

**ANNUAL FINANCIAL REPORT
VARNUM SCHOOL DISTRICT NO. I-7
SEMINOLE COUNTY, OKLAHOMA
JULY 1, 2021 TO JUNE 30, 2022**

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

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
SCHOOL DISTRICT OFFICIALS
JUNE 30, 2022**

Board of Education

President	Peary Robertson
Vice-President	Rick Gist
Clerk	Tashina Hinkle
Member	Brandon Biffle
Member	Brian White

Superintendent of Schools

David Brewer

School District Treasurer

Jeanette Wright

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
JUNE 30, 2022**

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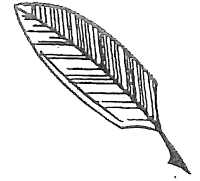
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SEMINOLE COUNTY, OKLAHOMA
JUNE 30, 2022**

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KERRY JOHN PATTEN, C.P.A.

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INDEPENDENT AUDITOR'S REPORT

March 6, 2023

The Honorable Board of Education
Varnum School District No. I-7
Seminole County, Oklahoma

Opinions

I have audited the accompanying combined fund type and account group financial statements – regulatory basis of Varnum School District No. I-7, Seminole County, Oklahoma, as of and for the year ended June 30, 2022, and the related notes to the financial statements, as listed in the table of contents.

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 Varnum School District No. I-7, Seminole County, Oklahoma, as of June 30, 2022, 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).

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” paragraph, the financial statements referred to in the first paragraph do not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of Varnum School District No. I-7, Seminole County, Oklahoma as of June 30, 2022, or the revenues, expenses, and changes in financial position for the year then ended.

Basis for Opinions

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. My responsibility under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of my report. I am required to be independent of the Varnum School District No. I-7, Seminole County, Oklahoma, and to meet my other ethical responsibilities, in accordance with the relevant ethical requirements relating to my audit. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my audit opinions.

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.

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 Varnum School District No. 1-7, Seminole 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 to comply with requirements of the Oklahoma State Department of Education. The effects on the financial statements of the variances between the regulatory basis of accounting described in Note 1 (C) and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material and pervasive.

Responsibilities of Management for the Financial Statements

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

Auditor's Responsibilities for the Audit of the Financial Statements

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

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

- Exercise professional judgement and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Varnum School District No. 1-7, Seminole County, internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in my judgement, there are conditions or events, considered in the aggregate, that raise substantial doubt about Varnum School District No. 1-7, Seminole County, Oklahoma's ability to continue as a going concern for a reasonable period of time.

Auditor's Responsibilities for the Audit of the Financial Statements (cont.)

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

Supplementary 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 purposes of additional analysis as required by Title 2 U.S. *Code of Federal Regulations* (CFR) Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, and is also not a required part of the basic 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 6, 2023, on my consideration of Varnum School District No. 1-7, Seminole County, Oklahoma, 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 solely 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 effectiveness of the District's internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the District's internal control over financial reporting and compliance.



Kerry John Patten, C.P.A.
Broken Arrow, OK

COMBINED FINANCIAL STATEMENTS

VARNUM SCHOOL DISTRICT NO. I-007
COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES
ALL FUND TYPES AND ACCOUNT GROUPS - REGULATORY BASIS
JUNE 30, 2022

	Governmental Fund Types		Fiduciary Fund Types	Account Groups	Total (Memorandum Only)
	General	Special Revenue	Trust and Agency	General Long-term Debt	June 30, 2022
ASSETS					
Cash	\$ 515,120.78	\$ 170,342.47	\$ 68,147.50	\$ -	\$ 753,610.75
Investments	-	-	-	-	-
Amounts available in debt service fund	-	-	-	-	-
Amounts to be provided for retirement of general long-term debt	-	-	-	243,388.86	243,388.86
Total assets	\$ 515,120.78	\$ 170,342.47	\$ 68,147.50	\$ 243,388.86	\$ 996,999.61
LIABILITIES AND FUND BALANCES					
Liabilities:					
Outstanding warrants	\$ 343,826.96	-	\$ 2,499.16	-	\$ 346,326.12
Encumbrances	6,805.14	-	-	-	6,805.14
Due to others	-	-	-	-	-
Long-term debt:					
Capitalized lease obligations payable	-	-	-	243,388.86	243,388.86
Bonds payable	-	-	-	-	-
Interest payable	-	-	-	-	-
Total liabilities	\$ 350,632.10	\$ -	\$ 2,499.16	\$ 243,388.86	\$ 596,520.12
Fund Balances					
Designated for capital projects	-	-	-	-	-
Designated for debt service	-	-	-	-	-
Cash fund balances	164,488.68	170,342.47	65,648.34	-	400,479.49
Total fund balances	\$ 164,488.68	\$ 170,342.47	\$ 65,648.34	\$ -	\$ 400,479.49
Total liabilities and fund balances	\$ 515,120.78	\$ 170,342.47	\$ 68,147.50	\$ 243,388.86	\$ 996,999.61

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

VARNUM SCHOOL DISTRICT NO. I-007
COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID AND CHANGES IN FUND BALANCES
ALL GOVERNMENTAL FUND TYPES - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022

	Governmental Fund Types		Total (Memorandum Only)
	General	Special Revenue	June 30, 2022
Revenues collected:			
Local sources	\$ 338,872.07	\$ 44,182.78	\$ 383,054.85
Intermediate sources	80,875.77	2,581.16	83,456.93
State sources	2,267,230.96	-	2,267,230.96
Federal sources	1,183,808.94	80,000.00	1,263,808.94
Non-revenue sources	6,826.80	-	6,826.80
Total revenues collected	\$ 3,877,614.54	\$ 126,763.94	\$ 4,004,378.48
Expenditures paid:			
Instruction	\$ 2,139,801.78	-	\$ 2,139,801.78
Support services	1,471,194.99	2,548.00	1,473,742.99
Non-instructional services	217,619.98	-	217,619.98
Capital outlay	-	-	-
Other outlays	3,660.80	-	3,660.80
Other uses	-	-	-
Repayments	-	-	-
Debt service:	-	-	-
Principal retirement			
Interest	22,118.06	72,802.64	94,920.70
	3,509.04	8,998.19	12,507.23
Total expenditures paid	\$ 3,857,904.65	\$ 84,348.83	\$ 3,942,253.48
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	\$ 19,709.89	\$ 42,415.11	\$ 62,125.00
Adjustments to prior year encumbrances	\$ 3,064.76	-	\$ 3,064.76
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)	\$ 22,774.65	\$ 42,415.11	\$ 65,189.76
Fund balances, beginning of year	\$ 141,714.03	\$ 127,927.36	\$ 269,641.39
Fund balances, end of year	\$ 164,488.68	\$ 170,342.47	\$ 334,831.15

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

VARNUM SCHOOL DISTRICT NO. 1-007
COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID AND CHANGES IN FUND BALANCES - BUDGET AND ACTUAL
BUDGETED GOVERNMENTAL FUND TYPES - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022

	General Fund			Special Revenue Fund		
	Original Budget	Final Budget	Actual	Original Budget	Final Budget	Actual
Revenues collected:						
Local sources	\$ 296,659.28	\$ 296,659.28	\$ 338,872.07	\$ 42,413.06	\$ 42,413.06	\$ 44,182.78
Intermediate sources	54,093.47	54,093.47	80,875.77	-	-	2,581.16
State sources	1,954,273.70	1,954,273.70	2,267,230.96	-	-	-
Federal sources	1,196,338.42	1,196,338.42	1,183,808.94	-	-	80,000.00
Non-revenue sources	-	-	6,826.80	-	-	-
Total revenues collected	\$ 3,501,364.87	\$ 3,501,364.87	\$ 3,877,614.54	\$ 42,413.06	\$ 42,413.06	\$ 126,763.94
Expenditures paid:						
Instruction	\$ 2,060,455.98	\$ 2,060,455.98	\$ 2,139,801.78	\$ -	\$ -	\$ -
Support services	1,496,822.09	1,496,822.09	1,471,194.99	170,340.42	170,340.42	2,548.00
Non-instructional services	85,800.83	85,800.83	217,619.98	-	-	-
Capital outlay	-	-	-	-	-	-
Other outlays	-	-	3,660.80	-	-	-
Other Uses	-	-	-	-	-	-
Repayment	-	-	-	-	-	-
Debt service:						
Principal retirement	-	-	22,118.06	-	-	72,802.64
Interest	-	-	3,509.04	-	-	8,998.19
Total expenditures paid	\$ 3,643,078.90	\$ 3,643,078.90	\$ 3,857,904.65	\$ 170,340.42	\$ 170,340.42	\$ 84,348.83
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	\$ (141,714.03)	\$ (141,714.03)	\$ 19,709.89	\$ (127,927.36)	\$ (127,927.36)	\$ 42,415.11
Adjustments to prior year encumbrances	\$ -	\$ -	\$ 3,064.76	\$ -	\$ -	\$ -
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)	\$ (141,714.03)	\$ (141,714.03)	\$ 22,774.65	\$ (127,927.36)	\$ (127,927.36)	\$ 42,415.11
Fund balance, beginning of year	\$ 141,714.03	\$ 141,714.03	\$ 141,714.03	\$ 127,927.36	\$ 127,927.36	\$ 127,927.36
Fund balance, end of year	\$ -	\$ -	\$ 164,488.68	\$ -	\$ -	\$ 170,342.47

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

NOTES TO THE FINANCIAL STATEMENTS

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022**

1. Summary of Significant Accounting Policies

The accompanying financial statements of the Varnum School District No. 1-7 (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

**VARNUM SCHOOL DISTRICT NO. I-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022**

Summary of Significant Accounting Policies (continued)

with expendable, available financial resources. Fiduciary type funds are accounted for using the regulatory 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 school 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.

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 Long-Term Debt Account Group – This account group was established to account for all long-term debt of the District, which is offset by the amount available in the debt service fund and the amount to be provided in future years to complete retirement of the debt principal.

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

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022**

Summary of Significant Accounting Policies (continued)

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.
- 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 Group. 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, demand deposit accounts with banks and other financial institutions.

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022**

Summary of Significant Accounting Policies (continued)

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.

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 such 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.

**VARNUM SCHOOL DISTRICT NO. I-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022**

Summary of Significant Accounting Policies (continued)

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.

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 entities 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.

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022**

Summary of Significant Accounting Policies (continued)

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 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 included in supporting schedules.

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.

**VARNUM SCHOOL DISTRICT NO. I-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022**

Deposit Categories of Credit Risk (continued)

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.

Certificates of deposit are collateralized at least by the amount not federally insured. As of June 30, 2022, the District had no deposits exposed to custodial credit risk.

The District had no investments at June 30, 2022.

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.

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. 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. The District did not have bonds outstanding as of June 30, 2022.

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022**

General Long-Term Debt (continued)

Lease-Purchase Commitments

The District has lease-purchase agreements at June 30, 2022 for equipment for the gymnasium and a 71 passenger bus. Lease purchase payments for the bus are made from the General Fund and lease purchase payments for the gymnasium equipment are made from the Building Fund. The following schedule reflects, by year, payments due under these commitments:

Year Ending June 30,	Principal	Interest	Total
2023	\$ 98,079.81	\$ 9,348.12	\$ 107,427.93
2024	101,344.58	6,083.35	107,427.93
2025	43,964.47	2,709.38	46,673.85
Total	\$ 243,388.86	\$ 18,140.85	\$ 261,529.71

The lease payments are appropriated annually from school district funds.

The above leases contain a clause that gives the District the ability to terminate the lease agreements at the end of each fiscal year. The District has recorded the liability for future lease payments in the General Long Term Debt Account Group.

Changes in Long-Term Debt

	Leases Payable
Balance, July 1, 2021	\$ 338,309.56
Additions	-
Retirements	94,920.70
Balance, June 30, 2022	\$ 243,388.86

4. 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.

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022**

Employee Retirement System (continued)

Basis of Accounting

The System has prepared its financial statements in accordance with accounting principles generally accepted in the United State of America and using the economic resources measurement focus. The financial statements are prepared using 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 purchase and sales are recorded as of their trade dates. Member and employer contributions are established by Oklahoma Statutes as percentage of salaries and are recognized when due, pursuant to legal requirements. Benefits and refunds are recognized when due and payable in accordance with the terms of the Oklahoma Statutes. Administrative expenses are funded through investment earnings.

Funding Policy

The District, the State of Oklahoma, and the participating employee make contributions. The contribution rates for the District and its employees are established by and may be amended by Oklahoma Statutes. The rates are not actuarially determined. The rates are applied to the employee's earnings plus employer-paid fringe benefits. The required contribution for the participating members is 7.0% of compensation. The contribution rate for employers is 9.5%. Additionally, the State of Oklahoma contributes a percentage of its revenues from sales taxes, use taxes, corporate income taxes, individual income taxes, and lottery proceeds to the system. For the fiscal year ending June 30, 2021, the dedicated state revenue was equivalent to a contribution rate of approximately 7.0% of covered payroll. Finally, the Teacher's Retirement System receives "grant matching" contributions from employers for positions whose funding comes from federal and certain other grants. The matching contribution rate for FY 2021 is 7.7% of applicable payroll. The District is allowed by the Oklahoma Teacher's Retirement System to make the required contributions on behalf of participating members. The school is required to pay 16.5% for any compensated retired teachers already receiving retirement benefits.

Annual Pension Cost

The District's total contributions for 2022, 2021, and 2020, were \$308,276.36, \$216,249.98, and \$176,597.20, respectively. The District's total payroll for fiscal year 2020-21 amounted to \$2,174,032.29.

5. 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, 2022.

6. Risk Management

The District is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; or acts of God. The District purchases commercial insurance to cover these risks, including general and auto liability, property damage, and public officials liability. Settled claims resulting from 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 Workers' Compensation coverage in which there is 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.

**VARNUM SCHOOL DISTRICT NO. I-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE FINANCIAL STATEMENTS – REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022**

Risk Management (continued)

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.

7. Surety Bonds

The encumbrance clerk is bonded by Old Republic Surety Company, bond number LSM1690191, for the sum of \$2,000.00 for the term of September 1, 2021 to September 1, 2022.

The treasurer is bonded by RLI Insurance Company, bond number LSM1181601, for the sum of \$100,000.00 for the term of August 1, 2021, to August 1, 2022.

The Superintendent is bonded by RLI Insurance Company, bond number LSM0639947, for the sum of \$100,000.00 for the term of July 1, 2021, to July 1, 2022.

The activity fund custodian is bonded by Old Republic Surety Company, bond number POB0833801, for the sum of \$3,000.00 for the term of September 1, 2021, to September 1, 2022.

The minute's clerk is bonded by Old Republic Company, bond number POB0833801, in the amount of \$3,000.00, for the term September 1, 2021, to September 1, 2022.

COMBINING FINANCIAL STATEMENTS

VARNUM SCHOOL DISTRICT NO. 1-007
 COMBINING STATEMENT OF ASSETS, LIABILITIES, AND FUND BALANCES
 ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS
 JUNE 30, 2022

	<u>Building Fund</u>
<u>ASSETS:</u>	
Cash	\$ 170,342.47
Investments	<u> -</u>
Total assets	<u><u>\$ 170,342.47</u></u>
 <u>LIABILITIES AND FUND BALANCES:</u>	
Liabilities:	
Outstanding warrants	\$ -
Encumbrances	<u> -</u>
Total liabilities	<u> -</u>
 Fund balances:	
Cash fund balances	\$ 170,342.47
Total fund balances	<u><u>\$ 170,342.47</u></u>
 Total liabilities and fund balances	<u><u>\$ 170,342.47</u></u>

VARNUM SCHOOL DISTRICT NO. 1-007
COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID
AND CHANGES IN FUND BALANCES
ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2022

	<u>Building Fund</u>
Revenues collected:	
Local sources	\$ 44,182.78
Intermediate sources	2,581.16
State sources	-
Federal sources	80,000.00
Non- Revenue Sources	-
Total revenue collected	\$ 126,763.94
Expenditures paid:	
Instruction	-
Support services	2,548.00
Non-instructional services	-
Capital outlay	-
Other outlays	-
Other uses	-
Repayments	-
Debt service:	
Principal retirement	72,802.64
Interest	8,998.19
Total expenditures paid	\$ 84,348.83
Excess of revenues collected over (under) expenditures paid before adjustments to prior year encumbrances	\$ 42,415.11
Adjustments to prior year encumbrances	\$ -
Other financing sources (uses):	
Operating transfers in/(out)	-
Bank charges	-
Total other financing sources (uses)	\$ -
Excess of revenues collected over (under) expenditures paid and other financing sources (uses)	\$ 42,415.11
Fund balances, beginning of year	\$ 127,927.36
Fund balances, end of year	\$ 170,342.47

VARNUM SCHOOL DISTRICT NO. I-007
COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES
FIDUCIARY FUND - REGULATORY BASIS
JUNE 30, 2022

		<u>Agency Fund</u>
		<u>Activity Fund</u>
<u>ASSETS:</u>		
Cash	\$ 68,147.50	
Investments	-	
Total assets	\$ 68,147.50	
<u>LIABILITIES AND FUND BALANCES:</u>		
Liabilities:		
Outstanding warrants	\$ 2,499.16	
Encumbrances	-	
Total liabilities	\$ 2,499.16	
Fund balances:		
Cash fund balances	\$ 65,648.34	
Total fund balances	\$ 65,648.34	
Total liabilities and fund balances	\$ 68,147.50	

SUPPLEMENTAL INFORMATION

VARNUM SCHOOL DISTRICT NO. I-007
BUDGETARY COMPARISON SCHEDULE - REGULATORY BASIS
SPECIAL REVENUE FUND
FOR THE YEAR ENDED JUNE 30, 2022

	BUILDING FUND				Variance with Final Budget Favorable (Unfavorable)
	Original Budget	Final Budget	Actual		
Revenues collected:					
Local sources	\$ 42,413.06	\$ 42,413.06	\$ 44,182.78	\$ 1,769.72	
Intermediate sources	-	-	2,581.16	2,581.16	
State sources	-	-	-	-	
Federal sources	-	-	80,000.00	80,000.00	
Total revenues collected	\$ 42,413.06	\$ 42,413.06	\$ 126,763.94	\$ 84,350.88	
Expenditures paid:					
Instruction	-	-	-	-	
Support services	170,340.42	170,340.42	2,548.00	167,792.42	
Non-instructional services	-	-	-	-	
Capital outlay	-	-	-	-	
Other Outlays	-	-	-	-	
Other Uses	-	-	-	-	
Repayment	-	-	-	-	
Debt service:					
Principal retirement	-	-	72,802.64	(72,802.64)	
Interest	-	-	8,998.19	(8,998.19)	
Total expenditures	\$ 170,340.42	\$ 170,340.42	\$ 84,348.83	\$ 85,991.59	
Excess of revenues collected over (under) expenditures paid before adjustments to prior year encumbrances	\$ (127,927.36)	\$ (127,927.36)	\$ 42,415.11	\$ 170,342.47	
Adjustments to prior year encumbrances	\$ -	\$ -	\$ -	\$ -	
Other financing sources (uses):					
Operating transfers in/out	-	-	-	-	
Bank charges	-	-	-	-	
Total other financing sources (uses)	\$ -	\$ -	\$ -	\$ -	
Excess of revenues collected over (under) expenditures paid and other financing sources (uses)	\$ (127,927.36)	\$ (127,927.36)	\$ 42,415.11	\$ 170,342.47	
Fund balances, beginning of year	\$ 127,927.36	\$ 127,927.36	\$ 127,927.36	\$ -	
Fund balance, end of year	\$ -	\$ -	\$ 170,342.47	\$ 170,342.47	

**VARNUM SCHOOL DISTRICT NO. I-007
SCHEDULE OF FEDERAL AWARDS EXPENDED
FOR THE YEAR ENDED JUNE 30, 2022**

Federal Grantor/Pass-Through Grantor/Program Title		Federal CFDA #	Grantor's Number	Balance at July 1, 2021	Receipts	Transfer In/Out	Expenditures	Balance at June 30, 2022
U.S. Department of Education								
Direct Programs:								
Impact Aid								
		84.041	S41B20224249	\$ 285,220.09	\$ 386,452.00	\$ -	\$ 225.00	\$ 671,447.09
	Title V Part B-Small Rural School Achievement Program	84.358A	S358A219456	-	21,717.00	-	21,717.00	-
	Title VI-Indian Education	84.060A	S060A210800	-	37,764.00	-	37,764.00	-
	Sub-Total U.S. Department of Education Direct			\$ 285,220.09	\$ 445,933.00	\$ -	\$ 59,706.00	\$ 671,447.09
Passed-Through State Department of Education								
	Title I-Basic	84.010	N/A	\$ -	\$ 87,140.00	\$ 10,078.71	\$ 125,998.70	\$ (28,779.99)
	Title II Part A	84.367	N/A	-	78.71	(78.71)	-	-
	Title IV Student Support	84.424A	N/A	-	10,000.00	(10,000.00)	-	-
*	Title IV 21 st Century Community Learning Centers	84.287	N/A	-	128,007.09	-	254,171.67	(126,164.58)
*	ARP ESSER Counselor Grant	84.425U	N/A	-	32,795.43	-	40,082.50	(7,287.07)
*	ESSER/CARES Act	84.425D	N/A	-	3,254.81	-	3,254.81	-
*	ESSER III American Rescue Plan	84.425U	N/A	-	199,700.32	-	255,244.70	(55,544.38)
	Sub-Total			\$ -	\$ 460,976.36	\$ -	\$ 678,752.38	\$ (217,776.02)
Special Education Cluster								
	Special Ed Prof Development	84.027	N/A	\$ -	\$ -	\$ -	\$ 1,519.62	\$ (1,519.62)
	ARP Flow Through	84.027X	N/A	-	-	-	14,739.41	(14,739.41)
	ARP Preschool	84.027X	N/A	-	-	-	847.28	(847.28)
	Sub-Total Special Education Cluster			\$ -	\$ -	\$ -	\$ 17,106.31	\$ (17,106.31)
	Sub-Total Passed-Through State Department of Education			\$ -	\$ 460,976.36	\$ -	\$ 695,858.69	\$ (234,882.33)
U.S. Department of Agriculture								
Passed-Through State Department of Education:								
	Child Nutrition Cluster:							
	Non-Cash Assistance (Commodities):							
	National School Lunch Program	10.555	N/A	\$ -	\$ 13,829.97	\$ -	\$ 13,829.97	\$ -
	Non-Cash Assistance Sub-Total			\$ -	\$ 13,829.97	\$ -	\$ 13,829.97	\$ -
	National School Lunch Program	10.555	N/A	\$ 14,675.90	\$ 160,687.16	\$ -	\$ 148,064.18	\$ 27,298.88
	School Breakfast	10.553	N/A	-	52,684.19	-	27,237.00	25,447.19
	Commodity Credit Corporation, Supply Chain Assistance	10.555		-	11,737.91	-	-	11,737.91
	Sub-Total Child Nutrition Cluster			\$ 14,675.90	\$ 238,939.23	\$ -	\$ 189,131.15	\$ 64,483.98
	P-EBT Local Admin Funds	10.649		-	614.00	-	-	614.00
	Sub-Total Passed-Through the Child Nutrition			\$ 14,675.90	\$ 239,553.23	\$ -	\$ 189,131.15	\$ 65,097.98

(continued)
The accompanying notes are an integral part of this schedule

**VARNUM SCHOOL DISTRICT NO. I-007
SCHEDULE OF FEDERAL AWARDS EXPENDED
FOR THE YEAR ENDED JUNE 30, 2022**

Federal Grantor/Pass-Through Grantor/Program Title	Federal CFDA #	Grantor's Number	Balance at July 1, 2021	Receipts	Transfer In/Out	Expenditures	Balance at June 30, 2022
<u>Other Federal Assistance</u>							
Passed-Through Seminole Nation JOM	15.130	N/A	\$ -	\$ 8,677.00	\$ -	\$ 8,677.00	\$ -
Sub-Total Passed-Through Seminole Nation			\$ -	\$ 8,677.00	\$ -	\$ 8,677.00	\$ -
Passed-Through State Department of Health & Human Services OJT	84.126	N/A	\$ -	\$ 667.00	\$ -	\$ 667.00	\$ -
Sub-Total Passed-Through State Department of Health and Human Services			\$ -	\$ 667.00	\$ -	\$ 667.00	\$ -
Sub-Total Other Federal Assistance			\$ -	\$ 9,344.00	\$ -	\$ 9,344.00	\$ -
TOTAL FEDERAL ASSISTANCE			<u>\$ 299,895.99</u>	<u>\$ 1,155,806.59</u>	<u>\$ -</u>	<u>\$ 954,039.84</u>	<u>\$ 501,662.74</u>

* Major Program

The accompanying notes are an integral part of this schedule

**VARNUM SCHOOL DISTRICT NO. I-7
SEMINOLE COUNTY, OKLAHOMA
NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
FOR THE YEAR ENDED JUNE 30, 2022**

Basis of Presentation

The accompanying schedule of expenditures of federal awards (the Schedule) includes the federal award activity of the School under programs of the federal government for the year ended June 30, 2022. The information in this Schedule is presented in accordance with the requirements of Title 2 U.S. Code of Federal Regulations Part 200, *Uniform Administrative Requirements, Cost principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the Schedule presents only selected portion of the operations of the School, it is not intended and does not present the financial position, changes in net assets, or cash flows of the School.

Summary of Significant Accounting Policies

Expenditures reported in the Schedule are reported on the regulatory basis of accounting consistent with the preparation of the combined financial states except for non-monetary assistance noted in Note C. Such expenditures are recognized following the cost principles contained in the uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement. The School has elected not to use the 10% de minimis indirect cost rate allowed under the Uniform Guidance.

Food Distribution

Non-monetary assistance is reported in the Schedule at the fair market value of the commodities received and disbursed.

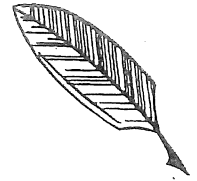
**VARNUM SCHOOL DISTRICT NO. I-007
SCHOOL ACTIVITY FUND
RECEIPTS, TRANSFERS, DISBURSEMENTS AND SUB-ACCOUNT BALANCES
FOR THE YEAR ENDED JUNE 30, 2022**

Activities	Balance 7-1-21	Deposited	Net Transfers/ Adjustments	Disbursed	Balance 6-30-22
General Activity	\$ 225.90	\$ 3,181.31	-	\$ 3,205.84	\$ 201.37
Student Council	-	6,082.48	-	5,607.28	475.20
4H	286.04	-	-	-	286.04
Flower Fund	33.40	-	-	29.88	3.52
Middle School	21.44	4.00	35.47	60.52	0.39
Yearbook	2,222.28	3,510.00	(300.00)	2,991.22	2,441.06
Cheerleader	(300.00)	19,721.00	300.00	15,352.22	4,368.78
Elementary	10,792.30	23,872.77	700.00	15,433.88	19,931.19
Class of 2022	2,726.87	7,109.67	-	9,552.80	283.74
Class of 2023	81.60	3,256.25	-	1,423.04	1,914.81
Class of 2025	-	2,848.50	-	959.92	1,888.58
Class of 2020	(300.00)	-	300.00	-	-
Boys Basketball	1,675.44	11,310.88	-	10,293.23	2,693.09
Boys Baseball	1,191.79	4,213.00	-	3,769.36	1,635.43
Girls Softball	1,079.53	5,075.00	-	4,784.74	1,369.79
Girls Basketball	1,530.05	3,123.22	-	3,027.81	1,625.46
BPA	429.99	60.00	-	130.54	359.45
FCA	94.36	120.00	-	-	214.36
Library	3,058.99	5,024.11	-	5,051.63	3,031.47
Jim 'Poppie' White Memorial Scholarship	700.00	800.00	-	1,500.00	-
Art Club	-	548.00	-	277.00	271.00
Athletic Funds	2,311.41	52,324.10	425.00	47,100.88	7,959.63
Journalism	-	1,255.00	-	929.06	325.94
Drama Club	-	200.20	-	-	200.20
Athletic Booster Club	2,512.83	9,506.63	-	4,404.84	7,614.62
Class of 2024	1,848.22	2,772.79	100.00	1,576.43	3,144.58
STEM	2,495.00	5,677.00	-	4,801.47	3,370.53
Unidentified	1,560.47	-	(1,560.47)	-	-
CCLC	-	1,990.05	-	1,951.94	38.11
Total Activities	\$ 36,277.91	\$ 173,585.96	\$ -	\$ 144,215.53	\$ 65,648.34

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
Varnum School District No. 1-7
Seminole 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 Varnum School District No. 1-7, Seminole County, Oklahoma (District), as listed in the Table of Contents, as of and for the year ended June 30, 2022, and the related notes to the financial statements, which collectively comprise the District's financial statements, and have issued my report thereon dated March 6, 2023, 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.

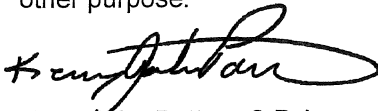
My consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during my audit I did not identify 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 findings and questioned costs that I consider to be significant deficiencies in internal control over financial reporting (Conditions 2022-1).

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*. I noted certain immaterial instances of noncompliance that I have reported to management in the "Schedule of Comments" on page 35-36 of this report.

Purpose of this Report

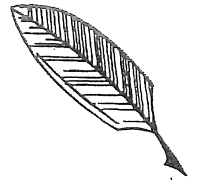
This report is solely to describe the scope of my testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *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 6, 2023

KERRY JOHN PATTEN, C.P.A.

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

March 6, 2023

The Honorable Board of Education
Varnum School District No. I-7
Seminole County, Oklahoma

Opinion of Each Major Federal Program

I have audited Varnum School District No. I-7, Seminole County, Oklahoma (District's) compliance with the types of compliance requirements described in the U.S. Office of Management and Budget *OMB Compliance Supplement* that could have a direct and material effect on each of the District's major federal programs for the year ended June 30, 2022. The District's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

In my opinion, Varnum School District No. I-7, Seminole County, Oklahoma, complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2022.

Basis of Opinion on Each Major Federal Program

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

I am required to be independent of Varnum School District No. I-7, Seminole County, Oklahoma and to meet my other ethical responsibilities, in accordance with relevant ethical requirements relating to my audit. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion on compliance for each major federal program. My audit does not provide a legal determination of Varnum School District I-7, Seminole County, Oklahoma's compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules and provisions of contracts or grant agreements applicable to Varnum School District No. I-7, Seminole County, Oklahoma's federal programs.

Auditor's Responsibility for the Audit of Compliance

My objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on Varnum School District No. 1-7, Seminole County, Oklahoma's compliance based on my audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance with it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about Varnum School District No. 1-7, Seminole County, Oklahoma's compliance with the requirements of each major federal program as a whole.

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

- Exercise professional judgement and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding Varnum School District No. 1-7, Seminole County, Oklahoma's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of Varnum School District No. 1-7, Seminole County, Oklahoma's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of Varnum District No. 1-7, Seminole County, Oklahoma's internal control over compliance. Accordingly, no such opinion is expressed.

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

Report on Internal Control Over Compliance

My consideration of internal control over compliance was for the limited purpose described in the Auditor's Responsibility for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance. Given these limitations, during my audit, I did not identify any deficiencies in internal control over compliance that I considered to be material weaknesses, as defined above. However, as discussed in the accompanying Schedule of Findings and Questioned Costs as item 2022-1, I did identify certain deficiencies in internal control over compliance that I consider to be significant deficiencies.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program, on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected on, a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance. I consider the deficiency in internal control over compliance described in the accompanying schedule of findings and questioned costs as item 2022-2 to be a significant deficiency.

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

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

A handwritten signature in black ink, appearing to read "Kerry John Patten". The signature is fluid and cursive, with a large loop at the end.

Kerry John Patten, C.P.A.
Broken Arrow, Oklahoma
March 6, 2023

**VARNUM SCHOOL DISTRICT NO. I-7
SEMINOLE COUNTY, OKLAHOMA
SCHEDULE OF FINDINGS AND QUESTIONED COST
JULY 1, 2021 TO JUNE 30, 2022**

A. SUMMARY OF AUDIT RESULTS

1. The auditor's report expresses an adverse opinion on the combined financial statements in conformity with generally accepted accounting principles and a qualified opinion for the omission of the general fixed asset account group on the combined financial statements in conformity with the regulatory basis of accounting prescribed by the Oklahoma Department of Education.
2. There was one audit findings reported of deficiencies in internal control, which the auditor considers to be "significant deficiency" as defined in A.I.C.P.A. standards.
3. No instances of noncompliance material to the financial statements of Varnum School District which would be required to be reported in accordance with Government Auditing Standards were disclosed during the audit.
4. There was one audit findings reported of deficiencies in internal control over major programs, which the auditor considers to be "significant deficiency" as defined by A.I.C.P.A. standards.
5. The auditor's report on compliance for the major federal award programs for Varnum School District expresses an unmodified opinion on all major programs.
6. There was one audit findings that is required to be reported in accordance with OMB Uniform Guidance, relative to major federal award programs for Varnum School District.
7. The programs tested as major programs included: Title IV, 21st Century Community Learning Centers (84.287); ARP ESSER Counselor Grant (84.425U); ESSER/CARES Act (84.425D); ESSER III, AMERICAN RESCUE PLAN (84.425U).
8. A threshold for distinguishing Types A and B programs was \$750,000.00.
9. Varnum School District did not qualify to be a low-risk auditee.

B. FINDINGS – FINANCIAL STATEMENTS AUDIT

2022-1

Condition: Internal controls surrounding the District's payroll procedures did not provide reasonable assurance that employees are being paid in accordance with District contracts and Board approval.

- Two employees selected for payroll testing had contracts that were not signed by the employee.
- Two employees selected for payroll testing had extra duty contracts available for review that were not signed/approved by any board members. Both extra duty contracts were for 'CCLC Program Co-Directors' in the amount of \$16,127.44 for each co-director. The employees were paid these funds from major federal program project 553.
- One employee was paid \$5,000 in excess of the contracted amount approved by the Board, with no supporting documentation for the additional amount paid.

Criteria: Internal controls should be in place that provide reasonable assurance that any employee paid has a board approved contract.

Effect: Because of the failure in internal controls, employees may be paid amounts without the approval or knowledge of the Board of Education.

Recommendation: We recommend that the school district implement procedures to ensure that all employees paid by the District have a contract and amounts paid to employees reconcile to the board approved contract. We recommend that management periodically review payroll records to ensure employees are being paid correct amounts based on contracted amount and that any amounts paid in excess of contracted amount is done only with proper documentation and approval.

**VARNUM SCHOOL DISTRICT NO. I-7
SEMINOLE COUNTY, OKLAHOMA
SCHEDULE OF FINDINGS AND QUESTIONED COST CONTINUED
JULY 1, 2021 TO JUNE 30, 2022**

I. FINDINGS AND QUESTIONED COSTS – MAJOR FEDERAL AWARD PROGRAMS AUDIT

U.S. Department of Education – 2022-2
Title IV, 21st Century Community Learning Centers – ALN No. 84.287
Grant Period – Fiscal year ended June 30, 2022

Significant Deficiency: As discussed in Finding 2022-1, written authority by the School Board of Education was not fulfilled when creating and approving the extra duty contracts, including payroll charged to federal awards. Due to the failure to require approvals from the Board of Education, employee's payroll was charged to federal awards without assurance that the School Board of Education had approved and/or had knowledge of the payroll expenditures. Procedures should be implemented requiring all employment contracts, including extra duty employment contracts be signed by appropriate members of the School Board of Education prior to paying employees.

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
SUMMARY OF PRIOR AUDIT FINDINGS
JULY 1, 2021 TO JUNE 30, 2022**

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.

I. **Condition:** Internal controls surrounding the District's payroll procedures did not provide reasonable assurance that employees are being paid in accordance with District contracts and Board approval.

- Three employees selected for payroll testing did not have contracts available for auditor review.
- Five employees selected for payroll testing had contracts available for review that were not signed/approved by the employee or any board member(s).

Criteria: Internal controls should be in place that provide reasonable assurance that any employee paid has a board approved contract.

Effect: Because of the failure in internal controls, employees may be paid amounts without the approval or knowledge of the Board of Education.

Recommendation: We recommend that the school district implement procedures to ensure that all employees paid by the District have a contract and amounts paid to employees reconcile to the board approved contract. We recommend that management periodically review payroll records to ensure employees are being paid correct amounts based on contracted amount and that any amounts paid in excess of contracted amount is done only with proper documentation and approval.

Current Status: This finding was reported in the 2021-2022 audit.

II. **Condition:** The District identified an instance of embezzlement of funds by an employee of the District. The employee signed a resignation agreement acknowledging her 'wrongdoing.' The resignation agreement was entered into without Board approval. The agreement arbitrarily determined the employee would repay a sum of \$50,000.00. As of the issuance date of the audit report, no monies have been repaid to the District.

Criteria: Internal controls should be in place that only allow District contracts to be in place with Board approval.

Effect: Because of the failure in internal controls, there is a null contract that has been entered into by the District.

Recommendation: We recommend that the Board of Education determine the legality of the current contract and specifically approve any further contracts moving forward. Additionally, we recommend that the Board of Education determine the actual amount of embezzlement and work swiftly in recouping determined amounts.

Current Status: This finding was not addressed during fiscal year 2021-2022, however the school district has engaged a forensic audit to determine any findings relating to the confirmation and magnitude of any illegal activity.

**VARNUM SCHOOL DISTRICT NO. I-7
SEMINOLE COUNTY, OKLAHOMA
SUMMARY OF PRIOR AUDIT FINDINGS CONTINUED
JULY 1, 2021 TO JUNE 30, 2022**

III. **Condition:** We noted the following discrepancies when verifying a sample of checks and endorsements to the District's payment register.

- One of the checks selected for testing from the general fund payment register, #46 was to Blocks! in the amount of \$2,320.00. When verifying the check and endorsement, the check was made out to the District's encumbrance clerk and endorsed by her.
- Two checks selected for testing from the general fund payment register, #894 and #1229 had the check made out to Varnum Schools when the payment register listed Tidwell Sports and Wal Mart Community, respectively.
- One check selected for testing from the activity fund payment register, #121 was to First United in the amount of \$800. When verifying the check and endorsement, the check was made out to the District's encumbrance clerk and endorsed by her.
- Fourteen of the checks selected for testing in the activity fund had a signature for the treasurer on the activity fund check that both was reported and appeared to be a forged signature. It was reported that the encumbrance clerk forged the treasurer's signature on these activity checks.

Criteria: Internal controls should be in place to ensure the payment register of the District reflects the expenditures made by the District. Segregation of duties should be in place that would identify any discrepancies from the checks to the payment register in a timely manner.

Effect: Because of the breakdown in internal controls and lack of segregation of duties, the encumbrance clerk has falsified District records, and redirected District expenditures in an illegal manner.

Recommendation: We recommend that the Board of Education identify the specific breakdown of internal controls and segregation of duties, then work to strengthen these controls to prevent any District funds being redirected for personal gain. We recommend the District determine the total amount of funds the encumbrance clerk illegally obtained from the District and move swiftly to recoup those funds.

Current Status: This finding was not reported in the 2021-2022 audit.

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
SUMMARY OF PRIOR AUDIT FINDINGS CONTINUED
JULY 1, 2021 TO JUNE 30, 2022**

IV. Condition: During our review of the activity fund sponsor receipts, we were unable to trace receipts to corresponding deposits due to the fact that there was no indication of which receipts made up a deposit.

We did select five subaccounts and totaled each subaccounts receipt books available and compared the totals to the amount posted on the activity subaccount report, which balanced to the bank statement. Our results were as follows:

- Baseball source receipts totaled \$5,034.00, the subaccount year to date report, that reconciled to activity fund bank balance, showed revenue in the baseball account of \$7,145.00 – a difference of \$2,111.00. In this case more money has been deposited into the account than receipts were written.
- Class of 2022 source receipts totaled \$130.00, the subaccount year to date report, that reconciled to activity fund bank balance, showed revenue in the Class of 2022 account of \$2,885.40 – a difference of \$2,755.40. In this case more money has been deposited into the account than receipts were written.
- Class of 2023 source receipts totaled \$1,434.50, the subaccount year to date report, that reconciled to activity fund bank balance, showed revenue in the Class of 2023 account of \$1,290.50 – a difference of \$144.00. In this case more money has been deposited into the account than receipts were written.
- Elementary source receipts totaled \$7,609.00, the subaccount year to date report, that reconciled to activity fund bank balance, showed revenue in the Elementary account of \$10,996.52 – a difference of \$3,387.52. In this case more money has been deposited into the account than receipts were written.
- Cheerleading source receipts totaled \$16,911.83, the subaccount year to date report, that reconciled to the activity fund bank balance showed revenue in the Cheerleading account of \$5,885.29 – a difference of \$11,026.54. **In this case more money was receipted than was deposited.**

Criteria: Internal controls should be in place to ensure the activity fund sponsors are receipting all of the monies collected for their activity fund subaccount and that the activity fund custodian is collecting the money from the sponsors and all monies are being timely deposited to the bank.

Effect: Because of the breakdown in internal controls within the activity fund, it appears that some monies collected and receipted for specific activity fund accounts were not ever deposited. In case where more money was receipted than deposited the encumbrance clerk/AF custodian was the listed sponsor of the sponsor of this subaccount.

Recommendation: We recommend that the Board of Education identify the specific breakdown of internal controls and segregation of duties within the activity fund, then work to strengthen these controls to prevent any District funds being redirected for personal gain. We recommend the District move to swiftly recoup any amounts that are determine to have been redirected for personal gain.

Current Status: This finding was not reported in the 2021-2022 audit.

**VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
SCHEDULE OF COMMENTS
JULY 1, 2021 TO JUNE 30, 2022**

The following conditions represent areas noted during my review of the school's accounting system in which I feel improvements in the internal control and/or operational efficiency may be attained. I have also noted, as required, any noncompliance with State Department of Education Regulations.

- *I. **Condition:** Several purchase orders selected for testing were not signed by either the school encumbrance clerk or an approving officer or purchasing agent designated by the school board.

Recommendations: All school district purchase orders should contain the signature of the school encumbrance clerk acknowledging that funds were encumbered to make the purchase and all purchase orders should have a signature of the board appointed purchasing agent or other school official authorizing approval for purchase.

- *II. **Condition:** Our examination of school district expenditures disclosed the following:

- Several purchase orders reviewed were paid without having any supporting invoices or other documentation to verify the occurrence or any other details of the expenditure.
- It appeared some expenditures had been purchased through PayPal. No policy or approval by school administration was available to support the usage of this method of payment.
- The District purchased turkeys and hams purchased from the General Fund for staff Thanksgiving. These types of expenditures would be more appropriate purchased from the Activity Fund. There was no list, signatures or other documentation verifying who received the gifts.
- A few travel reimbursements were made without supporting documentation or a properly filed school standard travel claim reflecting details of the trip.
- Purchases made from the General Fund for various candy items for purpose of preparing 'candy sacks' for students for Christmas. This is not an appropriate General Fund expenditure.

Recommendation: We recommend the District ensure that policies and procedures are in place and followed for all purchase orders for expenditures of school funds school be properly supported by itemized invoices and/or appropriate contract prior to the payment of the purchase order.

Oklahoma State Statutes require that each board of education prescribe and administer adequate business procedures and controls governing the ordering and delivery of merchandise. Such procedures should include a method of determining the school employee receiving the delivery of each purchase. The person receiving the delivery of goods and services should acknowledge satisfactory receipt by signing the delivery ticket, invoice or school receiving report. A copy of the signed document should subsequently become an attachment to the related purchase order.

Purchase orders for employee or student gifts should only be made from the school Activity Fund pursuant to the Board of Education preapproving the purpose of expenditure.

We know of no authorization for a school district to have or use a debit card and we recommend this practice be immediately discontinued.

VARNUM SCHOOL DISTRICT NO. I-7
SEMINOLE COUNTY, OKLAHOMA
SCHEDULE OF COMMENTS CONTINUED
JULY 1, 2021 TO JUNE 30, 2022

- III. **Condition:** Our review of the school's purchase orders noted instances in which the invoice/claim or other supporting documentation of the purchase order had not been signed by a school employee who received delivery of items purchased (or had knowledge of satisfactory completion of services rendered). This condition applied to 54% of the general fund purchase orders and 78% of the building fund purchase orders.

Recommendation: Oklahoma State Statutes require that each board of education prescribe and administer adequate business procedures and controls governing the ordering and delivery of merchandise. Such procedures should include a method of determining the school employee receiving the delivery of each purchase. The person receiving the delivery of goods or services should acknowledge satisfactory receipt by signing the delivery ticket, invoice, or school receiving report. A copy of the signed document should subsequently become an attachment to the related purchase order.

- IV. **Condition:** The District does not have a practice of timekeeping for support employees. Most support employees fall under the category of a non-exempt employee. An employee who is non-exempt must be paid overtime if time over 40 hours a week is worked. Timesheets must be kept documenting work hours to ensure employees are being paid correctly.

Recommendation: The School Board should adopt a policy and practice that requires a timekeeping plan that is complete and accurate for all non-exempt employees. The timesheet should include the date, daily hours worked, total hours worked each week, total hours at the regular earnings and total overtime hours. Non-exempt employees should be paid overtime for any hours worked in excess of forty hours each week. If an employee works dual positions for the school (such as a bus driver and custodian) the hours for both of these positions would be combined together to arrive at the total weekly hours worked. Additionally, if the employee is paid different rates for each position, the District must use a blended rate when calculating weekly overtime.

Previous Year's Audit Comments

Items in the School's 2020-21 audit report which have been repeated in this report are noted with an asterisk.

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.

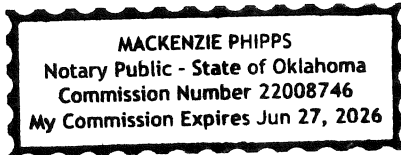
VARNUM SCHOOL DISTRICT NO. 1-7
SEMINOLE COUNTY, OKLAHOMA
SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT
JULY 1, 2021 TO JUNE 30, 2022

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 Varnum School District for the audit year 2021-22.

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

BY *Kerry John Patten*
AUTHORIZED AGENT



Subscribed and sworn to before me on this

6th day of March, 2023

Mackenzie Phipps
NOTARY PUBLIC

My commission expires on:

27th day of June, 2026