FINANCIAL STATEMENTS - REGULATORY BASIS AND REPORTS OF INDEPENDENT AUDITORS'

STRATFORD SCHOOL DISTRICT NO. 1-2, Garvin County, Oklahoma

JUNE 30, 2011

Audited by

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

SCHOOL DISTRICT OFFICIALS JUNE 30, 2011

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

Certified Public Accountants

Members

American Institute of Certified Public Accountants

Oklahoma Society of Certified Public Accountants

INDEPENDENT AUDITORS' REPORT

The Honorable Board of Education Stratford School District Number I-2 Stratford, Garvin County, Oklahoma

We have audited the accompanying fund type and general long-term debt financial statements, including budget and actual, of the Stratford School District Number I-2, Stratford, Garvin County, Oklahoma (District), as of and for the year ended June 30, 2011, which collectively comprise the District's combined financial statements as listed in the table of contents. These financial statements are the responsibility of the District's management. Our responsibility is to express opinions on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinions.

As described more fully in Note 1, the District prepares its financial statements using accounting practices prescribed or permitted by the Oklahoma State Department of Education, which differs from accounting principles generally accepted in the United States of America. The effect on the financial statements of the variances between these regulatory accounting practices and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material.

In addition, the District has not maintained the cost of fixed assets purchased in previous years and related depreciation, and thus does not know the amount that should be recorded in the fixed assets. Therefore, the fixed assets have not been presented. This information is required under the regulatory presentation prescribed by the Oklahoma State Department of Education.

In our opinion, because of the effects of the matters discussed in the third paragraph, the financial statements referred to above do not present fairly, in conformity with accounting principles generally accepted in the United States of America, the financial position of Stratford School District Number I-2, Stratford, Garvin County, Oklahoma as of June 30, 2011, or the changes in its financial position for the year ended.

Independent Auditors' Report

In our opinion, except for the omission of the fixed assets which result in an incomplete presentation as explained in the fourth paragraph, the financial statements referred to in the first paragraph present fairly, in all material respects, the assets, liabilities and cash fund balances of Stratford School District Number I-2, Stratford, Garvin County, Oklahoma, as of June 30, 2011, the revenues it received and expenditures it paid and encumbered, and the respective budgetary comparisons for the year then ended in conformity with the basis of accounting described in Note 1.

In accordance with *Government Auditing Standards*, we have also issued our report dated March 27, 2012 on our consideration of the District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of our audit.

Our audit was conducted for the purpose of forming opinions on financial statements that collectively comprise the District's combined financial statements. The combining financial statements and other schedules listed in the table of contents are presented for purposes of additional analysis and are not a required part of the combined financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by U.S. Office of Management and Budget Circular A-133, Audits of States, Local Governments, and Nonprofit Organizations, and is also not a required part of the combined financial statements. The combining fund statements and the schedule of expenditures of federal awards are the responsibility of management and were derived from and relate directly to the underlying accounting and other records used to prepare the financial statements. information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated in all material respects in relation to the combined financial statements as a whole.

Wilson, Don: associates

Wilson, Dotson & Associates, PLLC Shawnee, Oklahoma

March 27, 2012

COMBINED STATEMENT OF ASSETS, LIABILITIES AND CASH FUND BALANCES - REGULATORY BASIS ALL FUND TYPES AND GENERAL LONG-TERM DEBT JUNE 30, 2011

	GOVERN	IMENTAL FUN) TYPES	FIDUCIARY FUND TYPES	GENERAL	TOTALS
	GENERAL	SPECIAL REVENUE	DEBT SERVICE	AGENCY FUNDS	LONG-TERM DEBT	(MEMORANDUM ONLY)
<u>ASSETS</u>						
Cash and investments	\$ 1,109,058	53,569	71,386	149,555	-	1,383,568
Amounts available in debt service Amounts to be provided for retirement	-	-	-	-	71,386	71,386
of general long-term debt					623,559	623,559
Total Assets	\$ 1,109,058	53,569	71,386	149,555	694,945	2,078,513
LIABILITIES AND CASH FUND BALANCES						
Liabilities						
Warrants payable	\$ 340,892	2,072	-	-	-	342,964
Funds held for school organizations	-	-	-	149,555	-	149,555
Long-term debt:						
Bonds payable	-	-	-	-	445,000	445,000
Leases payable					249,945	249,945
Total liabilities	340,892	2,072	-	149,555	694,945	1,187,464
Cash Fund Balances						
Restricted	-	51,497	71,386			122,883
Unassigned	768,166					768,166
Total cash fund balances	768,166	51,497	71,386			891,049
Total Liabilities and Cash Fund Balances	\$ 1,109,058	53,569	71,386	149,555	694,945	2,078,513

COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES IN CASH FUND BALANCES - REGULATORY BASIS - ALL GOVERNMENTAL FUND TYPES FOR THE YEAR ENDED JUNE 30, 2011

	G	GOVERNMENTAL FUND TYPES					
		SPECIAL	CAPITAL	DEBT	(MEMORANDUM		
	<u>GENERAL</u>	REVENUE	PROJECTS	SERVICE	ONLY)		
Revenues collected:							
Local sources	\$ 573,152	59,314	3	258,261	890,730		
Intermediate sources	87,999	-	-	-	87,999		
State sources	2,849,068	-	-	-	2,849,068		
Federal sources	1,280,072				1,280,072		
Total revenues collected	4,790,291	59,314	3	258,261	5,107,869		
Expenditures:							
Instruction	2,887,156	-	-	-	2,887,156		
Support services	1,052,095	12,247	-	-	1,064,342		
Operation of non-instruction services	287,115	-	-	-	287,115		
Facilities acquisition & construction services	-	-	1,820		1,820		
Repayments			<u> </u>	302,805	302,805		
Total expenditures	4,226,366	12,247	1,820	302,805	4,543,238		
Excess of revenues collected over (under) expenditures							
before adjustments to prior year encumbrances	563,925	47,067	(1,817)	(44,544)	564,631		
Adjustments to prior year encumbrances	1,350				1,350		
Excess of revenues collected over (under) expenditures	565,275	47,067	(1,817)	(44,544)	565,981		
Cash fund balances, beginning of year	202,891	4,430	1,817	115,930	325,068		
Cash fund balances, end of year	\$ 768,166	51,497		71,386	891,049		

COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES IN CASH FUND BALANCES - BUDGET AND ACTUAL - REGULATORY BASIS - GOVERNMENTAL FUND TYPES FOR THE YEAR ENDED JUNE 30, 2011

	GI	ENERAL FUND	<u> </u>	SPECIAL REVENUE FUNDS		
	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL
Revenues collected:						
Local sources	\$ 426,191	426,191	573,152	55,084	55,084	59,314
Intermediate sources	98,499	98,499	87,999	-	-	-
State sources	2,681,679	2,681,679	2,849,068	-	-	-
Federal sources	909,870	909,870	1,280,072	-	-	-
Non-revenue receipts	12,260	12,260		1,753	1,753	
Total revenues collected	4,128,499	4,128,499	4,790,291	56,837	56,837	59,314
Expenditures:						
Instruction	2,992,180	2,992,180	2,887,156	_	_	_
Support services	1,052,095	1,052,095	1,052,095	61.267	61.267	12,247
Operation of non-instruction services	287,115	287,115	287,115	-	-	-,
Facilities acquisition & construction services	-	· -	, -	-	-	-
Other outlays	-	-	-	-	-	-
Repayments	-	-	-	-	-	-
Total expenditures	4,331,390	4,331,390	4,226,366	61,267	61,267	12,247
Excess of revenues collected over (under)						
expenditures before adjustments to prior year						
encumbrances	(202,891)	(202,891)	563,925	(4,430)	(4,430)	47,067
Adjustments to prior year encumbrances			1,350			
Excess of revenues collected over (under) expenditures	(202,891)	(202,891)	565,275	(4,430)	(4,430)	47,067
onpolitation of	(202,001)	(202,001)	000,270	(1,100)	(4,400)	47,007
Cash fund balances, beginning of year	202,891	202,891	202,891	4,430	4,430	4,430
Cash fund balances, end of year	\$ -		768,166		_	51,497

COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES IN CASH FUND BALANCES BUDGET AND ACTUAL -REGULATORY BASIS - GOVERNMENTAL FUND TYPES FOR THE YEAR ENDED JUNE 30, 2011

	 CAPITA	AL PROJECTS		SINKING FUND		
	RIGINAL UDGET	FINAL BUDGET	ACTUAL	ORIGINAL BUDGET	FINAL BUDGET	ACTUAL
Revenues collected:						
Local sources	\$ =	-	3	252,961	252,961	258,261
Intermediate sources	-	-	-	-	-	-
State sources	-	-	-	-	-	-
Federal sources	-	-	-	-	-	-
Non-revenue receipts	 				-	
Total revenues collected	 		3	252,961	252,961	258,261
Expenditures:						
Instruction	-	=	-	=	-	=
Support services	-	-	-	-	-	-
Operation of non-instruction services	-	-	-	-	-	-
Facilities acquisition & construction services	1,817	1,817	1,820	-	-	-
Repayments	 			368,891	368,891	302,805
Total expenditures	 1,817	1,817	1,820	368,891	368,891	302,805
Excess of revenues collected over (under)						
expenditures	(1,817)	(1,817)	(1,817)	(115,930)	(115,930)	(44,544)
Cash fund balances, beginning of year	 1,817	1,817	1,817	115,930	115,930	115,930
Cash fund balances, end of year	\$ 			<u> </u>	-	71,386

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The accompanying financial statements of the Stratford School District Number I-2, Stratford, Garvin County, Oklahoma (the "District") conform to the regulatory basis of accounting, which is an other comprehensive basis of accounting prescribed by the Oklahoma State Department of Education and conforms to the system of accounting authorized by the State of Oklahoma. Accordingly, the accompanying financial statements are not intended to present financial position and results of operations in conformity with accounting principles generally accepted in the United States of America. The District's accounting polices are described in the following notes that are an integral part of the District's financial statements. The District has adopted the Governmental Accounting Standards Board (GASB) 54, Fund Balance Reporting and Governmental Fund Type Definitions, which redefines the fund balance classifications from the previous two (2) into a possible five (5) classifications.

A. Reporting Entity

The District is a corporate body for public purposes created under Title 70 of the Oklahoma Statutes and accordingly is a separate entity for operating and financial reporting purposes. The District is part of the public school system of Oklahoma under the general direction and control of the State Board of Education and is financially dependent on state of Oklahoma support. The general operating authority for the public school system is the Oklahoma School Code contained in Title 70, Oklahoma Statues.

The governing body of the District is the Board of Education (Board) composed of five elected members. The appointed superintendent is the executive officer of the District. The Board, constituting an on-going entity, is the level of government, which has governance responsibilities over all activities, related to public elementary and secondary school education within the jurisdiction of the Local Independent School District. The Board receives funding from local, intermediate, state and federal government sources and must comply with the requirements of these funding source entities. However, the Board is not included in any other governmental "reporting entity" as defined in Section 2100, Codification of Governmental Accounting and Financial Reporting Standards, since Board members are elected by the public and have decision making authority, the power to designate management, the responsibility to significantly influence operations and primary accountability for fiscal matters.

These financial statements present only the activities of the District. There are no component units (entities considered to be financially accountable to the District).

B. Measurement Focus

The accounts of the District are organized and operate on the basis of funds and general long-term debt. 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 general long-term debt is a reporting device to account for certain liabilities of the governmental funds not recorded directly in other funds.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

B. Measurement Focus (Continued)

The District has the following fund types and general long-term debt:

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

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

Governmental funds include the following fund types:

<u>General fund</u> – is the general operating fund of the District. It accounts for all financial resources of the general government, except those required to be accounted for in another fund. This is a budgeted fund, and any fund balances are considered as resources available for use. Major revenue sources include local property taxes and federal and state funding. Expenditures include all costs associated with the daily operations of the schools 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.

<u>Special Revenue funds</u> – account for revenue sources that are restricted to expenditures for specific purposes (not including expendable trusts or major capital projects). The special revenue funds are composed of the District's Building Fund. This is a budgeted fund and any fund balance is considered as resources available for use.

<u>Building fund</u> – 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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

B. Measurement Focus (Continued)

software to be used on or for school district property, for paying energy and utility costs, for purchasing telecommunications services, for paying fire and casualty insurance premiums for school facilities, for purchasing security systems, and for paying salaries of security personnel.

<u>Debt Service fund</u> – consists of the District's Sinking Fund and accounts for the accumulation of financial resources for servicing of general long-term debt (principal, interest and related costs). This is a budgeted fund. The primary revenue sources are local property taxes levied specifically for debt service. The District had no debt service fund in the current fiscal year.

<u>Capital Project fund</u> – would consist of the District's Bond Fund and would account for the proceeds of bonds sales used exclusively for acquiring school sites, constructing and equipping new school facilities, renovating existing facilities, and the acquisition of transportation equipment. The District does not currently have any bond funds.

Fiduciary funds – account for assets held by the District in a trustee capacity or as an agent on behalf of others.

Agency fund – is custodial in nature and does not present results of operations or has a measurement focus. Agency funds are accounted for using the cash basis of accounting. This fund is the School Activities Fund used to account for monies collected principally through fundraising efforts of the students and District-sponsored groups. This is an unbudgeted fund. The administration is responsible, under the authority of the Board, of collecting, disbursing and accounting for these activity funds. These funds have no equity, assets are equal to liabilities, and do not include revenues and expenditures for general operation of the District.

General Long-term Debt – accounts for the outstanding principal balances of all long-term debt of the District, which is offset by the amount available in the debt service fund and the amount to be provided in future years to complete retirement of the debt principal.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

C. Basis of Accounting and Presentation (continued)

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

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

- Encumbrances represented by purchase orders, contracts, and other commitments for the expenditure of monies are recorded as expenditures when approved.
- Investments are recorded as assets when purchased.
- Inventories of school supplies are recorded as expenditures and not as assets.
- Warrants payable are recorded as liabilities when issued.
- Long-term debt is recorded when incurred.
- Compensated absences are recorded as an expenditure and liability when the obligation is paid.

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

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

1. Deposits and Investments

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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

D. Assets, Liabilities, Cash Fund Balances, Revenue and Expenditures (Continued)

2. Fair Value of Financial Instruments

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

3. Estimates

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

4. Interfund Transactions

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

5. Inventories

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

6. Fixed Assets

The regulatory basis of accounting prescribed by the Oklahoma State Board of Education requires the presentation of fixed assets. The District has not maintained a record of its fixed assets, and, accordingly, a statement of fixed assets required by generally accepted accounting principles prior to the issuance of GASB No. 34, is not included in the financial statements. Fixed assets purchased are recorded as expenditures in the various funds at the time of purchase.

7. Compensated Absences

The District provides vacation and sick leave benefits in accordance with Title 70 of the Oklahoma Statues, Article 6-104, which provides for annual sick leave and personal business days. District policy allows certified employees to accumulate such days to a

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

D. Assets, Liabilities, Cash Fund Balances, Revenue and Expenditures (Continued)

7. Compensated Absences (Continued)

maximum number of days. None of the benefits are payable upon retirement or death. Accrued vacation and sick leave benefits are not reflected in the financial statements because such statements are prepared on the regulatory basis of accounting. This practice differs from generally accepted accounting principles.

8. Long-term Obligations

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

9. Fund Balance Classifications

<u>Restricted Fund Balance</u> – 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 or other governments; or
- Imposed by law through constitutional provisions or enabling legislation.

<u>Unassigned Fund Balance</u> – Unassigned fund balance is the residual classification for the general fund. This classification represents fund balance that has not been assigned to other funds and that has not been restricted, committed, or assigned to specific purposes within the general fund.

10. Property Taxes and Other Local Revenues

The District is authorized by state law to levy property taxes, which consist of ad valorem taxes on real and personal property within the District. The County Assessor, upon receipt of the certification of tax levies from the County Excise Board, extends the tax levies on the tax roll for submission to the County Treasurer. Property taxes are levied on November 1 and are due on receipt of the tax bill. The first half of taxes is due prior to January 1. The second half is due prior to April 1. If the first payment is not made timely, the entire tax becomes due and payable on January 2. Second half taxes become delinquent on April 1 of the year following the assessment. If not paid by the following October 1, the property is offered for sale for the amount of the taxes due. The owner has two years to redeem the property by paying the taxes and penalty owed. If at the end of two years the owner has not done so, the purchaser is issued a deed to the property. No provision has been made for uncollected taxes, as all taxes are deemed collectible. Other local sources of revenues include tuition, fees, rentals, disposals, commissions and reimbursements.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

D. Assets, Liabilities, Cash Fund Balances, Revenue and Expenditures (Continued)

11. Intermediate Revenues

Revenue from intermediate sources is the amount of money from funds collected by an intermediate administrative unit, or a political subdivision between the district and the state, and distributed to districts in amounts that differ in proportion to those which were collected within such systems.

12. State Revenues

Revenues from state sources for current operations are primarily governed by state aid formula under the provisions of Article XVIII, Title 70, Oklahoma Statutes. The State Board of Education administers the allocation of state aid funds to school districts based on information accumulated from the districts. After review and verification of reports and supporting documentation, the State Department of Education may adjust subsequent fiscal period allocations of money for prior year errors disclosed by review. Normally, such adjustments are treated as reductions or additions of revenue of the year when the adjustment is made.

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

13. Federal Revenues

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

14. Non-Monetary Transactions

The District receives commodities from the U. S. Department of Agriculture. The value of these commodities has been included in the Schedule of Expenditures of Federal Awards; however, they have not been reflected in the combined financial statements as either revenue or expense since they are not reported under the regulatory basis of accounting.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

D. Assets, Liabilities, Cash Fund Balances, Revenue and Expenditures (Continued)

15. 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.

16. Comparative Data

Comparative total data for the prior year has been presented in the accompanying financial statements in order to provide an understanding of changes in the District's financial position and operations. However, complete comparative data (i.e., presentation of prior year totals by fund type in each of the statements) has not been presented since their inclusion would make the statements unduly complex and difficult to read.

2. STEWARDSHIP, COMPLIANCE AND ACCOUNTABILITY

Budgetary Information

The District is required by state law to prepare an annual budget. A preliminary budget is submitted to the Board of Education by December 31 for the fiscal year beginning the following July 1. The electors of the District have voted on the question to make the ad valorem levy for emergency levy and local support levy permanent; therefore, an annual mileage election (normally the first Tuesday in February) is not necessary. Under current Oklahoma Statutes, a formal Estimate of Needs (Budget) is required for all funds except for trust and agency funds. Budgets are presented for all funds that include the originally approved budgeted appropriations for expenditures and final budgeted appropriations as adjusted for supplemental appropriations and approved transfers between budget categories. The annual Estimate of Needs, when approved by the Board and subsequently filed with the County Clerk and approved 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 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 District. 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, 2011

3. DETAILED NOTES CONCERNING THE FUNDS

A. Deposits and Investments

Custodial Credit Risk

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

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

At June 30, 2011 the District held deposits of approximately \$407,456 in checking and \$794,338 in investments at financial institutions. The District's cash deposits, including interest-bearing accounts, and investments are entirely covered by Federal Depository Insurance (FDIC) or direct obligations of the U.S. Government insured or collateralized with securities held by the District or by its agent in the District's name. Therefore, the District was not exposed to custodial credit risk as defined above.

Investment Credit Risk

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

- 1. Direct obligations of the U.S. government, its agencies and instrumentalities to which the full faith and credit of the U.S. government is pledged, or obligations to the payment of which the full faith and credit of the State is pledged.
- 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.
- County, municipal or school district debt obligations for which an ad valorem tax may be levied.
- 6. Money market funds regulated by the SEC and in which investments consist of the investments of obligations of the United States, its agencies and instrumentalities.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

3. DETAILED NOTES CONCERNING THE FUNDS (Continued)

A. Deposits and Investments (Continued)

- 7. Warrants, bonds or judgments of the school district.
- 8. Qualified pooled investment programs through an interlocal cooperative agreement formed pursuant to applicable law and to which the board of education has voted to be a member, the investments of which consist of those items specified in paragraphs 1 through 7 above, as well as obligations of the United States agencies and instrumentalities.
- 9. Any other investment that is authorized by law.

Investment credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligation. The District has no formal policy limiting investments based on credit rating.

Unless there is information to the contrary, obligations of the U.S. government or obligations explicitly guaranteed by the U.S. government are not considered to have credit risk and do not require disclosure of credit quality.

The investments held at June 30, 2011 are as follows:

Type	Weighted Avg. Maturity (Month)	Credit Rating	Market Value	Cost
Investments: Certificates of deposit	12	N/A	\$ 794,338	794,338

The District had no investment credit risk as of June 30, 2011, as defined above.

Investment Interest Rate Risk

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

Concentration of Investment Credit Risk

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

At June 30, 2011, the District had no concentration of credit risk as defined above.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

3. DETAILED NOTES CONCERNING THE FUNDS (Continued)

B. Long-term Debt

State statues prohibit the District from becoming indebted in an amount exceeding the revenue to be received for any fiscal year without approval by the District's voters. Bond issues have been approved by the voters and issued by the District for various capital improvements. These bonds are required to be fully paid serially within 25 years from the date of issue. Debt Service requirements for bonds are payable solely from fund balance and future revenues of the debt service fund.

On June 1, 2007 the Stratford School District issued building bonds in the amount of \$925,000 with interest rates ranging from 3.55 to 4.35%. Bond maturities begin on June 1, 2009, first payment of \$250.000, 225,000 annually thereafter, with final maturity of \$250,000 due June 1, 2012.

On June 1, 2009 the Stratford School District issued combined purpose bonds in the amount of \$250,000 with interest rates ranging from 1.80 to 3.25%. Bond maturities begin on June 1, 2011, first payment of \$55,000, 65,000 annual installments thereafter, with final maturity of \$65,000 due June 1, 2014.

On April 1, 2007 the Stratford School District entered into a lease agreement for roof totaling \$400,000, interest rate of 2.76%, due in annual principal and interest installments for \$44,787 beginning June 26, 2008, final payment due June 26, 2017.

Year	General Obligation Bonds						
Ended		& Capita	al Leases	Total			
June 30,		Principal	Interest	Requirements			
2012	\$	354,514	18,304	372,818			
2013		105,347	7,300	112,647			
2014		106,199	5,115	111,314			
2015		45,100	2,260	47,360			
2016		41,892	1,609	43,501			
2017		41,893	1,608	43,501			
Total	\$	694,945	36,196	731,141			

C. Changes in General Long-term Debt

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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

3. DETAILED NOTES CONCERNING THE FUNDS (Continued)

C. Changes in General Long-term Debt (Continued)

	Balance			Balance
	July 1, 2010	Additions	Retirements	June 30, 2011
Bonds	\$ 725,000	-	280,000	445,000
Leases	313,937		63,992	249,945
Total	\$ 1,038,937		343,992	694,945

4. OTHER INFORMATION

A. Risk Management

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

The School also participates in a risk pool for Worker's compensation coverage in which there is a transfer or pooling of risks among the participants of that pool. In accordance with GASB No. 10, the School reports the required contribution to the pool, net of refunds, as insurance expense. The risk pool is the Oklahoma School Assurance Group (OSAG), an organization formed for the purpose of providing workers' compensation coverage to participating schools in the State of Oklahoma. In that capacity, OSAG is responsible for providing loss control services and certain fiscal activities, including obtaining contract arrangements for the underwriting, excess insurance agreements, claims processing, and legal defense for any and all claims submitted to them during the plan year. As a member of OSAG the District is required to pay fees set by OSAG according to an established payment schedule. A portion of the fees paid by the District goes into a loss fund for the District. The fee for the loss fund is calculated by projecting losses based on the schools losses for the last five years. OSAG provides coverage in excess of the Loss Fund so the District's liability for claim loss is limited to the balance of the loss fund. If the District does not use their loss fund in three years it is returned to them with no interest.

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

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

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

4. OTHER INFORMATION (Continued)

B. Contingent Liabilities (Continued)

already collected, may constitute a liability of the applicable funds. The amount, if any, of expenditures which may be disallowed by the grantor cannot be determined at this time although the District expects such amounts, if any, to be immaterial.

C. Non-Monetary Transactions

The fair market value as determined by the Oklahoma Department of Human Services of the commodities received during the period under audit was \$15,322.

D. Employee Retirement System and Plan

Description of Plan

The District participates in the state-administered Oklahoma Teachers' Retirement System, which is a cost sharing, multiple-employer defined benefit public employee retirement system (PERS), which is administered by the Board of Trustees of the Oklahoma Teachers' Retirement System (the "System"). The System provides retirement and disability benefits, annual cost-of-living adjustments, and death benefits to plan members and beneficiaries. Title 70 Section 17 of the Oklahoma Statutes establishes benefit provisions and may be amended only through legislative action. The Oklahoma Teachers' Retirement System issues a publicly available financial report that includes financial statements and required supplementary information for the System. That report may be obtained by writing to the Oklahoma Teachers' Retirement System, P.O. Box 53624, Oklahoma City, OK 73152 or by calling 405-521-2387.

Basis of Accounting

The System's financial statements are prepared using the cash basis of accounting, except for accruals of interest income. Plan member contributions are recognized in the period in which the contributions are made. Benefits and refunds are recognized when paid. The pension benefit obligation is a standardized disclosure measure of the present value of pension benefits. This pension valuation method reflects the present value of estimated pension benefits that will be paid in future years as a result of employee services performed to date and is adjusted for the effect of projected salary increases. There are no actuarial valuations performed on individual school districts. The System has an under-funded pension benefit obligation as determined as part of the latest actuarial valuation.

Funding Policy

The District, the State of Oklahoma, and the participating employees make contributions. The contribution rates for the District and its employees are established by and may be amended by Oklahoma Statutes. The rates are not actuarially determined. The rates are applied to the employee's earnings plus employer-paid fringe benefits. The required contribution for the participating members is 7.0% of covered compensation. Additionally, OTRS receives "federal matching contributions" for positions whose funding comes from federal sources or certain grants. The matching contribution rate was 6.5%. Contributions received by the System from the

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

4. OTHER INFORMATION (Continued)

D. Employee Retirement System and Plan (Continued)

State of Oklahoma are from 5.00% of its revenues from sales taxes, use taxes, corporate income taxes and individual income taxes. The District employer contribution rate was 9.50%. The District is allowed by the Oklahoma Teachers' Retirement System to make the required contributions on behalf of the participating members.

Annual Pension Cost

The District's total contributions for 2011, 2010, and 2009 were \$371,484, \$387,619, and \$235,573 respectively.

Schedule of Funding Progress (dollars in millions) (unaudited)

Actuarial	Actuarial Value of Assets	Actuarial Accrued Liability	Unfunded Actuarial Accrued Liability	Funded	Annual Covered	UAAL as % of Covered Payroll
Valuation Date	(AVA) (a)	(AAL) (b)	(UAAL) (b-a)	Ratio (a/b)	Payroll (c)	(b-a)/(c)
June 30, 2002	6,310.9	12,275.9	5,965.0	51.4%	3,047.1	195.8%
June 30, 2003	6,436.9	11,925.2	5,488.3	54.0%	3,045.7	180.2%
June 30, 2004	6,660.9	14,080.1	7,419.2	47.3%	3,030.7	244.8%
June 30, 2005	6,952.7	14,052.4	7,099.7	49.5%	3,175.2	223.6%
June 30, 2006	7,470.4	15,143.4	7,672.9	49.3%	3,354.9	228.7%
June 30, 2007	8,421.9	16,024.4	7,602.5	52.6%	3,598.9	211.2%
June 30, 2008	9,256.8	18,346.9	9,090.1	50.5%	3,751.4	242.3%
June 30, 2009	9,439.0	18,950.9	9,512.0	49.8%	3,807.9	249.8%
June 30, 2010	9,566.7	19,980.6	10,414.0	47.9%	3,854.8	270.2%
June 30, 2011	9,960.6	17,560.8	7,600.2	56.7%	3,773.3	201.4%

The employer contribution rates are established by the Oklahoma Legislature and are less than the annual required contribution, which is performed to determine the adequacy of such contribution rates.

E. Surety Bonds

The treasurer is bonded by The Ohio Casualty Insurance Company, bond number 5084974 for the penal sum \$100,000, term August 1, 2010 to August 1, 2011.

The District has the following positions bonded by Old Republic Surety Company:

Superintendent for \$100,000, bond number W150026905, term July 1, 2010 to July 1, 2011.

NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS June 30, 2011

4. OTHER INFORMATION (Continued)

E. Surety Bonds (Continued)

Encumbrance clerk for \$100,000, bond number W150027363, term July 1, 2010 to July 1, 2011.

Public School Employee for \$5,000, bond number CBB-1061961, term July 16, 2010 to July 16, 2011.

F. Subsequent Events

The District discovered a misappropriation of funds by personal use of the District's credit card totaling \$857. The District reported the theft to the Garvin County Sheriff's office.

COMBINING STATEMENT OF ASSETS AND LIABILITIES - REGULATORY BASIS ALL FIDUCIARY FUND TYPES

JUNE 30, 2011

ASSETS	AGENCY FUND ACTIVITY FUND
<u>A33E13</u>	
Cash	<u>\$ 149,555</u>
LIABILITIES	
Liabilities Funds held for school organizations	\$ 149,55 <u>5</u>

STRATFORD SCHOOL DISTRICT NO. I-2

Garvin County, Oklahoma COMBINING STATEMENT OF CHANGES IN ASSETS AND LIABILITIES -**REGULATORY BASIS - AGENCY FUNDS** FOR THE YEAR ENDED JUNE 30, 2011

<u>ASSETS</u>	B	ALANCE 7-01-10	ADDITIONS	ADJUSTMENTS	DEDUCTIONS	BALANCE 6-30-11
Cash	\$	119,058	315,351		284,854	149,555
<u>LIABILITIES</u>						
Funds held for school organizations:						
Athletics	\$	5,934	37,694	-	27,243	16,385
Miscellaneous		346	1,089	-	1,127	308
FFA		1,896	39,218	-	37,431	3,683
Athletic Booster		3,572	12,459	-	13,008	3,023
Yearbook		2,131	12,598	499	11,025	4,203
4-H		2,804	70	-	194	2,680
Delta Headstart		122	-	-	105	17
Flower Fund		435	591	-	473	553
Food Drive Fund		855	3,071	(155)	1,565	2,206
Softball		11	-	(11)	-	-
Football		2,677	18,036	-	18,930	1,783
Student Council		213	4,517	-	4,580	150
Art Club		272	-	-	-	272
Elementary		7,601	19,328	999	16,160	11,768
Spanish Club		1,640	-	-	137	1,503
Library Fund		661	5,253	-	5,494	420
Fellowship of Christian Athletics		6	-	-	-	6
BPA		495	375	-	758	112
Concession		2,815	15,483	-	15,689	2,609
Senior Class		431	1,362	740	2,232	301
SAFE		8,842	5,825	(845)	4,529	9,293
Track		165	-	-	-	165
FFA Booster		5,443	8,127	-	9,825	3,745
Junior Class		1,170	3,473	1,318	3,546	2,415
Sophomore Class		2,488	982	(1,835)	312	1,323
Baseball		896	550	-	216	1,230
Boy's Basketball		1,100	5,283	-	4,738	1,645
9th Grade Class		653	1,298	(399)	498	1,054
Letter Jackets		1	1,405	-	-	1,406
8th Grade Class		254	-	(254)	-	-
Speech		835	-	-	-	835

STRATFORD SCHOOL DISTRICT NO. I-2 Garvin County, Oklahoma COMBINING STATEMENT OF CHANGES IN ASSETS AND LIABILITIES REGULATORY BASIS - AGENCY FUNDS FOR THE YEAR ENDED JUNE 30, 2011

LIABILITIES	B	ALANCE 7-01-10	ADDITIONS	ADJUSTMENTS	DEDUCTIONS	BALANCE 6-30-11
Funds held for school organizations:						
SH Cheer	\$	2,803	6,895	-	8,148	1,550
JH Cheer		-	536	-	125	411
National Honor Society		795	876	-	1,217	454
Girls basketball		2,417	10,987	11	10,108	3,307
Band Boosters		688	-	-	200	488
Science Club		5,219	7,309	525	7,953	5,100
Pauline West Scholarship		4,254	156	-	-	4,410
PTO		3,955	8,004	-	8,667	3,292
Stratford Alumni Scholarship		28,302	410	-	-	28,712
Dance Team		3,791	7,276	-	7,826	3,241
Rental Property		7,760	10,143	-	7,313	10,590
Academic Team		101	-	-	60	41
High School Account		487	20,229	431	17,830	3,317
Camp Goddard		18	19,381	1,468	20,469	398
Teachers Scholarship Fund		390	556	-	500	446
Middle School Account		1,304	4,580	-	3,682	2,202
Ultimate Gift		10	2,751	-	2,350	411
Meredith Marquard Memorial		-	3,259	-	-	3,259
Ice Cream		-	11,189	(2,492)	6,435	2,262
Weight Lifting Team		-	2,727		2,156	571
TOTALS	\$	119,058	315,351		284,854	149,555

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS - REGULATORY BASIS FOR THE YEAR ENDED JUNE 30, 2011

Federal Grantor/Pass Through Grantor/Program Title U.S. Department of Education:	Federal CFDA <u>Number</u>	Federal Grantor's/ Pass Through Grantor's Number	Program or Award Amount	Revenue Collected	Total Expenditures	Unexpended Budgeted <u>Balance</u>
<u>Direct Programs</u> : Title VII Indian Education	84.060		\$ 41,288	41,288	41,288	
Passed Through State Department of Education: Title I Title II Part A Innovative Title II Part D Enhancing Education Tilte II Adult Education Libraray Grant 2009-10 - Note 1 IDEA-B Flowthrough IDEA-B Flowthrough 2009-10 - Note 1 IDEA-B Flowthrough ARRA 2009-10 - Note 1 IDEA-B Preschool Title IV Part B 21st Century Title IV Part B 21st Century 2009-10 - Note 1 ARRA Education Stabilization ARRA Education Stabilization 2009-10 - Note 1 Education Jobs Title VI Part B, Subpart 2, Rural & Low Income Sub Total	84.010 84.367 84.318 84.002 84.027 84.391A 84.173 84.287 84.287 84.394 84.394 84.394 84.358		143,781 34,782 488 - 130,908 - - 3,441 268,627 - 129,641 - 107,827 20,935 840,430	143,781 34,782 488 25,375 130,908 31,611 44,733 3,441 249,462 23,301 129,641 35,675 107,827 20,935 981,960	143,781 34,782 488 - 130,908 - - 3,441 254,653 - 129,641 - 107,827 20,935 826,456	- - - - - - 13,974 - - - - - 13,974
U.S. Department of Health and Human Services: Passed Through State Department of Human Services						
Rehabilitation Services Medical Assistance Program (Medicaid) Sub Total	84.126 93.778		- - -	4,923 13,399 18,322	4,923 13,399 18,322	- - -

STRATFORD SCHOOL DISTRICT NO. I-2 Garvin County, Oklahoma SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS - REGULATORY BASIS FOR THE YEAR ENDED JUNE 30, 2011

Federal Grantor/Pass Through Grantor/Program Title	Federal CFDA Number	Federal Grantor's/ Pass Through Grantor's Number	Program or Award Amount	Revenue Collected	Total Expenditures	Unexpended Budgeted Balance
Passed Through State Department of Education:						
Child Nutrition Programs:						
National School Lunch Program	10.555		\$ -	175,897	175,897	-
National School Lunch Program 2009-10 - Note 1	10.555		-	3,212	-	-
National School Lunch Program - commodities - Note 2	10.555		-	15,322	15,322	-
School Breakfast Program	10.553		-	50,265	50,265	-
School Breakfast Program 2009-10 - Note 1	10.553			1,190		
Sub Total				245,886	241,484	
Other Federal Assistance: Bureau of Indian Affairs:						
Johnson O'Malley	15.130		6,834	-	6,834	-
Johnson O'Malley 2009-10 - Note 1	15.130			7,938		
Sub Total			6,834	7,938	6,834	
Total Expenditures of Federal Awards - Note 3			\$ 888,552	1,295,394	1,134,384	13,974

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

Note 2: This amount represents federal non-cash assistance received in the form of commodities.

Note 3: Total revenue includes \$15,322 in non-cash assistance.

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

Certified Public Accountants

Members

American Institute of Certified Public Accountants

Oklahoma Society of Certified Public Accountants

INDEPENDENT AUDITORS' 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 Stratford School District Number I-2 Stratford, Garvin County, Oklahoma

We have audited the fund type and general long-term debt financial statements, including budget and actual, of the Stratford School District Number I-2, Stratford, Garvin County, Oklahoma (District), as of and for the year ended June 30, 2011, which collectively comprise the District's combined financial statements, and have issued our report thereon dated March 27, 2012. The report on these financial statements was adverse because the District has elected to prepare its financial statements in conformity with the accounting practices prescribed or permitted by the Oklahoma State Department of Education, which is a material departure from accounting principles generally accepted in the United States of America. Our opinion regarding the presentation of the financial statements referred to above in conformity with the prescribed basis of accounting was qualified due to a departure related to the general fixed assets. 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.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered the District's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the District's internal control over financial reporting.

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.

Our consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be deficiencies, significant deficiencies, or material weaknesses. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses, as defined above.

Independent Auditors' 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*

Compliance and Other Matters

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

This report is intended solely for the information and use of the board of education and management, others within the entity, the Oklahoma State Department of Education and federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

Wilson, Don' associates

Wilson, Dotson & Associates, PLLC Shawnee, Oklahoma

March 27, 2012

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

Certified Public Accountants

Members

American Institute of Certified Public Accountants

Oklahoma Society of Certified Public Accountants

INDEPENDENT AUDITORS' REPORT ON COMPLIANCE WITH REQUIREMENTS THAT COULD HAVE A DIRECT AND MATERIAL EFFECT ON EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE IN ACCORDANCE WITH OMB CIRCULAR A-133

The Honorable Board of Education Stratford School District Number I-2 Stratford, Garvin County, Oklahoma

Compliance

We have audited Stratford School District Number I-2, Stratford, Garvin County, Oklahoma's (District) compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have a direct and material effect on each of the District's major federal programs for the year ended June 30, 2011. The District's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts and grants applicable to each of its major federal programs is the responsibility of the District's management. Our responsibility is to express an opinion on the Stratford School District Number I-2, Oklahoma County, Oklahoma's compliance based on our audit.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Stratford School District Number I-2, Stratford, Garvin County, Oklahoma's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our audit provides a reasonable basis for our opinion. Our audit does not provide a legal determination of the District's compliance with those requirements.

In our opinion, the Stratford School District Number I-2, Stratford, Garvin County, Oklahoma complied, in all material respects, with the requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2011. However, the results of our auditing procedures disclosed instances of noncompliance with those requirements, which are required to be reported in accordance with OMB Circular A-133 and which are described in the accompanying schedule of findings and questioned costs as item 2011-1.

Independent Auditors' Report on Compliance With Requirements
That Could Have a Direct and Material Effect on Each Major Program and on
Internal Control Over Compliance in Accordance With OMB Circular A-133

Internal Control Over Compliance

Management of the Stratford School District Number I-2, Stratford, Garvin Oklahoma is responsible for establishing and maintaining effective internal control over compliance with the requirements of laws, regulations, contracts and grants applicable to federal programs. In planning and performing our audit, we considered the District's internal control over compliance with the requirements that could have a direct and material effect on a major federal program to determine the auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the District's internal control over compliance.

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

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be deficiencies, significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above.

The District's responses to the findings identified in our audit are described in the accompanying schedule of findings and questioned costs. We did not audit the District's responses and accordingly, we express no opinion on the responses.

This report is intended solely for the information and use of the board of education and management, others within the entity, the Oklahoma State Department of Education and federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

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Wilson, Dotson & Associates, PLLC Shawnee, Oklahoma

March 27, 2012

SCHEDULE OF FINDINGS AND QUESTIONED COSTS FOR THE YEAR ENDED JUNE 30, 2011

Section I - Summary of Auditors' Results

Financial Statements

Type of auditors' report issued:

Adverse

Internal control over financial reporting:

Material weakness(es) identified?

 Significant deficiency(ies) identified that are not considered to be material weakness(es)?
 None reported

Noncompliance material to the financial statements noted?

Federal Awards

Internal control over major programs:

Material weakness(es) identified?

 Significant deficiency(ies) identified that are not considered to be material weakness(es)?
 None reported

Type of auditors' report issued on compliance for major programs:

Unqualified

Any audit findings disclosed that are required to be reported in Accordance with section 510(a) of Circular A-133?

Identification of major programs:

CFDA Numbers Name of Federal program or Cluster

No

84.027 IDEA-B Flowthrough 84.394A ARRA Education Stabilization 84.410 ARRA Education Jobs 84.287 21st Century

Dollar threshold used to distinguish between type A

and type B programs: \$300,000

Auditee qualified as low-risk auditee under OMB

Circular A-133, Section 530?

SCHEDULE OF FINDINGS AND QUESTIONED COSTS FOR THE YEAR ENDED JUNE 30, 2011

Section II - Financial Statement Findings

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

Section III – Federal Award Findings and Questioned Costs

Title VIII - Impact Aid

Condition: Applications for this federal program were incorrectly prepared and submitted by the District.

Criteria: The District's personnel should be adequately trained to ensure that applications are properly prepared.

Cause: The District's personnel were not properly trained.

Effect: The District was overpaid \$68,895 in 2007, \$54,685 in 2008 and \$105,173 in 2009.

Recommendation: District should ensure the personnel are adequately trained to prepare applications.

Views of Responsible Officials and Planned Corrective Actions: The District agrees with the finding and the recommended training. A waiver of these questioned costs has been requested. In the meantime, the U.S. Department of Education is withholding the aforementioned amounts from current payments.

SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS FOR THE YEAR ENDED JUNE 30, 2011

There were no prior year findings or questioned costs.

SCHEDULE OF ACCOUNTANTS' PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT FOR THE YEAR ENDED JUNE 30, 2011

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County of Pottawatomie	
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The undersigned auditing firm of lawful age, being first duly sworn on oath says that said firm had in full force and effect Accountants' 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 Stratford Public Schools for the audit year 2010-11.

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

by

Authorized Agent

Subscribed and sworn to before me this 27th day of March, 2012.

Notary Public (Commission #11002236)

Spa Cook

My Commission Expires March 10, 2015

MAND 00 4 11002236

State of Oklahoma