FINANCIAL STATEMENTS - REGULATORY BASIS AND REPORTS OF INDEPENDENT AUDITOR

SANKOFA MIDDLE SCHOOL OF CREATIVE AND PERFORMING ARTS, NO. G-004
Tulsa County, Oklahoma

JUNE 30, 2021

Audited by

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

SCHOOL DISTRICT OFFICIALS JUNE 30, 2021

BOARD OF EDUCATION

President Millard Jones

Vice President Marvin Gibson

Member Everett Robinson

MINUTES/ENCUMBRANCE CLERK

Aisha Brown

SCHOOL TREASURER

Jack H. Jenkins

EXECUTIVE DIRECTOR

Deborah Brown

TABLE OF CONTENTS JUNE 30, 2021

	<u>Page No.</u>
SCHOOL DISTRICT OFFICIALS	2
TABLE OF CONTENTS	3
INDEPENDENT AUDITOR'S REPORT	4-6
COMBINED FINANCIAL STATEMENTS	
Combined Statement of Assets, Liabilities, and Fund Balance – Regulatory Basis – All Fund Types	7
Combined Statement of Revenues Collected, Expenditures, and Changes in Fund Balance – Regulatory Basis – All Governmental Fund Types	8
Combined Statement of Revenues Collected, Expenditures, and Changes in Fund Balance – Budget and Actual – Regulatory Basis – Budgeted Governmental Fund Types	9
Notes to Combined Financial Statements	10-21
OTHER SUPPLEMENTARY INFORMATION:	
Supporting Schedule	
Schedule of Expenditures of Federal Awards – Regulatory Basis	22-23
INTERNAL CONTROL AND COMPLIANCE REPORTS	
Independent Auditor's Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with <i>Government Auditing Standards</i>	24-25
SCHEDULE OF FINDINGS AND RESPONSES	
Findings Related to Financial Reporting	26
Summary Schedule of Prior Audit Findings	27
SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT	28

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

Certified Public Accountants

Members

American Institute of Certified Public Accountants

Oklahoma Society of Certified Public Accountants

INDEPENDENT AUDITOR'S REPORT

The Honorable Board of Education Sankofa Middle School of Creative and Performing Arts No. G-004 Tulsa County, Oklahoma

Report on the Financial Statements

We have audited the accompanying combined fund type financial statements – regulatory basis of the Sankofa Middle School of Creative and Performing Arts No. G-004, Tulsa County, Oklahoma (School), as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the School's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

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

Auditor's Responsibility

Our responsibility is to express opinions on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

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

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

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

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

Adverse Opinion on U.S. Generally Accepted Accounting Principles

In our opinion, because of the significance of the matter discussed in the "Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles" paragraph, the financial statements referred to in the first paragraph do not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of the School as of June 30, 2021, or the changes in its financial position, or, where applicable, it cash flows for the year then ended.

Basis for Qualified Opinion on Regulatory Basis of Accounting

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

Qualified Opinion on Regulatory Basis of Accounting

In our opinion, except for the effects of the matter described in the "Basis for Qualified Opinion on Regulatory Basis of Accounting" paragraph, the financial statements referred to in the first paragraph present fairly, in all material respects, the assets, liabilities, and fund balance arising from regulatory basis transactions of each fund type and account group of the School as of June 30, 2021, and the revenues collected, expenditures paid and encumbered, and budgetary results for the year ended on the regulatory basis of accounting described in Note 1.

Other Matters

Other Information

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the School's basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis in the format required by Title 2 U.S. Code of Federal Regulations (CFR) part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, and is not a required part of the basic financial statements, nor was a separate report issued for federal financial assistance, since the required threshold of \$750,000 or more in federal expenditures was not reached.

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

accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated, in all material respects, in relation to the basic financial statements as a whole on the regulatory basis of accounting described in Note 1.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated April 25, 2022, on our consideration of the School'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 School's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the School's internal control over financial reporting and compliance.

Wilson, Dotson & Associates, PLLC

Wilon Don: associates

Shawnee, Oklahoma April 25, 2022

COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCE - REGULATORY BASIS ALL FUND TYPES JUNE 30, 2021

	GOVERN- MENTAL <u>FUND TYPE</u>	
ASSETS	<u>GE</u> I	NERAL
Cash	\$	165,259
LIABILITIES AND FUND BALANCE		
Liabilities Warrants payable Encumbrances Total liabilities	\$	66,106 9,208 75,314
Fund Balance Unassigned		89,945
Total Liabilities and Fund Balance	\$	165,259

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

COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES IN FUND BALANCE - REGULATORY BASIS - ALL GOVERNMENTAL FUND TYPES FOR THE YEAR ENDED JUNE 30, 2021

	GOVERNMENTAL FUND TYPES	
	GENERAL	
Revenues collected:	Φ 000	
State sources State sources	\$ 260 536,943	
Federal sources	102,472	
Total revenues collected	639,675	
Expenditures:		
Instruction	296,000	
Support services	238,380	
Operation of non-instruction services	73,414	
Total expenditures	607,794	
Excess of revenues collected over (under) expenditures		
before adjustments to prior year encumbrances	31,881	
Adjustments to prior year encumbrances	10,007	
Excess of revenues collected over (under) expenditures	41,888	
Fund balance, beginning of year	48,057	
Fund balance, end of year	\$ 89,945	

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

COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES IN FUND BALANCES - BUDGET AND ACTUAL - REGULATORY BASIS - GOVERNMENTAL FUND TYPES FOR THE YEAR ENDED JUNE 30, 2021

	GENERAL FUND				
		SINAL OGET	FINAL BUDGET	ACTUAL	VARIANCE WITH FINAL BUDGET FAVORABLE (UNFAVORABLE)
Revenues collected:					
Local sources	\$	-	_	260	260
State sources		9,621	499,621	536,943	37,322
Federal sources	10	4,500	104,500	102,472	(2,028)
Total revenues collected	60)4,121	604,121	639,675	35,554
Expenditures:					
Instruction		_	294,000	296,000	(2,000)
Support services		_	235,718	238,380	(2,662)
Operation of non-instruction services		-	74,932	73,414	1,518
Other outlays		-	6,600	-	6,600
Unbudgeted	65	52,178	40,928		40,928
Total expenditures	65	52,178	652,178	607,794	44,384
Excess of revenues collected over (under) expenditures before adjustments to prior					
year encumbrances	(4	18,057)	(48,057)	31,881	79,938
Adjustments to prior year encumbrances				10,007	10,007
Excess of revenues collected over (under) expenditures	(4	18,057)	(48,057)	41,888	89,945
Fund balance, beginning of year		18,057	48,057	48,057	
Fund balance, end of year	\$			89,945	89,945

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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The accompanying financial statements of the Sankofa Middle School of Creative and Performing Arts No. G-004, Tulsa County, Oklahoma (the "School") conform to the regulatory basis of accounting, which is an other comprehensive basis of accounting prescribed by the Oklahoma State Department of Education and conforms to the system of accounting authorized by the State of Oklahoma. Accordingly, the accompanying financial statements are not intended to present financial position and results of operations in conformity with accounting principles generally accepted in the United States of America. The School's accounting polices are described in the following notes that are an integral part of the School's financial statements.

A. Reporting Entity

The School was formed under the provisions of the Oklahoma Charter Schools Act (Oklahoma Statutes 70-3-130) through a contract with Langston University, as its sponsoring organization. The School entered into a contract with Langston University and received subsequent approval from the Oklahoma State Department of Education to operate as a Charter School under the University's sponsorship. The University receives all of the State Aid allocation and any other state-appropriated revenue generated by the students of the School and retains 5% of the State Aid allocations as a fee for administrative services rendered.

The governing body of the school is the Board of Directors which consists of not less than five (5) members. The Board has general oversight authority over the affairs, funds, and property of the School. The School receives funding from local, state (as passed through Langston University), and federal government sources and must comply with the requirements of these funding sources. However, the School is not included in any other governmental "reporting entity" as defined in Section 2100, Codification of Governmental Accounting and Financial Reporting Standards, since the Board members are nominated by the existing Board members and have decision making authority, the power to designate management, the responsibility to significantly influence operations and primary accountability for fiscal matters.

Although the School is a not-for-profit entity that would normally follow the presentation requirements of the Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) No. 958-205, the School is considered a quasi-governmental entity subject to the reporting requirements of the Oklahoma State Department of Education. Therefore, the School 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 and the Oklahoma Charter Schools Act.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

B. Measurement Focus

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

The School has the following fund type:

Governmental funds are used to account for most of the School's general activities and general long-term debt account group, including the collection and disbursement of earmarked monies (special revenue funds), the acquisition or construction of fixed assets (capital projects funds), and the servicing of general long-term debt (debt service funds). Basis of accounting refers to when revenues and expenditures or expenses are recognized in the accounts and reported in the financial statements. Basis of accounting relates to the timing of the measurements made, regardless of the measurement focus applied. All governmental type funds are accounted for using the Regulatory (Statutory) basis of accounting. All revenues from all sources, including entitlements, grants, and shared revenues are recognized when they are received rather than earned.

Expenditures are generally recognized when encumbered or reserved rather than at the time the related liability is incurred. Compensated absences and claims and judgments are recognized when the obligations are expected to be liquidated with expendable available financial resources. Fiduciary type funds are accounted for using the cash basis of accounting. These practices differ from generally accepted accounting principles.

Governmental funds include the following fund type and account groups:

<u>General fund</u> – is the primary operating fund of the School. It accounts for all financial resources of the general government, except those required to be accounted for in another fund. This is a budgeted fund, and any fund balances are considered as resources available for use. Major revenue sources include state and federal funding. Expenditures include all costs associated with the daily operations of the schools expect for programs funded for building repairs and maintenance, school construction, and debt service on bonds and other long-term debt. The General Fund also accounts for federal and state financed programs where restricted monies must be expended for specific programs. Project accounting is employed to maintain integrity for the various sources of these funds.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

B. Measurement Focus - cont'd

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

C. Basis of Accounting and Presentation

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

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

- Encumbrances represented by purchase orders, contracts, and other commitments for the expenditure of monies are recorded as expenditures when approved.
- Investments are recorded as assets when purchased.
- Inventories of school supplies are recorded as expenditures and not as assets.
- Warrants payable are recorded as liabilities when issued.
- Long-term debt is recorded in the General Long-Term Debt Account Group and not in the financial statements.
- Compensated absences are recorded as an expenditure when paid and not recorded as a liability.

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.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

D. Assets, Liabilities, Fund Balances, Revenue and Expenditures

1. Deposits and Investments

State statues govern the School's investment policy. Permissible investments include direct obligations of the United States Government and Agencies; certificates of deposit of savings and loan associations, and bank and trust companies; and savings accounts or savings certificates of savings and loan associations, and trust companies. Collateral is required for demand deposits and certificates of deposit for all amounts not covered by federal deposit insurance. Investments are stated at cost. The School invests entirely in certificates of deposit, U. S. Treasury Securities, and participates in the Secured Investment Program of Oklahoma State School Boards Association, as authorized by Oklahoma Statutes Title 62, Section 348.

2. Fair Value of Financial Instruments

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

3. Estimates

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

4. Interfund Transactions

Interfund transactions are accounted for as revenues, expenditures or expenses. Transactions that constitute reimbursements to a fund or expenditures/expenses initially made from it that are properly applicable to another fund are recorded as expenditures/expenses in the fund that is reimbursed. Non-recurring or non-routine permanent transfers of equity are reported as residual equity transfers.

5. Inventories

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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

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

6. Fixed Assets

The School has not maintained a record of its general fixed assets, and accordingly, a General Fixed Asset Account Group required by the regulatory basis of accounting prescribed by the Oklahoma State Board 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.

7. Compensated Absences

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

8. Long-term Obligations

The School would report certain lease obligations not expected to be financed with current available financial resources in the general long-term debt account group.

9. Fund Balance Classifications

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

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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30. 2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

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

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

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

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

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

<u>Unassigned Fund Balance</u> – Unassigned fund balance is the residual classification for the general fund. This classification represents 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.

10. Local Revenues

Local sources of revenues include reimbursements and contributions.

11. 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. For purposes of funding, a charter school is considered a site within the school district in which the charter school is located. A charter school is to receive from the sponsoring district, the state aid revenue generated by its

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

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

students for the applicable year, less up to 5% of the total, which may be retained by the sponsoring school district as a fee for the administrative services rendered.

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 School 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.

12. Federal Revenues

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

13. Instruction Expenditures

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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

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

14. Support Services Expenditures

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

15. Operation of Non-Instructional Services Expenditures

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

16. Facilities Acquisition and Construction Services Expenditures

These expenditures consist of activities involved with the acquisition of land and buildings; remodeling buildings; the construction of buildings and additions to buildings; initial installation or extension of service systems and other built-in equipment; and improvements to sites.

17. Other Outlays Expenditures

A number of outlays of governmental funds are not properly classified as expenditures, but still require budgetary or accounting control. These are classified as Other Outlays. These include debt service payments (principal and interest) and certain transfers of monies from one fund to another.

18. Other Uses Expenditures

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

19. Repayment Expenditures

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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2021

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - cont'd

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

20. Memorandum Only - Total Columns

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

21. Resource Use Policy

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

2. STEWARDSHIP, COMPLIANCE AND ACCOUNTABILITY

Budgetary Information

The School is required by state law to prepare an annual budget. Under current Oklahoma Statutes, a formal Estimate of Needs (Budget) is required for all funds except for trust and agency funds. Budgets are presented for all funds that include the originally approved budgeted appropriations for expenditures and final budgeted appropriations as adjusted for supplemental appropriations and approved transfers between budget categories. The annual Estimate of Needs, when approved by the Board, becomes the legal budget. Supplemental appropriations, if required, were made during the year and are reflected on the budget vs. actual presentations shown as original budget and final budget.

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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2021

3. DETAILED NOTES CONCERNING THE FUNDS

Deposits and Investments

Custodial Credit Risk

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

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

At June 30, 2021 the School held deposits of approximately \$165,259 at financial institutions. The School's cash deposits, including interest-bearing accounts, were entirely covered by Federal Depository Insurance (FDIC) or direct obligations of the U.S. Government insured or collateralized with securities held by the School or by its agent in the School's name.

Investment Credit Risk

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

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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30. 2021

3. DETAILED NOTES CONCERNING THE FUNDS - cont'd

Deposits and Investments - cont'd

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

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

The School had no investment credit risk as of June 30, 2021, as defined above.

Investment Interest Rate Risk

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

Concentration of Investment Credit Risk

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

At June 30, 2021, the School had no concentration of credit risk as defined above.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30. 2021

4. OTHER INFORMATION

A. Risk Management

The School 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 School purchases commercial insurance to cover these risks, including general and auto liability, property damage, and public officials liability. Settled claims resulting from these risks have not exceeded the commercial insurance coverage in any of the past three fiscal years.

B. Contingent Liabilities

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

C. Non-Monetary Transactions

The fair market value as determined by the Oklahoma Department of Human Services of the commodities received during the period under audit was \$3,610.

D. Employee Retirement System and Plan

The School chose not to participate in the Oklahoma Teachers' Retirement System for the fiscal year ended June 30, 2021.

E. Surety Bonds

The treasurer is bonded by RLI Insurance Company, bond number LSM0744622, for the penal sum of \$100,000, term beginning July 14, 2020 and ending July 14, 2021. This is a renewal of a continuous bond.

The encumbrance/minutes clerk is bonded by RLI Insurance Company, bond number LSM0744624 for the penal sum of \$1,000, term beginning July 14, 2020 and ending July 14, 2021. This is a renewal of a continuous bond.

The executive director/superintendent is bonded by RLI Insurance Company, bond number LSM0744623 for the penal sum of \$100,000, term beginning July 14, 2020 and ending July 14, 2021. This is a renewal of a continuous bond.

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS - REGULATORY BASIS FOR THE YEAR ENDED JUNE 30, 2021

Federal Grantor/Pass Through Grantor/Program Title U.S. Department of Education:	Federal CFDA <u>Number</u>	Pass Through Grantor's Project Number	Approved _Amount	Balance at July 1, 2020	<u>Receipts</u>	Expenditures	Balance at June 30, 2021
Passed Through Oklahoma State Department of Education: Title I Title I Cluster	84.010	511	\$ 78,954 78,954	<u>-</u>	49,419 49,419	78,600 78,600	354 354
IDEA-B Flow Through Special Education Cluster	84.027	621	34,994 34,994		20,902 20,902	20,902 20,902	14,092 14,092
COVID-19 ESSERF/CARES Act	84.425D	788	37,500		32,151	37,461	39
Total U.S. Department of Education			113,948		102,472	99,502	14,446
U.S. Department of Agriculture:							
Passed Through Oklahoma State Department of Education: National School Lunch Program - commodities - Note 3 Child Nutrition Cluster Total U.S. Department of Agriculture	10.555		<u> </u>	<u> </u>	3,610 3,610 3,610	3,610 3,610 3,610	<u> </u>
Total Expenditures of Federal Awards			\$ 113,948	-	106,082	103,112	14,446

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS - REGULATORY BASIS FOR THE YEAR ENDED JUNE 30, 2021

- Note 1: **Basis of Presentation** The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of the District under programs of the federal government for the year ended June 30, 2021. The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the Schedule presents only a selected portion of the operations of the 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 the Schedule are reported on the regulatory basis of accounting consistent with the preparation of the combined financial statements.

 except for nonmonetary assistance noted in Note 3. Such expenditures are recognized following the cost principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. The District has elected not to use the 10 percent de minimus indirect cost rate allowed under the Uniform Guidance.
- Note 3: Food Distribution Non-monetary assistance is reported in the Schedule at the fair market value of the commodities received and disbursed.

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

Certified Public Accountants

Members

American Institute of Certified Public Accountants

Oklahoma Society of Certified Public Accountants

INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS

The Honorable Board of Education Sankofa Middle School of Creative and Performing Arts No. G-004 Tulsa 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 financial statements-regulatory basis, within the combined financial statements of the Sankofa Middle School of Creative and Performing Arts No. G-004, Tulsa County, Oklahoma (School), as of and for the year ended June 30, 2021, and the related notes to the financial statements, which collectively comprise the School's financial statements, and have issued our report thereon dated April 25, 2022. The report on these financial statements was adverse with respect to the presentation of the financial statements in conformity with accounting principles generally accepted in the United States of America because the presentation followed the regulatory basis of accounting for Oklahoma school districts and did not conform to the presentation requirements of the Governmental Accounting Standards Board. However, our report was qualified for the omission of the general fixed asset account group with respect to the presentation of the financial statements on the regulatory basis of accounting authorized by the Oklahoma State Board of Education.

Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the School's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the School's internal control. Accordingly, we do not express an opinion on the effectiveness of the School'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 out 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 School's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed an instance of noncompliance or other matter that is required to be reported under *Government Auditing Standards* and which is described in the schedule of findings related to financial reporting as item 2021-001.

District's Response to Finding

The District's response to the finding identified in our audit is described in the accompanying schedule of findings related to financial reporting. The District's response was not subjected to the auditing procedures applied in the audit of 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.

Wilon, Don: associates

Wilson, Dotson & Associates, PLLC

Shawnee, Oklahoma April 25, 2022

FINDINGS RELATED TO FINANCIAL REPORTING FOR THE YEAR ENDED JUNE 30, 2021

Finding 2021-001

- Statement of Condition \$54,932 in payments for student meals were classified to the 2600 expenditure classification function code instead of the 3100 expenditure classification function code. These payments have been correctly classified in the audit's financial statements.
- Criteria Oklahoma Statutes require the use of OCAS accounting codes for the reporting of the Schools expenditures. These codes identify the 3100 function codes to be used to classify expenditures for the child nutrition program operations.
- Cause/Effect of Condition The support service expenditures for the School were over-stated and the child nutrition program operation expenditures were understated on the information previously reported to the Oklahoma State Department of Education. This variance results in financial information that is not comparable from year to year.
- Recommendation The School should accurately classify the expenditures related to the child nutrition programs.

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

SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS FOR THE YEAR ENDED JUNE 30, 2021

Finding 2020-001

Statement of Condition – \$51,237 in payments for student meals were classified to the 2600 expenditure classification function code instead of the 3100 expenditure classification function code. These payments have been correctly classified in the audit's financial statements.

Disposition – this finding continued in the current fiscal year.

SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT FOR THE YEAR ENDING JUNE 30, 2021

County of Pottawatomie)			
The undersigned auditing fi	irm of lawful age, being first duly	sworn on oath says that sa	aid firm had in full
force and effect Accountan	nt's Professional Liability Insuranc	e in accordance with the	"Oklahoma Public

School Audit Law" at the time of audit contract and during the entire audit engagement with Sankofa

Middle School of Creative and Performing Arts Public for the audit year 2020-21.

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

Pamely R. E Stam

by______Authorized Agent

Subscribed and sworn to before me this 25th day of April, 2022.

Notary Public (Commission # 11002236)

sa Cook

State of Oklahoma

My commission expires: March 10, 2023

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

	20 0	OUTSELS VIIII	
(20	α	107	1
G0	U4.	191	4

72

PUBLIC SCHOOL DISTRICT COUNTY

AUDIT FINDING CORRECTIVE ACTION PLAN

Reference Number:		
Name of Award – Projec (Federal Findings)	et Number	
Condition/Finding:	Function code to FSMC coded inco	rrectly
Corrective steps that ha	ve already been implemented and/or t	he steps that will be implemented:
Please see PO attached. Ha	ve made corrections per Oklahoma Cor	sultung & Accounting Services, LLC
Completion Date:	5-5-22	
The plan for monitoring	adherence to the corrective action pla	an:
If warranted, reasons w	ny the district does not consider a Cor	rective Action necessary.
If a refund is made in re check for the refund.	lation to this finding please include th	e mailing date, amount and number of the
Mailing Date	Check Number	Amount of Refund
= August E	2 mg mg ()	5-5-22
Superintendent	's Signature	Date

If the district disagrees with the Audit Finding this would be noted in the Steps Implemented Section.



Audit Acknowledgement

Audit Year: 2020-2021

District Name	Sankola Middle Sch	OOI District Number G004		
County Name	Tulsa	County Code 72		
The annual inde	pendent audit was presented to the Bo	ard of Education in a meeting conducted in		
accordance with	the Open Meeting Act 25 O.S. Section			
The audit was p	resented by Wilson, Dotson & Associates, PLL	C/Pamela Dotson Date of Meeting		
	(Independent Aug	itor) (Independent Auditor's Signature)		
The School Bo the district's fin been presented	pard acknowledges that as the governing ancial and compliance operations, the to them.	ng body of the district, responsible for audit findings and exceptions have		
A copy of the Education and 70 O.S. § 22-1	the State Auditor and Inspector within	nt form, will be sent to the State Board of a 30 days from its presentation, as stated in		
"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:			
E DOLO	ral Strong			
Superintendent Nillad Board of Educat	7. Janes (Board of Education Vice President Board of Education Member		
THE THE PARTY OF T	ER MANNING	Board of Education Member		
STATION OF THE PARTY OF THE PAR	COLUMN TO THE STATE OF THE STAT	Board of Education Member		
11111	Mannaman	Board of Education Member		
Subscribed and sv	worm before me on $4/29/22$	My Commission expires $1/10/23$		
(N	otary Public)			