

**FINANCIAL STATEMENTS - REGULATORY BASIS
AND REPORTS OF INDEPENDENT AUDITOR**

**DAVIDSON SCHOOL DISTRICT NO. C-9,
Tillman County, Oklahoma**

JUNE 30, 2020

Audited by

**WILSON, DOTSON & ASSOCIATES, P.L.L.C.
SHAWNEE, OK**

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**SCHOOL DISTRICT OFFICIALS
JUNE 30, 2020**

BOARD OF EDUCATION

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Vice-President	Gabby Minor
Clerk	Alan Hill

MINUTES CLERK

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SCHOOL DISTRICT TREASURER

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**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**TABLE OF CONTENTS
JUNE 30, 2020**

	<u>Page No.</u>
SCHOOL DISTRICT OFFICIALS	2
TABLE OF CONTENTS	3
INDEPENDENT AUDITOR'S REPORT	4-6
<u>COMBINED FINANCIAL STATEMENTS</u>	
Combined Statement of Assets, Liabilities, and Fund Balances – Regulatory Basis – All Fund Types	7
Combined Statement of Revenues Collected, Expenditures, and Changes in Fund Balances – Regulatory Basis – All Governmental Fund Types	8
Combined Statement of Revenues Collected, Expenditures, and Changes in Fund Balances – Budget and Actual – Regulatory Basis – Budgeted Governmental Fund Types	9-10
Notes to Combined Financial Statements	11-25
<u>OTHER SUPPLEMENTARY INFORMATION:</u>	
<u>Combining Financial Statements</u>	
Combining Statement of Assets and Liabilities – Regulatory Basis – All Fiduciary Fund Types	26
Combining Statement of Changes in Assets and Liabilities – Regulatory Basis - Agency Funds	27
<u>Supporting Schedules</u>	
Schedule of Expenditures of Federal Awards – Regulatory Basis	28-29
<u>INTERNAL CONTROL AND COMPLIANCE REPORTS</u>	
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 <i>Government Auditing Standards</i>	30-31
<u>SCHEDULE OF FINDINGS AND RESPONSES</u>	
Findings Related to Financial Reporting	32
Summary Schedule of Prior Year Audit Findings	33
<u>SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT</u>	34

WILSON, DOTSON & ASSOCIATES, P.L.L.C.

Certified Public Accountants

Members

American Institute of Certified Public Accountants

Oklahoma Society of Certified Public Accountants

INDEPENDENT AUDITOR'S REPORT

The Honorable Board of Education
Davidson School District No. C-009
Tillman County, Oklahoma

Report on the Financial Statements

We have audited the accompanying combined fund type financial statements – regulatory basis of the Davidson School District No. C-9, Tillman County, Oklahoma (District), 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 the 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

Our responsibility is to express opinions on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free 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 the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

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

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

As discussed in Note 1, the financial statements are prepared by the District on the basis of the financial reporting provisions of the Oklahoma State Department of Education, which is a basis of accounting other than accounting principles generally accepted in the United States of America, to meet the 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 and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material.

Adverse Opinion on U.S. Generally Accepted Accounting Principles

In our opinion, because of the significance of the matter discussed in the “Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles” paragraph, the financial 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 the District as of June 30, 2020, or the changes in its financial position, or, where applicable, its cash flows for the year then ended.

Basis for Qualified Opinion on Regulatory Basis of Accounting

The financial statements referred to above do not include the general fixed asset account group, which is a departure from the regulatory basis of accounting prescribed 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 our 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 balance arising from regulatory basis transactions of each fund type and account group of the District as of June 30, 2020, and the revenues collected, expenditures paid and encumbered, and budgetary results for the year ended on the regulatory basis of accounting described in Note 1.

Other Matters

Other Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the District’s basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis in the format 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 not a required part of the basic financial statements, nor was a separate report issued for federal financial assistance, since the required threshold of \$750,000 or more in federal expenditures was not reached.

The schedule of expenditures of federal awards is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements

themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated, in all material respects, in relation to the basic financial statements as a whole on the from regulatory basis of accounting described in Note 1.

Other Reporting Required by *Government Auditing Standards*

In accordance with *Government Auditing Standards*, we have also issued our report dated April 24, 2021, on our consideration of the District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the District's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the District's internal control over financial reporting and compliance.

Wilson, Dotson & Associates

Wilson, Dotson & Associates, PLLC

Shawnee, Oklahoma

April 24, 2021

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES - REGULATORY BASIS
ALL FUND TYPES AND ACCOUNT GROUPS
JUNE 30, 2020**

	<u>GOVERNMENTAL FUND TYPES</u>		<u>FIDUCIARY FUND TYPES</u>	<u>TOTALS (MEMORANDUM ONLY)</u>
	<u>GENERAL</u>	<u>SPECIAL REVENUE BUILDING</u>	<u>AGENCY FUNDS</u>	
<u>ASSETS</u>				
Cash	\$ 42,639	2,414	7,019	52,072
<u>LIABILITIES AND FUND BALANCES</u>				
Liabilities				
Warrants payable	\$ 45,405	2,281	-	47,686
Funds held for school organizations	-	-	7,019	7,019
Total liabilities	45,405	2,281	7,019	54,705
Fund Balances				
Restricted	-	133	-	133
Unassigned	(2,766)	-	-	(2,766)
Total fund balances (deficit)	(2,766)	133	-	(2,633)
 Total Liabilities and Fund Balances	\$ 42,639	2,414	7,019	52,072

The notes to the combined financial statements - regulatory basis are an integral part of this statement.

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

**COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES
AND CHANGES IN FUND BALANCES - REGULATORY BASIS - ALL GOVERNMENTAL FUND TYPES
FOR THE YEAR ENDED JUNE 30, 2020**

	GOVERNMENTAL FUND TYPES		
	GENERAL	SPECIAL REVENUE BUILDING	TOTALS (MEMORANDUM ONLY)
Revenues collected:			
Local sources	\$ 191,493	25,351	216,844
Intermediate sources	5,500	-	5,500
State sources	172,260	-	172,260
Federal sources	101,712	-	101,712
Non-revenue receipts	150	-	150
Total revenues collected	471,115	25,351	496,466
Expenditures:			
Instruction	264,727	-	264,727
Support services	129,645	38,002	167,647
Operation of non-instructional services	87,653	-	87,653
Other outlays	400	-	400
Total expenditures	482,425	38,002	520,427
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances	(11,310)	(12,651)	(23,961)
Adjustments to prior year encumbrances	905	-	905
Excess of revenues collected over (under) expenditures	(10,405)	(12,651)	(23,056)
Fund balances, beginning of year	7,639	12,784	20,423
Fund balances (deficit), end of year	\$ (2,766)	133	(2,633)

The notes to the combined financial statements - regulatory basis are an integral part of this statement.

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

**COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES
AND CHANGES IN FUND BALANCES - BUDGET AND ACTUAL -
REGULATORY BASIS - GOVERNMENTAL FUND TYPES
FOR THE YEAR ENDED JUNE 30, 2020**

	GENERAL FUND			VARIANCE WITH FINAL BUDGET FAVORABLE (UNFAVORABLE)
	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL	
Revenues collected:				
Local sources	\$ 165,269	178,912	191,493	12,581
Intermediate sources	5,092	5,092	5,500	408
State sources	159,757	159,757	172,260	12,503
Federal sources	68,614	150,305	101,712	(48,593)
Non-revenue receipts	-	-	150	150
Total revenues collected	<u>398,732</u>	<u>494,066</u>	<u>471,115</u>	<u>(22,951)</u>
Expenditures:				
Instruction	-	264,727	264,727	-
Support services	-	129,645	129,645	-
Operation of non-instructional services	-	87,653	87,653	-
Other outlays	-	400	400	-
Unbudgeted	406,371	19,280	-	19,280
Total expenditures	<u>406,371</u>	<u>501,705</u>	<u>482,425</u>	<u>19,280</u>
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances	(7,639)	(7,639)	(11,310)	(3,671)
Adjustments to prior year encumbrances	-	-	905	905
Excess of revenues collected over (under) expenditures	(7,639)	(7,639)	(10,405)	(2,766)
Fund balance, beginning of year	<u>7,639</u>	<u>7,639</u>	<u>7,639</u>	-
Fund balance (deficit), end of year	<u>\$ -</u>	<u>-</u>	<u>(2,766)</u>	<u>(2,766)</u>

The notes to the combined financial statements - regulatory basis are an integral part of this statement.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES
AND CHANGES IN FUND BALANCES - BUDGET AND ACTUAL -
REGULATORY BASIS - GOVERNMENTAL FUND TYPES
FOR THE YEAR ENDED JUNE 30, 2020**

	SPECIAL REVENUE FUND			VARIANCE WITH FINAL BUDGET FAVORABLE (UNFAVORABLE)
	BUILDING			
	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL	
Revenues collected:				
Local sources	\$ 23,371	23,371	25,351	1,980
Expenditures:				
Support services	-	36,155	38,002	(1,847)
Unbudgeted	36,155	-	-	-
Total expenditures	36,155	36,155	38,002	(1,847)
Excess of revenues collected over (under) expenditures	(12,784)	(12,784)	(12,651)	133
Fund balance, beginning of year	12,784	12,784	12,784	-
Fund balance, end of year	\$ -	-	133	133

The notes to the combined financial statements - regulatory basis are an integral part of this statement.

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The accompanying financial statements of the Davidson School District Number C-9, Tillman County, Oklahoma (the "District") conform to the regulatory basis of accounting, which is an other 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 state of Oklahoma support. 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 (Board) composed of three 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 evaluation 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. The District has various supporting groups. However, the District does not appoint any of the board members or exercise any oversight authority over these groups and the dollar amounts are not material to the District.

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

B. Measurement Focus

The accounts of the District are organized and operate on the basis of funds. A fund is an independent fiscal accounting entity with a self-balancing set of accounts. Fund accounting segregates funds according to their intended purpose and is used to aid management in demonstrating compliance with finance-related legal and contractual provisions. The minimum number of funds is maintained consistent with legal and managerial requirements. The account groups are reporting devices to account for certain assets and liabilities of the governmental funds not recorded directly in other funds. The District did not maintain any account groups.

The District has the following fund types:

Governmental funds – are used to account for most of the District's general activities, including the collection and disbursement of earmarked monies (special revenue funds). Basis of accounting refers to when revenues and expenditures or expenses are recognized in the accounts and reported in the financial statements. 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 with expendable available financial resources. Fiduciary type funds are accounted for using the cash basis of accounting. These practices differ from generally accepted accounting principles.

Governmental funds include the following fund types:

General fund – is the general operating fund of the District. It accounts for all financial resources of the general government, except those required to be accounted for in another fund. This is a budgeted fund, and any fund balances are considered as resources available for use. 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 also accounts for federal and state financed programs where restricted monies must be expended for specific programs. Project accounting is employed to maintain integrity for the various sources of these funds.

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

B. Measurement Focus – cont'd

Special Revenue funds – account for revenue sources that are restricted to expenditures for specific purposes (not including expendable trusts or major capital projects). The special revenue funds are composed of the District's Building Fund. This budgeted fund and any fund balance is considered as resources available for use.

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 district 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.

Fiduciary funds are used to account for assets held by the District in a trustee capacity or as an agent on behalf of others.

Agency fund – is custodial in nature and does not present results of operations or has a measurement focus. Agency funds are accounted for using the cash basis of accounting. This fund is the School Activities Fund used to account for monies collected principally through fundraising efforts of the students and District-sponsored groups. This is an unbudgeted fund. The administration is responsible, under the authority of the Board, of collecting, disbursing and accounting for these activity funds. These funds have no equity, assets are equal to liabilities, and do not include revenues and expenditures for general operation of the District.

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* with certain modifications. This format differs significantly from that required by GASB 34.

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

- Encumbrances represented by purchase orders, contracts, and other commitments for the expenditure of monies are recorded as expenditures when approved.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

C. Basis of Accounting and Presentation

- Investments are recorded as assets when purchased.
- Inventories of school supplies are recorded as expenditures and not as assets.
- Warrants payable are recorded as liabilities when issued.
- Long-term debt is recorded in the General Long-Term Debt Account Group and not in the financial statements.
- Compensated absences are recorded as an expenditure and liability when the obligation is paid.

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. Assets, Liabilities, Fund Balances, Revenue and Expenditures

1. Deposits and 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. The School District invests entirely in certificates of deposit, U. S. Treasury Securities, and participates in the Secured Investment Program of Oklahoma State School Boards Association, as authorized by Oklahoma Statutes Title 62, Section 348.

2. Fair Value of Financial Instruments

The District's financial instruments include cash and investments. The District's estimate of the fair value of all financial instruments does not differ materially from the aggregate carrying values of its financial instruments recorded in the accompanying balance sheet. The carrying amount of these financial instruments approximates fair value because of the short maturity of these instruments.

3. Estimates

The preparation of financial statements in conformity with the regulatory basis of accounting requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

D. Assets, Liabilities, Fund Balances, Revenue and Expenditures – cont'd

4. Interfund Transactions

Interfund 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. Non-recurring or non-routine permanent transfers of equity are reported as residual equity transfers.

5. 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 cost of inventories are recorded as expenditures when encumbered and purchased rather than when consumed.

6. Fixed Assets

The regulatory basis of accounting prescribed by the Oklahoma State Board of Education requires the presentation of fixed assets. The District has not maintained a record of its fixed assets, and, accordingly, a statement of fixed assets required by generally accepted accounting principles prior to the issuance of GASB No. 34, is not included in the financial statements. Fixed assets purchased are recorded as expenditures in the various funds at the time of purchase.

7. Compensated Absences

The District provides vacation and sick leave benefits in accordance with Title 70 of the Oklahoma Statutes, Article 6-104, which provides for annual sick leave and personal business days. District policy allows certified employees to accumulate such days to a maximum number of days. None of the benefits are payable upon retirement or death. Accrued vacation and sick leave benefits are not reflected in the financial statements because such statements are prepared on the regulatory basis of accounting. This practice differs from generally accepted accounting principles.

8. Fund Balance Classifications

In the fund financial statements, governmental funds report the hierarchy of fund balances. The hierarchy is based primarily on the degree of spending constraints placed upon use of resources for specific purposes versus availability of appropriation. An important distinction that is made in reporting fund balance is between amounts that are considered *nonspendable* (i.e. fund balance associated with assets that are *not in spendable form*, such as inventories or prepaid items, long-term portions of loans and note receivables, or items that are legally

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

D. Assets, Liabilities, Fund Balances, Revenue and Expenditures – cont'd

required to be maintained intact (such as the corpus of a permanent fund)) and those that are *spendable* (such as fund balance associated with cash, investments or receivables).

Amounts in the *spendable* fund balance category are further classified as *restricted*, *committed*, *assigned* or *unassigned*, as appropriate.

Restricted Fund Balance – The fund balance should be reported as restricted when constraints placed on the use of resources are either:

- Externally imposed by creditors (such as through debt covenants), grantors, contributors, or laws or regulations of other governments; or
- Imposed by law through constitutional provisions or enabling legislation.

Committed Fund Balance – The fund balance should be reported as committed for amounts that are useable only for specific purposes by formal action of the government's highest level of decision-making authority. Such amounts are not subject to legal enforceability (like restricted amounts), but cannot be used for any other purpose unless the government removes or changes the limitation by taking action similar to that which imposed the commitment.

Assigned Fund Balance – The fund balance should be reported as assigned for amounts that are *intended* to be used for specific purposes, but are neither restricted nor committed. Intent is expressed by the governing body itself, or a subordinated high-level body or official who the governing body has delegated the authority to assign amounts to be used for specific purposes. Assigned fund balances include all remaining spendable amounts (except negative balances) that are reported in governmental funds *other than the general fund*, that are neither restricted nor committed, and amounts in the general fund that are intended to be used for specific purposes in accordance with the provisions of the standard.

Unassigned Fund Balance – Unassigned fund balance is the residual classification for the general fund. This classification represents fund balance that has not been assigned to other funds and that has not been restricted, committed, or assigned to specific purposes within the general fund.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

D. Assets, Liabilities, Fund Balances, Revenue and Expenditures – cont'd

9. Property Taxes and Other Local Revenues

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. Property taxes are levied on November 1 and are due on receipt of the tax bill. The first half of taxes 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 assessment. If not paid by the following October 1, the property is offered for sale for the amount of the taxes due. The owner has two years to redeem the property by paying the taxes and penalty owed. If at the end of two years the owner has not done so, the purchaser is issued a deed to the property. No provision has been made for uncollected taxes, as all taxes are deemed collectible. Other local sources of revenues include tuition, fees, rentals, disposals, commissions and reimbursements.

10. Intermediate Revenues

Revenue from intermediate sources is the amount of money from funds collected by an intermediate administrative unit, or a political subdivision between the district and the state, and distributed to districts in amounts that differ in proportion to those which were collected within such systems.

11. State Revenues

Revenues from state sources for current operations are primarily governed by 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 and 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.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

D. Assets, Liabilities, Fund Balances, Revenue and Expenditures – cont'd

12. Federal Revenues

Federal revenues consist of revenues from the federal government in the form of operating grants or entitlements. An operating grant is a contribution to be used for a specific purpose, activity or facility. A grant may be received either directly from the federal government or indirectly as a pass through from another government, such as the state. Entitlement is the amount of payment to which the District is entitled pursuant to an allocation formula contained in applicable statutes. The majority of the federal revenues received by the District are apportioned to the general fund. The District maintains a separate child nutrition fund and the federal revenues received for the child nutrition programs are apportioned there.

13. 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. Included here are the activities of teacher assistants 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.

14. 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 objectives of instruction, community services and enterprise programs, rather than as entities within themselves.

15. Operation of Non-Instructional Services Expenditures

These expenditures are activities concerned with providing non-instructional services to students, staff or the community.

16. Facilities Acquisition and Construction Services Expenditures

These 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 improvements to sites.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

D. Assets, Liabilities, Fund Balances, Revenue and Expenditures – cont'd

17. 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) and certain transfers of monies from one fund to another.

18. Other Uses Expenditures

Other uses expenditures include 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 School or a third-party administrator.

19. Repayment Expenditures

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

20. Non-Monetary Transactions

The District receives commodities from the U. S. Department of Agriculture. The value of these commodities has been included in the Schedule of Expenditures of Federal Awards; however, they have not been reflected in the combined financial statements as either revenue or expense since they are not reported under the regulatory basis of accounting.

21. Memorandum Only – Total Columns

Total columns on the combined financial statements are captioned “memorandum only” because they do not represent consolidated financial information and are presented only to facilitate analysis. The columns do not present information that reflects financial position or results of operations in accordance with generally accepted accounting principles. Inter-fund eliminations have not been made in the aggregation of this data.

22. Resource Use Policy

It is the District’s policy for all funds that when an expenditure is incurred for purposes for which both restricted and unrestricted resources, including fund balances, are available, the District considers restricted amounts to be spent first before any unrestricted amounts are used. Furthermore, it is the District’s policy when an expenditure is incurred for purposes for which committed, assigned, or unassigned resources, including fund balances, are available,

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

D. Assets, Liabilities, Fund Balances, Revenue and Expenditures – cont'd

the District considers committed amounts to be spent first followed by assigned amounts and lastly unassigned amounts.

2. STEWARDSHIP, COMPLIANCE AND ACCOUNTABILITY

Budgetary Information

The District is required by state law to prepare an annual budget. Under current Oklahoma Statutes, a formal Estimate of Needs (Budget) is required for all funds except for trust and agency 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 as original budget and final budget.

A budget is legally adopted by the Board of Education for all governmental funds that include revenues and expenditures.

The 2019-20 Estimate of Needs was amended by the following supplemental appropriation:

Fund	Supplemental Appropriations	Original Appropriations	Final Appropriations
General	\$ 95,334	406,371	501,705

This amendment was approved by the Tillman County Clerk.

Encumbrances represent commitments related 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. Purchase orders or contracts document encumbrances for goods or purchased services. Under Oklahoma law, unencumbered appropriations lapse at year-end.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

3. DETAILED NOTES CONCERNING THE FUNDS

Deposits and Investments

Custodial Credit Risk

Exposure to custodial credit risk related to deposits exists when the District holds deposits that are uninsured and uncollateralized; collateralized with securities held by the pledging financial institution, or by its trust department or agent but not in the District's name; or collateralized without a written or approved collateral agreement. Exposure to custodial credit risk related to investments exists when the District holds investments that are uninsured and unregistered, with securities held by the counterparty or by its trust department or agent but not in the District's name.

The District's policy as it relates to custodial credit risk is to secure its uninsured deposits with collateral, valued at no more than market value, at least at a level of 100 percent of the uninsured deposits and accrued interest thereon. The investment policy and state law also limits acceptable collateral to U.S. Treasury and agency securities and direct obligations of the state, municipalities, counties, and school districts in the state of Oklahoma, surety bonds, and letters of credit. As required by Federal 12 U.S.C.A., Section 1823(e), all financial institutions pledging collateral to the District must have a written collateral agreement approved by the board of directors or loan committee.

At June 30, 2020 the District held deposits of approximately \$52,072 at financial institutions. The District's cash deposits, including interest-bearing accounts, and investments are entirely covered by Federal Depository Insurance (FDIC) or direct obligations of the U.S. Government insured or collateralized with securities held by the District or by its agent in the District's name. Therefore, the District was not exposed to custodial credit risk as defined above.

Investment Credit Risk

The District has no investment policy that limits its investment choices other than the limitations of state law that generally authorize investment in:

1. Direct obligations of the U.S. government, its agencies and instrumentalities to which the full faith and credit of the U.S. government is pledged, or obligations to the payment of which the full faith and credit of the State is pledged.
2. Certificates of deposit of banks when such certificates of deposits are secured by acceptable collateral for the deposit of public monies.
3. Savings accounts or saving certificates to the extent that such accounts or certificates are fully insured by the United States government.
4. Repurchase agreements that have underlying collateral including obligations of the United States government, its agencies and instrumentalities, or the State of Oklahoma.
5. County, municipal or school district debt obligations for which an ad valorem tax may be levied.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

3. DETAILED NOTES CONCERNING THE FUNDS – cont'd

Deposits and Investments – cont'd

6. Money market funds regulated by the SEC and in which investments consist of the investments of obligations of the United States, its agencies and instrumentalities.
7. Warrants, bonds or judgments of the school district.
8. Qualified pooled investment programs through an interlocal cooperative agreement formed pursuant to applicable law and to which the board of education has voted to be a member, the investments of which consist of those items specified in paragraphs 1 through 7 above, as well as obligations of the United States agencies and instrumentalities.
9. Any other investment that is authorized by law.

Investment credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligation. The District has no formal policy limiting investments based on credit rating. Unless there is information to the contrary, obligations of the U.S. government or obligations explicitly guaranteed by the U.S. government are not considered to have credit risk and do not require disclosure of credit quality.

The District had no investment credit risk as of June 30, 2020, as defined above.

Investment Interest Rate Risk

Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of an investment. The District does not have a formal investment policy that limits investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates. The District had no investment interest rate risk as defined above.

Concentration of Investment Credit Risk

Exposure to concentration of credit risk is considered to exist when investments in any one issuer represent a significant percent of total investments of the District. Investments issued or explicitly guaranteed by the U.S. government and investments in mutual funds, external investment pools, and other pooled investments are excluded from this consideration. The District places no limit on the amount it may invest in any one issuer.

At June 30, 2020, the District had no concentration of credit risk as defined above.

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020

4. OTHER INFORMATION

A. 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 Worker's compensation coverage in which there is a 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 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.

B. Contingent Liabilities

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

C. Non-Monetary Transactions

The fair market value as determined by the Oklahoma Department of Human Services of the commodities received during the period under audit was \$2,511.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

4. OTHER INFORMATION – cont'd

D. Employee Retirement System and Plan

Description of Plan

The District participates in the state-administered Oklahoma Teachers' Retirement System, which is a cost sharing, multiple-employer defined benefit public employee retirement system (PERS), which is administered by the Board of Trustees of the Oklahoma Teachers' Retirement System (the "System"). The System provides retirement and disability benefits, annual cost-of-living adjustments, and death benefits to plan members and beneficiaries. Title 70 Section 17 of the Oklahoma Statutes establishes benefit provisions and may be amended only through legislative action. The Oklahoma Teachers' Retirement System issues a publicly available financial report that includes financial statements and required supplementary information for the System. That report may be obtained by writing to the Oklahoma Teachers' Retirement System, P.O. Box 53624, Oklahoma City, OK 73152 or by calling 405-521-2387.

Basis of Accounting

The System's financial statements are prepared using the cash basis of accounting, except for accruals of interest income. Plan member contributions are recognized in the period in which the contributions are made. Benefits and refunds are recognized when paid. The pension benefit obligation is a standardized disclosure measure of the present value of pension benefits. This pension valuation method reflects the present value of estimated pension benefits that will be paid in future years as a result of employee services performed to date and is adjusted for the effect of projected salary increases. There are no actuarial valuations performed on individual school districts. The System has an under-funded pension benefit obligation as determined as part of the latest actuarial valuation.

Funding Policy

The District, the State of Oklahoma, and the participating employees 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 7.00% of covered compensation. Additionally, OTRS receives "federal matching contributions" for positions whose funding comes from federal sources or certain grants. The matching contribution rate was 7.70%. Contributions received by the System from the State of Oklahoma are from 5.00% of its revenues from sales taxes, use taxes, corporate income taxes and individual income taxes. The District's employer contribution rate was 9.50%. The District is allowed by the Oklahoma Teachers' Retirement System to make the required contributions on behalf of the participating members.

Annual Pension Cost

The District's total contributions, including the state offset, for 2020, 2019, and 2018 were \$47,829, \$54,747 and \$50,276, respectively.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
June 30, 2020**

4. OTHER INFORMATION – cont'd

E. Surety Bonds

The treasurer is bonded by Western Surety Company, bond number 14237678 for the penal sum of \$100,000, term beginning September 1, 2019 and ending September 1, 2020. This is a renewal of a continuous bond.

The superintendent is bonded by Western Surety Company, bond number 70809175 for the penal sum of \$100,000, term beginning October 5, 2019 and ending October 5, 2020. This is a renewal of a continuous bond.

The encumbrance clerk, minutes and activity fund custodian is bonded by Western Surety Company, bond number 70425055 for the penal sum of \$1,000, term beginning November 1, 2019 and ending November 1, 2020. This is a renewal of a continuous bond.

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

COMBINING STATEMENT OF ASSETS AND LIABILITIES - REGULATORY BASIS
ALL FIDUCIARY FUND TYPES
JUNE 30, 2020

	<u>AGENCY FUND ACTIVITY FUND</u>
<u>ASSETS</u>	
Cash	\$ <u>7,019</u>
 <u>LIABILITIES</u>	
Liabilities	
Funds held for school organizations	\$ <u>7,019</u>

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

COMBINING STATEMENT OF CHANGES IN ASSETS AND LIABILITIES -
REGULATORY BASIS - AGENCY FUNDS
FOR THE YEAR ENDED JUNE 30, 2020

<u>ASSETS</u>	<u>BALANCE</u> <u>7-01-19</u>	<u>ADDITIONS</u>	<u>TRANSFERS</u>	<u>DEDUCTIONS</u>	<u>BALANCE</u> <u>6-30-20</u>
Cash	\$ 7,307	12,998	(300)	12,986	7,019
<u>LIABILITIES</u>					
Funds held for school organizations:					
Athletics	\$ 1,144	605	-	921	828
Elementary PE	673	-	-	-	673
Eighth	146	334	-	82	398
Seventh	190	7	-	67	130
Sixth	226	141	-	66	301
Fifth	266	107	-	45	328
Fourth	228	139	-	66	301
Third	106	333	-	162	277
Second	90	150	-	-	240
First	382	170	-	122	430
Kindergarten	344	211	-	71	484
Petty Cash	-	400	-	400	-
Home Economics	1,849	900	-	1,526	1,223
Jr. High Cheerleaders	114	-	-	-	114
Administrative	276	339	(300)	215	100
Flower Fund	122	-	-	-	122
4-H	582	8,978	-	9,214	346
Library	1	-	-	-	1
Special Programs	75	-	-	-	75
Pre-Kindergarten	493	184	-	29	648
TOTAL LIABILITIES	\$ 7,307	12,998	(300)	12,986	7,019

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2020

<u>Federal Grantor/Pass Through Grantor/Program Title</u>	<u>Federal CFDA Number</u>	<u>Pass Through Grantor's Number</u>	<u>Approved Amount</u>	<u>Balance at July 1, 2019</u>	<u>Receipts</u>	<u>Expenditures</u>	<u>Balance at June 30, 2020</u>
<u>U.S. Department of Education:</u>							
<u>Direct Programs:</u>							
Small Rural Schools	84.358A	588	\$ 36,658	-	15,720	15,720	20,938
Sub Total			<u>36,658</u>	<u>-</u>	<u>15,720</u>	<u>15,720</u>	<u>20,938</u>
<u>Passed Through Oklahoma State Department of Education:</u>							
Title I	84.010	511	40,299	-	33,633	33,633	6,666
Title I Cluster			<u>40,299</u>	<u>-</u>	<u>33,633</u>	<u>33,633</u>	<u>6,666</u>
COVID Assistance	84.027	617	2,500	-	-	-	2,500
IDEA-B Flow Through	84.027	621	19,760	-	18,230	18,230	1,530
IDEA-B Preschool	84.173	641	994	-	-	-	994
Special Education Cluster			<u>23,254</u>	<u>-</u>	<u>18,230</u>	<u>18,230</u>	<u>5,024</u>
FY2020 CARES Act	84.425D	788	21,779	-	-	-	21,779
Total U.S. Department of Education			<u>121,990</u>	<u>-</u>	<u>67,583</u>	<u>67,583</u>	<u>54,407</u>
<u>U.S. Department of Agriculture:</u>							
<u>Passed Through Oklahoma State Department of Education:</u>							
School Breakfast Program	10.553	764	-	4,282	13,294	17,576	-
National School Lunch Program	10.555	763	-	-	20,835	17,852	2,983
National School Lunch Program - commodities - Note 3	10.555		-	-	2,511	2,511	-
Child Nutrition Cluster			<u>-</u>	<u>4,282</u>	<u>36,640</u>	<u>37,939</u>	<u>2,983</u>
Total U.S. Department of Agriculture			<u>-</u>	<u>4,282</u>	<u>36,640</u>	<u>37,939</u>	<u>2,983</u>
Total Expenditures of Federal Awards			<u>\$ 121,990</u>	<u>4,282</u>	<u>104,223</u>	<u>105,522</u>	<u>57,390</u>

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2020

Note 1: **Basis of Presentation** - The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of the School under programs of the federal government for the year ended June 30, 2020. The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the Schedule presents only a selected portion of the operations of the School, it is not intended and does not present the financial position, changes in net assets, or cash flows of the School.

Note 2: **Summary of Significant Accounting Policies** - Expenditures reported on the Schedule are reported on the regulatory basis of accounting consistent with the preparation of the combined financial statements, except for nonmonetary assistance noted in Note 3. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. The District has elected not to use the 10 percent de minimus indirect cost rate allowed under the Uniform Guidance.

Note 3: **Food Distribution** - Non-monetary assistance is reported in the Schedule at the fair market value of the commodities received and disbursed.

WILSON, DOTSON & ASSOCIATES, P.L.L.C.

Certified Public Accountants

Members

American Institute of Certified Public Accountants

Oklahoma Society of Certified Public Accountants

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
Davidson School District No. C-9
Tillman County, Oklahoma

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the accompanying fund type and account group financial statements- regulatory basis, which comprise the combined financial statements, of Davidson School District No. C-9, Tillman County, Oklahoma (the "District"), 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 our report thereon dated April 24, 2021. The report on these financial statements 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, our report was qualified for the omission of the general fixed asset account group with respect to the presentation of the 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 our audit of the financial statements, we considered the District's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control. Accordingly, we 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 a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

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

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the District's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the schedule of findings related to financial reporting as items 2020-001 and 2020-002.

Purpose of this Report

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

Wilson, Dotson & Associates

Wilson, Dotson & Associates, PLLC

Shawnee, Oklahoma
April 24, 2021

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**FINDINGS RELATED TO FINANCIAL REPORTING
FOR THE YEAR ENDED JUNE 30, 2020**

Finding 2020-001

Statement of Condition: The general fund ended the year with a cash fund deficit of (\$2,766).

Criteria: The District is required to maintain positive fund balances.

Cause/Effect of Condition: The District is in violation of Oklahoma Statutes.

Recommendation: We recommend the District establish a formal policy for the District's general fund balance that establishes a minimum fund balance, provides guidance on how to maintain this minimum fund balance, and requires monthly financial or progress reports that gives a projected end of year balance based on each month's financial conditions.

Management's Response – Management has responded in an attached letter.

Finding 2020-002

Statement of Condition: The building fund's expenditures exceeded the legally approved appropriations for this fund by (\$1,847). This appears to be the result of entering an incorrect amount of appropriations into the accounts payable software for this fund.

Criteria: The District can only expend up to a fund's legally approved appropriations.

Cause/Effect of Condition: The District is in violation of Oklahoma Statutes.

Recommendation: We recommend the District take greater care when entering the appropriations into the accounts payable software.

Management's Response – Management has responded in an attached letter.

**DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma**

**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS
FOR THE YEAR ENDED JUNE 30, 2020**

There were no prior year findings.

DAVIDSON SCHOOL DISTRICT NO. C-9
Tillman County, Oklahoma

SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT
FOR THE YEAR ENDING JUNE 30, 2020

State of Oklahoma)
)ss
County of Pottawatomie)

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 Davidson School District for the audit year 2019-20.

Wilson, Dotson & Associates, P.L.L.C.
Auditing Firm

Pamela R. Dotson

by _____
Authorized Agent

Subscribed and sworn to before me this 24th day of April, 2021.

Lisa Cook

Notary Public (Commission # 11002236)
My commission expires: March 10, 2023

LISA COOK
NOTARY PUBLIC - STATE OF OKLAHOMA
MY COMMISSION EXPIRES MAR. 10, 2023
COMMISSION # 11002236

**DAVIDSON PUBLIC SCHOOLS
PHILLIP RATCLIFF-SUPERINTENDENT
P.O. BOX 338 DAVIDSON, OK 73530
PHONE: 580-568-2423**

April 29, 2021

Wilson, Dotson & Associates, P.L.L.C.
907 East 35th Unit 4
Shawnee, Oklahoma 74804

Dear Mrs. Pam Dotson,

This correspondence is in reference to the reportable findings that were found in the school's 2019-2020 audit.

Finding 2020-001. The General Fund ended the year with a cash fund deficit of (\$2766). Response is as follows.

1. The District was assessed an Administrative Cost penalty of \$6768.10. We were informed by the OCAS office prior to our final submission of 2019 expenditures information to SDE about exceeding administrative cost limits. Our records show that we had inadvertently made OCAS errors pertaining to our administrative cost. We corrected the coding errors under the direction of our Accounting vendor ADPC and reduced the administrative cost to the allowable limit. We do not know what happened but our records show the coding changes were made prior to certification of our OCAS data which was thought to be correct. We still feel this penalty was unwarranted. We did our part at the District level. As a result we were penalized \$6768.10 in state aid.
2. The school participated in the Summer Seamless Food Service options for breakfast and lunch after the COVID-19 Pandemic closed the school in March. We received our first claim on May 8 for March and April meals. Our plan was to discontinue this Food Service program early in June to ensure enough time for payment for May and June meals to post by June 30. We processed the May and June claim early in June. The claim payment of \$12967.50 was posted July 2 which is 2021 revenue.
3. The school lost the opportunity to have 2-3 local fund raisers during the spring due to school closure because of COVID-19. This additional revenue of \$4000-\$5000 would have been deposited in the General Fund.

The Administration is certain that if only one the three events listed above had not happened the District would have a positive General Fund balance. Avoidance of all three events the District would have more than double the General Fund balance from 2019.

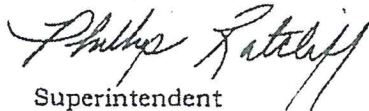
Finding 2020-002. The building fund expenditures exceeded the legally appropriations for this fund by (\$1847). Response is as follows.

It appears an incorrect appropriation amount was inadvertently enter into the account payable software for the buiding fund. The building fund collections for the year were above the original Estimate of Needs amount and would offset the above deficit when added as a supplemental appropriations.

The District plan is to continue to implement and practice financial procedures to prevent the findings that are listed in the 2020 audit that we can control. Additionally avoid the financial events that are out of our control the school experienced in 2020 school year.

Sincerely,

Phillip Ratcliff

A handwritten signature in cursive script that reads "Phillip Ratcliff".

Superintendent
Davidson School

WILSON, DOTSON & ASSOCIATES, P.L.L.C.

Certified Public Accountants

Members

American Institute of Certified Public Accountants

Oklahoma Society of Certified Public Accountants

April 24, 2021

Mr. Phillip Ratcliff, Supt.
Davidson Public Schools
PO Box 338
Davidson, OK 73530

Dear Mr. Ratcliff:

Listed below are the audit exceptions and recommendations relayed to management. Please review them very carefully. If you have questions or desire additional information, please call me so that any discrepancies may be resolved.

Lack of Segregation of Duties

An adequate internal control structure does not exist because of the small size of the entity nor is there adequate segregation of duties.

Surety Bonds

The surety bond for the encumbrance/minutes clerk and activity fund custodian is currently set at \$1,000. We recommend that this amount be increased to \$2,000 to be in compliance with the Oklahoma Statutes.

Child Nutrition Programs Expenditures

We observed during the audit that the expenditures for the child nutrition programs were all classified to the 3150-630 function-object code for food. We recommend that the non-food expenditures (e.g., supplies, utilities) be classified to the appropriate function-object codes for those types of expenditures.

We take this opportunity to thank you and your professional staff, especially Hope, for the outstanding cooperation and invaluable assistance you gave us during our recent onsite work.

Sincerely,



Wilson, Dotson & Associates, P.L.L.C.