

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

**GRANDVIEW DEPENDENT SCHOOL DISTRICT NO. C-82,
STEPHENS COUNTY, OKLAHOMA**

JUNE 30, 2017

Audited by

**SANDERS, BLEDSOE & HEWETT
CERTIFIED PUBLIC ACCOUNTANTS, LLP**

BROKEN ARROW, OK

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
SCHOOL DISTRICT OFFICIALS
JUNE 30, 2017

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DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
JUNE 30, 2017

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JUNE 30, 2017

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SANDERS, BLEDSOE & HEWETT

CERTIFIED PUBLIC ACCOUNTANTS, LLP

INDEPENDENT AUDITOR'S REPORT

February 7, 2018

The Honorable Board of Education
Grandview School District Number C-82
Comanche, Stephens County, Oklahoma

Report on the Financial Statements

We have audited the accompanying combined fund type and account group financial statements – regulatory basis of the Grandview School District Number C-82, Comanche, Stephens County, Oklahoma (the District), as of and for the year ended June 30, 2017, and the related notes to the financial statements, which collectively comprise the District's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with financial reporting provisions of the Oklahoma State Department of Education to meet financial reporting requirements of the State of Oklahoma; this includes determining that the regulatory basis of accounting is an acceptable basis for the preparation of the financial statements in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America, and the standards applicable to 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 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 comply with 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 reasonable determined, are presumed to be material.

Adverse Opinion on U.S. Generally Accepted Accounting Principles

In our opinion, because 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, 2017, 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.

An Internal Revenue Service garnishment of \$166,265 was charged to the building fund. This garnishment should have been charged to the general fund. An adjustment was not made prior to fiscal year-end, therefore the fund balances in the general and building funds were misstated on the financial statements.

Qualified Opinion on Regulatory Basis of Accounting

In our opinion, except for the effects of the matters 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, 2017, and the revenues collected and expenditures paid and encumbered for the year then ended on the regulatory basis of accounting described in Note 1.

Other Matters

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 schedule of expenditures of federal awards is presented for purposes of additional analysis, and is also not a required part of the basic financial statements.

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.

Other Reporting required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated February 7, 2018 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 to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the District’s internal control over financial reporting and compliance.



Sanders, Bledsoe & Hewett
Certified Public Accountants, LLP

Broken Arrow, OK



SANDERS, BLEDSOE & HEWETT

CERTIFIED PUBLIC ACCOUNTANTS, LLP

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

February 7, 2018

The Honorable Board of Education
Grandview School District Number C-82
Grandview, Stephens 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 the Grandview School District Number C-82, Grandview, Stephens County, Oklahoma (District), as of and for the year ended June 30, 2017, and the related notes to the financial statements, which collectively comprise the District's financial statements, and have issued our report thereon dated February 7, 2018, which was adverse with respect to the presentation of the financial statements in conformity with accounting principles generally accepted in the United States 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, and for the misclassification of an Internal Revenue Service garnishment.

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) to determine the 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 District's internal control. Accordingly, we do not express an opinion on the effectiveness of 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 and therefore, material weaknesses or significant deficiencies may exist that were not identified. We did identify certain deficiencies in internal control, described in the accompanying schedule of audit results that we consider to be material weaknesses, as items 2017-1, 2017-2, 2017-3, 2017-4, 2017-5, 2017-6, 2017-7, and 2017-8.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the District's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, non-compliance with which could have a direct and material effect on the determination of financial statements amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the accompanying schedule of audit results as items, 2017-2, 2017-3, 2017-4, 2017-5 2017-6, 2017-7, and 2017-8.

District's Response to Findings

The District's response to the findings identified in our audit are described in the attached corrective action plan. The District's responses were not subjected to the auditing procedures applied in the audit on the financial statements and accordingly, we express no opinion on it.

Purpose of this Report

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



Sanders, Bledsoe & Hewett
Certified Public Accountants, LLP

Broken Arrow, OK

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
DISPOSITION OF PRIOR YEAR'S SIGNIFICANT DEFICIENCIES AND MATERIAL
INSTANCES OF NON-COMPLIANCE
JUNE 30, 2017

FINDING 2016-1

Condition: The district has a lack of segregation of duties resulting from a small number of employees performing functions that would normally be divided among employees were a larger number available prevent a proper segregation of accounting. Currently one individual performs the functions for payroll, activity fund and accounts payable.

Recommendation: Although this is an ongoing issue in small school districts, we recommend that board implement procedures to segregate key accounting functions, and determine the cost effectiveness of the possible hiring/assigning of personnel to help better segregate accounting functions.

Current Status: This is a continuing issue for the District.

FINDING 2016-2

Condition: The district paid a fringe titled 'superintendent fringe FICA' to the Superintendent. This was mentioned in the contract, but there was no detail of the amount. Checks were made payable to the Superintendent. This fringe did not qualify to be excluded from taxes per *IRS Publication 15-B Employers Tax Guide to Fringe Benefits*, therefore the applicable taxes were not withheld. This fringe was also not coded correctly. We cannot determine the rationale for this fringe. Due to the timing of the prior year audit this finding continued for most of the current fiscal year.

Recommendation: We recommend that procedures be implemented that an individual who is independent of the payroll processing, would compare the board approved contract to what is actually being paid throughout the fiscal year to determine its accuracy.

Current Status: This District continues to pay this fringe and we cannot find any statutory authority to support this type of fringe benefit, unless the appropriate taxes are withheld.

FINDING 2016-3

Condition: The district paid a fringe for 'car and cell phone allowance' to the Superintendent. Checks were made payable to the Superintendent. This fringe did not qualify to be excluded from taxes per *IRS Publication 15-B Employers Tax Guide to Fringe Benefits*, therefore the applicable taxes were not withheld.

Recommendation: We recommend that procedures be implemented that an individual who is independent of the payroll processing, would compare the board approved contract to what is actually being paid throughout the fiscal year to determine its accuracy.

Current Status: This District continues to pay this fringe and we cannot find any statutory authority to support this type of fringe benefit unless the appropriate taxes are withheld.

FINDING 2016-4

Condition: General fund purchase orders, were issued to the superintendent for reimbursement of expenses. Support was attached, however, not all of the support was adequate, it did not include an itemized detail of the expenditure. Support also did not include a list of individuals or the purpose of the reimbursement for meal expenditures, no purpose for gas reimbursements, and no purpose or disposition given for reimbursement of services or equipment.

Recommendation: We recommend that reimbursements be limited to travel related expenditures, and all other expenditures for services or equipment have a purchase order be issued directly to the vendor. Also, for any meal reimbursements, in addition to the itemized receipt, a listing of all individuals who ate and a purpose of the trip should be included in the documentation.

Current Status: This finding continued in the current fiscal year.

FINDING 2016-5

Condition: We observed during the audit of payroll that the federal income withholding taxes, and the social security and medicare withholding taxes were not being remitted to the Internal Revenue Service in a timely manner for the 2015 and 2016 calendar year. We were able to reconcile the amounts paid for the 2016 calendar year to the 941 quarterly reports. We also observed that the bank account that is being used as a clearing account for taxes was not being properly reconciled (cleared to -0-) each month.

Recommendation: We recommend the District implement procedures that an individual independent of the payroll function, review the monthly payroll registers and reconciles, and/or submits, the applicable withholdings to the Internal Revenue Service through the *Electronic Funds Transfer Payment System*, as required, and reconcile the monthly withholdings to the clearing account to ensure that withholding are being paid in timely manner.

Current Status: The timeliness of deposits improved during the 2016-17 fiscal year, however, the clearing tax account was not being properly reconciled (cleared to -0-) each month. We observed that during the 2017-18 fiscal year, the clearing tax account was closed and taxes are now run through the normal operating account.

FINDING 2015-6

Condition: During the review of the appropriated and activity fund expenditures, we made the following observations:

- Payments for general fund PO #7 to Walmart were made from statements not invoices
- General fund PO's #71 and 74 did not testfoot (purchase order not properly closed), description of services rendered lacked detail, and invoices presented for payment were similar to each purchase order
- General fund PO #98, 2 of 4 invoices were similar in form to the invoices used with general fund PO#71 and 74
- General fund PO #92 only had itemized receipts for \$488.31 out of \$3,322.74

- Child nutrition PO#s 1 and 3, did not testfoot (purchase order not properly closed)
- Activity fund check #s 3,9,10 and 11 did not have supporting documentation
- Activity fund check #32, had supporting documentation but could not be reconciled (testfoot) to the check amount. This was for the year end student trip.

Recommendation: We recommend that the District enforce its policies and procedures which require proper approval of the expenditure, original documentation be obtained, invoices be signed as received, the face of the purchase order reflect the total amount actually paid, and the warrant number(s) be recorded on the purchase order.

Current Status: Some areas were improved from the prior year, however, we still noted several observations which continued in the current fiscal year.

FINDING 2016-7

Condition: We could not adequately reconcile the payroll contracts as none were presented for audit. We used the personnel report that is submitted to the OSDE to compare with earnings reports. We recommend that contracts be prepared for all personnel, as required by Oklahoma Statutes.

Recommendation: We recommend that after the board approves and signs the personnel contracts, for both certified and support, that the signed contract, along with the informational worksheet, required by O.S 70 § 6-101.6, be filed and maintained for review.

Current Status: Contracts signed by the Board of Education were provided during our audit; however, these contracts were not signed by the corresponding employee. In addition, there were three instances where the contract did not reconcile to the amounts paid.

FINDING 2016-8

Condition: We observed during the audit where the district either under coded or over coded expenditures to the applicable project code in regards to the federal programs as follows:

<u>Program</u>	<u>Claimed/Received</u>	<u>Coded</u>	<u>Difference</u>
Title I	46,596.74	47,173.24	576.50
Small School REAP	16,378.00	16,756.53	378.53
School Breakfast*	22,389.68	11,727.11	(10,662.57)
School Lunch*	44,916.85	0.00	(44,916.85)

*current year only, does not include prior year carryover.

Recommendation: We recommend that the District review/reconcile at year end, for each program, what has been coded to the project code compared to what was claimed for reimbursement.

Current Status: This finding was improved upon during the 2016-17 fiscal year.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
SCHEDULE OF AUDIT RESULTS
JUNE 30, 2017

Section 1 - Summary of Auditor's Results:

1. An adverse opinion was issued on the combined financial statements in conformity with generally accepted accounting principles, and a qualified opinion was issued for the omission of the general fixed asset account group on the combined financial statements in conformity with a regulatory basis of accounting prescribed by the Oklahoma State Department of Education and for the misclassification of an IRS garnishment.
2. The audit disclosed significant deficiencies in the internal controls over financial reporting.
3. The audit disclosed instances of noncompliance which were not considered to be material to the financial statements.

Section 2 – Findings relating to the financial statements required to be reported in accordance with GAGAS:

FINDING 2017-1

Condition: The district has a lack of segregation of duties resulting from a small number of employees performing functions that would normally be divided among employees were a larger number available prevent a proper segregation of accounting. Currently one individual performs the functions for payroll, activity fund and accounts payable.

Criteria: A good system of internal control would provide for the proper segregation of entering information, processing information, issuing of checks and reconciling.

Cause / Effect: Due to a limited number of personnel available to perform the various accounting functions, there is an increased risk that errors or fraud may occur and not be detected in a timely manner.

Recommendation: Although this is an ongoing issue in small school districts, and a repeat issue, we recommend that board implement procedures to segregate key accounting functions, and determine the cost effectiveness of the possible hiring/assigning of personnel to help better segregate accounting functions.

FINDING 2017-2

Condition: The district paid a fringe titled 'superintendent fringe FICA' to the Superintendent. This was mentioned in the contract, but there was no detail of the amount. Checks were made payable to the Superintendent. This fringe did not qualify to be excluded from taxes per *IRS Publication 15-B Employers Tax Guide to Fringe Benefits*, therefore the applicable taxes were not withheld. This fringe was also not coded correctly. We cannot determine the rationale for this fringe.

Criteria: All compensation, including fringes, should be detailed on the contract so employees will not be paid over or under their contracted amount, and will only be paid for what is detailed in the contract and approved by the board of education.

Cause / Effect: Controls and procedures were not in place to review the contracted amount to what was actually being paid, therefore employee could be getting paid an incorrect amount.

Recommendation: We recommend that the applicable taxes be determined and submitted as soon as possible to the IRS, and that procedures be implemented so that an individual who is independent of the payroll processing, would compare the board approved contract to what is actually being paid throughout the fiscal year to determine its accuracy. This is a repeat finding.

FINDING 2017-3

Condition: The district paid a fringe for ‘car and cell phone allowance’ to the Superintendent. Checks were made payable to the Superintendent. This fringe did not qualify to be excluded from taxes per *IRS Publication 15-B Employers Tax Guide to Fringe Benefits*. We were unable to reconcile the contract for the Superintendent with the payroll register, therefore, we can not determine if the appropriate taxes are being withheld.

Criteria: Employees should only be paid for what is detailed in the contract and approved by the board of education.

Cause / Effect: Controls and procedures were not in place to review the contracted amount to what was actually being paid, therefore the employee may have received payments less than or in excess of the contracted amount.

Recommendation: We recommend that the applicable taxes be determined and submitted as soon as possible to the IRS, and that procedures be implemented so that an individual who is independent of the payroll processing, would compare the board approved contract to what is actually being paid throughout the fiscal year to determine its accuracy. This is a repeat finding.

FINDING 2017-4

Condition: General fund purchase orders, numbers 33 (\$8,164.14) and 114 (\$451.57), were issued to the superintendent for reimbursement of expenses. Support was attached, however, not all of the support was adequate, it did not include a list of individuals or the purpose of the reimbursement for meal expenditures, no purpose for gas reimbursements, and no purpose or disposition given for reimbursement of services or equipment. In addition, reimbursements were made for the purchase of ammunition. While this may be an allowable expense for the Districts armed security personnel, the amount of ammunition purchased (\$1,196) appears to be excessive and could be perceived as a misuse of taxpayer dollars.

Criteria: Expenditures should only be paid after the receipt of adequate documentation, which should include, an itemized invoice that details the purchase, a purpose and disposition of the purchase if applicable, and a listing of individuals present if more than one.

Cause / Effect: Procedures were not in place to require the proper documentation be obtained prior to the reimbursement being paid. This could result in the reimbursement of unallowable or unapproved expenditures.

Recommendation: We recommend that reimbursements be limited to travel related expenditures, and all other expenditures for services or equipment have a purchase order be issued directly to the vendor. Also, for any meal reimbursements, in addition to the itemized receipt, a listing of all individuals who ate and a purpose of the trip should be included in the documentation. This is a repeat finding.

FINDING 2017-5

Condition: We observed during the audit that federal income withholding taxes, and the social security and medicare withholding taxes were not remitted to the Internal Revenue Service in a timely manner for several tax periods. The District received a notice of levy dated 1-4-17 from the Internal Revenue Service for assessment penalties and interest for late payments of withholding taxes in the amount of \$83,119.93, additionally the District received a notice of penalty for failure to file forms W-2 for 2013, in the amount of \$53,921.21. This resulted in the IRS garnishing the Districts accounts in the amount of \$166,264.86, which the District charged to the building fund. Since no payroll is issued out of the building fund, this should have been a charge to the general fund. This caused a misstatement between the two funds which resulted in an audit qualification. We also observed that the bank account that is being used as a clearing account for taxes was not being properly reconciled (cleared to -0-) each month.

Criteria: Internal Revenue Service *Publication 15 Employers Tax Guide (Circular E)*, establishes rules to determine what type of depositor an entity is. The District is determined to be a semiweekly depositor, which means that tax withholding deposits should be made approximately 3-5 days after the payroll is prepared and the clearing account should be reconciled to zero. Year end forms W-3 and W-2s should be submitted to the IRS by January 31 following the year covered, and a tax clearing account should be reconciled to zero each month.

Cause / Effect: The District did not have good controls over the payroll function, and therefore, by not paying the withholding taxes in a timely manner, the District will be subjected to penalty assessments and interest. The District did not have procedures in place adequately review and reconcile expenditures, which increases the risk of expenditures not being coded to the proper fund, therefore, misreporting the fund balances to the school board and to the Oklahoma State Department of Education.

Recommendation: We recommend the District implement procedures that an individual independent of the payroll function, review the monthly payroll registers and reconciles, and/or submits, the applicable withholdings to the Internal Revenue Service through the *Electronic Funds Transfer Payment System*, as required, and reconcile the monthly withholdings to the clearing account to ensure that withholding are being paid in timely manner. We observed during the 2017-18 fiscal year, the clearing account was closed and taxes now appear to be paid timely through the normal operating account. The IRS appears to have withdrew an incorrect amount from the District, and the IRS subsequently issued a refund of \$83,119.93, in July 2017 and was receipted back into the building fund. This is a repeat finding.

FINDING 2017-6

Condition: During the review of the appropriated and activity fund expenditures, we made the following observations:

- Payments for general fund PO #7 to Walmart were made from statements not invoices

- General fund PO #s 64, 65, and 70, all invoices were similar in form despite being different vendors
- Most invoices in the general fund were not signed received
- Activity fund check #s 3, 15, 37, and 44 did not have supporting documentation
- Activity fund check #42, had supporting documentation but could not be reconciled (testfoot) to the check amount. This was for the year end student trip.
- Majority of invoices observed in the activity fund where neither signed as received nor marked as paid.

Criteria: All expenditures should be properly authorized, adequate support be obtained and attached to the purchase order. Purchase orders should be closed out in order to reflect the accurate amount of the expenditure as required by Oklahoma Statute 70 § 5-135. In addition, all invoices or delivery tickets should be signed and dated when the merchandise is received, as required by Oklahoma Statutes. (Reference: 62 O.S. 2001 § 310.1a and 70 O.S. 2001 § 5-135 C and E)

Cause / Effect: Proper procedures were not in place over the accounts payable function for both the appropriated and activity fund purchases. This increases that risk that a misappropriation of assets will occur and not be detected whether due to error or fraud.

Recommendation: We recommend that the District enforce its policies and procedures which require proper approval of the expenditure, original documentation be obtained, invoices be signed as received, the face of the purchase order reflect the total amount actually paid, and the warrant number(s) be recorded on the purchase order. This is a repeat finding.

FINDING 2017-7

Condition: We could not adequately reconcile three of the payroll contracts and two contracts could not be presented for review. We did observe that the contracts were signed by the board of education, however, most were not signed by the employee.

Criteria: Per Oklahoma Statute 70 O.S. 2001 § 5-123 and Attorney General's Opinion No. 82-62, (dated 3-3-82) the District is required to have a written contract for each purchase order that is over \$500. This Attorney General's opinion has been construed to relate to personnel contracts.

Cause / Effect: Proper procedures were not in place to adequately file and maintain the personnel contracts. This increases the risk that individuals may be being paid an incorrect amount but will not be detected in a timely manner.

Recommendation: We recommend that after the board approves and signs, along with the employee, the personnel contracts, for both certified and support, that the signed contract, along with the informational worksheet, required by O.S 70 § 6-101.6, be filed and maintained for review. Further, we recommend that an earnings report be run at the end of each fiscal year, and all contracts be reconciled to actual amounts paid. This is a repeat finding.

FINDING 2017-8

Condition: The treasurers' bank statements were not being properly reconciled to the accounting records each month, and, the "Balance Sheet" (MAS report) had cash/investments balances incorrectly assigned to prior fiscal years.

Criteria: Sound accounting practices require that bank statements be reconciled to the accounting records in a timely manner, and as required by Oklahoma statutes 70 2001 § 5-115.

Cause / Effect: Failure to reconcile the bank statements to the accounting records in a timely manner increases the risk of error, fraud and inaccurate financial information, which will not be detected in a timely manner.

Recommendation: We recommend that procedures be implemented that would require the bank statements be reconciled monthly and that an individual that is independent of the process review the reconciliations for accuracy and completeness.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
 COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCE
 - ALL FUND TYPES AND ACCOUNT GROUPS - REGULATORY BASIS
 JUNE 30, 2017

	<u>GOVERNMENTAL FUND TYPES</u>			<u>FIDUCIARY FUND TYPES</u>	<u>TOTALS (MEMORANDUM ONLY)</u>
	<u>GENERAL</u>	<u>SPECIAL REVENUE</u>	<u>DEBT SERVICE</u>	<u>AGENCY FUNDS</u>	
<u>ASSETS</u>					
Cash	\$ 372,743	136,182	2,683	7,132	518,740
 <u>LIABILITIES AND FUND BALANCE</u>					
Liabilities					
Warrants payable	\$ 51,973	2,853			54,826
Funds held for school organizations				7,132	7,132
Total liabilities	<u>51,973</u>	<u>2,853</u>	<u>0</u>	<u>7,132</u>	<u>61,958</u>
Fund Balance					
Restricted		133,329			133,329
Unassigned	320,770		2,683		323,453
Cash fund balances	<u>320,770</u>	<u>133,329</u>	<u>2,683</u>	<u>0</u>	<u>456,782</u>
Total Liabilities and Fund Balance	<u>\$ 372,743</u>	<u>136,182</u>	<u>2,683</u>	<u>7,132</u>	<u>518,740</u>

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

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
 COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES IN CASH FUND BALANCES
 - ALL GOVERNMENTAL FUND TYPES AND EXPENDABLE TRUSTS - REGULATORY BASIS
 FOR THE YEAR ENDED JUNE 30, 2017

	GOVERNMENTAL FUND TYPES			TOTALS (MEMORANDUM ONLY)
	GENERAL	SPECIAL REVENUE	DEBT SERVICE	
Revenues Collected				
Local sources	\$ 143,773	21,078		164,851
Intermediate sources	27,555			27,555
State sources	696,238	779		697,017
Federal sources	137,442	64,478		201,920
Interest earnings	1,170			1,170
Total revenues collected	<u>1,006,178</u>	<u>86,335</u>	<u>0</u>	<u>1,092,513</u>
Expenditures				
Instruction	520,721			520,721
Support services	455,579	166,265		621,844
Operation of non-instructional services	32,668	77,058		109,726
Total expenditures	<u>1,008,968</u>	<u>243,323</u>	<u>0</u>	<u>1,252,291</u>
Excess of revenues collected over (under) expenditures before other financing sources (uses)	(2,790)	(156,988)	0	(159,778)
Other financing sources (uses)				
Transfers in (out)	12,000	(12,000)	0	0
Excess of revenues collected over (under) expenditures	9,210	(168,988)	0	(159,778)
Cash fund balances, beginning of year	<u>311,560</u>	<u>302,317</u>	<u>2,683</u>	<u>616,560</u>
Cash fund balances, end of year	<u>\$ 320,770</u>	<u>133,329</u>	<u>2,683</u>	<u>456,782</u>

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

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
 COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND
 CHANGES IN CASH FUND BALANCES - BUDGETED GOVERNMENTAL FUND TYPES - REGULATORY BASIS
 FOR THE YEAR ENDED JUNE 30, 2017

	GENERAL FUND		
	Original/Final Budget	Actual	Variance Favorable (Unfavorable)
Revenues Collected			
Local sources	\$ 128,616	143,773	15,157
Intermediate sources	30,095	27,555	(2,540)
State sources	652,927	696,238	43,311
Federal sources	70,677	137,442	66,765
Interest earnings		1,170	1,170
Total revenues collected	882,315	1,006,178	123,863
Expenditures			
Instruction	1,193,875	520,721	673,154
Support services		455,579	(455,579)
Operation of non-instruction services		32,668	(32,668)
Total expenditures	1,193,875	1,008,968	184,907
Excess of revenues collected over (under) expenditures before other financing sources (uses)	(311,560)	(2,790)	308,770
Other financing sources (uses)			
Transfers in (out)	0	12,000	12,000
Excess of revenues collected over (under) expenditures	(311,560)	9,210	320,770
Cash fund balance, beginning of year	311,560	311,560	0
Cash fund balance, end of year	\$ 0	320,770	320,770

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

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
 COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND
 CHANGES IN CASH FUND BALANCES - BUDGETED GOVERNMENTAL FUND TYPES - REGULATORY BASIS
 FOR THE YEAR ENDED JUNE 30, 2017

	SPECIAL REVENUE FUNDS		
	Original/Final Budget	Actual	Variance Favorable (Unfavorable)
Revenues Collected			
Local sources	\$ 20,137	21,078	941
State sources	701	779	78
Federal sources	68,552	64,478	(4,074)
Total revenues collected	89,390	86,335	(3,055)
Expenditures			
Support services		166,265	(166,265)
Operation of non-instructional services	104,013	77,058	26,955
Unbudgeted	287,694		287,694
Total expenditures	391,707	243,323	148,384
Excess of revenues collected over (under) expenditures before other financing sources (uses)	(302,317)	(156,988)	145,329
Other financing sources (uses)			
Transfers in (out)	0	(12,000)	(12,000)
Excess of revenues collected over (under) expenditures	(302,317)	(168,988)	133,329
Cash fund balances, beginning of year	302,317	302,317	0
Cash fund balances, end of year	\$ 0	133,329	133,329

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

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
 COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND
 CHANGES IN CASH FUND BALANCES - BUDGETED GOVERNMENTAL FUND TYPES - REGULATORY BASIS
 FOR THE YEAR ENDED JUNE 30, 2017

	DEBT SERVICE FUND		
	Original/Final Budget	Actual	Variance Favorable (Unfavorable)
Revenues Collected:			
Local sources	\$		
Interest earnings			
Total revenues collected	<u>0</u>	<u>0</u>	<u>0</u>
Requirements:			
Bonds			
Coupons			
Total requirements	<u>0</u>	<u>0</u>	<u>0</u>
Excess of revenue collected over (under) expenditures	0	0	0
Cash fund balance, beginning of year	<u>2,683</u>	<u>2,683</u>	<u>0</u>
Cash fund balance, end of year	<u>\$ 2,683</u>	<u>2,683</u>	<u>0</u>

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

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The accompanying financial statements of the Grandview Public Schools Dependent District, No. C-82 (the “District”), have been prepared in conformity with another comprehensive basis of accounting prescribed by the Oklahoma State Department of Education as authorized by Oklahoma Statutes. Accordingly, the accompanying financial statements are not intended to present financial position and results of operations in conformity with the 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 composed of three elected members. The appointed superintendent is the executive officer of the District. The Board, constituting an on-going entity, is the level of government, which has governance responsibilities over all activities, related to public elementary and secondary school education within the jurisdiction of the local Dependent school district. The District receives funding from local, state and federal government sources and must comply with the requirements of these funding source entities. However, the District is not included in any other governmental “reporting entity” as defined in Section 2100, Codification of Governmental Accounting and Financial Reporting Standards, since Board members are elected by the public and have decision making authority, the power to designate management, the responsibility to significantly influence operations and primary accountability for fiscal matters.

In evaluating how to define the District, for financial reporting purposes, management has considered all potential component units. The decision to include a potential component unit in the reporting entity was made by applying the criteria established by the Governmental Accounting Standards Board (GASB). The basic – but not the only – criterion for including a potential component unit within the reporting entity is the governing body’s ability to exercise oversight responsibility. The most significant manifestation of this ability is financial interdependency. Other manifestations of the ability to exercise oversight responsibility include, but are not limited to, the selection of governing authority, the designation of management, the ability to significantly influence operations and accountability for fiscal matters. A second criterion used in evaluating potential component units is the scope of public service. Application of this criterion involves considering

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

A. Reporting Entity – cont'd

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.

B. Measurement Focus

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

A fund is a separate accounting entity with a self-balancing set of accounts. An account group, on the other hand, is a financial reporting device designed to provide accountability for certain assets and liabilities that are not recorded in the funds because they do not directly affect net expendable available financial resources.

Funds are classified into three categories: Governmental, proprietary and fiduciary. Each category, in turn, is divided into separate "fund types."

Governmental Fund Types

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

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

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont’d

B. Measurement Focus - cont’d

Special Revenue Funds – Special revenue funds account for revenue sources that are restricted to expenditures for specific purposes. The special revenue funds typically include the building, co-op and child nutrition funds. The district did not maintain a co-op fund during the 2016-17 fiscal year.

Building Fund – The building fund consists mainly of monies derived from property taxes levied for the purpose of erecting, remodeling, repairing, or maintaining school buildings and for purchasing furniture, equipment and computer software to be used on or for school 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.

Co-op Fund – The co-op fund is established when the boards of education of two or more school districts enter into cooperative agreements and maintain joint programs. The revenues necessary to operate a cooperative program can come from federal, state, or local sources, including the individual contributions of participating school districts. The expenditures for this fund would consist of those necessary to operate and maintain the joint programs.

Child Nutrition Fund - The child nutrition fund consists of monies derived from federal and state financial assistance and food sales. This fund is used to account for the various nutrition programs provided to students.

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

Capital Projects Fund – The capital projects fund is the District’s bond fund and is used to account for the proceeds of bond sales to be used exclusively for acquiring school sites, constructing and equipping new school facilities, renovating existing facilities and acquiring transportation equipment. The District did not maintain this fund during the 2016-17 fiscal year.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont’d

B. Measurement Focus – cont’d

Fiduciary Fund Types

Fiduciary funds are used to account for assets held on behalf of outside parties, including other governments, or on behalf of other funds within the District. The terms “non-expendable” and “expendable” refer to whether or not the District is under an obligation to maintain the trust principal. Agency funds generally are used to account for assets that the District holds on behalf of others as their agent and do not involve measurement of results of operation.

Expendable Trust Funds – Expendable trust funds typically include the gifts and endowments fund. The District did not maintain any expendable trust funds during the 2016-17 fiscal year.

Gifts and Endowments Fund – The gifts and endowments fund receives its assets by way of philanthropic foundations, individuals, or private organizations for which no repayment or special service to the contributor is expected. This fund is used to promote the general welfare of the District.

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

Account Groups

An account group is not a fund and consists of a self-balancing set of accounts used only to establish accounting control over long-term debt and fixed assets.

General Long-Term Debt Account Group – This account group is established to account for all the 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. It is also used to account for other liabilities (judgements and lease purchases) which are to be paid from funds provided in future years.

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

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont’d

B. Measurement Focus – cont’d

Memorandum Only - Total Column

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

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 inventory 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 basic financial statements.
- Compensated absences are recorded as expenditures when paid and not recorded as a liability.
- Fixed assets are recorded in the General Fixed Asset Account Group and not in the basic financial statements. Fixed assets are not depreciated.

This regulatory basis of accounting differs from accounting principles generally accepted in the United States of America, which require revenues to be recognized when they become available and measurable, or when they are earned, and expenditures or expenses to be recognized when the related liabilities are incurred for governmental fund types; and, when revenues are earned.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

C. Basis of Accounting and Presentation – cont'd

Basis of accounting refers to when revenues and expenditures 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 basis of accounting. Revenues are recognized when they are received rather than earned and expenditures are generally recognized when encumbered/reserved rather than at the time the related fund liability is incurred. These practices differ from accounting principles generally accepted in the United States.

D. Budgets and Budgetary Accounting

The District is required by state law to prepare an annual budget. A preliminary budget must be submitted to the Board of Education by December 31, for the fiscal year beginning the following July 1. If the preliminary budget requires an additional levy, the District must hold an election on the first Tuesday in February to approve the levy. If the preliminary budget does not require an additional levy, it becomes the legal budget. If an election is held and the taxes are approved, then the preliminary budget becomes the legal budget. If voters reject the additional taxes, the District must adopt a budget within the approved tax rate.

A budget is legally adopted by the Board of Education for all funds (with the exception of the trust and agency funds) that includes revenues and expenditures.

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. Unencumbered appropriations lapse at the end of each fiscal year. While the Debt Service Fund is a governmental fund, a comparison of budget to actual schedule is presented in the financial statements, although the board can exercise no control of the revenue sources for this fund (except interest earnings), and no control over its expenditures.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

E. Assets, Liabilities and Fund Balance

Cash and cash equivalents – The District considers all cash on hand, demand deposit accounts, and highly liquid investments, with an original maturity of three months or less when purchased, to be cash and cash equivalents.

Investments – The District considers investments of direct obligations of the United States government and agencies, certificates of deposits, savings accounts or savings certificates with maturities of greater than three months. All investments are recorded at cost, which approximates market value.

Inventories – The value of consumable inventories at June 30, 2017, is not material to the combined financial statements.

Fixed Assets and Property, Plant and Equipment – The District has not maintained a record of general fixed assets, and, accordingly, a General Fixed Assets Account Group required by the regulatory basis of accounting prescribed by the Oklahoma State Department of Education is not included in the financial statements. General fixed assets purchased are recorded as expenditures in the various funds at the time of purchase.

Warrants Payable – Warrants are issued to meet the obligations for goods and services provided to the District. The District recognizes a liability for the amount of outstanding warrants that have yet to be redeemed by the District's treasurer.

Encumbrances – Encumbrances represent commitments related to purchase orders, contracts, other commitments for expenditures or resources, and goods or services received by the District for which a warrant has not been issued. An expenditure is recorded and a liability is recognized for outstanding encumbrances at year end in accordance with the regulatory basis of accounting. While the regulatory basis that is used for the Debt Service Fund approximates full accrual accounting, the accruals recorded are reported to meet regulatory requirements, as opposed to the requirements of generally accepted accounting principles.

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. Vested or accumulated vacation leave that is expected to be liquidated with expendable available financial resources had not been reported as an expenditure of the governmental fund that will pay it since the financial statements have been prepared on the regulatory basis of accounting. This practice differs from generally accepted accounting principles.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

E. Assets, Liabilities and Fund Balance – cont'd

Funds Held for School Organizations – Funds held for school organizations represent the funds received or collected from students or other cocurricular and extracurricular activities conducted in the District, control over which is exercised by the board of education. These funds are credited to the account maintained for the benefit of each particular activity within the school activity fund.

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

Fund Balance – 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 notes receivable, 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).

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

Restricted fund balance represents amounts that are constrained either externally by creditors (such as debt covenants), grantors, contributors or laws or regulations of other governments; or by law, through constitutional provisions or enabling legislation.

Committed fund balance represents 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.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont’d

E. Assets, Liabilities and Fund Balance – cont’d

Assigned fund balance represents 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 is the residual classification for the general fund. It represents the amounts that have not been assigned to other funds, and that have not been restricted, committed, or assigned to specific purposes within the general fund.

F. Revenue and Expenditures

Local Revenues – Revenue from local sources is the money generated from within the boundaries of the District and available to the District for its use. 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. These property taxes are distributed to the District’s general, building and sinking funds based on the levies approved for each fund. The County Assessor, upon receipt of the certification of tax levies from the county excise board, extends the tax levies on the tax rolls for submission to the county treasurer prior to October 1. The county treasurer must commence tax collection within fifteen days of receipt of the tax rolls. The first half of taxes is due prior to January 1. The second half is due prior to April 1. If the first payment is not made in a timely manner, the entire tax becomes due and payable on January 2. Second half taxes become delinquent on April 1, of the year following the year of assessment. If not paid by the following October 1, the property is offered for sale for the amount of 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. Other local sources of revenues include tuition, fees, rentals, disposals, commissions and reimbursements.

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 are collected within such systems.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

F. Revenue and Expenditures – cont'd

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

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

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 passthrough 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.

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 included in the financial statements as either revenue or expense since they are not reported under the regulatory basis of accounting.

Interest Earnings – Represent compensation for the use of financial sources over a period of time.

Non-Revenue Receipts – Non-revenue receipts represent receipts deposited into a fund that are not new revenues to the District, but the return of assets.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

F. Revenue and Expenditures – cont'd

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 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.

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.

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

Facilities Acquisition and Construction Services Expenditures – Consists 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.

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

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

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 District funds.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont’d

F. Revenue and Expenditures – cont’d

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

All other interfund transactions, except quasi-external transactions and reimbursements, are reported as transfers. Nonrecurring or nonroutine permanent transfers of equity are reported as residual equity transfers. All other interfund transfers are reported as operating transfers. During the 2016-17 fiscal year, the District transferred \$12,000 from the child nutrition fund into the general fund.

2. CASH AND INVESTMENTS

Custodial Credit Risk – Custodial credit risk is the risk that in the event of a bank failure, the District’s deposits may not be returned to the District. The District’s cash deposits and investments at June 30, 2017, were \$520,896 , at financial institutions, and were completely insured or collateralized by federal depository insurance, direct obligations of the U.S. Government, or securities held by the District or by its agent in the District’s name.

Investment Interest Rate Risk – Interest rate risk is the risk that changes in interest rates will adversely affect the fair market value of an investment. Due to the required liquidity for those investments, these funds have no defined maturity dates. The District does not have a formal policy that limits investment maturities as a means of managing its exposure to fair value losses from increasing interest rates.

Investment Credit risk – Credit risk is the risk that the issuer or other counterparty to an investment will not fulfill its obligations. The District does not have a formal policy limiting its investment choices, other than the limitation of state law as follows:

- Direct obligations of the U.S. Government, its agencies and instrument 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.
- Certificates of deposit or savings accounts that are either insured or secured with acceptable collateral with in-state financial institutions, and fully insured certificates of deposit or savings accounts in out-of-state financial institutions.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

2. CASH AND INVESTMENTS – cont'd

- With certain limitation, negotiable certificates of deposit, prime bankers acceptances, prime commercial paper and repurchase agreements with certain limitations.
- County, municipal or school district tax supported debt obligations, bond or revenue anticipation notes, money judgments, or bond or revenue anticipation notes of public trusts whose beneficiary is a county, municipality or school district.
- Notes or bonds secured by mortgage or trust deed insured by the Federal Housing Administrator and debentures issued by the Federal Housing Administrator, and in obligations of the National Mortgage Association.
- Money market funds regulated by the SEC and in which investments consist of the investments mentioned in the previous bullet items.

Concentration of Investment Credit Risk – The District places no limit on the amount it may invest in any one issuer.

3. INTERFUND RECEIVABLES AND PAYABLES

There were no interfund receivables or payables at June 30, 2017.

4. GENERAL LONG-TERM DEBT

State statutes prohibit the District from becoming indebted in an amount exceeding the revenue to be received for any fiscal year without approval by the District's voters. Bond issues can be 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 of the date of issue.

General long-term debt of the District normally consists of building bonds payable and capital leases. Debt service requirements for bonds are payable solely from the fund balance and the future revenues of the debt service fund.

The District had no outstanding long-term debt at June 30, 2017.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

5. EMPLOYEE RETIREMENT SYSTEM

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 employee make contributions. The contribution rates for the District and its employees are established by and may be amended by Oklahoma Statutes. The rates are not actuarially determined. The rates are applied to the employee's earnings plus employer-paid fringe benefits. The required contribution for the participating members is 7.0% of compensation. Contributions received by the System from the State of Oklahoma are used to offset required employer contributions by the local school district. For the 2016-17 fiscal year, the District contributed 9.5% and the State of Oklahoma contributed the remaining amount during the year. The District is allowed by Oklahoma Teachers' Retirement System to make the required contributions on behalf of the participating members. In addition, if a member's salary is paid in part by federal or private funds, the contribution on that portion of the salary paid by those funds must be matched by the District at 7.70%.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

5. EMPLOYEE RETIREMENT SYSTEM – cont'd

Annual Pension Cost

The District's total contributions for 2017, 2016 and 2015 were \$75,881, \$56,349 and \$72,557, respectively. Ten-year historical trend information is presented in the Teacher's Retirement System of Oklahoma Annual Report for the year ended June 30, 2017. This information is useful in assessing the pension plan's accumulation of sufficient assets to pay pension benefits as they become due. Please visit www.ok.gov/TRS for all plan information.

GASB Statement 68 became effective for fiscal years beginning after June 15, 2015, and significantly changes pension accounting and financial reporting for governmental employers who participate in a pension plan, such as the System, and who prepare published financial statements on an accrual basis using Generally Accepted Accounting Principles. Since the District does not prepare and present their financial statements on an accrual basis, the net pension amount is not required to be presented on the audited financial statements. The amount of calculated pension liability for the District at June 30, 2016 (the latest information available) was \$715,239.

6. RISK MANAGEMENT

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

The District participates in a risk pool for Workers' 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 District 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 it 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 school's 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 its loss fund in three years, it is returned to the District with no interest.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

6. RISK MANAGEMENT – cont'd

The District is also a member of the Oklahoma Public Schools Unemployment Compensation Program. In this program the District is required to contribute 1.6% of its taxable payroll for unemployment insurance. The funds for each District are kept separate and Districts can contribute more than 1.6% of their payroll if they elect to. The money contributed by each District earns interest and is fully insured. If the District has claims in excess of the amount in its account, it will be liable for the excess.

7. CONTINGENCIES

Federal Grants

Amounts received or receivable from grant agencies are subject to audit and adjustment by grantor agencies. Any disallowed claims, including amounts already collected, may constitute a liability of the applicable funds. The amounts, 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.

Schedule of Expenditure of Federal Awards

The schedule shows the federal awards received and expended by the District during the 2016-17 fiscal year. The new Uniform Guidance, *Audits of States, Local Governments and Non-Profit Organizations*, established uniform audit requirements for nonfederal entities which expended more than \$750,000 in federal awards.

The District did not fall under this threshold during the 2016-17 fiscal year.

Litigation

School officials are not aware of any pending or threatened litigation, claims or assessments or unasserted claims or assessments against the District.

IRS Notice

In January 2017 the District received notice of levy from the IRS regarding unpaid assessments, interest and penalties for late payment of taxes for several tax periods totaling \$83,119.93 and another notice in January 2017 for failure to file W-2's for the period ending December 2013, with a penalty assessment of \$53,921.21. As of final audit work the IRS has garnished the Districts bank account for the \$166,264.86. The District has hired a law firm which specializes in tax issues, which is in the process of appealing, in order to have the penalties abated. It appears the IRS garnished too much from the District and subsequently issued repayment of \$83,119.93 to the District in July 2017.

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
 COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCE -
 ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS
 JUNE 30, 2017

<u>ASSETS</u>	<u>BUILDING FUND</u>	<u>CHILD NUTRITION FUND</u>	<u>TOTAL</u>
Cash	\$ 123,099	13,083	136,182
<u>LIABILITIES AND FUND BALANCE</u>			
Liabilities			
Warrants payable	\$ 0	2,853	2,853
Fund Balance			
Restricted	123,099	10,230	133,329
Total Liabilities and Fund Balance	\$ 123,099	13,083	136,182

INDEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
 COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES
 IN CASH FUND BALANCES - ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS
 FOR THE YEAR ENDED JUNE 30, 2017

	BUILDING FUND	CHILD NUTRITION FUND	TOTAL
Revenues Collected			
Local sources	\$ 20,029	1,049	21,078
State sources		779	779
Federal sources		64,478	64,478
Total revenues collected	<u>20,029</u>	<u>66,306</u>	<u>86,335</u>
Expenditures			
Support services	166,265		166,265
Operation of non-instructional services		77,058	77,058
Total expenditures	<u>166,265</u>	<u>77,058</u>	<u>243,323</u>
Excess of revenues collected over (under) expenditures before other financing sources (uses)	(146,236)	(10,752)	(156,988)
Other financing sources (uses)			
Transfers in (out)	<u>0</u>	<u>(12,000)</u>	<u>(12,000)</u>
Excess of revenues collected over (under) expenditures	(146,236)	(22,752)	(168,988)
Cash fund balances, beginning of year	<u>269,335</u>	<u>32,982</u>	<u>302,317</u>
Cash fund balances, end of year	<u>\$ 123,099</u>	<u>10,230</u>	<u>133,329</u>

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
 COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES
 IN CASH FUND BALANCES - BUDGET AND ACTUAL - SPECIAL REVENUE FUNDS - REGULATORY BASIS
 FOR THE YEAR ENDED JUNE 30, 2017

	BUILDING FUND			CHILD NUTRITION FUND		
	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL
Revenues Collected						
Local sources	\$ 18,359	18,359	20,029	\$ 1,778	1,778	1,049
State sources				701	701	779
Federal sources				68,552	68,552	64,478
Total revenues collected	<u>18,359</u>	<u>18,359</u>	<u>20,029</u>	<u>71,031</u>	<u>71,031</u>	<u>66,306</u>
Expenditures						
Support services			166,265			
Operation of non-instructional services				104,013	104,013	77,058
Unbudgeted	287,694	287,694				
Total expenditures	<u>287,694</u>	<u>287,694</u>	<u>166,265</u>	<u>104,013</u>	<u>104,013</u>	<u>77,058</u>
Excess of revenues collected over (under) expenditures before other financing sources (uses)	(269,335)	(269,335)	(146,236)	(32,982)	(32,982)	(10,752)
Other financing sources (uses)						
Transfers in (out)	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>(12,000)</u>
Excess of revenues collected over (under) expenditures	(269,335)	(269,335)	(146,236)	(32,982)	(32,982)	(22,752)
Cash fund balances, beginning of year	<u>269,335</u>	<u>269,335</u>	<u>269,335</u>	<u>32,982</u>	<u>32,982</u>	<u>32,982</u>
Cash fund balances, end of year	<u>\$ 0</u>	<u>0</u>	<u>123,099</u>	<u>\$ 0</u>	<u>0</u>	<u>10,230</u>

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
 COMBINING STATEMENT OF CHANGES IN ASSETS AND LIABILITIES -
 AGENCY FUNDS - REGULATORY BASIS
 FOR THE YEAR ENDED JUNE 30, 2017

	BALANCE 7-01-16	ADDITIONS	NET TRANSFERS/ ADJUSTMENTS	DEDUCTIONS	BALANCE 6-30-17
<u>ASSETS</u>					
Cash	\$ 9,834	14,500	0	17,202	7,132
 <u>LIABILITIES</u>					
Funds held for school organizations:					
General activity	\$ 289	973	3,446	4,706	2
4H School	1,985	268		991	1,262
Interest and service charges	58	9		0	67
Class of 2017	782	12,342		10,794	2,330
Kindergarden	292	37		68	261
Class of 2023	99	46		0	145
Class of 2018	914	197		72	1,039
OEA contributions	131	0		0	131
Teams	30	64		60	34
Class of 2019	681	32		0	713
Class of 2020	558	32		0	590
Class of 2021	101	149		107	143
Class of 2022	165	150		251	64
Class of 2024	3,597	119	(3,446)	63	207
Drawing	25	0		0	25
3 year olds	70	45		90	25
Pre-K	47	37		0	84
Grant	10	0		0	10
Total Liabilities	\$ 9,834	14,500	0	17,202	7,132

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2017

Federal Grantor / Pass Through Grantor / Program Title	CFDA Number	Federal Grantor's/ Pass-through No.	Program or Award Amount	Balance at 07/01/16	Revenue Collected	Total Expenditures	Balance at 06/30/17
<u>U.S. Department of Education</u>							
Small, Rural School Achievement Program	84.358	S358A162492	\$ 16,837	0	16,837	16,837	0
<u>Passed Through State Department of Education:</u>							
Title I Basic program	84.010	S010A160036	37,654		37,654	37,654	
Title I Basic program 2015-16 - Note	84.010			39,985	39,985		
IDEA-B Flow Through	84.027	H02716A0051	25,528		25,528	25,528	
IDEA-B Pre-school	84.173	H173A160084	1,048		1,048	1,048	
Title II, Part A	84.367	S367A160035	6,565		6,565	6,565	
Title II, Part A 2015-16 - Note	84.367			6,611	6,611		
Sub Total			<u>70,795</u>	<u>46,596</u>	<u>117,391</u>	<u>70,795</u>	<u>0</u>
<u>U.S. Department of Agriculture</u>							
<u>Passed Through State Department of Education:</u>							
Child Nutrition Programs:							
National School Lunch Program	10.555				43,621	46,948	
School Breakfast Program	10.553				20,857	20,857	
Sub Total					<u>64,478</u>	<u>67,805</u>	
<u>Passed Through Department of Human Services:</u>							
Non-cash assistance - Commodities - Note 3							
National School Lunch Program	10.555				4,828	4,828	
<u>Other Federal Assistance:</u>							
Flood Control	12.112		3,215	0	3,215	0	0
Total Federal Assistance			<u>\$ 90,847</u>	<u>46,596</u>	<u>206,749</u>	<u>160,265</u>	<u>0</u>

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

Note 1 - Basis of Presentation - The accompanying schedule of expenditures of federal awards includes the federal activity of the District for the year ended June 30, 2017. This information 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 District, it is not intended and does not present the financial position, changes in net assets, or cash flows of the District.

Note 2 - Summary of Significant Accounting Policies - Expenditures reported on this schedule are reported on the regulatory basis of accounting consistent with the preparation of the combined financial statements except as noted in Note 3. 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 - Non-Monetary Assistance - Commodities received by the District in the amount of \$4,828 were of a non-monetary nature and therefore the total revenue does not agree with the financial statements

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
 STATEMENT OF STATUTORY, FIDELITY AND HONESTY BONDS
 FOR THE YEAR ENDED JUNE 30, 2017

BONDING COMPANY	POSITION COVERED	BOND NUMBER	COVERAGE AMOUNT	EFFECTIVE DATES
Western Surety Company- Headrick Insurance Agency	Treasurer	62062164	\$ 100,000	6/11/16 - 6/11/17
	Superintendent	71015940	100,000	10/25/16 - 10/25/17
	Activity fund	13446335	1,000	7/18/16 - 7/18/17
	Encumbrance/Minutes Clerk	13446336	1,000	7/25/16 - 7/25/17
	Security Guard	62556722	1,000	10/13/16 - 10/13/17
	Security Guard	62556799	1,000	10/13/16 - 10/13/17

DEPENDENT SCHOOL DISTRICT NO. C-82, STEPHENS COUNTY
SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE
AFFIDAVIT
JULY 1, 2016 TO JUNE 30, 2017

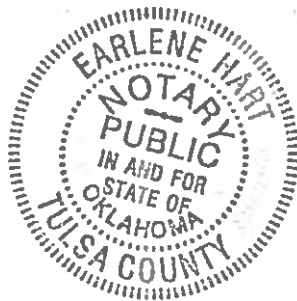
State of Oklahoma)
) ss
County of Tulsa)

The undersigned auditing firm of lawful ages, 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 Grandview Public Schools for the audit year 2016-17.

Sanders, Bledsoe & Hewett,
Certified Public Accountants, LLP
Auditing Firm

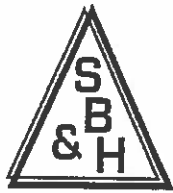
By Jeffrey D. Hewett
Authorized Agent

Subscribed and sworn to before me
This 7th day of February, 2018



Earlene Hart
Notary Public (or Clerk or Judge)

My Commission Expires: 5-19-20
Commission # 00008621



SANDERS, BLEDSOE & HEWETT
CERTIFIED PUBLIC ACCOUNTANTS, LLP

Stephen H. Sanders, CPA
Eric M. Bledsoe, CPA
Jeffrey D. Hewett, CPA

P.O. BOX 1310 • 101 N. MAIN ST. • BROKEN ARROW, OK 74013 • (918) 449-9991 • (800) 522-3831 • FAX (918) 449-9779

February 7, 2018

Mr. Gary Wade, Supt.
Grandview Public Schools
Rural Route 1, Box 105
Comanche, Oklahoma 73529

Dear Mr. Wade:

Listed below are control deficiencies and recommendations from the final audit work we performed for you. Any material weaknesses are listed within your audit report. Please review them very carefully, along with the review copy of your audit report. If you have questions or desire additional information, please call us so that any discrepancies may be resolved.

The following section contains the observations relayed to management that are control deficiencies, which we feel need to be communicated to you so appropriate action may be taken to correct these deficiencies. These deficiencies could evolve into material findings if not addressed.

Appropriations/Budget

The appropriations for the general fund and the child nutrition fund were not allocated among the various line item function codes, and, therefore, line item expenditures were in excess of appropriations/budget in several instances. However, the funds, in total, did not have expenditures in excess of appropriations. We recommend that the district implement procedures which require continuous review of available appropriations versus current expenditures and future needs by line item function codes in order to ensure that transfers are made before expenditures exceed available line item appropriations/budget.

Minutes

We reported in the prior years' audit that the board minutes did not provide sufficient detail as to what transacted during the board meetings, i.e. district did not approve the hiring of certified and non-certified personnel, no loan deficit agreement with the Child Nutrition fund was approved, no activity fund fundraisers were approved, and no authorized representative for federal programs. The District did improve in this area during the current fiscal year and we recommend that the District continue to increase their efforts in order to provide sufficient detail of the transactions that occur in the board meetings.

In addition, there were two meetings that could not be located for review during our audit. Board minutes should be permanently filed and available for review. The meetings we could not locate were the March 9, 2017 regular meeting and the March 30, 2017 special meeting.

Activity Fund Deposits

During the audit, we observed that the activity fund custodian was not depositing the revenue on a timely basis. Oklahoma Statutes require that, “Deposits of funds shall be made daily, however, if the deposit for a day totals less than one hundred dollars (\$100.00), a school district may accumulate monies required to be deposited into the fund on a daily basis until the total accumulated balance of deposits equals or exceeds one hundred dollars (\$100.00). Provided, a school district shall deposit accumulated monies into the fund not less than one (1) time per week, regardless of whether the monies total one hundred dollars (\$100.00).” We observed some weeks during the year in which no revenue was deposited on any of the days where accumulated monies exceeded one hundred dollars (\$100.00). We recommend that the receipt be entered into the system when the collection is made by the activity fund custodian and then subsequently deposited.

Further, we recommend that all activity funds collected be receipted in pre-numbered receipt books, with a receipt copy being issued to any student or patron from whom money is received, and all receipt books be kept on file for review. Further, we recommend that sponsor receipt books be checked in/out to sponsors at the beginning/end of each year and a log be used to record the checking in/out of receipt books. We recommend that the activity fund collection/receipts processes and procedures be reexamined and improved upon.

Federal Coding

We observed a few instances where the district coded either too much or not enough to the applicable project code in regards to the federal programs. We recommend that the District review at year end for each program what has been coded to the project code compared to what was claimed for reimbursement/received and make any adjustments. The following is what was observed.

<u>Program</u>	<u>Claimed/Received</u>	<u>Coded</u>	<u>Difference</u>
School Lunch*	43,620.74	46,948.27	3,327.53
Flood control	3,214.51	0.00	(3,214.51)
Project 770	0.00	9,631.59	9,631.59

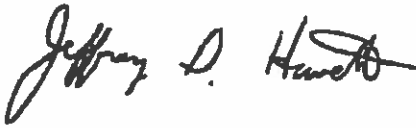
*current year only, does not include any prior year carryover.

Child Nutrition Review

The Child Nutrition Program Division of the State Department of Education conducted a Procurement and Administrative review of the District on January 31, 2017, and noted several areas of non-compliance. The District submitted a corrective action plan to the Child Nutrition Program Division of the State Department of Education. The Child Nutrition Program Division accepted the corrective action plan and closed the review in a memo dated June 5, 2017.

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

Sincerely,

A handwritten signature in black ink that reads "Jeffrey D. Hewett". The signature is written in a cursive style with a large initial "J" and a distinct "H".

Jeffrey D. Hewett

For

Sanders, Bledsoe & Hewett
Certified Public Accountants, LLP