

**ANNUAL FINANCIAL REPORT
SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
JULY 1, 2014 TO JUNE 30, 2015**

**AUDITED BY
KERRY JOHN PATTEN, C.P.A.**

SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
SCHOOL DISTRICT OFFICIALS
JUNE 30, 2015

Board of Education

President	Dalton Jones
Vice-President	Jeannie Williamson
Clerk	Loy "Tobe" Sperry

Superintendent of Schools

Mrs. Christine Midgley

School District Treasurer

Connie Newby

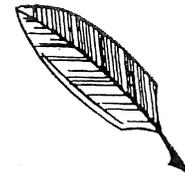
**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
JUNE 30, 2015**

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Independent Auditor's Report

The Honorable Board of Education
Spavinaw School District No. C-21
Mayes County, Oklahoma

Report on Financial Statements

I have audited the accompanying combined fund type and account group financial statements – regulatory basis of the Spavinaw School District No. C-21, Mayes County, Oklahoma, as of and for the year ended June 30, 2015, as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with financial reporting provisions prescribed or permitted by the Oklahoma State Department of Education. 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

My responsibility is to express an opinion on these financial statements based on my audit. I conducted my 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 I 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 amount and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of 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, I 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.

I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my audit opinion.

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

As discussed in Note 1 (C) to the financial statements, the financial statements are prepared by the Spavinaw School District No. C-21, Mayes County, Oklahoma, on the basis of the financial reporting provisions of the Oklahoma State Department of Education, which a basis of accounting other than accounting principles generally accepted in the United States of America

The effects on the financial statements of the variances between the regulatory basis of accounting described in Note 1 (C) 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 my opinion, because of the significance of the matter discussed in the "Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles" paragraphs, 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 Spavinaw School District No. C-21, Mayes County, Oklahoma as of June 30, 2015, or the revenues, expenses, and changes in financial position for the year then ended.

Basis for Qualified Opinion on Regulatory Basis of Accounting

The financial statements referred to in the first paragraph do not include the general fixed asset account group, which is a departure from the regulatory basis of accounting prescribed or permitted 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 my opinion, except for the effects of the matter described in the "Basis for Qualified Opinion on Regulatory Basis of Accounting" paragraph, the financial statements referred to in the first paragraph present fairly, in all material respects, the assets, liabilities, and fund balances arising from regulatory basis transactions of each fund type and account group of Spavinaw School District No. C-21, Mayes County, Oklahoma, as of June 30, 2015, and the revenues collected and expenditures paid and encumbered for the year then ended, on the regulatory basis of accounting described in the Note 1 (C).

Emphasis-of-Matter

The Spavinaw School District has made plans to annex with surrounding school districts subsequent to June 30, 2016 due to the decline in student population and receding revenues. These plans raise substantial doubt about the school district's ability to continue as a going concern. The financial statements do not include any adjustments that might arise from the outcome of this uncertainty. My opinion is not modified with respect to that matter.

Other Matters Other Information

My audit was conducted for the purpose of forming opinions on the fund type and account group financial statements within the combined financial statements. The combining fund statements-regulatory basis, and other schedules as listed in the table of contents, under supplementary information, are presented for purposes of additional analysis and are not a required part of the combined financial statements of the District. The Schedule of Expenditures of Federal Awards is presented for additional analysis as required by U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments, and Nonprofit Organizations* and/or the Oklahoma State Department of Education, and is not a required part of the combined financial statements.

The combining financial statements-regulatory basis, and other schedules as listed in the table of contents, under supplementary information and the Schedule of Expenditures of Federal Awards are the responsibility of management and were derived from and relate directly to the underlying accounting records used to prepare the combined financial statements. Such 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, and other additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the combined financial statements, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In my opinion, the supplementary information including the Schedule of Expenditures of Federal Awards are fairly stated in all material respects in relation to the combined financial statements taken as a whole on the regulatory basis of accounting described in Note 1 (C).

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, I have also issued my report dated March 21, 2016 on my consideration of Spavinaw School District No. C-21, Mayes County, Oklahoma's, internal control over financial reporting and on my tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is to describe the scope of my testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of my audit.



Kerry John Patten, C.P.A.
Broken Arrow, OK
March 21, 2016

COMBINED FINANCIAL STATEMENTS

SPAVINAW SCHOOL DISTRICT NO. C-21
 COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES
 ALL FUND TYPES AND ACCOUNT GROUPS - REGULATORY BASIS
 JUNE 30, 2015

	Governmental Fund Types		Fiduciary Fund Types	Total (Memorandum Only)
	General	Special Revenue	Trust and Agency	June 30, 2015
ASSETS				
Cash	\$ 336,880.19	\$ 56,200.27	\$ 5,103.76	\$ 398,184.22
Investments	-	-	-	-
Total assets	\$ 336,880.19	\$ 56,200.27	\$ 5,103.76	\$ 398,184.22

LIABILITIES AND FUND BALANCES

Liabilities:				
Outstanding warrants	\$ 39,651.95	\$ 2,759.39	\$ -	\$ 42,411.34
Encumbrances	-	-	-	-
Total liabilities	\$ 39,651.95	\$ 2,759.39	\$ -	\$ 42,411.34
Fund Balances				
Designated for capital projects	\$ -	\$ -	\$ -	\$ -
Designated for debt service	-	-	-	-
Cash fund balances	297,228.24	53,440.88	5,103.76	355,772.88
Total fund balances	\$ 297,228.24	\$ 53,440.88	\$ 5,103.76	\$ 355,772.88
Total liabilities and fund balances	\$ 336,880.19	\$ 56,200.27	\$ 5,103.76	\$ 398,184.22

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

SPAVINAW SCHOOL DISTRICT NO. C-21
COMBINED STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES
ALL GOVERNMENTAL FUND TYPES - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015

	Governmental Fund Types		Total (Memorandum Only)
	General	Special Revenue	
Revenues collected:			
Local sources	\$ 214,688.10	\$ 24,052.72	\$ 238,740.82
Intermediate sources	20,319.28	-	20,319.28
State sources	408,371.45	9.77	408,381.22
Federal sources	152,213.70	-	152,213.70
Total revenues collected	\$ 795,592.53	\$ 24,062.49	\$ 819,655.02
Expenditures paid:			
Instruction	\$ 378,099.63	-	\$ 378,099.63
Support services	315,194.66	23,474.00	338,668.66
Non-instructional services	107,514.28	-	107,514.28
Capital outlay	-	-	-
Other outlays	-	-	-
Other uses	-	-	-
Repayments	-	-	-
Total expenditures paid	\$ 800,808.57	\$ 23,474.00	\$ 824,282.57
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	\$ (5,216.04)	\$ 588.49	\$ (4,627.55)
Adjustments to prior year encumbrances	\$ 1,925.17	-	\$ 1,925.17
Other financing sources (uses):			
Bond sale proceeds	-	-	-
Operating transfers in/(out)	-	-	-
Bank charges	-	-	-
Total other financing sources (uses)	-	-	-
Excess (deficiency) of revenue collected over (under) expenditures paid and other financing sources (uses)	\$ (3,290.87)	\$ 588.49	\$ (2,702.38)
Fund balances, beginning of year	\$ 300,519.11	\$ 52,852.39	\$ 353,371.50
Fund balances, end of year	\$ 297,228.24	\$ 53,440.88	\$ 350,669.12

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

SPAVINAW SCHOOL DISTRICT NO. C-21
COMBINED STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES - BUDGET AND ACTUAL
BUDGETED GOVERNMENTAL FUND TYPES - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015

	General Fund			Special Revenue Fund		
	Original Budget	Final Budget	Actual	Original Budget	Final Budget	Actual
Revenues collected:						
Local sources	\$ 155,752.63	\$ 155,752.63	\$ 214,688.10	\$ 22,228.95	\$ 22,228.95	\$ 24,062.72
Intermediate sources	14,606.90	14,606.90	20,319.28	-	-	-
State sources	417,522.53	417,522.53	408,371.45	-	-	9.77
Federal sources	118,779.56	118,779.56	152,213.70	-	-	-
Total revenues collected	\$ 706,661.62	\$ 706,661.62	\$ 795,592.53	\$ 22,228.95	\$ 22,228.95	\$ 24,062.49
Expenditures paid:						
Instruction	\$ 584,471.79	\$ 584,471.79	\$ 378,099.63	\$ 75,081.34	\$ 75,081.34	\$ 23,474.00
Support services	315,194.66	315,194.66	315,194.66	-	-	-
Non-instructional services	107,514.28	107,514.28	107,514.28	-	-	-
Capital outlay	-	-	-	-	-	-
Other outlays	-	-	-	-	-	-
Other Uses	-	-	-	-	-	-
Repayment	-	-	-	-	-	-
Total expenditures paid	\$ 1,007,180.73	\$ 1,007,180.73	\$ 800,808.57	\$ 75,081.34	\$ 75,081.34	\$ 23,474.00
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	\$ (300,519.11)	\$ (300,519.11)	\$ (5,216.04)	\$ (52,852.39)	\$ (52,852.39)	\$ 588.49
Adjustments to prior year encumbrances	\$ -	\$ -	1,925.17	\$ -	\$ -	\$ -
Other financing sources (uses):						
Operating transfers in/out	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Bank Charges	-	-	-	-	-	-
Total other financing sources (uses)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Excess (deficiency) of revenue collected over expenditures paid and other financing sources (uses)	\$ (300,519.11)	\$ (300,519.11)	\$ (3,290.87)	\$ (52,852.39)	\$ (52,852.39)	\$ 588.49
Fund balance, beginning of year	\$ 300,519.11	\$ 300,519.11	\$ 300,519.11	\$ 52,852.39	\$ 52,852.39	\$ 52,852.39
Fund balance, end of year	\$ -	\$ -	\$ 297,228.24	\$ -	\$ -	\$ 53,440.88

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

NOTES TO THE FINANCIAL STATEMENTS

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015**

1. Summary of Significant Accounting Policies

The accompanying financial statements of the Spavinaw School District No. C-21 (the "District") conform to the regulatory basis of accounting, which is another comprehensive basis of accounting prescribed by the Oklahoma State Department of Education and conforms to the system of accounting authorized by the State of Oklahoma. Accordingly, the accompanying financial statements are not intended to present financial position and results of operations in conformity with accounting principles generally accepted in the United States of America. The District's accounting policies are described in the following notes that are an integral part of the District's financial statements.

A. Reporting Entity

The District is a corporate body for public purposes created under Title 70 of the Oklahoma Statutes and, accordingly, is a separate entity for operating and financial reporting purposes. The District is part of the public school system of Oklahoma under the general direction and control of the State Board of Education and is financially dependent on the State of Oklahoma. 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 include, but are not limited to, the selection of governing authority, the designation of management, the ability to significantly influence operations, and accountability for fiscal matters. A second criterion used in evaluating potential component units is the scope of public service. Application of this criterion involves considering 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. These statements present only the activities of the District.

B. Measurement Focus

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

A fund is an independent accounting entity with a self-balancing set of accounts. The account groups are financial reporting devices designed to provide accountability for certain assets and liabilities that are not recorded directly in the funds.

Funds are classified into three categories: governmental, proprietary and fiduciary. Each category, in turn, is divided into separate "fund types." The District has the following fund types and account groups:

Governmental Funds

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 project funds), and the servicing of general long-term debt (debt service funds). Basis of accounting relates to the timing of the measurements made, regardless of the measurement focus applied. All governmental type funds are accounted for using the Regulatory (Statutory) basis of accounting. All revenues from all sources, including property taxes, entitlements, grants, and shared revenues are recognized when they are received, rather than earned. Expenditures are generally recognized when encumbered or reserved, rather than at the time the related liability is incurred. Unmatured interest for debt service is recognized when due and certain compensated absences and claims and judgments are recognized when the obligations are expected to be liquidated

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015**

Summary of Significant Accounting Policies (continued)

with expendable, available financial resources. Fiduciary type funds are accounted for using the cash basis of accounting. These practices differ from accounting principles generally accepted in the United States of America.

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 local property taxes and federal and state funding. Expenditures include all costs associated with the daily operations of the schools, except for programs funded for building repairs and maintenance, school construction and debt service on bonds and other long-term debt. The general fund includes federal and state restricted monies that must be expended for specific programs. The District's cafeteria operations are reported as part of the general fund.

Special Revenue Fund – The special revenue funds are used for proceeds of specific revenue sources that are legally restricted to expenditures for specified purposes.

Building Fund – The building fund consists mainly of monies derived from property taxes levied for the purpose of erecting, remodeling, repairing or maintaining school buildings and for purchasing furniture, equipment and computer software to be used on or for technology center property, for paying energy and utility costs, for purchasing telecommunications services, for paying fire and casualty insurance premiums for center facilities, for purchasing security systems, and for paying salaries of security personnel.

Fiduciary Funds

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 trust agreement, trust funds are used for their accounting and reporting. 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 Funds – The agency fund is the school activities fund, which is used to account for monies, collected principally through fundraising 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.

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.

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 the information necessary to include this group in its combined financial statements.

C. Basis of Accounting and Presentation

The District prepares its financial statements in a presentation format that is prescribed by the Oklahoma State Department of Education. This format is essentially the generally accepted form of presentation used by state and local governments prior to the effective date of GASB Statement No. 34, *Basic Financial Statements-Management's Discussion and Analysis-for State and Local Governments*. 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 are recorded as assets when purchased.

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015**

Summary of Significant Accounting Policies (continued)

- Warrants payable are recorded as liabilities when issued.
- Long-term debt is recorded when incurred.
- Compensated absences are recorded as an expenditure when the obligation is paid.
- Fixed Assets are recorded in the General Fixed Asset Account. Fixed assets are not depreciated.

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

D. Budgets and Budgetary Accounting

Prior to July 1 each year, the governing board of the school district prepares a verified application showing the needs of the school district and submits the application to the County Excise Board, who makes temporary appropriations for lawful current expenses of the school district. The temporary appropriations are merged with the annual appropriations when the annual budget for the school district is finally approved.

Prior to October 1 each year, the school Board of Education must make a financial statement, showing the true fiscal condition of the school as of the close of the previous fiscal year ended June 30, along with an itemized statement of estimated needs and probable income from all sources for the fiscal year.

A budget is legally adopted by the Board of Education for the general fund and special revenue fund(s) of the school district.

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. Under Oklahoma Law, unencumbered appropriations lapse at the end of the year.

E. Assets, Liabilities and Fund Equity

Memorandum Only – Total Column

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

Cash – Cash consists of currency and checks on hand and demand deposit accounts with banks and other financial institutions.

Investments – State statutes govern the District's investment policy. Permissible investments include direct obligations of the United States Government and Agencies; certificates of deposit of savings and loan associations, and bank and trust companies; and savings accounts or savings certificates of savings and loan associations, and trust companies. Collateral is required for demand deposits and certificates of deposit for all amounts not covered by federal deposit insurance. Investments are stated at cost.

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

Compensated Absences – Vested or accumulated vacation leave that is expected to be liquidated with expendable, available financial resources is reported as expenditure and a fund liability of the governmental fund that will pay it. There are no amounts of vested or accumulated vacation leave that are not expected to be liquidated with expendable, available financial resources.

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015**

Summary of Significant Accounting Policies (continued)

No liability is recorded for non-vesting accumulating rights to receive such pay benefits.

Fixed Assets – The District has not maintained a record of its general fixed assets, and, accordingly, a General Fixed Asset Account Group is not included in the financial statements. General fixed assets purchased are recorded as expenditures in the various funds at the time of purchase.

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

Cash Fund Balance – Cash fund balance represents the funds not encumbered by purchase order, legal contracts, and outstanding warrants.

F. Revenues, Expenses and Expenditures

Local Revenues – Revenue from local sources is revenue produced within the school district, which includes ad valorem taxes. It is available for current educational expenses and for other purposes authorized by the school board.

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

If the first payment is not made timely, the entire tax becomes due and payable on January 2. Second half taxes become delinquent on April 1 of the year following the year of assessment. If taxes are delinquent and unpaid for a period of three years or more the real estate may be sold for taxes.

Intermediate Revenues – Revenue from intermediate sources is revenue from funds collected by an intermediate administrative unit or political sub-division, such as a county or municipality, and redistributed to the school district.

State Revenues – Revenue 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. These rules also require that the money not expended, as of the close of the fiscal year, be carried forward into the following year to be expended for the same categorical programs. The State Department of Education requires that categorical educational program revenues be accounted for in the general fund.

Federal Revenues – Revenue from Federal sources is money originating from the Federal government and made available to the school district either as direct grants or under various programs passed-through the State Department of Education and other state agencies.

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015**

Summary of Significant Accounting Policies (continued)

The Federal government also makes payments to school districts whose revenues are adversely affected by the presence of Federal activities. Although these payments are made in consideration of lost property tax revenue, the Oklahoma State Department of Education advocates classifying such amounts as revenue from Federal sources.

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. Examples of expenditures that might be included here are the activities of teacher assistant of any type (clerks, graders, teaching machines, etc.), which assist in the instructional process. The activities of tutors, translators, and interpreters would be recorded here. Department chairpersons who teach for any portion of time are included here. Tuition/transfer fees paid to other LEAs would be included here.

Support Services Expenditures – Support services expenditures provide administrative, technical (such as guidance and health) and logistical support to facilitate and enhance instruction. These services exist as adjuncts for fulfilling the objective of instruction, community services and enterprise programs, rather than as entitles within them.

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

Facilities Acquisition and Construction Services 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 improvement to sites.

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

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

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

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

All other interfund transactions, except quasi-external transactions and reimbursements, are reported as transfers. Nonrecurring or nonroutine permanent transfers of equity are reported as residual equity transfers.

Budgetary Information

Under current Oklahoma Statutes, a formal Estimate of Needs (Budget) is required for all General and Special Revenue funds. Budgets are presented for all funds that include the originally approved budgeted appropriations for expenditures and final budgeted appropriations as adjusted for supplemental appropriations and approved transfers between budget categories. The annual Estimate of Needs, when approved by the Board and subsequently filed with the County Clerk and approved by the County Excise Board, becomes the legal budget. Supplemental appropriations, if required, were made during the year and are reflected on the budget vs. actual presentations shown in supporting schedules.

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015**

2. Deposit Categories of Credit Risk

Collateral is required for demand deposits and certificates of deposit for all amounts not covered by federal deposit insurance. The District's investment policies are governed by state statute. Permissible investments include:

1. Direct obligations of the United States Government to the payment of which the full faith and credit of the government is pledged.
2. Obligations to the payment of which the full faith and credit of the state is pledged.
3. Certificates of deposits of banks when such certificates of deposits are secured by acceptable collateral as in the deposit of other public monies.
4. Savings accounts or savings certificates of savings and loan associations to the extent that such accounts or certificates are fully insured by the Federal Savings and Loan Insurance Corporation.
5. Repurchase agreements that have underlying collateral consisting of those items specified in paragraphs 1 and 2 of this section including obligations of the United States, its agencies and instrumentalities, and where collateral has been deposited with a trustee of custodian bank in an irrevocable trust or escrow account established for such purposes.
6. County, municipal or school district direct debt obligations for which an ad valorem tax may be levied or bond and revenue anticipation notes, money judgments against such county, municipality or school district ordered by a court of record or bonds or bond and revenue anticipation notes issued by a public trust for which such county, municipality or school district is a beneficiary thereof. All collateral pledged to secure public funds shall be valued at no more than market value.
7. Money market mutual funds regulated by the Securities and Exchange Commission and which investments consist of obligations of the United States, its agencies and instrumentalities, and investments in those items listed above.
8. Warrants, bonds or judgments of the school district.
9. Qualified pooled investment programs, the investments of which consist of those items specified above, as well as obligations of the United States agencies and instrumentalities, regardless of the size of the district's budget. To be qualified, a pooled investment program for school funds must be governed through an Interlocal cooperative agreement formed pursuant to Title 70 Section 5-117b, and the program must competitively select its investment advisors and other professionals. Any pooled investment program must be approved by the Board of Education.

The District's investment policy instructs the treasurer to minimize risks by diversifying the investment portfolio; structuring investments so that securities mature in time to meet cash requirements; and by investing the full amount of all accounts of the District.

Custodial Credit Risk:

Deposits and Investments - The District's demand deposits are required by law to be collateralized by the amount that is not federally insured.

Securities pledged as collateral are held by a third party or Federal Reserve Bank. Joint custody safekeeping receipts are held in the name of the depositing institution, but are pledged to the District. The security cannot be released, substituted, or sold without the School Treasurer's approval and release of the security.

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015**

Deposit Categories of Credit Risk (continued)

Certificates of deposit are collateralized at least by the amount not federally insured. As of June 30, 2015, the District had no deposits exposed to custodial credit risk.

The District had no investments at June 30, 2015.

Interest Rate Risk:

Investments are made based upon prevailing market conditions at the time of the transaction with the intent to hold the instrument until maturity. However, the District has no formal written policy addressing interest rate risk.

Credit Risk:

The District has no formal written policy addressing credit risk.

At June 30, 2015, the District has no investments.

3. General Long-Term Debt

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

At June 30, 2015, the Spavinaw School District had not incurred any long-term debt under these provisions.

4. Lease Commitments

The District leases a copier at a rate of \$125.00 per month. The lease is for 60 months starting in December of 2013.

5. Employee Retirement System

Description of Plan

The District participates in the state-administrated Teacher's Retirement System of Oklahoma (the "system"), which is a cost-sharing multiple-employer public employee retirement system. The supervising authority for the management and operation of the System is a 13-member Board of Trustees, which acts as a fiduciary for investment of the funds and the application of plan interpretations. The System provides retirement and disability benefits, annual cost of living adjustments, death benefits and other benefits to plan members and beneficiaries. Oklahoma State Statutes establish benefit provisions and may be amended only through legislative action. The District has no responsibility or authority for the operation and administration of the system nor has it any liability, except for contribution requirements. The Oklahoma Teachers' Retirement System issues a publicly available financial report that includes financial statements and required supplementary information for the System. The report may be obtained by writing to the Oklahoma Teachers' Retirement System, P.O. Box 53624, Oklahoma City, Oklahoma 73152.

Basis of Accounting

The System's financial statements are prepared in conformity with accounting principles generally accepted in the United States of America. The financial statements have also been prepared in compliance with the requirements of the Government Accounting Standards Board Statement No. 34. The financial statements are prepared on the accrual basis of accounting, under which expenses are recorded when the liability is incurred, revenues are recorded in the accounting period they are earned and become measurable, and investment purchases and sales are recorded as of their trade dates. Member and employer contributions are recognized when due, pursuant to formal commitments. Benefits and refunds are recognized when due and payable.

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015**

Employee 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 nonfunded pension benefit obligation of the System, as determined as part of the latest actuarial valuation dated June 30, 2015, is as follows:

		Dollars in Millions
Actuarial Accrued Liability	\$	20,693
Actuarial Value of Assets		13,772
Unfunded Actuarial Accrued Liability	\$	6,921

Annual Pension Cost

The District's total contribution for 2015, 2014, and 2013 were \$32,791.99, \$46,074.12, and \$47,042.64, respectively. The District's total payroll for fiscal year 2014-15 amounted to \$442,818.05.

6. Litigation

The District is contingently liable for lawsuits and other claims in the ordinary course of its operations. The settlement of such contingencies under the budgetary process would require appropriation of revenues yet to be realized, and would not materially affect the financial position of the District at June 30, 2015.

7. Risk Management

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

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2015**

8. Surety Bonds

The District has a Public School System Faithful Performance Blanket Position Bond with Western Surety. The bond number is 18209066, it covers all the employees including the Activity Fund Custodian, Encumbrance Clerk, Lunch fund Custodian, Secretary/Receptionists, and (3) board members for the penal sum of \$ 7,000.00 for the term of June 29, 2014, to June 29, 2015.

The minutes clerk is bonded by Western Surety, bond number 71415546, for the sum of \$1,000.00 for the term of May 15, 2014, to May 15, 2015.

The treasurer is bonded by Western Surety, bond number 70842110, for the sum of \$100,000.00 for the term of July 1, 2014, to June 30, 2015.

The superintendent is bonded by Western Surety, bond number 71135277, for the sum of \$100,000.00 for the term of July 5, 2014, to July 5, 2015.

9. District Annexation

Spavinaw School District has made plans to be annexed into surrounding school districts after 6/30/16. The final decision will be made at the school election on June 28, 2016. This annexation is due to the decline in student population and receding revenue. The Administration and Board of Education made the determination based on the best solution for the students it serves.

COMBINING FINANCIAL STATEMENTS

SPAVINAW SCHOOL DISTRICT NO. C-21
 COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES
 SPECIAL REVENUE FUND - REGULATORY BASIS
 JUNE 30, 2015

	<u>Building Fund</u>
<u>ASSETS:</u>	
Cash	\$ 56,200.27
Investments	-
Total assets	\$ 56,200.27
<u>LIABILITIES AND FUND BALANCES:</u>	
Liabilities:	
Outstanding warrants	\$ 2,759.39
Encumbrances	-
Total liabilities	\$ 2,759.39
Fund balance:	
Cash fund balance	\$ 53,440.88
Total fund balance	\$ 53,440.88
Total liabilities and fund balance	\$ 56,200.27

SPAVINAW SCHOOL DISTRICT NO. C-21
 COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES
 PAID AND CHANGES IN FUND BALANCES
 SPECIAL REVENUE FUND - REGULATORY BASIS
 FOR THE YEAR ENDED JUNE 30, 2015

	Building Fund
Revenues collected:	
Local sources	\$ 24,052.72
Intermediate sources	-
State sources	9.77
Federal sources	-
Total revenue collected	\$ 24,062.49
Expenditures paid:	
Instruction	-
Support services	23,474.00
Non-instructional services	-
Capital outlay	-
Other outlays	-
Other uses	-
Repayments	-
Total expenditures paid	\$ 23,474.00
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	\$ 588.49
Adjustments to prior year encumbrances	\$ -
Other financing sources (uses):	
Operating transfers in/(out)	-
Bank charges	-
Total other financing sources (uses)	\$ -
Excess of revenues and other sources over (under) expenditures and other uses	\$ 588.49
Fund balances, beginning of year	\$ 52,852.39
Fund balances, end of year	\$ 53,440.88

SPAVINAW SCHOOL DISTRICT NO. C-21
 COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES
 FIDUCIARY FUND - REGULATORY BASIS
 JUNE 30, 2015

		<u>Agency Fund</u>
		<u>Activity Fund</u>
<u>ASSETS:</u>		
Cash	\$ 5,103.76	
Investments	-	
Total assets	\$ 5,103.76	
<u>LIABILITIES AND FUND BALANCES:</u>		
Liabilities:		
Outstanding warrants	-	
Encumbrances	-	
Total liabilities	\$ -	
Fund balances:		
Cash fund balances	\$ 5,103.76	
Total fund balances	\$ 5,103.76	
Total liabilities and fund balances	\$ 5,103.76	

SUPPLEMENTAL INFORMATION

SPAVINAW SCHOOL DISTRICT NO. C-21
 BUDGETARY COMPARISON SCHEDULE - REGULATORY BASIS
 SPECIAL REVENUE FUND
 FOR THE YEAR ENDED JUNE 30, 2015

		BUILDING FUND			
	Original Budget	Final Budget	Actual	Variance with Final Budget Favorable (Unfavorable)	
Revenues collected:					
Local sources	\$ 22,228.95	\$ 22,228.95	\$ 24,052.72	\$ 1,823.77	
Intermediate sources	-	-	-	-	
State sources	-	-	9.77	9.77	
Federal sources	-	-	-	-	
Total revenues collected	\$ 22,228.95	\$ 22,228.95	\$ 24,062.49	\$ 1,833.54	
Expenditures paid:					
Instruction	\$ 75,081.34	\$ 75,081.34	-	\$ 75,081.34	
Support services	-	-	23,474.00	(23,474.00)	
Non-instructional services	-	-	-	-	
Capital outlay	-	-	-	-	
Other Outlays	-	-	-	-	
Other Uses	-	-	-	-	
Total expenditures	\$ 75,081.34	\$ 75,081.34	\$ 23,474.00	\$ 51,607.34	
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	\$ (52,852.39)	\$ (52,852.39)	\$ 588.49	\$ 53,440.88	
Adjustments to prior year encumbrances	\$ -	\$ -	\$ -	\$ -	
Other financing sources (uses):					
Operating transfers in/out	-	-	-	-	
Bank charges	-	-	-	-	
Total other financing sources (uses)	\$ -	\$ -	\$ -	\$ -	
Excess (deficiency) of revenue collected over (under) expenditures paid and other financing sources (uses)	\$ (52,852.39)	\$ (52,852.39)	\$ 588.49	\$ 53,440.88	
Fund balances, beginning of year	\$ 52,852.39	\$ 52,852.39	\$ 52,852.39	\$ -	
Fund balance, end of year	\$ -	\$ -	\$ 53,440.88	\$ 53,440.88	

SPAVINAW SCHOOL DISTRICT NO. C-21
SCHEDULE OF FEDERAL AWARDS EXPENDED
FOR THE YEAR ENDED JUNE 30, 2015

Federal Grantor/Pass-Through Grantor/ Program Title	Federal CFDA #	Grantor's Number	Balance at July 1, 2014	Receipts	Transfer In/Out	Expenditures	Balance at June 30, 2015
<u>U.S. Department of Education</u>							
Direct Programs:							
<u>2014-2015 Programs</u>							
Title VIII, Impact Aid Operations	84.041	S041B20154203	\$ -	\$ 13,564.42	-	\$ 13,564.42	\$ -
Title VII, Indian Education	84.060A	S060A141084	-	9,534.00	-	9,534.00	-
Small Rural Schools Achievement Program	84.358A	S358A143368	-	5,823.00	-	5,823.00	-
Sub-Total			\$ -	\$ 28,921.42	-	\$ 28,921.42	\$ -
<u>Passed-Through State Department of Education</u>							
<u>2014-2015 Programs</u>							
Title I, Basic	84.010	N/A	\$ -	\$ 43,778.68	-	\$ 43,778.68	\$ -
IDEA-B Flow Through	84.027	N/A	-	17,116.20	-	17,116.20	-
Title II, Part A Training & Recruiting Fund-Note 5	84.367	N/A	-	11,878.26	(11,878.26)	-	-
Title VI REAP Flex-Note 5		N/A	-	-	11,878.26	11,878.26	-
Preschool	84.173	N/A	-	96.89	-	96.89	-
Sub-Total			\$ -	\$ 72,870.03	-	\$ 72,870.03	\$ -
<u>U. S. Department of Agriculture</u>							
<u>Passed-Through State Department of Education:</u>							
Child Nutrition Cluster:							
Non-Cash Assistance (Commodities):							
National School Lunch Program - Note 4	10.555	N/A	\$ -	\$ 3,628.91	-	\$ 3,628.91	\$ -
Non-Cash Assistance Sub-Total			\$ -	\$ 3,628.91	-	\$ 3,628.91	\$ -
Cash Assistance:							
School Breakfast Program	10.553	N/A	\$ -	\$ 15,069.60	-	\$ 15,069.60	\$ -
National School Lunch Program	10.555	N/A	-	29,408.26	-	29,408.26	-
Fresh Fruits & Vegetables	10.582	N/A	-	4,317.44	-	-	4,317.44
Cash Assistance Sub- Total			\$ -	\$ 48,795.30	-	\$ 44,477.86	\$ 4,317.44
Sub- Total for Child Nutrition Cluster			\$ -	\$ 52,424.21	-	\$ 48,106.77	\$ 4,317.44

(continued)

The accompanying notes are an integral part of this schedule

SPAVINAW SCHOOL DISTRICT NO. C-21
SCHEDULE OF FEDERAL AWARDS EXPENDED
FOR THE YEAR ENDED JUNE 30, 2015

Federal Grantor/Pass-Through Grantor/ Program Title	Federal CFDA #	Grantor's Number	Balance at July 1, 2014	Receipts	Transfer In/Out	Expenditures	Balance at June 30, 2015
<u>Other Federal Assistance</u>							
<u>2013-2014 Programs</u>							
Johnson O'Malley	15.130	N/A	\$ (1,486.33)	\$ 1,486.33	-	\$ -	\$ -
Sub-Total			<u>\$ (1,486.33)</u>	<u>\$ 1,486.33</u>	<u>-</u>	<u>\$ -</u>	<u>\$ -</u>
<u>2014-2015 Programs</u>							
Johnson O'Malley	15.130	N/A	-	-	-	845.57	(845.57)
Sub-Total			<u>\$ -</u>	<u>\$ -</u>	<u>-</u>	<u>\$ 845.57</u>	<u>\$ (845.57)</u>
<u>2014-2015 Programs</u>							
Flood Control	12.112	N/A	-	140.62	-	-	140.62
Sub-Total			<u>\$ -</u>	<u>\$ 140.62</u>	<u>-</u>	<u>\$ -</u>	<u>\$ 140.62</u>
TOTAL FEDERAL ASSISTANCE			<u>\$ (1,486.33)</u>	<u>\$ 155,842.61</u>	<u>-</u>	<u>\$ 150,743.79</u>	<u>\$ 3,612.49</u>

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
FOR THE YEAR ENDED JUNE 30, 2015**

1. For all federal programs, the District uses the fund types prescribed by the Oklahoma State Department of Education and conforms to the system of accounting authorized by the State of Oklahoma. The General Fund is used to account for resources restricted, or designated for, specific purposes by a grantor. Federal and state financial assistance generally is accounted for in the General Fund.
2. The accounting and financial reporting treatment applied to a fund is determined by its measurement focus. The Governmental Fund types are accounted for using a current financial measurement focus. All federal grant funds were accounted for in the General Fund, which is a Governmental Fund type. With this measurement focus, only current assets and current liabilities and the fund balance are included on the balance sheet. Operating statements of these funds present increases and decreases in net current assets.

The Regulatory Basis of Accounting is used for the Governmental Fund types and Agency Funds. This basis of accounting recognizes revenue from all sources when they are received. Federal grant funds are considered to be recognized when encumbered or reserved to the extent of expenditures made under the provisions of the grant.

3. Positive amounts listed in the either "Balance at July 1, 2014" or "Balance at June 30, 2015" column represent funds received by the school and not yet expended or coded to the program. Negative amounts represent expenditures which have been claimed, but the revenue not yet collected.
4. The District received donated foods through the Federal Food Distribution Program (10.555). At June 30, 2015, the school maintained an immaterial amount of food commodities inventory. Per the Regulatory Basis of Accounting, the commodities received and used are not recognized as revenue or expenditures in the school's Financial Statements.
5. The District transferred from Title IIA into Title VI REAP \$11,878.26. Expenditures were coded to Title VI REAP and revenue receipted into Title IIA.
6. Reconciliation of the Revenue shown on the *Schedule of Expenditures of Federal Awards* to Statement of Revenue, Expenditures and Changes in Fund Balance is as follows:

		Revenue
Total revenue per "Schedule of Expenditures of Federal Awards"	\$	155,842.61
Less: Commodities (non-cash assistance)		<u>(3,628.91)</u>
Net Total	\$	<u><u>152,213.70</u></u>
Federal program revenues per "Statement of Revenue, and Changes in Fund Balance"		
General Fund	\$	<u>152,213.70</u>
Net Total	\$	<u><u>152,213.70</u></u>

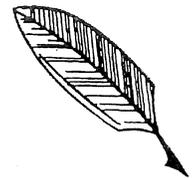
SPAVINAW SCHOOL DISTRICT NO. C-21
 SCHOOL ACTIVITY FUND
 RECEIPTS, TRANSFERS, DISBURSEMENTS AND SUB-ACCOUNT BALANCES
 FOR THE YEAR ENDED JUNE 30, 2015

Activities	Balance 7-1-14	Deposited	Net Transfers/ Adjustments	Disbursed	Balance 6-30-15
School Activity Program	\$ 1,906.53	\$ 7,264.52	\$ 328.74	\$ 7,561.88	\$ 1,937.91
Eighth Grade	535.88	2,634.30	(328.74)	2,799.48	41.96
Library	1,041.79	-		-	1,041.79
Athletic Fund	934.10	3,528.00		2,380.00	2,082.10
Total Activities	\$ 4,418.30	\$ 13,426.82	\$ -	\$ 12,741.36	\$ 5,103.76

REPORTS REQUIRED BY *GOVERNMENT AUDITING STANDARDS*

KERRY JOHN PATTEN, C.P.A.

2101 N. Willow Ave.
Broken Arrow, OK 74012
Phone Number (918) 250-8838
FAX Number (918) 250-9853



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
Spavinaw School District No. C-21
Mayes County, Oklahoma

I 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 Spavinaw School District No. C-21, Mayes County, Oklahoma (District), as listed in the Table of Contents, as of and for the year ended June 30, 2015, and the related notes to the financial statements, which collectively comprise the District's financial statements, and have issued my report thereon dated March 21, 2016, which 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, my 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 my audit of the financial statements, I considered the District's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing my opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control over financial reporting. Accordingly, I do not express an opinion on the effectiveness of the District's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency, or 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.

My 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 my audit I did not identify any deficiencies in internal control that I consider to be material weaknesses. However, material weaknesses may exist that have not been identified. However, I identified certain deficiencies in internal control over financial reporting, described in the accompanying Schedule of Comments that I consider to be significant deficiencies in internal control over financial reporting. 2015-1. A significant deficiency is a deficiency or 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.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the District's financial statements are free of material misstatement, I 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 determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of my audit, and accordingly, I do not express such an opinion. The results of my tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Purpose of this Report

This report is solely to describe the scope of my 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.



Kerry John Patten, C.P.A.
Broken Arrow, OK
March 21, 2016

**SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
SUMMARY OF PRIOR AUDIT FINDINGS
JULY 1, 2014 TO JUNE 30, 2015**

The summary of prior audit findings is required to report the status of all audit findings reported in the prior audit's schedule of findings and questioned costs relative to federal awards.

Finding: 2014-1

For the FY 2014, our review reflected an adequate internal control structure did not exist because of the small size of the entity nor was there adequate segregation of duties.

For the FY 2015, the finding was yet again applicable.

SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
SCHEDULE OF COMMENTS
JULY 1, 2014 TO JUNE 30, 2015

Significant Deficiency:

* 2015-1

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

Criteria: Internal controls should be in places that provide reasonable assurance that any one individual does not have control over several of the financial functions of the School District.

Effect: Because of the inadequate segregation of duties there may be an opportunity for an employee to alter record keeping.

Recommendation: We have recommended that the School District strive to implement an adequate segregation of duties.

Response: We concur with the recommendation; however, we have concluded that the cost to correct this condition would exceed the benefit.

Previous Year's Audit Comments

Excluding conditions marked with an asterisk, there are no other items in the 2013-14 audit report, which have been repeated in this report.

I would like to express my appreciation for the courtesies and cooperation extended to us by school district administrators and employees during the course of this audit.

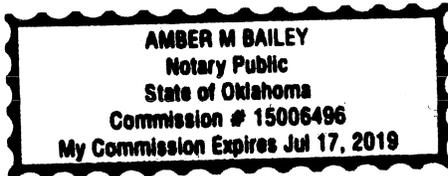
SPAVINAW SCHOOL DISTRICT NO. C-21
MAYES COUNTY, OKLAHOMA
SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT
JULY 1, 2014 TO JUNE 30, 2015

State of Oklahoma)
County of Tulsa)

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 Spavinaw School District for the audit year 2014-15.

Kerry John Patten, C.P.A.
AUDITING FIRM

BY *Kerry John Patten*
AUTHORIZED AGENT



Subscribed and sworn to before me on this

21st day of March, 2016

Amber M Bailey
NOTARY PUBLIC

My commission expires on:

17th day of July, 2019