,594.92</u>	<u>\$ 815.39</u>	<u>\$ 448,410.31</u>
<b>Fund balances, end of year</b>	<u><u>\$ 367,849.52</u></u>	<u><u>\$ 5,899.93</u></u>	<u><u>\$ 373,749.45</u></u>

**COMMERCE SCHOOL DISTRICT NO. I-18**  
**COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES**  
**CAPITAL PROJECT FUND - REGULATORY BASIS**  
**JUNE 30, 2020**

	<u>Bond Fund 31</u>	<u>Bond Fund 32</u>	<u>Bond Fund 33</u>	<u>Bond Fund 34</u>	<u>Total</u>
<b><u>ASSETS</u></b>					
<b>Assets:</b>					
Cash	\$ -	\$ -	\$ -	\$ 2,541.23	\$ 2,541.23
Investments	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
<b>Total assets</b>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 2,541.23</u>	<u>\$ 2,541.23</u>
<b><u>LIABILITIES AND FUND BALANCES</u></b>					
<b>Liabilities:</b>					
Outstanding warrants	\$ -	\$ -	\$ -	\$ -	\$ -
Encumbrances	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
<b>Total liabilities</b>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
<b>Fund balances:</b>					
Designated for capital projects	\$ -	\$ -	\$ -	\$ 2,541.23	\$ 2,541.23
Undesignated	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
<b>Total fund balances</b>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 2,541.23</u>	<u>\$ 2,541.23</u>
<b>Total liabilities and fund balances</b>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 2,541.23</u>	<u>\$ 2,541.23</u>

**COMMERCE SCHOOL DISTRICT NO. I-18  
COMBINING STATEMENT OF REVENUES, EXPENDITURES AND  
CHANGES IN FUND BALANCES  
CAPITAL PROJECT FUND - REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2020**

	<u>Bond Fund 31</u>	<u>Bond Fund 32</u>	<u>Bond Fund 33</u>	<u>Bond Fund 34</u>	<u>Total</u>
<b>Revenues collected:</b>					
Local sources	\$ -	\$ -	\$ -	\$ 496.14	\$ 496.14
Intermediate sources	-	-	-	-	-
State sources	-	-	-	-	-
Federal sources	-	-	-	-	-
Non-revenue sources	-	-	-	-	-
<b>Total revenues collected</b>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 496.14</u>	<u>\$ 496.14</u>
<b>Expenditures paid:</b>					
Instruction	\$ -	\$ -	\$ -	\$ -	\$ -
Support services	6,760.31	2,405.45	2,043.83	300.00	11,509.59
Non-instructional services	-	-	-	-	-
Capital outlays	-	-	-	11,654.91	11,654.91
Other outlays	-	-	-	-	-
Other uses	-	-	-	-	-
Repayments	-	-	-	-	-
Debt service:					
Principal retirement	-	-	-	395,143.52	395,143.52
Interest	-	-	-	145,856.48	145,856.48
<b>Total expenditures paid</b>	<u>\$ 6,760.31</u>	<u>\$ 2,405.45</u>	<u>\$ 2,043.83</u>	<u>\$ 552,954.91</u>	<u>\$ 564,164.50</u>
Excess of revenues collected over (under)					
expenditures	<u>\$ (6,760.31)</u>	<u>\$ (2,405.45)</u>	<u>\$ (2,043.83)</u>	<u>\$ (552,458.77)</u>	<u>\$ (563,668.36)</u>
<b>Adjustments to prior year encumbrances</b>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>
<b>Other financing sources (uses):</b>					
Bond sale proceeds	\$ -	\$ -	\$ -	\$ 555,000.00	\$ 555,000.00
Operating transfers in/(out)	-	-	-	-	-
Bank Fees	-	-	-	-	-
<b>Total other financing sources (uses)</b>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 555,000.00</u>	<u>\$ 555,000.00</u>
Excess of revenues collected over (under)					
expenditures and other financing sources (uses)	<u>\$ (6,760.31)</u>	<u>\$ (2,405.45)</u>	<u>\$ (2,043.83)</u>	<u>\$ 2,541.23</u>	<u>\$ (8,668.36)</u>
<b>Fund balances, beginning of year</b>	<u>\$ 6,760.31</u>	<u>\$ 2,405.45</u>	<u>\$ 2,043.83</u>	<u>\$ -</u>	<u>\$ 11,209.59</u>
<b>Fund balances, end of year</b>	<u><u>\$ -</u></u>	<u><u>\$ -</u></u>	<u><u>\$ -</u></u>	<u><u>\$ 2,541.23</u></u>	<u><u>\$ 2,541.23</u></u>

**COMMERCE SCHOOL DISTRICT NO. I-18**  
**COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES**  
**FIDUCIARY FUNDS - REGULATORY BASIS**  
**JUNE 30, 2020**

	<u>Private Purpose Trust Fund</u>	<u>Agency Fund</u>	
	<u>Scholarship Fund</u>	<u>Activity Fund</u>	<u>Total</u>
<b><u>ASSETS:</u></b>			
Cash	\$ 61,474.21	\$ 107,986.95	\$ 169,461.16
Investments	<u>-</u>	<u>72,000.00</u>	<u>72,000.00</u>
<b>Total assets</b>	<b><u>\$ 61,474.21</u></b>	<b><u>\$ 179,986.95</u></b>	<b><u>\$ 241,461.16</u></b>
<b><u>LIABILITIES AND FUND BALANCES:</u></b>			
<b>Liabilities:</b>			
Outstanding warrants	\$ -	\$ 25,802.41	\$ 25,802.41
Encumbrances	<u>-</u>	<u>-</u>	<u>-</u>
<b>Total liabilities</b>	<b><u>\$ -</u></b>	<b><u>\$ 25,802.41</u></b>	<b><u>\$ 25,802.41</u></b>
<b>Fund balances:</b>			
Cash fund balances	\$ 61,474.21	\$ 154,184.54	\$ 215,658.75
<b>Total fund balances</b>	<b><u>\$ 61,474.21</u></b>	<b><u>\$ 154,184.54</u></b>	<b><u>\$ 215,658.75</u></b>
<b>Total liabilities and fund balances</b>	<b><u>\$ 61,474.21</u></b>	<b><u>\$ 179,986.95</u></b>	<b><u>\$ 241,461.16</u></b>

**COMMERCE SCHOOL DISTRICT NO. I-18**  
**COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID,**  
**AND CHANGES IN FUND BALANCE**  
**FIDUCIARY FUND TYPE - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2020**

	<b>Private Purpose Trust Fund</b>
	<b>Scholarship Fund</b>
<b>Revenues Collected</b>	
Interest	\$ 1,876.61
Donation	-
Total	<u>1,876.61</u>
<b>Expenditures Paid</b>	
Scholarships	\$ <u>2,130.77</u>
Total	<u>2,130.77</u>
Excess of revenues collected over (under) expenses paid	\$ <u>(254.16)</u>
Other financing sources (uses):	
Bank charges	\$ <u>-</u>
Excess revenues and other sources over/(under) expenditures and other uses	\$ <u>(254.16)</u>
<b>Fund balance, beginning of year</b>	\$ <u>61,728.37</u>
<b>Fund balance, end of year</b>	\$ <u><u>61,474.21</u></u>

## **SUPPLEMENTAL INFORMATION**

**COMMERCE SCHOOL DISTRICT NO. I-18**  
**BUDGETARY COMPARISON SCHEDULE - REGULATORY BASIS**  
**SPECIAL REVENUE FUND**  
**FOR THE YEAR ENDED JUNE 30, 2020**

	<b>BUILDING FUND</b>			
	<b>Original Budget</b>	<b>Final Budget</b>	<b>Actual</b>	<b>Variance with Final Budget Favorable (Unfavorable)</b>
<b>Revenues collected:</b>				
Local sources	\$ 110,432.46	\$ 110,432.46	\$ 121,950.88	\$ 11,518.42
Intermediate sources	-	-	-	-
State sources	-	-	-	-
Federal sources	-	-	-	-
Non-Revenue sources	-	-	-	-
<b>Total revenues collected</b>	<b>\$ 110,432.46</b>	<b>\$ 110,432.46</b>	<b>\$ 121,950.88</b>	<b>\$ 11,518.42</b>
<b>Expenditures paid:</b>				
Instruction	\$ -	\$ -	\$ -	\$ -
Support services	558,027.38	558,027.38	201,981.28	356,046.10
Non-instructional services	-	-	-	-
Capital outlay	-	-	-	-
Other Outlays	-	-	-	-
Other Uses	-	-	-	-
Repayment	-	-	-	-
Debt service:				
Principal retirement	-	-	-	-
Interest	-	-	-	-
<b>Total expenditures</b>	<b>\$ 558,027.38</b>	<b>\$ 558,027.38</b>	<b>\$ 201,981.28</b>	<b>\$ 356,046.10</b>
Excess of revenues collected over (under) expenditures paid before adjustments to prior year encumbrances	<b>\$ (447,594.92)</b>	<b>\$ (447,594.92)</b>	<b>\$ (80,030.40)</b>	<b>\$ 367,564.52</b>
<b>Adjustments to prior year encumbrances</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 285.00</b>	<b>\$ 285.00</b>
<b>Other financing sources (uses):</b>				
Operating transfers in/out	\$ -	\$ -	\$ -	\$ -
Bank charges	-	-	-	-
<b>Total other financing sources (uses)</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
Excess of revenues collected over (under) expenditures paid and other financing sources (uses)	<b>\$ (447,594.92)</b>	<b>\$ (447,594.92)</b>	<b>\$ (79,745.40)</b>	<b>\$ 367,849.52</b>
<b>Fund balances, beginning of year</b>	<b>\$ 447,594.92</b>	<b>\$ 447,594.92</b>	<b>\$ 447,594.92</b>	<b>\$ -</b>
<b>Fund balance, end of year</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 367,849.52</b>	<b>\$ 367,849.52</b>

COMMERCE SCHOOL DISTRICT NO. 1-18  
BUDGETARY COMPARISON SCHEDULE - REGULATORY BASIS  
SPECIAL REVENUE FUND  
FOR THE YEAR ENDED JUNE 30, 2020

	COOP FUND			
	Original Budget	Final Budget	Actual	Variance with Final Budget Favorable (Unfavorable)
<b>Revenues collected:</b>				
Local sources	\$ -	\$ -	\$ -	\$ -
Intermediate sources	-	-	-	-
State sources	-	-	-	-
Federal sources	17,087.89	17,087.89	16,845.42	(242.47)
Non-revenue sources	-	-	-	-
<b>Total revenues collected</b>	<b>\$ 17,087.89</b>	<b>\$ 17,087.89</b>	<b>\$ 16,845.42</b>	<b>\$ (242.47)</b>
<b>Expenditures paid:</b>				
Instruction	\$ 17,903.28	\$ 17,903.28	\$ 11,760.88	\$ 6,142.40
Support services	-	-	-	-
Non-instructional services	-	-	-	-
Capital outlay	-	-	-	-
Other Outlays	-	-	-	-
Other Uses	-	-	-	-
Repayment	-	-	-	-
Debt service:				
Principal retirement	-	-	-	-
Interest	-	-	-	-
<b>Total expenditures</b>	<b>\$ 17,903.28</b>	<b>\$ 17,903.28</b>	<b>\$ 11,760.88</b>	<b>\$ 6,142.40</b>
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	\$ (815.39)	\$ (815.39)	\$ 5,084.54	\$ 5,899.93
<b>Adjustments to prior year encumbrances</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>Other financing sources (uses):</b>				
Operating transfers in/out	\$ -	\$ -	\$ -	\$ -
Bank charges	-	-	-	-
<b>Total other financing sources (uses)</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
Excess of revenues collected over (under) expenditures paid and other financing sources (uses)	\$ (815.39)	\$ (815.39)	\$ 5,084.54	\$ 5,899.93
<b>Fund balances, beginning of year</b>	<b>\$ 815.39</b>	<b>\$ 815.39</b>	<b>\$ 815.39</b>	<b>\$ -</b>
<b>Fund balance, end of year</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 5,899.93</b>	<b>\$ 5,899.93</b>



**COMMERCE SCHOOL DISTRICT NO. I-18  
SCHEDULE OF FEDERAL AWARDS EXPENDED  
FOR THE YEAR ENDED JUNE 30, 2020**

<u>Federal Grantor/Pass-Through Grantor/ Program Title</u>	<u>Federal CFDA #</u>	<u>Grantor's Number</u>	<u>Balance at July 1, 2019</u>	<u>Receipts</u>	<u>Transfer</u>	<u>Expenditures</u>	<u>Balance at June 30, 2020</u>
<b><u>U.S. Department of Education</u></b>							
<b>Direct Programs:</b>							
<b><u>2018-2019 Programs</u></b>							
Title VI Indian Education	84.060A	S060A180597	\$ (34,656.80)	\$ 34,656.80	\$ -	\$ -	\$ -
<b>Sub-Total</b>			<b>\$ (34,656.80)</b>	<b>\$ 34,656.80</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b><u>2019-2020 Programs</u></b>							
Title VI Indian Education	84.060A	S060A190597	\$ -	\$ 45,504.50	\$ -	\$ 60,172.70	\$ (14,668.20)
<b>Sub-Total</b>			<b>\$ -</b>	<b>\$ 45,504.50</b>	<b>\$ -</b>	<b>\$ 60,172.70</b>	<b>\$ (14,668.20)</b>
<b>Passed-Through State Department of Education</b>							
<b><u>2018-2019 Programs</u></b>							
Title I, Basic	84.010	N/A	\$ (67,162.59)	\$ 67,162.59	\$ -	\$ -	\$ -
Title II, Part A Training & Recruitment	84.367	N/A	(605.10)	605.10	-	-	-
Title IV, Student Support	84.424B	N/A	(336.58)	336.58	-	-	-
Title V, Part B, Rural & Low Income	84.358B	N/A	(14,588.59)	14,588.59	-	-	-
IDEA-B Flow Through	84.027	N/A	(50,357.08)	50,357.08	-	-	-
Title I, Migrant	84.011	N/A	(3,972.14)	3,972.14	-	-	-
Title III, Part A LEP	84.365	N/A	(4,870.51)	4,870.51	-	-	-
<b>Sub-Total</b>			<b>\$ (141,892.59)</b>	<b>\$ 141,892.59</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b><u>2019-2020 Programs</u></b>							
Title I, Basic	84.010	N/A	\$ -	\$ 200,948.34	\$ 17,797.20	\$ 272,046.26	\$ (53,300.72)
IDEA-B Flow Through	84.027	N/A	\$ -	\$ 156,968.24	\$ -	\$ 199,295.75	\$ (42,327.51)
Preschool	84.173	N/A	-	2,749.46	-	2,749.46	-
<b>Special Education Cluster Subtotal</b>			<b>\$ -</b>	<b>\$ 159,717.70</b>	<b>\$ -</b>	<b>\$ 202,045.21</b>	<b>\$ (42,327.51)</b>
Title I, Migrant	84.011	N/A	\$ -	\$ 11,546.97	\$ -	\$ 18,239.17	\$ (6,692.20)
Title II, Part A Training & Recruitment	84.367	N/A	-	16,652.71	(2,797.20)	21,797.47	(7,941.96)
* Title III, Part A LEP	84.365	N/A	-	11,974.91	-	11,974.91	-
* Education Stabilization Fund Under the Coronavirus Aid, Relief, and Economic Security Act	84.425D	N/A	-	-	-	5,645.85	(5,645.85)
21st Century	84.287	N/A	-	67,435.80	-	92,350.20	(24,914.40)
Title V, Rural and Low Income	84.358B	N/A	-	17,630.08	-	19,399.40	(1,769.32)
Title IV, Student Support - Note 6	84.424B	N/A	-	15,000.00	(15,000.00)	-	-
<b>Sub-Total Passed through State Department of Education</b>			<b>\$ (141,892.59)</b>	<b>\$ 642,799.10</b>	<b>\$ -</b>	<b>\$ 643,498.47</b>	<b>\$ (142,591.96)</b>

(continued)

See accompanying Notes to the Schedule of Expenditures of Federal Awards.

**COMMERCE SCHOOL DISTRICT NO. I-18  
SCHEDULE OF FEDERAL AWARDS EXPENDED  
FOR THE YEAR ENDED JUNE 30, 2020**

<b>Federal Grantor/Pass-Through Grantor/ Program Title</b>	<b>Federal CFDA #</b>	<b>Grantor's Number</b>	<b>Balance at July 1, 2019</b>	<b>Receipts</b>	<b>Transfer</b>	<b>Expenditures</b>	<b>Balance at June 30, 2020</b>
<b><u>U. S. Department of Agriculture</u></b>							
Passed-Through State Department of Education:							
* Child Nutrition Cluster:							
Non-Cash Assistance (Commodities):							
National School Lunch Program - Note 4	10.555	N/A	\$ -	\$ 35,790.65	\$ -	\$ 35,790.65	\$ -
Non-Cash Assistance Sub-Total			\$ -	\$ 35,790.65	\$ -	\$ 35,790.65	\$ -
Cash Assistance:							
National School Lunch Program	10.555	N/A	\$ -	\$ 289,837.75	\$ -	\$ 289,837.75	\$ -
National School Breakfast Program	10.553	N/A	-	111,024.92	-	111,024.92	-
Cash Assistance Sub- Total			\$ -	\$ 400,862.67	\$ -	\$ 400,862.67	\$ -
<b>Sub- Total for Child Nutrition Cluster</b>			\$ -	\$ 436,653.32	\$ -	\$ 436,653.32	\$ -
* Fresh Fruits and Vegetables	10.582	N/A	\$ (2,843.40)	\$ 31,957.55	\$ -	\$ 30,923.39	\$ (1,809.24)
<b>Sub-total Passed-Through State Department of Education</b>			\$ (2,843.40)	\$ 468,610.87	\$ -	\$ 467,576.71	\$ (1,809.24)
<b><u>U. S. Department of Health and Human Services</u></b>							
Passed-Through Oklahoma Health Care Authority:							
Medicaid Assistance Program	93.778	N/A	\$ -	\$ 32,345.86	\$ -	\$ 11,900.20	\$ 20,445.66
<b>Sub-Total</b>			\$ -	\$ 32,345.86	\$ -	\$ 11,900.20	\$ 20,445.66
<b><u>U.S. Department of Interior</u></b>							
Passed-Through Bureau of Indian Education							
<u>2019-2020 Programs</u>							
JOM	15.130	A16AV00537	\$ (5,706.30)	\$ 5,706.30	\$ -	\$ -	\$ -
<b>Sub-Total</b>			\$ (5,706.30)	\$ 5,706.30	\$ -	\$ -	\$ -
<u>2019-2020 Programs</u>							
JOM	15.130	A19V00646	\$ -	\$ 14,067.70	\$ -	\$ 3,936.84	\$ 10,130.86
<b>Sub-Total</b>			\$ (5,706.30)	\$ 19,774.00	\$ -	\$ 3,936.84	\$ 10,130.86
<b><u>Other Federal Assistance</u></b>							
Passed-Through Ottawa County							
<u>2019-2020 Programs</u>							
In Lieu Public Housing	15.226	N/A	\$ 136.80	\$ 21.60	\$ -	\$ -	\$ 158.40
<b>Sub-Total</b>			\$ 136.80	\$ 21.60	\$ -	\$ -	\$ 158.40
<b>TOTAL FEDERAL ASSISTANCE</b>			\$ (184,962.29)	\$ 1,243,712.73	\$ -	\$ 1,187,084.92	\$ (128,334.48)

\* Major Program

See accompanying Notes to the Schedule of Expenditures of Federal Awards.

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FOR THE YEAR ENDED JUNE 30, 2020**

1. For all federal programs, the District uses the fund types prescribed by the Oklahoma State Department of Education and conforms to the system of accounting authorized by the State of Oklahoma. The General Fund is used to account for resources restricted, or designated for, specific purposes by a grantor. Federal and state financial assistance generally is accounted for in the General Fund.
2. The accounting and financial reporting treatment applied to a fund is determined by its' measurement focus. The Governmental Fund types are accounted for using a current financial measurement focus. All federal grant funds were accounted for in the General Fund. With this measurement focus, only current assets and current liabilities and the fund balance are included on the balance sheet. Operating statements of these funds present increases and decreases in net current assets.

The Regulatory Basis of Accounting is used for the Governmental Fund types and Agency funds. This basis of accounting recognizes revenue from all sources when they are received. Federal grant funds are considered to be recognized when encumbered or reserved to the extent of expenditures made under the provisions of the grant.

3. Positive amounts listed in the either "Balance at July 1, 2019" or "Balance at June 30, 2020" column represent funds received by the school and not yet expended or coded to the program. Negative amounts represent expenditures which have been claimed, but the revenue not yet collected.
4. The District received donated foods through the Federal Food Distribution Program (10.555). At June 30, 2020, the school maintained an immaterial amount of food commodities inventory. Per the Regulatory Basis of Accounting, the commodities received and used are not recognized as revenue or expenditures in the school's Financial Statements.
5. The District has not elected to use the 10% de minimus indirect cost rate allowed under the Uniform Guidance.
6. The District transferred \$15,000.00 from Title IV and \$2,797.20 from Title II, A into Title I. Expenditures were coded in Title I and revenue was received in Title IV and Title II, A respectively.
7. Reconciliation of the Revenue shown on the *Schedule of Expenditures of Federal Awards* to Statement of Revenue, Expenditures and Changes in Fund Balance is as follows:

		Revenue
Schedule of Expenditures of Federal Awards	\$	1,243,712.73
Less Commodities		<u>(35,790.65)</u>
Total per Schedule of Expenditures of Federal Awards		
Reconciled Balance	\$	<u><u>1,207,922.08</u></u>
Federal Program Revenues:		
General Fund	\$	1,191,076.66
Coop		<u>16,845.42</u>
Total per Federal Statement of Revenue, Expenditures, And Changes in Fund Balance	\$	<u><u>1,207,922.08</u></u>

**COMMERCE SCHOOL DISTRICT NO. I-18**  
**SCHOOL ACTIVITY FUND**  
**RECEIPTS, TRANSFERS, DISBURSEMENTS AND SUB-ACCOUNT BALANCES**  
**FOR THE YEAR ENDED JUNE 30, 2020**

Activities	Balance 7-1-19	Deposited	Net Transfers/ Adjustments	Disbursed	Balance 6-30-20
Football Booster	\$ 1,848.80	\$ 3,419.97	\$ -	\$ 4,261.02	\$ 1,007.75
AES Parent Faculty Club	12,862.34	9,447.00	-	12,963.64	9,345.70
General Fund	2,156.79	5,293.30	80.49	1,355.06	6,175.52
Elementary Kindergarten	1,427.82	3,266.45	-	2,764.34	1,929.93
AES Library	821.17	7,339.80	-	7,122.36	1,038.61
Elem. Principal	8,791.67	3,881.39	-	5,524.83	7,148.23
AES Phys Ed	2,773.25	741.85	-	717.18	2,797.92
AES Miscellaneous	1,072.08	-	-	-	1,072.08
21st CCLC	115.20	-	-	-	115.20
MS Snack Program	930.49	406.34	-	256.49	1,080.34
Alexander Grant	18.71	-	-	-	18.71
C.M.S. Basketball Boosters	1.83	-	-	-	1.83
N.J.H.S.	195.00	190.00	-	385.00	-
Chromebood Maint. Fees	3,823.10	11,090.00	-	6,332.10	8,581.00
Ping Pong Club	118.85	-	-	-	118.85
CHS Key Club	15.65	-	-	-	15.65
M.S. Cheerleader	1,658.89	1,125.94	-	2,255.00	529.83
M.S. Cheerleader Booster	13.20	-	-	-	13.20
M.S. Library	339.22	210.09	-	192.69	356.62
M.S. SADD	7.92	-	-	-	7.92
M.S. Science Club	1,762.17	2,955.00	-	1,630.75	3,086.42
M.S. Stuco	1,620.87	266.64	-	702.88	1,184.63
TSA Club	2,841.59	9,419.20	(10.00)	6,863.64	5,387.15
TSA Booster Club	434.96	-	-	-	434.96
M.S. Principal	2,041.20	3,004.39	-	3,829.57	1,216.02
Annual	6,295.98	4,975.93	-	4,474.35	6,797.56
Soccer	494.23	3,233.00	-	3,179.53	547.70
Soccer Booster Club	717.34	380.00	-	490.25	607.09
H.S. Academic Team	155.00	-	(20.00)	130.00	5.00
High School Art	94.29	740.00	-	608.72	225.57
Art Club	261.83	313.00	(20.00)	91.78	463.05
Middle School Art	462.61	475.00	-	684.71	252.90
Guitar Club	751.00	200.00	-	375.59	575.41
Mickey Mantle Tournament	14,264.89	10,875.00	-	7,891.06	17,248.83
Boys & Girls Track	248.87	3,845.00	-	2,161.27	1,932.60

(continued)

**COMMERCE SCHOOL DISTRICT NO. I-18**  
**SCHOOL ACTIVITY FUND**  
**RECEIPTS, TRANSFERS, DISBURSEMENTS AND SUB-ACCOUNT BALANCES**  
**FOR THE YEAR ENDED JUNE 30, 2020**

Activities	Balance 7-1-19	Deposited	Net Transfers/ Adjustments	Disbursed	Balance 6-30-20
H.S. Athletics/Gate/Office	1,750.65	38,662.80	(86.00)	33,196.32	7,131.13
Athletics-Concession	4,588.93	25,612.81	-	22,242.13	7,959.61
Boys Basketball	3,257.50	3,961.00	(360.00)	4,612.55	2,245.95
Softball	2,468.39	4,313.00	-	4,628.05	2,153.34
Football Booster	1,884.78	6,260.00	-	7,713.91	430.87
Girls Basketball	354.93	8,393.05	360.00	7,709.73	1,398.25
Baseball	1,420.76	-	-	594.25	826.51
Lady Tigers BB Booster	-	1,038.00	21.00	176.19	882.81
Band	4,567.62	6,258.95	(20.00)	3,945.00	6,861.57
Choir/ AES Music	1,965.89	546.00	(10.00)	570.52	1,931.37
Band Boosters	157.87	252.00	-	-	409.87
Baseball Booster Club	4,743.07	1,010.00	-	3,329.31	2,423.76
Banquet Account	426.93	420.00	-	420.00	426.93
H.S. Cheerleaders	1,238.16	4,451.97	-	3,241.55	2,448.58
H.S. Cheerleaders Booster	3,213.37	18,641.00	-	17,304.77	4,549.60
Girls Softball Booster Club	4,320.39	7,685.00	-	5,975.47	6,029.92
Drama/Speech	734.45	-	-	-	734.45
Boys Basketball Booster	42.00	715.00	(21.00)	579.00	157.00
F.C.C.L.A.	6,056.47	19,244.60	-	18,148.20	7,152.87
FCA	312.50	1,450.00	(20.00)	1,360.00	382.50
Foreign Language	150.94	2,325.35	(10.00)	1,683.91	782.38
Jr Parents After Prom	159.30	10,230.60	-	8,750.61	1,639.29
H.S. Library	712.28	-	-	-	712.28
N.H.S.	22.51	2,033.25	(405.00)	1,444.10	206.66
H.S. Principal	6,236.22	371.02	385.00	1,493.13	5,499.11
H.S. SADD	103.24	16.00	(20.00)	-	99.24
Class of 2021	-	30.00	3,030.00	1,155.30	1,904.70
H.S. Science Club	886.04	624.00	(10.00)	550.00	950.04
Class of 2022	144.83	107.00	-	110.75	141.08
Class of 2020	1,465.94	800.00	(40.00)	2,047.25	178.69
Class of 2019	80.49	-	(80.49)	-	-
Native American Club	-	63.00	(20.00)	-	43.00
H.S. Stuco	2,931.30	1,073.59	306.00	1,246.42	3,064.47
CHS Special Education	236.00	-	-	-	236.00
H.S. Miscellaneous	870.93	3,030.00	(3,030.00)	-	870.93
Total Activites	\$ 128,943.49	\$ 256,713.28	\$ -	\$ 231,472.23	\$ 154,184.54

**REPORTS REQUIRED BY *GOVERNMENT AUDITING STANDARDS***

# KERRY JOHN PATTEN, C.P.A.

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Broken Arrow, OK 74012  
Phone Number (918) 250-8838  
FAX Number (918) 250-9853



## 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 Education  
Commerce School District No. I-18  
Ottawa County, Oklahoma

I have audited, 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, the accompanying fund type and account group financial statements-regulatory basis, within the combined financial statements of Commerce School District No. I-18, Ottawa County, Oklahoma (District), as listed in the Table of Contents, as of and for the year ended June 30, 2020, and the related notes to the financial statements, which collectively comprise the District's financial statements, and have issued my report thereon dated March 3, 2021, which was adverse with respect to the presentation of the financial statements in conformity with accounting principles generally accepted in the United States of America because the presentation followed the regulatory basis of accounting for Oklahoma school districts and did not conform to the presentation requirements of the Governmental Accounting Standards Board. However, my report was qualified for the omission of the general fixed asset account group with respect to the presentation of financial statements on the regulatory basis of accounting authorized by the Oklahoma State Board of Education.

### Internal Control over Financial Reporting

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

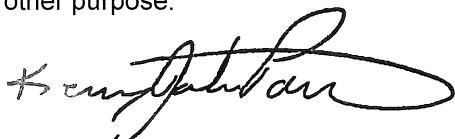
My consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during my audit I did not identify any deficiencies in internal control that I 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 the District's financial statements are free of material misstatement, I 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 my audit, and accordingly, I do not express such an opinion. The results of my tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*. I noted certain immaterial instances of noncompliance that I have reported to management in the "Schedule of Comments" on page 36 of this report.

### Purpose of this Report

This report is solely to describe the scope of my 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.

A handwritten signature in black ink, appearing to read "Kerry John Patten", with a stylized, flowing script.

Kerry John Patten, C.P.A.  
Broken Arrow, OK  
March 3, 2021



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## INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR FEDERAL PROGRAM; REPORT ON INTERNAL CONTROL OVER COMPLIANCE; AND REPORT ON THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS REQUIRED BY THE UNIFORM GUIDANCE

The Honorable Board of Education  
Commerce School District No. I-18  
Ottawa County, Oklahoma

### Report on Compliance for Each Major Federal Program

I have audited the compliance of Commerce School District No. I-18, Ottawa County, Oklahoma (District's) compliance with the types of compliance requirements described in the *OMB Uniform Guidance* that could have a direct and material effect on each of the District's major federal programs for the year ended June 30, 2020. The District's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

### Management's Responsibility

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

### Auditor's Responsibility

My responsibility is to express an opinion on compliance for each of the District's major federal programs based on my audit of the types of compliance requirements referred to above. I conducted my audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits continued in *Government Auditing Standards*, issued by the comptroller general of the United States, and the audit requirements of Title 2 U.S. *Code of Federal Regulations* (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and Uniform Guidance require that I 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 program occurred. An audit includes examining on a test basis, evidence about the District's compliance with those requirements and performing such other procedures as I consider necessary in the circumstances.

I believe that my audit provides a reasonable basis for my opinion on compliance for each major federal program. However, my audit does not provide a legal determination of the District's compliance.

### Opinion on Each Major Federal Program

In my opinion, Commerce School District, No. I-18, Ottawa County, Oklahoma, complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2020.

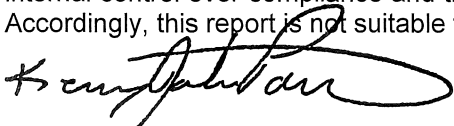
## Report on Internal Control Over Compliance

Management of Commerce School District No. I-18, Ottawa County, Oklahoma (District), is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing my audit of compliance, I considered the District's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with Uniform Guidance, but not for the purpose of expressing an opinion on effectiveness of internal control over compliance. Accordingly, I do not express an opinion on the effectiveness of the District's internal control over compliance.

*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. A significant deficiency in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

My consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. I did not identify any deficiencies in internal control over compliance that I considered to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of my testing of internal control over compliance and the results of that testing based on the requirements of Uniform Guidance. Accordingly, this report is not suitable for any other purpose.



Kerry John Patten, C.P.A.  
Broken Arrow, Oklahoma  
March 3, 2021

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
FOR THE YEAR ENDED JUNE 30, 2020**

**A. SUMMARY OF AUDIT RESULTS**

1. The auditor's report expresses an adverse opinion on the combined financial statements in conformity with generally accepted accounting principles and a qualified opinion for the omission of the general fixed asset account group on the combined financial statements in conformity with the regulatory basis of accounting prescribed by the Oklahoma Department of Education.
2. There were no audit findings reported of deficiencies in internal control, which the auditor considers to be "significant deficiency" as defined in A.I.C.P.A. standards.
3. No instances of noncompliance material to the financial statements of Commerce School District which would be required to be reported in accordance with Government Auditing Standards were disclosed during the audit.
4. There were no audit findings reported of deficiencies in internal control over major programs, which the auditor considers to be "significant deficiency" as defined by A.I.C.P.A. standards.
5. The auditor's report on compliance for the major federal award programs for Commerce School District expresses an unmodified opinion on all major programs.
6. There were no audit findings that are required to be reported in accordance with OMB Uniform Guidance, relative to major federal award programs for Commerce School District.
7. The programs tested as major programs included: Child Nutrition Cluster (10.553 & 10.555), Fresh Fruits and Vegetable Program (10.582), Title III, Part A LEP (84.365) and the Education Stabilization Fund Under the Coronavirus Aid, Relief, and Economic Security Act (84.425D).
8. A threshold for distinguishing Types A and B programs was \$750,000.00.
9. Commerce School District did not qualify to be a low-risk auditee.

**B. FINDINGS – FINANCIAL STATEMENTS AUDIT**

1. No matters were reported.

**C. FINDINGS AND QUESTIONED COSTS – MAJOR FEDERAL AWARD PROGRAMS AUDIT**

1. No matters were reported.

**COMMERCE SCHOOL DISTRICT NO. 1-18  
OTTAWA COUNTY, OKLAHOMA  
SUMMARY OF PRIOR AUDIT FINDINGS  
JULY 1, 2019 TO JUNE 30, 2020**

The summary of prior audit findings is required to report the status of all audit findings reported in the prior audit's schedule of findings and questioned costs relative to federal awards.

The school district had no prior year audit findings relative to federal award programs.

**COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
SCHEDULE OF COMMENTS  
JULY 1, 2019 TO JUNE 30, 2020**

The following conditions represent areas noted during my review of the school's accounting system in which I feel improvements in the internal control and/or operational efficiency may be attained. I have also noted, as required, any noncompliance with State Department of Education Regulations.

- \*I. **Condition:** Approximately 62% of Activity Fund source receipts tested had not been deposited with the Activity Fund Custodian in a timely manner. All untimely deposits were over \$100.00.

**Recommendation:** State law requires Activity Fund monies to be deposited daily if amounts are at least \$100.00 or weekly if amounts are less than \$100.00. When sponsors hold funds overnight or longer, it increases the opportunity for lost or stolen funds. We recommend that all Activity Funds collected each day should be turned into the Activity Fund custodian for immediate deposit.

Previous Year's Audit Comments

Excluding condition marked with an asterisk, there are no other items in the 2018-19 audit report, which have been repeated in this report.

I would like to express my appreciation for the courtesies and cooperation extended to us by school district administrators and employees during the course of this audit.

COMMERCE SCHOOL DISTRICT NO. I-18  
OTTAWA COUNTY, OKLAHOMA  
SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT  
JULY 1, 2019 TO JUNE 30, 2020

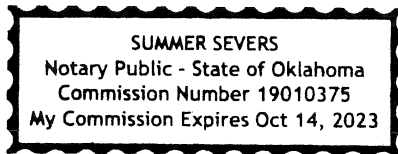
State of Oklahoma )  
County of Tulsa )

The undersigned auditing firm of lawful age, being first duly sworn on oath, says that said firm had in full force and effect Accountant's Professional Liability Insurance in accordance with the "Oklahoma Public School Audit Law" at the time of audit contract and during the entire audit engagement with Commerce School District for the audit year 2019-20.

Kerry John Patten, C.P.A.  
AUDITING FIRM

BY

  
AUTHORIZED AGENT



Subscribed and sworn to before me on this

3rd day of March, 2021

  
NOTARY PUBLIC

My commission expires on:

14th day of October, 2023