

**AUDIT REPORT**

**KEYS SCHOOL DISTRICT NO. I-006**

**PARK HILL, CHEROKEE COUNTY, OKLAHOMA**

**JULY 1, 2023 THROUGH JUNE 30, 2024**

**AUDITED BY**

**DREW KIMBLE**

**CERTIFIED PUBLIC ACCOUNTANT**

**104 S. Muskogee Ave.**

**TAHLEQUAH, OKLAHOMA**

**KEYS SCHOOL DISTRICT No. I-006  
CHEROKEE COUNTY, OKLAHOMA  
JUNE 30, 2024**

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**DREW KIMBLE**  
***Certified Public Accountant***  
104 S. Muskogee Ave  
Tahlequah, OK 74464  
(918) 575 - 1873

**INDEPENDENT AUDITOR'S REPORT**

November 6, 2024

The Honorable Board of Education  
Keys School District No. I-006  
Cherokee County, Oklahoma

***Report on the Audit of the Financial Statements***

We have audited the accompanying combined fund type and account group financial statements-regulatory basis of the Keys School District, No. I-006, Cherokee County, Oklahoma (District), as of and for the year ended June 30, 2024, and the related notes to the financial statements, as listed in the table of contents.

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

In our opinion, except for the effects of the matter described in the "Basis for Qualified Opinion on Regulatory Basis of Accounting" paragraph, the financial statements referred to in the first paragraph present fairly, in all material respects, the assets, liabilities and fund balance arising from regulatory basis transactions of each fund type and account group of Keys School District, No. I-006, Cherokee County, Oklahoma, as of June 30, 2024, and the revenues collected and expenditures paid and encumbered for the year then ended on the regulatory basis of accounting described in Note 1.

***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 Keys School District, No. I-006, Cherokee County, Oklahoma, as of June 30, 2024, the changes in its financial position, or, where applicable, its cash flows for the year then ended.

***Basis for Opinions***

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. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Keys School District, No. I-006, Cherokee County, Oklahoma, and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

### ***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.

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

As discussed in Note 1, the financial statements are prepared by the Keys School District, No. I-006, 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 reasonably determined, are presumed to be material and pervasive.

### ***Responsibilities of Management 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. 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.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the District's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

### ***Auditor's Responsibilities for the Audit of the Financial Statements***

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with generally accepted auditing standards and *Government Auditing Standards*, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit 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 Keys School District, No. I-006, Cherokee County, Oklahoma's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Keys School District, No. I-006, Cherokee County, Oklahoma's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

### ***Supplementary Information***

Our audit was conducted for the purpose of forming opinions on the fund type and account group financial statements-regulatory basis that collectively comprise the District's basic financial statements. The accompanying combining financial statements-regulatory basis and other supplementary information and schedule of expenditures of federal awards, as required by Title 2 U.S. Code of Federal Regulations (CFR) Part 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, are presented for purposes of additional analysis and are not a required part of the combined financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the combined financial statements-regulatory basis. The information has been subjected to the auditing procedures applied in the audit of the fund type and account group financial statements within the combined financial statements-regulatory basis 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, except for the financial statements being prepared in compliance with the regulatory basis as prescribed by the Oklahoma State Department of Education as discussed in Note I, the combining financial statements-regulatory basis and other supplementary information and the schedule of expenditures of federal awards are fairly stated, in all material respects, in relation to the combined financial statements-regulatory basis as a whole.

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

In accordance with *Government Auditing Standards*, we have also issued our report dated November 6, 2024 on our consideration of the District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is solely to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the District's internal control over financial reporting 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.

  
Drew Kimble, CPA

**KEYS SCHOOL DISTRICT NO. I-006**  
**COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES**  
**REGULATORY BASIS - ALL FUND TYPES AND ACCOUNT GROUPS**  
**JUNE 30, 2024**

	Governmental Fund Types			Fiduciary Fund Types	Account Group	Total (Memorandum Only
	General	Special Revenue (Building Fund)	Debt Service	Trust and Agency	General Long- Term Debt	Note 1) 2024
<b>ASSETS</b>						
Cash and Investments	\$ 2,090,413.62	\$ 1,133,984.00	\$ 28,211.36	\$ 242,817.15	\$ -	\$ 3,495,426.13
Amount Available in Debt Service Fund	-	-	-	-	28,211.36	28,211.36
Amount to be Provided for Retirement of General Long-Term Debt	-	-	-	-	3,806,788.64	3,806,788.64
Amount to be Provided for Capitalized Lease Agreements	-	-	-	-	88,118.84	88,118.84
<b>Total Assets</b>	<u>\$ 2,090,413.62</u>	<u>\$ 1,133,984.00</u>	<u>\$ 28,211.36</u>	<u>\$ 242,817.15</u>	<u>\$ 3,923,118.84</u>	<u>\$ 7,418,544.97</u>
<b>LIABILITIES AND FUND BALANCES</b>						
<b>Liabilities:</b>						
Warrants Payable	\$ 592,350.83	\$ 15,283.03	\$ -		\$ -	\$ 607,633.86
Reserves	13,869.48	-	-	-	-	13,869.48
Due to Others	-	-	-	242,817.15	-	242,817.15
General Obligation Bonds Payable	-	-	-	-	3,835,000.00	3,835,000.00
Capitalized Lease Obligations Payable	-	-	-	-	88,118.84	88,118.84
<b>Total Liabilities</b>	<u>606,220.31</u>	<u>15,283.03</u>	<u>-</u>	<u>242,817.15</u>	<u>3,923,118.84</u>	<u>4,787,439.33</u>
<b>Fund Balances:</b>						
Designated for Capital Projects	-	-	-	-	-	-
Designated for Debt Service	-	-	28,211.36	-	-	28,211.36
Undesignated	1,484,193.31	1,118,700.97	-	-	-	2,602,894.28
<b>Total Fund Balances</b>	<u>1,484,193.31</u>	<u>1,118,700.97</u>	<u>28,211.36</u>	<u>-</u>	<u>-</u>	<u>2,631,105.64</u>
<b>Total Liabilities and Fund Balances</b>	<u>\$ 2,090,413.62</u>	<u>\$ 1,133,984.00</u>	<u>\$ 28,211.36</u>	<u>\$ 242,817.15</u>	<u>\$ 3,923,118.84</u>	<u>\$ 7,418,544.97</u>

The accompanying notes and auditor's report are an integral part of these financial statements.

**KEYS SCHOOL DISTRICT NO. I-006**  
**COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID,**  
**AND CHANGES IN FUND BALANCES - REGULATORY BASIS**  
**ALL GOVERNMENTAL FUND TYPES**  
**JUNE 30, 2024**

	Governmental Fund Types			Total (Memorandum Only Note 1) 2024
	General	Special Revenue (Building Fund)	Debt Service	
<b><u>REVENUES:</u></b>				
Local Sources	\$ 2,008,641.13	\$ 271,477.86	\$ 3,834.87	\$ 2,283,953.86
Intermediate Sources	134,282.67	-	351,926.95	486,209.62
State Sources	4,746,055.40	184,099.97	-	4,930,155.37
Federal Sources	1,106,680.72	264,934.00	-	1,371,614.72
Total Revenues Collected	<u>7,995,659.92</u>	<u>720,511.83</u>	<u>355,761.82</u>	<u>9,071,933.57</u>
<b><u>EXPENDITURES:</u></b>				
Instruction	4,258,083.46	6,539.75	-	4,264,623.21
Support Services	2,760,209.96	706,761.15	-	3,466,971.11
Non-Instructional Services	501,220.69	-	-	501,220.69
Capital Outlays	255,106.48	59,909.98	-	315,016.46
Other Outlays	-	27,500.11	-	27,500.11
Debt Service:				
Principal Retirement	-	-	305,000.00	305,000.00
Interest and Fiscal Agent Charges	-	-	41,875.00	41,875.00
Total Expenditures	<u>7,774,620.59</u>	<u>800,710.99</u>	<u>346,875.00</u>	<u>8,922,206.58</u>
Other Financing Sources (Uses):				
Bond Sale Proceeds	-	-	-	-
Excess of Revenues Over (Under) Expenditures	<u>221,039.33</u>	<u>(80,199.16)</u>	<u>8,886.82</u>	<u>149,726.99</u>
Adjustments to Prior Year Encumbrances	<u>10,663.23</u>	<u>-</u>	<u>-</u>	<u>10,663.23</u>
Excess of Revenues and Other Sources Over (Under) Expenditures and Other Uses	231,702.56	(80,199.16)	8,886.82	160,390.22
Beginning Fund Balances	<u>1,252,490.75</u>	<u>1,198,900.13</u>	<u>19,324.54</u>	<u>2,470,715.42</u>
Ending Fund Balances	<u>\$ 1,484,193.31</u>	<u>\$ 1,118,700.97</u>	<u>\$ 28,211.36</u>	<u>\$ 2,631,105.64</u>

The accompanying notes and auditor's report are an integral part of these financial statements.



**KEYS SCHOOL DISTRICT NO. I-006**  
**COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID,**  
**AND CHANGES IN FUND BALANCES - BUDGET AND ACTUAL - REGULATORY BASIS**  
**BUDGETED GOVERNMENTAL FUND TYPES**  
**FOR THE YEAR ENDED JUNE 30, 2024**

	General Fund			Special Revenue Funds (Building)		
	<u>Original Budget</u>	<u>Final Budget</u>	<u>Actual</u>	<u>Original Budget</u>	<u>Final Budget</u>	<u>Actual</u>
<b><u>REVENUES COLLECTED:</u></b>						
Local sources	\$ 1,423,334.90	\$ 1,423,334.90	\$ 2,008,641.13	\$ 203,390.75	\$ 203,390.75	\$ 271,477.86
Intermediate sources	123,055.67	123,055.67	134,282.67	-	-	-
State sources	4,220,403.08	4,220,403.08	4,746,055.40	-	-	184,099.97
Federal sources	<u>844,387.82</u>	<u>844,387.82</u>	<u>1,106,680.72</u>	<u>-</u>	<u>-</u>	<u>264,934.00</u>
Total revenues collected	<u>6,611,181.47</u>	<u>6,611,181.47</u>	<u>7,995,659.92</u>	<u>203,390.75</u>	<u>203,390.75</u>	<u>720,511.83</u>
<b><u>EXPENDITURES PAID:</u></b>						
Instruction	4,192,672.22	4,192,672.22	4,258,083.46	10,000.00	10,000.00	6,539.75
Support services	2,900,000.00	2,900,000.00	2,760,209.96	1,302,290.88	1,302,290.88	706,761.15
Non-instructional services	510,000.00	510,000.00	501,220.69	-	-	-
Capital outlays	261,000.00	261,000.00	255,106.48	60,000.00	60,000.00	59,909.98
Other outlays	<u>-</u>	<u>-</u>	<u>-</u>	<u>30,000.00</u>	<u>30,000.00</u>	<u>27,500.11</u>
Total expenditures paid	<u>7,863,672.22</u>	<u>7,863,672.22</u>	<u>7,774,620.59</u>	<u>1,402,290.88</u>	<u>1,402,290.88</u>	<u>800,710.99</u>
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances	<u>(1,252,490.75)</u>	<u>(1,252,490.75)</u>	<u>221,039.33</u>	<u>(1,198,900.13)</u>	<u>(1,198,900.13)</u>	<u>(80,199.16)</u>
Adjustments to prior year encumbrances	<u>-</u>	<u>-</u>	<u>10,663.23</u>	<u>-</u>	<u>-</u>	<u>-</u>
Excess (deficiency) of revenues and other resources over expenditures and other financing sources (uses)	<u>(1,252,490.75)</u>	<u>(1,252,490.75)</u>	<u>231,702.56</u>	<u>(1,198,900.13)</u>	<u>(1,198,900.13)</u>	<u>(80,199.16)</u>
Fund balance, beginning of year	<u>1,252,490.75</u>	<u>1,252,490.75</u>	<u>1,252,490.75</u>	<u>1,198,900.13</u>	<u>1,198,900.13</u>	<u>1,198,900.13</u>
Fund balance, end of year	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 1,484,193.31</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 1,118,700.97</u>

The accompanying notes and auditor's report are an integral part of these financial statements.

**KEYS SCHOOL DISTRICT NO. I-006**  
**COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID,**  
**AND CHANGES IN FUND BALANCES - BUDGET AND ACTUAL - REGULATORY BASIS**  
**BUDGETED GOVERNMENTAL FUND TYPES**  
**FOR THE YEAR ENDED JUNE 30, 2024**

	Debt Service		
	<u>Original Budget</u>	<u>Final Budget</u>	<u>Actual</u>
<b><u>REVENUES COLLECTED:</u></b>			
Local sources	\$ 3,834.87	\$ 3,834.87	\$ 3,834.87
Intermediate sources	351,926.95	351,926.95	351,926.95
State sources	-	-	-
Federal sources	-	-	-
Total revenues collected	<u>355,761.82</u>	<u>355,761.82</u>	<u>355,761.82</u>
<b><u>EXPENDITURES PAID:</u></b>			
Support Services	-	-	-
Capital Outlay	-	-	-
Other Outlays			
Principal Retirement	305,000.00	305,000.00	305,000.00
Interest and Fiscal Agent Charges	41,875.00	41,875.00	41,875.00
Total expenditures paid	<u>346,875.00</u>	<u>346,875.00</u>	<u>346,875.00</u>
Excess of revenues collected over (under) expenditures before adjustments to prior year encumbrances	<u>8,886.82</u>	<u>8,886.82</u>	<u>8,886.82</u>
Other Financing Sources (uses): Bond Sale Proceeds			
Adjustments to prior year encumbrances	<u>-</u>	<u>-</u>	<u>-</u>
Excess (deficiency) of revenues and other resources over expenditures and other financing sources (uses)	8,886.82	8,886.82	8,886.82
Fund balance, beginning of year	<u>19,324.54</u>	<u>19,324.54</u>	<u>19,324.54</u>
Fund balance, end of year	<u>\$ 28,211.36</u>	<u>\$ 28,211.36</u>	<u>\$ 28,211.36</u>

The accompanying notes and auditor's report are an integral part of these financial statements.

**NOTES TO THE FINANCIAL STATEMENTS**

**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

The financial statements of the Keys School District No. I-006 (the “District”) have been prepared on a regulatory basis of accounting which is another comprehensive basis of accounting other than accounting principles generally accepted in the United States of America. Accordingly, the accompanying financial statements are not intended to present financial position and results of operations in conformity with accounting principles generally accepted in the United States of America. The accounting policies are prescribed by the Oklahoma Department of Education, and conform to the system of accounting authorized by the State of Oklahoma. The following is a summary of the more significant accounting policies.

**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 elected members. The appointed superintendent is the executive officer of the District.

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

**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**A. REPORTING ENTITY (continued)**

The Board of School Trustees (Board), an elected five member group constituting an on-going entity, is the level of government which has governance responsibilities over all activities related to public school education within the jurisdiction of the Local Independent School District. The board receives funding from local, state, and federal government sources, and must comply with the requirements of these funding source entities. However, the Board 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.

**B. FUND ACCOUNTING**

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 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.

**KEYS SCHOOL DISTRICT NO. I-006  
NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**Special Revenue Funds** - The District's only Special Revenue Fund is the District's **Building Fund**. The Building Fund consists of monies derived from property taxes levied for the purpose of erecting, remodeling, or repairing buildings and for purchasing furniture and equipment.

**Debt Service Fund** - The Debt Service Fund is the District's Sinking Fund used to account for the accumulation of financial resources for the payment of general long-term 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 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.

**Proprietary Fund Types**

Proprietary Funds are used to account for activities similar to those found in the private sector, where the determination of net income is necessary or useful to sound financial administration. Goods or services from such activities can be provided either to outside parties (Enterprise Funds) or to other departments or agencies primarily within the District (Internal Service Funds). The District does not have any Proprietary Funds.

**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. When these assets are held under the terms of a formal trust agreement, either a nonexpendable trust fund or an expendable trust fund is used. The terms "nonexpendable" 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 operations.

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

**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**Account Groups**

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

**General Long-Term Debt Account Group** - This account group was established to account for all long-term debt of the District, which is offset by the amount available in the Debt Service Fund and the amount to be provided in future years to complete retirement of the debt principal. It is also used to account for liabilities for compensated absences and early retirement incentives which are to be paid from funds provided in future years.

**General Fixed Asset Account Group** - This account group is used to account for property, plant, and equipment of the School District. The District does not maintain a record of its general fixed assets, and accordingly, a statement of general fixed assets, required by accounting principles generally accepted in the United states of America, is not included in the financial statements. Land, buildings, nonstructural improvements, and all other physical assets in all funds are considered expenditures in the year of acquisition, and are not recorded as assets for financial statement purposes.

**Memorandum Only - Total Column**

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

**C. BASIS OF ACCOUNTING**

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 - and Management's Discussion and Analysis - for State and Local Governments*. This format significantly differs from that required by GASB 34.

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

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

**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**C. BASIS OF ACCOUNTING (continued)**

- Capital assets in proprietary funds are recorded when acquired and depreciated over their useful lives.
- Warrants payable are recorded as liabilities when issued.
- Long-term debt is recorded when incurred.
- Accrued compensated absences are recorded as an expenditure and liability when the obligation is incurred.

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 and liabilities are incurred for proprietary fund types and trust funds.

**D. BUDGETS AND BUDGETARY ACCOUNTING - ESTIMATE OF NEEDS**

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 the General Fund and Special Revenue Funds (Building Fund and Child Nutrition Fund) that includes revenues and expenditures.

The 2023-2024 Estimate of Needs was approved by the Board and subsequently filed with the county clerk. The Estimate of needs was approved by the excise board, and the requested levies were made.

**E. ENCUMBRANCES**

Encumbrances represent commitments to unperformed contracts for goods or services. Encumbrance accounting--under which purchase orders and other commitments of resources are recorded as expenditures of the applicable fund--is utilized in all governmental funds of the District. Appropriations not used or encumbered lapse at the end of the year.



**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**F. ASSETS, LIABILITIES, AND FUND EQUITY**

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

**Investments** - Investments consist of bank certificates of deposit with maturities greater than three months when purchased. All investments are recorded at cost, which approximates market value.

**Inventories** - The value of consumable inventories at June 30, 2024, is not material to the financial statements. Purchases for inventory items are considered expenditures at the time the items were encumbered.

**Fixed Assets and Property, Plant, and Equipment** - The General Fixed Asset Account Group is not presented. The amount that should be recorded in the General Fixed Asset Account Group is not known.

**Compensated Absences** - Vested or accumulated vacation leave that is expected to be liquidated with expendable available financial resources has not been reported as an expenditure or a fund liability of the governmental fund that will pay it since the combined financial statements have been prepared on the regulatory basis of accounting. Vested accumulated rights to receive sick pay benefits have not been reported in the General Long-Term Debt Account Group since the combined financial statements have been prepared on the regulatory basis of accounting. These practices differ from accounting principles generally accepted in the United States of America.

In accordance with the provisions of Statement of Financial Accounting Standards No. 43, Accounting for Compensated Absences, no liability is recorded for nonvesting accumulating rights to receive sick pay benefits. Vested accumulated rights to receive sick pay benefits have been reported in the General Long-Term Debt Account Group since none of the vested sick leave is expected to be liquidated with expendable available financial resources.

**Long-Term Debt** - Long-term debt is recognized as a liability of 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 when applicable.

**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

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

**G. REVENUES, EXPENSES, AND EXPENDITURES**

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

If the first payment is not made timely, the entire tax becomes due and payable on January 2. Second half taxes become delinquent on April 1 of the year following the year of assessment. If 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.

**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 or additions of revenue of the year when the adjustment is made.

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

**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

**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)**

**Interfund Transactions (continued)**

recorded as revenues, expenditures, or 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. There were no operating transfers or residual equity transfers during fiscal year 2024.

**Use of Estimates** - The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America, requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Accordingly, actual results could differ from those estimates.

**Risk Management** - The District participates in a risk pool for worker's compensation coverage in which there is a transfer or pooling of risks among the participants of that pool. In accordance with GASB No. 10, the District reports that required contribution to the pool, net of refunds, as insurance expense.

**NOTE 2: CASH AND INVESTMENTS**

The District's investment policies are governed by state statute. Permissible investments include direct obligations of the United States Government and Agencies, certificates of deposit of savings and loan associations, and bank and trust companies, savings accounts or savings certificates of savings and loan associations, and trust companies. Collateral is required for demand deposits and certificates of deposit for all amounts not covered by federal deposit insurance.

In accordance with state statutes, the District's investment policy:

**Deposits and Investments** - The District's cash deposits and investments at June 30, 2024, were completely insured or collateralized by federal deposit insurance, direct obligations of the United States Government, or securities held by the District or by its agent in the District's name.

Therefore, the District's cash deposits and investments at June 30, 2024, were not exposed to Custodial Credit Risk, Investment Credit Risk, Investment Interest Rate Risk, or Concentration of Investment Credit Risk.

**KEYS SCHOOL DISTRICT NO. I-006  
NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 3: INTERFUND RECEIVABLES AND PAYABLES**

There were no interfund receivables or payables at June 30, 2024.

**NOTE 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 the approval by the District's voters. General long-term debt of the District consists of lease/purchase agreements and outstanding general obligation bonds.

The following is a summary of the long term debt transactions of the District for the year ended June 30, 2024:

	<u>Bonds Payable</u>	<u>Capital Lease Obligations</u>	<u>Total</u>
Balance July 1, 2023	\$ 2,140,000.00	\$ 130,223.91	\$ 2,270,223.91
Additions	2,000,000.00	0.00	2,000,000.00
Retirements	<u>(305,000.00)</u>	<u>(42,105.07)</u>	<u>(347,105.07)</u>
Balance June 30, 2024	<u>\$ 3,835,000.00</u>	<u>\$ 88,118.84</u>	<u>\$ 3,923,118.84</u>

A brief description of the outstanding general obligation issues at June 30, 2024, is set forth below:

	<u>Amount Outstanding</u>
Independent School District No. I-006 Building Bonds of June 1, 2020. Original Issue \$2,750,000. Interest rates of 1.75% to 2.50% due in installments of \$305,000 due annually beginning June 1, 2022 and a final payment of \$310,000 due June 1, 2030.	<u>\$ 1,835,000.00</u>
Independent School District No. I-006 Building Bonds Of December 1, 2023. Original Issue \$2,000,000. Interest rates of 4.75% due in installments of \$160,000 starting December 1, 2025 and then increase to \$230,000.00 on December 1, 2026 through December 1, 2033.	<u>2,000,000.00</u>
Total Outstanding	<u>\$ 3,835,000.00</u>

**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 4: GENERAL LONG-TERM DEBT (continued)**

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

<u>Year Ending June 30</u>	<u>Principal</u>	<u>Interest</u>	<u>Total</u>
2025	305,000.00	100,782.29	405,782.29
2026	465,000.00	100,947.50	565,947.50
2027	535,000.00	93,512.71	628,512.71
2028	535,000.00	82,752.92	617,752.92
2029	535,000.00	71,993.13	606,993.13
<u>2030-2033</u>	<u>1,460,000.00</u>	<u>170,591.67</u>	<u>1,630,591.67</u>
Total	3,835,000.00	620,580.22	4,455,580.22

Interest expense on general long-term debt incurred during the current year totals \$8,260.

As disclosed in Note 1 to the Financial Statements, the District does not record fixed assets in the financial statements. Consistent with this, the District has not recorded the assets in the General Fixed Assets Account Group. The District has recorded the liability for future lease payments in the General Long-Term Account Group.

The schedule of future minimum lease payments under the capital lease and the present value of the net minimum lease payments at June 30, 2024, are as follows:

<u>Year Ending June 30</u>	<u>2020 Ford Truck</u>	<u>2020 Bus</u>	<u>2022 Ram Truck</u>	<u>2023 Chevy Traverse</u>	<u>Total</u>
2025	7,481.39	6,967.33	15,588.12	7,923.84	
2026	0.00	0.00	15,588.12	7,923.84	
2027	0.00	0.00	15,588.12	7,923.84	
2028	0.00	0.00	10,392.08	3,301.60	
Total Minimum Lease Payments	\$ 7,481.39	\$ 6,967.33	\$7,156.44	27,073.12	
Less: Amount Representing Interest	<u>83.19</u>	<u>56.70</u>	<u>6,868.62</u>	<u>3,550.93</u>	
Present Value of Future Minimum Lease Payments	<u>\$ 7,398.20</u>	<u>\$6,910.63</u>	<u>\$50,287.82</u>	<u>\$23,522.19</u>	<u>\$88,118.84</u>

**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 5: OTHER POST EMPLOYMENT BENEFITS**

The District offers a \$5,000 retirement incentive.

**NOTE 6: EMPLOYMENT RETIREMENT SYSTEM**

The District participates in the state administered Oklahoma Teacher's Retirement System (The "System"), which is a cost-sharing, multiple employer public employee retirement system (PERS). Under the system contributions are made by the District, the State of Oklahoma, and the participating employees.

Participation is required for all teachers and other certified employees, and is optional for all other regular employees of public educational institutions who work at least 20 hours per week. A participant's date of membership is the date the first contribution is made to the System. The System is administered by a Board of Trustees which acts as a fiduciary for investing the funds and governing the administration of the System. The District has no responsibility or authority for the operation and administration of the System, nor has it any liability, except for the current contribution requirements.

A participant with five years of creditable service may retire with a normal retirement allowance at the age of sixty-two or with reduced benefits as early as age fifty-five. The normal retirement allowance paid monthly for life and then to beneficiaries, if certain options are exercised, equals two percent of the average of the highest earning years on contributory service multiplied by the number of years credited service. A participant leaving employment before attaining retirement age, but completing ten years of service, may elect to vest his accumulated contributions and defer receipt of a retirement annuity until a later date.

When a participant dies in active service and has completed ten years of credited service, the beneficiary is entitled to a death benefit of \$18,000.00 and the participant's contributions plus interest. If the beneficiary is a surviving spouse, the surviving spouse may, in lieu of the death benefit, elect to receive, subject to the surviving spousal options, the participant's retirement benefits accrued at the time of death.

The contribution rates for the District, which are not actuarial determined, and its employees are established by statute and applied to the employee's earnings, plus employer paid fringe benefits. The District is required by statute to contribute 9.5% of applicable compensation for the year ended June 30, 2024. The District is allowed by the Oklahoma Teacher's Retirement System to make the required contributions on behalf of the participating members. The required contribution for participating members is 7%.

**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 6: EMPLOYMENT RETIREMENT SYSTEM (continued)**

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 Oklahoma Teacher Retirement System issues an independent financial report, financial statements, and required supplementary information that can be obtained in writing at the Oklahoma Teacher's Retirement System, P.O. Box 53524, Oklahoma City, OK 73152 or by calling 405-521-2387.

**NOTE 7: CONTINGENCIES AND OTHER COMMITMENTS**

Amounts received or receivable from grantor 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 amount, if any, of expenditures which may be disallowed by the grantor cannot be determined at this time although the District expects such amounts, if any, to be immaterial.

**NOTE 8: INSURANCE COVERAGE**

The District purchases commercial insurance policies covering property casualty loss, public liability, school board member and administrator liability, and worker's compensation.

**KEYS SCHOOL DISTRICT NO. I-006**  
**NOTES TO THE FINANCIAL STATEMENTS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

**NOTE 9: SURETY BONDS**

The District has the following surety bonds: Superintendent in the amount of \$100,000.00 bond no. 62439313 dated 7/1/2023-7/1/2024 with Western Surety. Co-Custodian of Activity Fund the amount of \$25,000.00 bond no. 62439545 dated 7/1/2023-7/1/2024 with Western Surety. Co-Custodian of Activity Fund and Encumbrance Clerk in the amount of \$25,000.00 bond no. 62390073 dated 5/1/2024-5/1/2025 with Western Surety. Minutes Clerk and Co Custodian Activity Fund in the amount of \$25,000.00 bond no. 601122943 dated 1/1/2024-1/1/2025 with Ohio Casualty Insurance. Treasurer surety bond #LSM1669095 in the amount of \$100,000.00, which is dated 7/1/23-7/1/24 with Ohio Casualty Insurance. .

**NOTE 10: SUBSEQUENT EVENTS**

Subsequent events have been evaluated through November 6, 2024, which is the date the financial statements were available to be issued.



**COMBINING FINANCIAL STATEMENTS**

**KEYS SCHOOL DISTRICT NO. I-006**  
**STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES**  
**REGULATORY BASIS - FIDUCIARY FUNDS**  
**JUNE 30, 2024**

	Agency Fund
	Activity Fund
<b><u>ASSETS</u></b>	
Cash and Investments	<u>\$ 242,817.15</u>
Total Assets	<u><u>\$ 242,817.15</u></u>
 <b><u>LIABILITIES AND FUND BALANCES</u></b>	
Liabilities:	
Due to Student Groups	<u>\$ 242,817.15</u>
Total Liabilities	<u><u>\$ 242,817.15</u></u>
 Fund Balances:	
Unreserved:	
Undesignated	<u>-</u>
Total Fund Balances	<u>-</u>
 Total Liabilities and Fund Balances	<u><u>\$ 242,817.15</u></u>

The accompanying notes and auditor's report are an integral part of these financial statements.

**KEYS SCHOOL DISTRICT NO. I-006**  
**STATEMENT OF CHANGES IN ASSETS AND LIABILITIES**  
**REGULATORY BASIS - FIDUCIARY FUNDS**  
**JUNE 30, 2024**

	Agency Funds			
	Balance July 1, 2023	Additions	Deletions	Balance June 30, 2024
<b><u>ACTIVITIES</u></b>				
Student Activities	\$ 181,620.46	\$ 455,919.86	\$ 425,639.32	\$ 211,901.00
Parent and booster activities	14,830.35	44,368.19	48,803.10	10,395.44
Total Activities	<u>196,450.81</u>	<u>500,288.05</u>	<u>474,442.42</u>	<u>222,296.44</u>
 <b><u>ADMINISTRATIVE</u></b>				
Library Fund	16,896.90	7,122.91	6,592.27	17,427.54
High School Library Fund	240.75	-	-	240.75
Drivers Education	-	3,900.00	3,900.00	-
Child Nutrition	-	92,480.12	89,627.70	2,852.42
Total Administrative	<u>17,137.65</u>	<u>103,503.03</u>	<u>100,119.97</u>	<u>20,520.71</u>
 TOTAL - All Agency Funds	<u>\$ 213,588.46</u>	<u>\$ 603,791.08</u>	<u>\$ 574,562.39</u>	<u>\$ 242,817.15</u>
 <b><u>ASSETS</u></b>				
Cash	\$ 213,588.46	\$ 603,791.08	\$ 574,562.39	\$ 242,817.15
Total Assets	<u>\$ 213,588.46</u>	<u>\$ 603,791.08</u>	<u>\$ 574,562.39</u>	<u>\$ 242,817.15</u>
 <b><u>LIABILITIES</u></b>				
Due to Student Groups and Administrative	\$ 213,588.46	\$ 603,791.08	\$ 574,562.39	\$ 242,817.15
Total Liabilities	<u>\$ 213,588.46</u>	<u>\$ 603,791.08</u>	<u>\$ 574,562.39</u>	<u>\$ 242,817.15</u>

The accompanying notes and auditor's report are an integral part of these financial statements.

**DREW KIMBLE**  
*Certified Public Accountant*

104 S. Muskogee Ave  
Tahlequah, OK 74464  
(918) 575 - 1873

**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**

November 6, 2024

The Honorable Board of Education  
Keys School District No. I-006  
Cherokee 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 Keys School District, No. I-006, Cherokee County, Oklahoma (District), as of and for the year ended June 30, 2024, and the related notes to the financial statements, which collectively comprise the District's basic financial statements, and have issued our report thereon dated November 6, 2024, 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.

***Internal Control Over Financial Reporting***

In planning and performing our audit of the financial statements, we considered the District's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of 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. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

### ***Compliance and Other Matters***

As part of obtaining reasonable assurance about whether the District's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

### ***Purpose of this Report***

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.

A handwritten signature in black ink, appearing to read "Drew Kimble".

Drew Kimble, CPA

**DREW KIMBLE**  
***Certified Public Accountant***

104 S. Muskogee Ave  
Tahlequah, OK 74464  
(918) 575 – 1873

**INDEPENDENT AUDITOR'S REPORT ON COMPLIANCE FOR EACH MAJOR  
PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE REQUIRED  
BY THE UNIFORM GUIDANCE**

November 6, 2024

The Honorable Board of Education  
Keys School District No. I-006  
Cherokee County, Oklahoma

***Report on Compliance for Each Major Federal Program***

***Opinion on Each Major Federal Program***

We have audited the Keys School District, No. I-006, Cherokee County, Oklahoma (the District)'s compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of the District's major federal programs for the year ended June 30, 2024. The District's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

In our opinion, Keys School District, No. I-006, Cherokee County, Oklahoma, complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2024.

***Basis of Opinion on Each Major Federal Program***

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of Keys School District, No. I-006, Cherokee County, Oklahoma and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of Keys School District, No. I-006, Cherokee County, Oklahoma's compliance with the compliance requirements referred to above.

### ***Responsibilities of Management for Compliance***

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to Keys School District, No. I-006, Cherokee County, Oklahoma's federal programs.

### ***Auditor's Responsibilities for the Audit of Compliance***

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on Keys School District, No. I-006, Cherokee County, Oklahoma's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about Keys School District, No. I-006, Cherokee County, Oklahoma's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding Keys School District, No. I-006, Cherokee County, Oklahoma's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of Keys School District, No. I-006, Cherokee County, Oklahoma's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of Pawnee School District Number 1-1, Cherokee County, Oklahoma's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

### ***Report on Internal Control Over Compliance***

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

Our consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during our audit we did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above. However, material weaknesses or significant deficiencies in internal control over compliance may exist that were not identified.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

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

A handwritten signature in black ink, appearing to read "Drew Kimble".

Drew Kimble, CPA



**KEYS SCHOOL DISTRICT NO. I-006**  
**SCHEDULE OF FEDERAL AWARDS - REGULATORY BASIS**  
**FOR THE YEAR ENDED JUNE 30, 2024**

<u>Grant: Federal Grantor/Pass Through Grantor/Program Title</u>	<u>CFDA Number</u>	<u>Project Number</u>	<u>Balance at June 30, 2023</u>	<u>Receipts</u>	<u>Expenditures</u>	<u>Balance at June 30, 2024</u>
<b>U.S. DEPARTMENT OF EDUCATION</b>						
<b><u>Direct Programs:</u> - Note 1</b>						
Title VII Indian Education	84.060	561	\$ -	\$ 114,999.00	\$ 114,999.00	\$ -
Title VIII Impact Aid	84.041	591	-	268,532.00	268,532.00	-
Title VIII Impact Aid, Disabled	84.041	592	(23,053.00)	10,412.00	-	(33,465.00)
<b><u>Pass-through State Department of Education</u> - Note 1</b>						
Title I	84.010	511	36,798.47	264,435.41	244,487.96	16,851.02
REAP	84.358	587	3,573.61	27,096.96	23,523.35	-
Special Education Cluster						
Special Ed Professional Development	84.027	613	-	2,310.00	2,310.00	-
IDEA-B Flow Through	84.027	621	29,971.96	184,939.17	177,635.27	22,668.06
IDEA-B Preschool	84.173	641	663.51	4,522.59	4,503.77	644.69
Total for Special Education Cluster			30,635.47	191,771.76	184,449.04	23,312.75
COVID 19 Prevention	93.323	723	96,415.72	96,415.72	-	-
Total U.S. Department of Education			144,370.27	973,662.85	835,991.35	6,698.77
<b>U.S. DEPARTMENT OF AGRICULTURE</b>						
<b><u>Pass-through State Department of Education</u></b>						
Child Nutrition Cluster						
School Breakfast Program - cash assistance	10.553	764	(5,407.90)	85,041.20	103,317.28	12,868.18
National School Lunch Program:						
Cash assistance	10.555	763	(129,165.14)	271,320.04	275,016.89	(125,468.29)
Pass-through State Department of Human Services						
Non-cash assistance: commodities	10.565	385	-	26,297.73	26,297.73	-
Total National School Lunch Program			(129,165.14)	297,617.77	301,314.62	(125,468.29)
Total for Child Nutrition Cluster			(134,573.04)	382,658.97	404,631.90	(112,600.11)
<b><u>OTHER FEDERAL PROGRAMS</u></b>						
Johnson O'Malley	15.130	563	7,521.23	14,901.94	15,487.73	8,107.02
<b>TOTAL FEDERAL ASSISTANCE</b>			<b>\$ 17,318.46</b>	<b>\$ 1,371,223.76</b>	<b>\$ 1,256,110.98</b>	<b>\$ (97,794.32)</b>

Note A: Food Distribution: Nonmonetary assistance is reported in the schedule at the fair market value of the commodities received and disbursed

Note B: This schedule was prepared on a regulatory basis of accounting consistent with the preparation of the combined financial statements, except for the nonmonetary assistance noted in Note A.

Note C: None of the Federal grant/contracts include any loan programs, loan guarantee programs, has no sub-recipients, and does not use the 10% de minimis cost rate.

**KEYS SCHOOL DISTRICT NO. I-006  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
FOR THE YEAR ENDED JUNE 30, 2024**

**Section I - Summary of Auditor's Results:**  
**Financial Statements**

Type of Auditor's Report issued: I have audited the accompanying fund type and account group financial statements - regulatory basis - of Keys School District No. I-006, Cherokee County, Oklahoma as listed in the table of contents, as of and for the year ended June 30, 2024. In my opinion letter, my report was adverse on U.S. Generally Accepted Accounting Principles because the school district prepares its financial statements on a basis of accounting other than accounting principles generally accepted in the United States of America. This basis of accounting is prescribed by the laws of the State of Oklahoma. Also, my report was qualified with regard to the prescribed basis of accounting because of the omission of the general fixed asset account group.

**Internal Control Over Financial Reporting:**

Material weaknesses identified?	NO
Reportable conditions identified not considered to be material weaknesses?	NONE REPORTED
Noncompliance material to financial statements noted?	NONE REPORTED

**Federal Awards**

**Internal Control Over Major Programs:**

Material weaknesses identified?	NO
Reportable conditions identified not considered to be material weaknesses?	NONE REPORTED
Any audit finding disclosed that are required to be Reported in accordance with The Uniform Guidance	NONE REPORTED
Type of Auditor's Report Issued on Compliance for Major Programs:	UNQUALIFIED

**Identification of Major Programs:**

Title I (CFDA 84.010), Impact Aid (CFDA 84.041)

The dollar threshold used to distinguish between type A and type B programs was \$750,000.00. The percentage of coverage of rule was used to achieve 40% of Federal program expenditures.

Auditee qualified as low-risk auditee? No

**Section II - Financial Statement Findings:**

No matters were reported.

**Section III - Federal Award Findings and Questioned Costs - Current Year:**

No questioned costs were identified.

**Section IV - Federal Award Findings and Questioned Costs - Prior Year:**

No questioned costs were identified.

**KEYS SCHOOL DISTRICT NO. I-006**  
**STATEMENT OF PRIOR YEAR FINDINGS AND CURRENT YEAR FINDINGS**  
**REQUIRED BY THE OKLAHOMA STATE DEPARTMENT OF EDUCATION**  
**JUNE 30, 2024**

**PRIOR YEAR FINDINGS:**

There were no prior year findings.

**CURRENT YEAR FINDINGS:**

There were no current year findings.

**KEYS SCHOOL DISTRICT NO. I-006  
SCHEDULE OF ACCOUNTANT'S PROFESSIONAL  
LIABILITY INSURANCE AFFIDAVIT  
REQUIRED BY THE OKLAHOMA STATE DEPARTMENT OF EDUCATION  
JULY 1, 2023 TO JUNE 30, 2024**

State of Oklahoma

County of Cherokee

The undersigned auditing firm of lawful age, being first duly sworn on oath, says that said firm had in full force and effect Accountant's Professional Liability Insurance in accordance with the "Oklahoma Public School Audit Law" at the time of audit contract and during the entire audit engagement with Keys School for the audit year 2023-2024.

Drew Kimble, C.P.A.

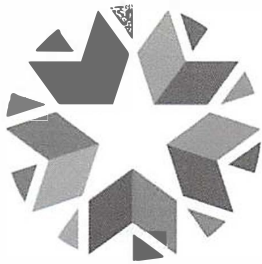
By *Drew Kimble*  
Authorized Agent

Subscribed and sworn to before me this 10 day of Nov, 2024.

*Lori Denise Kimble*  
Notary Public

My Commission Expires: 10-9-27  
My Commission Number: 19010185





# OKLAHOMA Education

**Audit Acknowledgement**

**Audit Year: 2023-2024**

**District Name** KEYS SCHOOL DISTRICT

**District Number** 1006

**County Name** CHEROKEE

**County Code** \_\_\_\_\_

The annual independent audit was presented to the Board of Education in a meeting conducted in accordance with the Open Meeting Act 25 O.S. Section 301-314 on 11/14/24.

Date of Meeting

The audit was presented by DREW KIMBLE

(Independent Auditor)

Drew Kimble

(Independent Auditor's Signature)

The School Board acknowledges that as the governing body of the district, responsible for the district's financial and compliance operations, the audit findings and exceptions have been presented to them.

A copy of the audit, including this acknowledgement form, will be sent to the State Board of Education and the State Auditor and Inspector within 30 days from its presentation, as stated in 70 O.S. § 22-108:

"The district board of education shall forward a copy of the auditor's opinions and related financial statements to the State Board of Education and the State Auditor and Inspector within thirty (30) days after receipt of the audit."

Signature of the Board of Education:

[Signature]  
Superintendent

[Signature]  
Board of Education President

[Signature]  
Board of Education Vice President

[Signature]  
Board of Education Member

[Signature]  
Board of Education Member

[Signature]  
Board of Education Member

\_\_\_\_\_  
Board of Education Member

Subscribed and sworn before me on \_\_\_\_\_

My Commission expires \_\_\_\_\_

\_\_\_\_\_  
(Notary Public)

Updated 7/2024