

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

**FORT TOWSON SCHOOL DISTRICT NO. 1-2  
Choctaw County, Oklahoma**

**JUNE 30, 2020**

**Audited by**

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

**FORT TOWSON SCHOOL DISTRICT NO. 1-2  
Choctaw County, Oklahoma**

**SCHOOL DISTRICT OFFICIALS  
JUNE 30, 2020**

BOARD OF EDUCATION

President	Robbie Maple
Vice-President	Kimberley Fowler
Clerk	James Diggs
Member	Tonie Johnson
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SCHOOL DISTRICT TREASURER

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SUPERINTENDENT OF SCHOOLS

Phillip Hall

**FORT TOWSON SCHOOL DISTRICT NO. I-2  
Choctaw 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	9-11
Notes to Combined Financial Statements	12-27
<u>OTHER SUPPLEMENTARY INFORMATION:</u>	
<u>Combining Financial Statements</u>	
Combining Statement of Assets, Liabilities and Fund Balances - Regulatory Basis – All Special Revenue Funds	28
Combining Statement of Revenues Collected, Expenditures, and Changes in Fund Balances – Regulatory Basis – All Special Revenue Funds	29
Combining Statement of Revenues Collected, Expenditures and Changes in Fund Balances – Budget and Actual – Regulatory Basis – All Special Revenue Funds	30-31
Combining Statement of Assets and Liabilities – Regulatory Basis – All Fiduciary Fund Types	32
Combining Statement of Changes in Assets and Liabilities – Regulatory Basis – Agency Funds	33-34
<u>Supporting Schedules</u>	
Schedule of Expenditures of Federal Awards – Regulatory Basis	35-36
<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>	37-38
<u>SCHEDULE OF FINDINGS AND RESPONSES</u>	
Findings Related to Financial Reporting	39
Summary Schedule of Prior Audit Findings	40
<u>SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT</u>	41

# **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  
Fort Towson School District No. 1-2  
Choctaw County, Oklahoma

### **Report on the Financial Statements**

We have audited the accompanying combined fund type and account group financial statements-regulatory basis of the Fort Towson School District No. 1-2, Choctaw 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 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 of material misstatement.

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

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our 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 balances 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 then 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 combining statements-regulatory basis, are presented for purposes of additional analysis and are not a required part of the 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 also 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 combining statements-regulatory basis and the schedule of expenditures of federal awards are the responsibility of management and were derived from and relate 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 combining statements-regulatory basis and the schedule of expenditures of federal awards are fairly stated, in all material respects, in relation to the basic financial statements as a whole on the 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 7, 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 7, 2021

**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw County, Oklahoma**

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

	GOVERNMENTAL FUND TYPES			FIDUCIARY FUND TYPES	ACCOUNT GROUP	TOTALS (MEMORANDUM ONLY)
	GENERAL	SPECIAL REVENUE	DEBT SERVICE	AGENCY FUNDS	GENERAL LONG-TERM DEBT	
<b><u>ASSETS</u></b>						
Cash	\$ 1,853,261	40,188	248,965	177,244	-	2,319,658
Amounts available in debt service	-	-	-	-	248,965	248,965
Amounts to be provided for retirement of general long-term debt	-	-	-	-	42,059	42,059
Total Assets	<b>\$ 1,853,261</b>	<b>40,188</b>	<b>248,965</b>	<b>177,244</b>	<b>291,024</b>	<b>2,610,682</b>
 <b><u>LIABILITIES AND FUND BALANCES</u></b>						
Liabilities						
Warrants payable	\$ 224,034	8,261	-	-	-	232,295
Funds held for school organizations	-	-	-	177,244	-	177,244
Long-term debt:						
Bonds payable	-	-	-	-	275,000	275,000
Capital leases payable	-	-	-	-	16,024	16,024
Total liabilities	224,034	8,261	-	177,244	291,024	700,563
Fund Balances						
Restricted	-	31,927	248,965	-	-	280,892
Unassigned	1,629,227	-	-	-	-	1,629,227
Total fund balances	1,629,227	31,927	248,965	-	-	1,910,119
Total Liabilities and Fund Balances	<b>\$ 1,853,261</b>	<b>40,188</b>	<b>248,965</b>	<b>177,244</b>	<b>291,024</b>	<b>2,610,682</b>

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

**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw 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**

	<u>GOVERNMENTAL FUND TYPES</u>			<u>TOTALS</u> <u>(MEMORANDUM ONLY)</u>
	<u>GENERAL</u>	<u>SPECIAL REVENUE</u>	<u>DEBT SERVICE</u>	
Revenues collected:				
Local sources	\$ 893,348	116,425	121,493	1,131,266
Intermediate sources	75,849	-	-	75,849
State sources	3,670,909	21,341	-	3,692,250
Federal sources	369,841	142,088	-	511,929
Non-revenue receipts	1,255	-	-	1,255
Total revenues collected	<u>5,011,202</u>	<u>279,854</u>	<u>121,493</u>	<u>5,412,549</u>
Expenditures:				
Instruction	2,248,973	-	-	2,248,973
Support services	1,711,172	183,859	-	1,895,031
Operation of non-instruction services	49,439	213,416	-	262,855
Other outlays	1,255	-	141,675	142,930
Total expenditures	<u>4,010,839</u>	<u>397,275</u>	<u>141,675</u>	<u>4,549,789</u>
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances and residual equity transfer in	1,000,363	(117,421)	(20,182)	862,760
Adjustments to prior year encumbrances	17,957	1,006	-	18,963
Residual equity transfers in	<u>177,057</u>	<u>24,760</u>	<u>223,587</u>	<u>425,404</u>
Excess of revenues collected over (under) expenditures	1,195,377	(91,655)	203,405	1,307,127
Fund balances, beginning of year	<u>433,850</u>	<u>123,582</u>	<u>45,560</u>	<u>602,992</u>
Fund balances, end of year	<u>\$ 1,629,227</u>	<u>31,927</u>	<u>248,965</u>	<u>1,910,119</u>

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



**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw 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	\$ 733,004	733,004	893,348	160,344
Intermediate sources	41,878	41,878	75,849	33,971
State sources	3,618,657	3,618,657	3,670,909	52,252
Federal sources	384,984	384,984	369,841	(15,143)
Non-revenue receipts	-	-	1,255	1,255
Total revenues collected	<u>4,778,523</u>	<u>4,778,523</u>	<u>5,011,202</u>	<u>232,679</u>
Expenditures:				
Instruction	-	-	2,248,973	(2,248,973)
Support services	-	-	1,711,172	(1,711,172)
Operation of non-instruction services	-	-	49,439	(49,439)
Other outlays	-	-	1,255	(1,255)
Unbudgeted	<u>5,212,373</u>	<u>5,212,373</u>	<u>-</u>	<u>5,212,373</u>
Total expenditures	<u>5,212,373</u>	<u>5,212,373</u>	<u>4,010,839</u>	<u>1,201,534</u>
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances and residual equity transfer in	(433,850)	(433,850)	1,000,363	1,434,213
Adjustments to prior year encumbrances	-	-	17,957	17,957
Residual equity transfers in	<u>-</u>	<u>-</u>	<u>177,057</u>	<u>177,057</u>
Excess of revenues collected over (under) expenditures	(433,850)	(433,850)	1,195,377	1,629,227
Fund balance, beginning of year	<u>433,850</u>	<u>433,850</u>	<u>433,850</u>	<u>-</u>
Fund balance, end of year	<u>\$ -</u>	<u>-</u>	<u>1,629,227</u>	<u>1,629,227</u>

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

**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw 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 FUNDS			VARIANCE WITH FINAL BUDGET FAVORABLE (UNFAVORABLE)
	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL	
Revenues collected:				
Local sources	\$ 105,487	105,487	116,425	10,938
State sources	1,680	1,680	21,341	19,661
Federal sources	194,644	194,644	142,088	(52,556)
Total revenues collected	301,811	301,811	279,854	(21,957)
Expenditures:				
Support services	-	-	183,859	(183,859)
Operation of non-instruction services	-	-	213,416	(213,416)
Unbudgeted	425,393	425,393	-	425,393
Total expenditures	425,393	425,393	397,275	28,118
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances and residual equity transfer in	(123,582)	(123,582)	(117,421)	6,161
Adjustments to prior year encumbrances	-	-	1,006	1,006
Residual equity transfer in	-	-	24,760	24,760
Excess of revenues collected over (under) expenditures	(123,582)	(123,582)	(91,655)	31,927
Fund balance, beginning of year	123,582	123,582	123,582	-
Fund balance, end of year	\$ -	-	31,927	31,927

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

**FORT TOWSON SCHOOL DISTRICT NO. I-2  
Choctaw 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**

	SINKING FUND			VARIANCE WITH FINAL BUDGET FAVORABLE (UNFAVORABLE)
	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL	
Revenues collected:				
Local sources	\$ 118,104	118,104	121,493	3,389
Expenditures:				
Other outlays	<u>141,675</u>	<u>141,675</u>	<u>141,675</u>	<u>-</u>
Excess of revenues collected over (under) expenditures before residual equity transfer in	(23,571)	(23,571)	(20,182)	3,389
Residual equity transfers in	<u>-</u>	<u>-</u>	<u>223,587</u>	<u>223,587</u>
Excess of revenues collected over (under) expenditures	(23,571)	(23,571)	203,405	226,976
Fund balance, beginning of year	<u>45,560</u>	<u>45,560</u>	<u>45,560</u>	<u>-</u>
Fund balance, end of year	<u>\$ 21,989</u>	<u>21,989</u>	<u>248,965</u>	<u>226,976</u>

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

**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw County, Oklahoma**

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

**1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

The accompanying financial statements of the Fort Towson School District Number I-2, Fort Towson, Choctaw 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 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.

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw 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 and account groups. 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 has the following fund types and account groups:

**Governmental funds** – are used to account for most of the District’s general activities and general long-term debt account group, including the collection and disbursement of earmarked monies (special revenue funds), the acquisition or construction of fixed assets (capital projects funds), and the servicing of general long-term debt (debt service 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.

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw 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 and Child Nutrition Fund. These are budgeted funds and any fund balances are 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.

Child Nutrition Fund – The Child Nutrition Fund consists of monies derived from local food sales and federal and state financial assistance. This fund is used to account for the various nutrition programs provided to students. The Child Nutrition Fund reported a deficit balance of (\$22,478) at June 30, 2020 due to the under-collection of federal revenues.

Debt Service fund – consists of the District's Sinking Fund and accounts for the accumulation of financial resources for servicing of general long-term debt (principal, interest and related costs). This is a budgeted fund. The primary revenue sources are local property taxes levied specifically for debt service.

Capital Projects fund – consists of the District's Bond Fund and accounts for the proceeds of bonds sales used exclusively for acquiring school sites, constructing and equipping new school facilities, renovating existing facilities, and the acquisition of transportation equipment. The District did not have a Bond Fund during the current fiscal year.

**Fiduciary funds** – 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.

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw 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**

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

General Long-Term Debt Account Group – is used to account for the outstanding principal balances of 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.

**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.
- 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.

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw 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**

**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.

**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. The residual equity transfers reported in the audit represent the account balances transferred from the Swink School District following the District's annexation into the Fort Towson School District.

**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.



**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw 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**

**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. Long-term Obligations**

The District reports long-term debt at face value in the general long-term debt account group. Certain other lease obligations not expected to be financed with current available financial resources are also reported in the general long-term debt account group.

**9. 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 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.

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw 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**

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.

**10. 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.

**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw 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**

**11. 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.

**12. 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.

**13. 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.

**14. 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 cocurricular activities. It may also be provided through some other approved medium, such as television, radio, telephone and correspondence. Included here are the

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw 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**

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.

**15. 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.

**16. Operation of Non-Instructional Services Expenditures**

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

**17. 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.

**18. 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.

**19. 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.

**20. 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.

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw 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**

**21. Non-Monetary Transactions**

The District receives commodities from the U. S. Department of Agriculture. The value of these commodities 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.

**22. 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.

**23. 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, 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 County Excise Board becomes the legal budget. Supplemental appropriations, if required, were made during the year and are reflected in the budget vs. actual presentations shown as original budget and final budget.

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw County, Oklahoma**

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

**2. STEWARDSHIP, COMPLIANCE AND ACCOUNTABILITY – cont'd**

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.

**3. DETAILED NOTES CONCERNING THE FUNDS**

**A. 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 \$2,319,658 at financial institutions. The District's cash deposits, including interest-bearing accounts, and investments were 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.

*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.

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw County, Oklahoma**

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

**3. DETAILED NOTES CONCERNING THE FUNDS – cont'd**

**A. Deposits and Investments – cont'd**

3. Savings accounts or savings 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.
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.

**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw County, Oklahoma**

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

**3. DETAILED NOTES CONCERNING THE FUNDS – cont'd**

**B. 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. A bond issue has 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. Debt Service requirements for bonds are payable solely from fund balance and future revenues of the debt service fund. The District also has a capital lease agreement.

On May 1, 2015, the Swink School District (which has been annexed into the Fort Towson School District) issued building bonds in the amount of \$300,000, with an interest rate of 3.00%. Bond maturities began May 1, 2017, with an initial installment of \$20,000, installments of \$35,000 per year thereafter, with the final maturity of \$35,000 due May 1, 2025.

On May 1, 2016, the District issued building bonds in the amount of \$385,000, with interest rates of 1.00-3.00%. Bond maturities began May 1, 2018, with an initial installment of \$95,000, installments of \$95,000 per year thereafter, with the final maturity of \$100,000 due May 1, 2021.

On December 22, 2016, the District entered into a lease-purchase agreement for an Ag truck. The lease-purchase is in the amount of \$38,061, has an interest rate of 3.50%, and is due in annual principal and interest installments of \$8,442 beginning December 1, 2017, with the final payment of \$8,442 due December 1, 2021.

Annual debt service requirements to maturity are as follows:

Year Ended June 30,	General Obligation Bonds & Capital Leases		Total Requirements
	Principal	Interest	
2021	\$ 142,872	8,820	151,692
2022	43,152	4,489	47,641
2023	35,000	3,150	38,150
2024	35,000	2,100	37,100
2025	35,000	1,050	36,050
Total	<u>\$ 291,024</u>	<u>19,609</u>	<u>310,633</u>

Interest paid on general long-term debt during the current fiscal year totaled \$18,090.



**FORT TOWSON SCHOOL DISTRICT NO. 1-2  
Choctaw County, Oklahoma**

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

**3. DETAILED NOTES CONCERNING THE FUNDS – cont'd**

**C. Changes in General Long-term Debt**

General long-term debt consists of bonds and a capital lease payable. The following is a summary of the changes in the general long-term debt transactions of the District for the fiscal year:

	Balance July 1, 2019	Additions	Retirements	Balance June 30, 2020
Bonds	\$ 195,000	210,000	130,000	275,000
Capital lease	118,627	-	102,603	16,024
Total	\$ 313,627	210,000	232,603	291,024

**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 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.

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw County, Oklahoma**

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

**4. OTHER INFORMATION – cont'd**

**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 \$14,017.

**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 obligation as determined as part of the latest actuarial valuation dated June 30, 2020.

**FORT TOWSON SCHOOL DISTRICT NO. 1-2**  
**Choctaw County, Oklahoma**

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

**4. OTHER INFORMATION – cont'd**

**D. Employee Retirement System and Plan – cont'd**

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 employer's 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 credit, for 2020, 2019 and 2018 were \$308,372, \$307,571 and \$243,779, respectively.

**E. Surety Bonds**

The treasurer is bonded through Liberty Mutual Surety, bond number 999004817, for the penal sum of \$100,000, term beginning July 1, 2019 and ending June 30, 2020.

The activity fund custodian/minutes clerk/deputy treasurer is bonded through RLI Insurance Company, bond number LSM1441146, for the penal sum of \$100,000, term beginning June 10, 2020 and ending June 10, 2021.

The superintendent is bonded through RLI Insurance Company, bond number LSM1185100, for the penal sum of \$100,000, term beginning September 26, 2019 and ending September 26, 2020. This is a renewal of a continuous bond.

The encumbrance/payroll clerk is bonded through RLI Insurance Company, bond number LSM0593912, for the penal sum of \$50,000, term beginning May 20, 2020 and ending May 20, 2021. This is a renewal of a continuous bond.

**FORT TOWSON SCHOOL DISTRICT NO. I-2  
Choctaw County, Oklahoma**

**COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES -  
REGULATORY BASIS - ALL SPECIAL REVENUE FUNDS  
JUNE 30, 2020**

	<u>BUILDING FUND</u>	<u>CHILD NUTRITION FUND</u>	<u>TOTAL</u>
<u>ASSETS</u>			
Cash	\$ 56,497	(16,309)	40,188
<u>LIABILITIES AND FUND BALANCES</u>			
Liabilities			
Warrants payable	\$ 2,092	6,169	8,261
Fund Balances			
Restricted	<u>54,405</u>	<u>(22,478)</u>	<u>31,927</u>
Total Liabilities and Fund Balances	<u>\$ 56,497</u>	<u>(16,309)</u>	<u>40,188</u>

**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw County, Oklahoma**

**COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES IN FUND  
BALANCES - REGULATORY BASIS - ALL SPECIAL REVENUE FUNDS  
FOR THE YEAR ENDED JUNE 30, 2020**

	<u>BUILDING FUND</u>	<u>CHILD NUTRITION FUND</u>	<u>TOTAL</u>
Revenues collected:			
Local sources	\$ 112,359	4,066	116,425
State sources	-	21,341	21,341
Federal sources	<u>-</u>	<u>142,088</u>	<u>142,088</u>
Total revenues collected	<u>112,359</u>	<u>167,495</u>	<u>279,854</u>
Expenditures:			
Support services	183,859	-	183,859
Operation of non-instruction services	<u>-</u>	<u>213,416</u>	<u>213,416</u>
Total expenditures	<u>183,859</u>	<u>213,416</u>	<u>397,275</u>
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances and residual equity transfer in	(71,500)	(45,921)	(117,421)
Adjustments to prior year encumbrances	1,006	-	1,006
Residual equity transfer in	<u>24,760</u>	<u>-</u>	<u>24,760</u>
Excess of revenues collected over (under) expenditures	(45,734)	(45,921)	(91,655)
Fund balances, beginning of year	<u>100,139</u>	<u>23,443</u>	<u>123,582</u>
Fund balances (deficit), end of year	<u>\$ 54,405</u>	<u>(22,478)</u>	<u>31,927</u>

**FORT TOWSON SCHOOL DISTRICT NO. I-2  
Choctaw County, Oklahoma**

**COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES  
AND CHANGES IN FUND BALANCES - BUDGET AND ACTUAL -  
REGULATORY BASIS - ALL SPECIAL REVENUE FUNDS  
FOR THE YEAR ENDED JUNE 30, 2020**

	BUILDING FUND			VARIANCE WITH FINAL BUDGET FAVORABLE (UNFAVORABLE)
	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL	
Revenues collected:				
Local sources	\$ 104,715	104,715	112,359	7,644
Expenditures:				
Support services	-	-	183,859	(183,859)
Unbudgeted	204,854	204,854	-	204,854
Total expenditures	204,854	204,854	183,859	20,995
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances and residual equity transfer in	(100,139)	(100,139)	(71,500)	28,639
Adjustments to prior year encumbrances	-	-	1,006	1,006
Residual equity transfer in	-	-	24,760	24,760
Excess of revenues collected over (under) expenditures	(100,139)	(100,139)	(45,734)	54,405
Fund balance, beginning of year	100,139	100,139	100,139	-
Fund balance, end of year	\$ -	-	54,405	54,405

**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw County, Oklahoma**

**COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES  
AND CHANGES IN FUND BALANCES - BUDGET AND ACTUAL -  
REGULATORY BASIS - ALL SPECIAL REVENUE FUNDS  
FOR THE YEAR ENDED JUNE 30, 2020**

	CHILD NUTRITION FUND			
	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL	VARIANCE WITH FINAL BUDGET FAVORABLE (UNFAVORABLE)
Revenues collected:				
Local sources	\$ 772	772	4,066	3,294
State sources	1,680	1,680	21,341	19,661
Federal sources	194,644	194,644	142,088	(52,556)
Total revenues collected	197,096	197,096	167,495	(29,601)
Expenditures:				
Operation of non-instruction services	-	-	213,416	(213,416)
Unbudgeted	220,539	220,539	-	220,539
Total expenditures	220,539	220,539	213,416	7,123
Excess of revenues collected over (under) expenditures	(23,443)	(23,443)	(45,921)	(22,478)
Fund balance, beginning of year	23,443	23,443	23,443	-
Fund balance (deficit), end of year	\$ -	-	(22,478)	(22,478)

FORT TOWSON SCHOOL DISTRICT NO. I-2  
Choctaw 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>\$ 177,244</u>
<u>LIABILITIES</u>	
Liabilities	
Funds held for school organizations	<u>\$ 177,244</u>



**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw 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> 7-01-19	<u>ADDITIONS</u>	<u>TRANSFERS</u>	<u>DEDUCTIONS</u>	<u>BALANCE</u> 6-30-20
Cash	\$ 136,300	220,558	31,410	215,100	174,484
Investments	4,063	-	(4,063)	-	-
<b>TOTAL ASSETS</b>	<b>\$ 140,363</b>	<b>220,558</b>	<b>27,347</b>	<b>215,100</b>	<b>174,484</b>

LIABILITIES

Funds held for school organizations:

General Activity - <b>Note 1</b>	\$ 10,570	18,293	18,378	34,664	12,577
FFA	13,507	101,763	-	95,432	19,838
FCCLA	970	5,526	-	1,144	5,352
Camp Goddard	642	6,430	-	4,507	2,565
Cap and Gown Fund	1	-	-	-	1
Class of 1945 Scholarship	759	-	-	-	759
Library	10,829	2,052	-	7,128	5,753
Class of 2020	6,317	18,994	(5,616)	19,192	503
Student Council	946	1,523	-	1,262	1,207
Livestock Booster Club	12,612	13,951	-	14,301	12,262
Flower Fund	380	660	300	46	1,294
High School Cheerleaders	1,422	1,598	-	1,663	1,357
Yearbook	4,937	2,678	-	3,453	4,162
CD - Travis & Neva Hyde	4,063	13	(1,316)	-	2,760
Class of 2028	1,475	509	-	-	1,984
Fill the Bus	1,586	-	-	74	1,512
Elementary Girls Basketball	55	-	-	-	55
General Fund Refund	-	2,175	-	2,155	20
Class of 2032	825	999	-	149	1,675
Elementary Fund	755	2,731	(40)	2,736	710
Girls Basketball	3,929	-	-	99	3,830
Boys Baseball Fund	873	1,000	-	1,659	214
TSA Fund	1,750	-	-	-	1,750
Class of 2033	-	165	-	-	165
Child Nutrition Refund	-	5,298	-	5,128	170
Boys & Girls Club - <b>Note 2</b>	-	2,955	13,032	1,961	14,026
Sr Class of 2020 Trip Refund	-	-	5,616	-	5,616
Class of 2034	-	100	-	-	100
HS Baseball Booster Club	160	1,462	-	1,297	325
HS National Honor Society	150	177	-	132	195

**FORT TOWSON SCHOOL DISTRICT NO. I-2  
Choctaw County, Oklahoma**

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

	<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>
Funds held for school organizations (cont'd):					
Class of 1946 Scholarship	\$ 105	-	-	-	105
SOSU/FTHS Alumni Schlrshp	-	600	150	500	250
Elementary Basketball	129	-	-	-	129
Project 854	150	-	(150)	-	-
Jr/Sr High School Fund	579	48	-	-	627
Elementary Cheerleaders	363	512	-	644	231
Speech & Drama	921	341	-	328	934
4-H	12,153	843	(300)	189	12,507
Class of 2021	7,644	11,040	-	3,139	15,545
Class of 2022	4,239	429	-	-	4,668
Class of 2023	5,767	350	-	100	6,017
Class of 2024	8,023	488	-	930	7,581
Box Tops for Education	133	68	-	-	201
Girls Softball	4,938	1,032	-	4,477	1,493
Boys Basketball	384	600	-	842	142
Class of 2025	4,572	717	40	-	5,329
Class of 2031	683	2,838	-	-	3,521
Science Club	351	112	-	-	463
Class of 2026	3,197	895	-	-	4,092
JH Cheer	328	557	-	555	330
Class of 2027	3,362	361	-	-	3,723
Class of 2029	1,889	1,103	-	30	2,962
Class of 2030	2,256	6,585	-	5,184	3,657
Unidentified Adjustment	(1,316)	-	1,316	-	-
<b>TOTAL LIABILITIES</b>	<b>\$ 140,363</b>	<b>220,571</b>	<b>31,410</b>	<b>215,100</b>	<b>177,244</b>

**Note 1:** The transfer represents the residual equity transfer in from the Swink School District's activity fund sub-account balance.

**Note 2:** The transfer represents the residual equity transfer in from the Swink School District's activity fund sub-account balance.

**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw County, Oklahoma**

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

Federal Grantor/Pass Through Grantor/Program Title	Federal CFDA Number	Pass Through Grantor's Number	Approved Amount	Balance at July 1, 2019	Receipts	Expenditures	Balance at June 30, 2020
<b><u>U.S. Department of Education:</u></b>							
<b><u>Direct Programs:</u></b>							
Title VIII Impact Aid	84.041	591	\$ -	3,336	37,081	-	40,417
Title VIII Impact Aid	84.041	592	-	-	1,282	-	1,282
Title VIA Indian Education	84.060A	561	20,432	-	-	20,432	-
Small Rural Schools Achievement Program	84.358A	588	27,265	-	-	27,265	-
Sub Total			<u>47,697</u>	<u>3,336</u>	<u>38,363</u>	<u>47,697</u>	<u>41,699</u>
<b><u>Passed Through Oklahoma State Department of Education:</u></b>							
Title I	84.010	511	221,497	-	91,961	217,968	3,529
Title I 2018-19 - Note 1	84.010	799	-	-	26,989	-	-
Title I School Improvement	84.010	515	58,775	-	58,025	58,025	750
Title I School Improvement 2018-19 - Note 1	84.010	799	-	-	21,965	-	-
Title I Cluster			<u>280,272</u>	<u>-</u>	<u>198,940</u>	<u>275,993</u>	<u>4,279</u>
COVID Assistance	84.027	617	5,952	-	-	-	5,952
IDEA-B Flow Through	84.027	621	121,867	-	77,181	121,867	-
IDEA-B Flow Through 2018-19 - Note 1	84.027	799	-	-	16,187	-	-
IDEA-B Preschool	84.173	641	10,995	-	10,275	10,995	-
Special Education Cluster			<u>138,814</u>	<u>-</u>	<u>103,643</u>	<u>132,862</u>	<u>5,952</u>
Title IX, Part A, Homeless Children & Youth	84.196	596	50,000	-	-	12,381	37,619
Title V, Part B, REAP	84.358	586	35,724	-	-	7,356	28,368
FY 2020 CARES Act	84.425D	788	158,250	-	-	-	158,250
Sub Total			<u>243,974</u>	<u>-</u>	<u>-</u>	<u>19,737</u>	<u>224,237</u>
<b>Total U.S. Department of Education</b>			<u>710,757</u>	<u>3,336</u>	<u>340,946</u>	<u>476,289</u>	<u>276,167</u>
<b><u>Bureau of Indian Affairs:</u></b>							
<b><u>Passed Through the Choctaw Nation:</u></b>							
Johnson O'Malley	15.130	563	5,980	-	-	5,980	-
Johnson O'Malley 2018-19 - Note 1	15.130	799	-	-	6,695	-	-
<b>Total Bureau of Indian Affairs</b>			<u>5,980</u>	<u>-</u>	<u>6,695</u>	<u>5,980</u>	<u>-</u>

**FORT TOWSON SCHOOL DISTRICT NO. I-2**  
**Choctaw County, Oklahoma**

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

Federal Grantor/Pass Through Grantor/Program Title	Federal CFDA Number	Pass Through Grantor's Number	Approved Amount	Balance at July 1, 2019	Receipts	Expenditures	Balance at June 30, 2020
<b>U.S. Department of Agriculture:</b>							
<u>Passed Through Oklahoma State Department of Education:</u>							
School Breakfast Program	10.553	764	\$ -	-	43,746	43,746	-
National School Lunch Program	10.555	763	-	-	89,524	89,524	-
National School Lunch Program - Commodities - Note 4	10.555		-	-	14,017	14,017	-
Summer Food Service Program	10.559	766	-	-	4,250	4,250	-
Equipment Assistance Grant	10.579	791	-	-	4,568	4,568	-
Total Child Nutrition Cluster			-	-	156,105	156,105	-
<u>Passed Through USDA Rural Development:</u>							
Community Facilities - Sound/Communications	10.766	771	6,500	-	6,500	6,500	-
Community Facilities - Roof Materials	10.766	772	15,700	-	15,700	15,700	-
Sub Total			22,200	-	22,200	22,200	-
<b>Total U.S. Department of Agriculture</b>			22,200	-	178,305	178,305	-
<b>Total Expenditures of Federal Awards</b>			\$ 738,937	3,336	525,946	660,574	276,167

Note 1: These amounts represent reimbursements for prior year expenditures which were not received until the current fiscal year.

Note 2: **Basis of Presentation** - The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of the District 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 portions of the operations of the District, it is not intended and does not present the financial position, changes in net assets, or cash flows of the District.

Note 3: **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 4. 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 4: **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  
Fort Towson School District No. 1-2  
Choctaw County, Oklahoma

We 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 Fort Towson School District No. 1-2, Choctaw 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 7, 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 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 no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

### **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 7, 2021

**FORT TOWSON SCHOOL DISTRICT NO. I-2  
Choctaw County, Oklahoma**

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

There were no material weaknesses or instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

**FORT TOWSON SCHOOL DISTRICT NO. I-2  
Choctaw County, Oklahoma**

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

**Finding 2019-01**

**Statement of Condition** – We observed during the audit that the activity fund custodian’s ledger was not properly reconciled during the fiscal year. There was a (\$1,316) difference between the bank reconciliation and the total of the activity fund sub-account balances at June 30, 2019.

**Disposition** – The District’s new activity fund custodian for the 2019-20 fiscal year accurately reconciled the activity fund custodian’s ledger.

**Finding 2019-02**

**Statement of Condition:** We observed during the audit that one of the employees initially funded through the Title I program changed jobs during the year. The employee moved from being a paraprofessional to a custodian. However, the expenditure classification code to which her wages were assigned did not change. Consequently, \$5,088 in custodial wages were reimbursed in error through the Title I program.

**Disposition** – The District refunded the \$5,088 overpayment of Title I funds to the State Department of Education during the 2019-20 fiscal year.

**Finding 2019-03**

**Statement of Condition:** We observed during the audit that one of the expenditures classified to the Johnson O’Malley (JOM) project code, in the amount of \$454, was later refunded to the District. This expenditure was properly reclassified as a correcting entry, but it retained the JOM project code and was subsequently claimed for reimbursement through the Choctaw Nation.

**Disposition** – The expenditures for the District’s 2019-20 fiscal year JOM program were properly classified and claimed for reimbursement.



FORT TOWSON SCHOOL DISTRICT NO. I-2  
Choctaw 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 Fort Towson Public Schools 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 7<sup>th</sup> 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

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

**Certified Public Accountants**

Members

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Oklahoma Society of Certified Public Accountants

April 7, 2021

Mr. Phillip Hall, Supt.  
Fort Towson Public Schools  
PO Box 39  
Fort Towson, OK 74735

Dear Mr. Hall:

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.

### Reconciliation of Schedule of Expenditures of Federal Awards to OCAS Data

Listed below are the differences between the federal expenditures classified to the individual program project codes and the federal expenditures reported on the Schedule of Expenditures of Federal Awards:

1. The expenditures for the Community Facilities – Sound/Communication Program were not previously reported to the State Department of Education through the OCAS data.
2. The expenditures for the Community Facilities – Roof Materials Program were not previously reported to the State Department of Education through the OCAS data.

### Purchase Orders

Of the purchase orders examined, several had at least one invoice and/or delivery ticket that had not been initialed and dated by a designated school employee to reflect that the goods were received or services rendered. We recommend that every purchase order issued be supported by documentation that has been signed as received.

### Activity Fund

1. The General Fund Refund sub-account in the school activity fund maintained a balance of \$20 at June 30, 2020. We recommend that any remaining funds in this sub-account be cleared to the District's general fund before the end of each fiscal year, as required by Oklahoma Statutes.
2. The Child Nutrition Refund sub-account in the school activity fund maintained a balance of \$170 at June 30, 2020. We recommend that any remaining funds in this sub-account be cleared to the District's child nutrition fund before the end of each fiscal year, as required by Oklahoma Statutes.

Activity Fund

3. Of the school activity fund checks examined, several had at least one invoice and/or delivery ticket that had not been initialed and dated by a designated school employee to reflect that the goods were received or services rendered. We recommend that every check issued be supported by documentation that has been signed as received.
4. Purchase order forms were used during the audit period for the activity fund. However, from our examination of these forms and the related records, it appears that several of the expenditures tested were not encumbered against the applicable sub-account balances before the indebtedness was incurred. The use of purchase orders or requisitions for activity fund expenditures not only insures there are sufficient funds within a sub-account to pay for the order that is to be placed, but it also documents approval of the purchase prior to the expenditure. We, therefore, recommend that these forms be completed prior to incurring any activity fund indebtedness.

Appropriations

We observed during the audit that the District's appropriations for the various funds remained unallocated throughout the year amongst the District's bold function expenditure classification codes. We recommend the District develop an operating budget at the beginning of the year that takes into account prior spending habits and current projected needs. This budget should then be used to distribute the appropriations within the District's software once the Estimate of Needs has been approved.

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

Sincerely,



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