ANNUAL FINANCIAL REPORT

WICKLIFFE SCHOOL DISTRICT NO. C-35

MAYES COUNTY, OKLAHOMA

JULY 1, 2012 TO JUNE 30, 2013

AUDITED BY

KERRY JOHN PATTEN, C.P.A.

WICKLIFFE SCHOOL DISTRICT NO. C-35
MAYES COUNTY, OKLAHOMA
SCHOOL DISTRICT OFFICIALS
JUNE 30, 2013

Board of Education

President	Eliza Carroll
Vice-President	Chris Pickup
Clerk	Stephanie Cox

Superintendent of Schools

Donald Pullen

School District Treasurer

Brenda Rogers

WICKLIFFE SCHOOL DISTRICT NO. C-35
MAYES COUNTY, OKLAHOMA
JUNE 30, 2013

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Independent Auditor's Report

The Honorable Board of Education
Wickliffe School District No. C-35
Mayes County, Oklahoma

Report on Financial Statements

I have audited the accompanying combined fund type and account group financial statements – regulatory basis of the Wickliffe School District No. C-35, Mayes County, Oklahoma, as of and for the year ended June 30, 2013, as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with financial reporting provisions prescribed or permitted by the Oklahoma State Department of Education. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

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

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

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

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

As discussed in Note 1 (C) to the financial statements, the financial statements are prepared by the Wickliffe School District No. C-35, Mayes County, Oklahoma, on the basis of the financial reporting provisions of the Oklahoma State Department of Education, which a basis of accounting other than accounting principles generally accepted in the United States of America

The effects on the financial statements of the variances between the regulatory basis of accounting described in Note 1 (C) and accounting principles generally accepted in the United States of America, although not reasonably determinable, are presumed to be material.

Adverse Opinion on U.S. Generally Accepted Accounting Principles

In my opinion, because of the significance of the matter discussed in the "Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles" paragraphs, the financial statements referred to in the first paragraph do not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of Wickliffe School District No. C-35, Mayes County, Oklahoma as of June 30, 2013, or the revenues, expenses, and changes in financial position for the year then ended.

Basis for Qualified Opinion on Regulatory Basis of Accounting

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

Qualified Opinion on Regulatory Basis of Accounting

In my opinion, except for the effects of the matter described in the "Basis for Qualified Opinion on Regulatory Basis of Accounting" paragraph, the financial statements referred to in the first paragraph present fairly, in all material respects, the assets, liabilities, and fund balances arising from regulatory basis transactions of each fund type and account group of Wickliffe School District No. C-35, Mayes County, Oklahoma, as of June 30, 2013, 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).

Other Matters
Other Information

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

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

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, I have also issued my report dated March 6, 2014, on my consideration of Wickliffe School District No. C-35, Mayes County, Oklahoma's, internal control over financial reporting and on my tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. The purpose of that report is to describe the scope of my testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of my audit.

Kerry John Patten, C.P.A.
Broken Arrow, OK
March 6, 2014

COMBINED FINANCIAL STATEMENTS

WICKLIFFE SCHOOL DISTRICT NO. C-35
COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES
ALL FUND TYPES AND ACCOUNT GROUPS - REGULATORY BASIS
JUNE 30, 2013

	Governmental Fund Types		Fiduciary Fund Types	Total (Memorandum Only)
	General	Special Revenue	Trust and Agency	June 30, 2013
ASSETS				
Cash	$ 248,001.95	$ 21,602.46	$ 15,379.61	$ 284,984.02
Investments	122,022.04	-	-	122,022.04
Amounts available in debt service fund	-	-	-	-
Amounts to be provided for retirement of general long-term debt	-	-	-	-
Total assets	$ 370,023.99	$ 21,602.46	$ 15,379.61	$ 407,006.06
LIABILITIES AND FUND BALANCES				
Liabilities:				
Outstanding warrants	$ 14,206.14	$ -	$ -	$ 14,206.14
Encumbrances	2,104.83	-	-	2,104.83
Due to others	-	-		-
Long-term debt:				
Capitalized lease obligations payable	-	-	-	-
Bonds payable	-	-	-	-
Interest payable	-	-	-	-
Total liabilities	$ 16,310.97	$ -	$ -	$ 16,310.97
Fund Balances				
Designated for capital projects	$ -	$ -	$ -	$ -
Designated for debt service	-	-	-	-
Cash fund balances	353,713.02	21,602.46	15,379.61	390,695.09
Total fund balances	$ 353,713.02	$ 21,602.46	$ 15,379.61	$ 390,695.09
Total liabilities and fund balances	$ 370,023.99	$ 21,602.46	$ 15,379.61	$ 407,006.06

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

WICKLIFFE SCHOOL DISTRICT NO. C-35
COMBINED STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES
ALL GOVERNMENTAL FUND TYPES - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2013

	Governmental Fund Types		Total (Memorandum Only)
	General	Special Revenue	June 30, 2013
Revenues collected:			
Local sources	$ 81,386.89	$ 8,235.43	$ 89,622.32
Intermediate sources	24,471.62	-	24,471.62
State sources	784,099.58	-	784,099.58
Federal sources	485,371.95	25,000.00	510,371.95
Total revenues collected	$ 1,375,330.04	$ 33,235.43	$ 1,408,565.47
Expenditures paid:			
Instruction	$ 771,341.19	$ -	$ 771,341.19
Support services	480,193.61	38,417.65	518,611.26
Non-instructional services	103,319.97	-	103,319.97
Capital outlay	-	-	-
Other outlays	5,051.90	-	5,051.90
Other uses	-	-	-
Repayments	-	-	-
Debt service:	-		
Principal retirement	26,309.55	-	26,309.55
Interest	1,283.35	-	1,283.35
Total expenditures paid	$ 1,387,499.57	$ 38,417.65	$ 1,425,917.22
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	$ (12,169.53)	$ (5,182.22)	$ (17,351.75)
Adjustments to prior year encumbrances	$ 5,270.40	$ -	$ 5,270.40
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)	$ (6,899.13)	$ (5,182.22)	$ (12,081.35)
Fund balances, beginning of year	$ 360,612.15	$ 26,784.68	$ 387,396.83
Fund balances, end of year	$ 353,713.02	$ 21,602.46	$ 375,315.48

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

WICKLIFFE SCHOOL DISTRICT NO. C-35
COMBINED STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BLANACES - BUDGET AND ACTUAL
BUDGETED GOVERNMENTAL FUND TYPES - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2013

	General Fund			Special Revenue Fund		
	Original Budget	Final Budget	Actual	Original Budget	Final Budget	Actual
Revenues collected:						
Local sources	$ 56,488.75	$ 56,488.75	$ 81,386.89	$ 7,622.01	$ 7,622.01	$ 8,235.43
Intermediate sources	16,646.68	16,646.68	24,471.62	-	-	-
State sources	768,227.49	768,227.49	784,099.58	-	-	-
Federal sources	191,035.14	321,555.69	485,371.95	-	25,000.00	25,000.00
Total revenues collected	$ 1,032,398.06	$ 1,162,918.61	$ 1,375,330.04	$ 7,622.01	$ 32,622.01	$ 33,235.43
Expenditures paid:						
Instruction	$ 776,453.87	$ 776,453.87	$ 771,341.19	$ -	$ -	$ -
Support services	495,333.48	625,854.03	480,193.61	34,406.69	59,406.69	38,417.65
Non-instructional services	110,125.82	110,125.82	103,319.97	-	-	-
Capital outlay	-	-	-	-	-	-
Other outlays	11,097.04	11,097.04	5,051.90	-	-	-
Other Uses	-	-	-	-	-	-
Repayment	-	-	-	-	-	-
Debt service:						
Principal retirement	-	-	26,309.55	-	-	-
Interest	-	-	1,283.35	-	-	-
Total expenditures paid	$ 1,393,010.21	$ 1,523,530.76	$ 1,387,499.57	$ 34,406.69	$ 59,406.69	$ 38,417.65
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	$ (360,612.15)	$ (360,612.15)	$ (12,169.53)	$ (26,784.68)	$ (26,784.68)	$ (5,182.22)
Adjustments to prior year encumbrances	$ -	$ -	$ 5,270.40	$ -	$ -	$ -
Other financing sources (uses):						
Operating transfers in/out	$ -	$ -	$ -	$ -	$ -	$ -
Bank Charges	-	-	-			-
Total other financing sources (uses)	$ -	$ -	$ -	$ -	$ -	$ -
Excess (deficiency) of revenue collected over expenditures paid and other financing sources (uses)	$ (360,612.15)	$ (360,612.15)	$ (6,899.13)	$ -	$ -	$ (5,182.22)
Fund balance, beginning of year	$ 360,612.15	$ 360,612.15	$ 360,612.15	$ 26,784.68	$ 26,784.68	$ 26,784.68
Fund balance, end of year	$ -	$ -	$ 353,713.02	$ -	$ -	$ 21,602.46

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

NOTES TO THE FINANCIAL STATEMENTS

1. Summary of Significant Accounting Policies

The accompanying financial statements of the Wickliffe School District No. C-35 (the "District") conform to the regulatory basis of accounting, which is an other comprehensive basis of accounting prescribed by the Oklahoma State Department of Education and conforms to the system of accounting authorized by the State of Oklahoma. Accordingly, the accompanying financial statements are not intended to present financial position and results of operations in conformity with accounting principles generally accepted in the United States of America. The District's accounting 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 with expendable, available financial resources. Fiduciary type funds are accounted for using the cash

Summary of Significant Accounting Policies (continued)

basis of accounting. These practices differ from accounting principles generally accepted in the United States of America.

General Fund – The general fund is used to account for all financial transactions except those required to be accounted for in another fund. Major revenue sources include local property taxes and federal and state funding. Expenditures include all costs associated with the daily operations of the schools, except for programs funded for building repairs and maintenance, school construction and debt service on bonds and other long-term debt. The general fund includes federal and state restricted monies that must be expended for specific programs. The District's cafeteria operations are reported as part of the general fund.

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

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

Fiduciary Funds

Fiduciary funds are used to account for assets held on behalf of outside parties, including other governments or on behalf of other funds within the District. When these assets are held under the terms of a trust agreement, trust funds are used for their accounting and reporting. Agency funds generally are used to account for assets that the District holds on behalf of others as their agent and do not involve measurement of results of operations.

Agency Funds – The agency fund is the school activities fund, which is used to account for monies, collected principally through fundraising efforts of the students and District-sponsored groups. The administration is responsible, under the authority of the Board, for collecting, disbursing, and accounting for these activity funds.

Account Groups

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

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

C. Basis of Accounting and Presentation

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

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

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

Summary of Significant Accounting Policies (continued)

- Warrants payable are recorded as liabilities when issued.
- Long-term debt is recorded when incurred.
- Compensated absences are recorded as an expenditure when the obligation is paid.
- Fixed assets are recorded in the General Fixed Asset Account 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 cash on hand, demand deposit accounts, and interest bearing checking accounts.

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. Vested or accumulated vacation leave of proprietary funds is recorded as an expense and liability of those funds as the benefits accrue to employees.

Summary of Significant Accounting Policies (continued)

No liability is recorded for non-vesting accumulating rights to receive such pay benefits. Vested accumulated rights to receive sick pay benefits have been reported in the general long-term debt account group since none of the vested sick leave is expected to be liquidated with expendable, available financial resources.

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 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.

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.

Summary of Significant Accounting Policies (continued)

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

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

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

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

Facilities Acquisition and Construction Services Expenditures – Consist of activities involved with the acquisition of land and buildings; remodeling buildings; the construction of buildings and additions to buildings; initial installation or extension of service systems and other built-in equipment; and improvement to sites.

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

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

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

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

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

Budgetary Information

Under current Oklahoma Statutes, a formal Estimate of Needs (Budget) is required for all 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.

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 allows the treasurer to invest in direct obligations of the United States government, certificates of deposit of banks secured by acceptable collateral, or in savings accounts or savings certificates of savings and loan associations, when fully insured by the Federal Savings and Loan Insurance Corporation.

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.

Deposit Categories of Credit Risk (continued)

Certificates of deposit are collateralized at least by the amount not federally insured. As of June 30, 2013, the District had no deposits exposed to custodial credit risk.

The District's investment consists of a certificate of deposit.

Interest Rate Risk:

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

Credit Risk:

The District has no formal written policy addressing credit risk.

At June 30, 2013, the District has no investments that are not guaranteed by the full faith and credit of the United States Government.

3. General Long-Term Debt

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

At June 30, 2013, the Wickliffe School District had not incurred any long-term debt under these provisions, nor did they have any lease purchase commitments.

Changes in General Long-Term Debt

		Lease Payable
Balance, July 1, 2012	$	26,309.55
Additions		0.00
Retirements		26,309.55
Balance, June 30, 2013	$	0.00

4. Employee Retirement System

Description of Plan

The System is a qualified governmental defined benefit retirement plan. For GASB purposes it 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 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.

Employee Retirement System (continued)

Basis of Accounting

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

The pension benefit obligation is a standardized disclosure measure of the present value of pension benefits. This pension valuation method reflects the present value of estimated pension benefits that will be paid in future years as a result of employee **5**services performed to date and is adjusted for the effect of projected salary increases. There are no actuarial valuations performed on individual school districts. The nonfunded pension benefit obligation of the System, as determined as part of the latest actuarial valuation dated June 30, 2013, is as follows:

		Dollars in Millions
Actuarial Accrued Liability	$	18,973
Actuarial Value of Assets		10,861
Unfunded Actuarial Accrued Liability	$	8,112

Funding Policy

A participant with five years of creditable service may retire with a normal retirement allowance at the age of sixty-two (62) or with reduced benefits as early as age fifty-five (55). The normal retirement allowance paid monthly for life and then to beneficiaries, if certain options are exercised, equals two percent of the average of the highest three earning years of contributory service multiplied by the number of years of credited service. Retiring members may count up to 120 days of unused accumulated sick leave toward an additional year of service credit. A participant leaving employment before attaining retirement age, but completing five (5) years of service, may elect to vest his accumulated contributions and defer receipt of a retirement annuity until a later date. When a participant dies in active service and has completed ten years of credited service, the beneficiary is entitled to a death benefit of $18,000.00 and the participant's contributions plus interest. If the beneficiary is a surviving spouse, the surviving spouse may, in lieu of the death benefit, elect to receive, subject to the surviving spousal options, the participant's retirement benefits accrued at the time of death. The contribution rates for the Districts, which are not actuarially determined, and its employees are established by statute and applied to the employee's earnings, plus employer-paid fringe benefits. The employers' contribution rate is 9.5%. Employees contribute 7.0% of covered compensation.

Annual Pension Cost

The District's total contribution for 2013, 2012 and 2011 were $82,894.06, $85,436.30, and $89,163.58, , respectively. The District's total payroll for fiscal year 2012-13 amounted to $845,271.84.

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, 2013.

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. 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 District has a Public Official Position Schedule Bond with CNA Western Surety Bond Company, bond number 18277481. It covers two secretaries, principal, activity fund custodian, encumbrance clerk, and minutes clerk for the penal sum of $1,000.00. This bond also covers the Superintendent for the sum of $100,000.00 for the term of August 15, 2012, to August 15, 2013.

The treasurer is bonded by Western Surety Company; bond number 71294873, for the sum of $100,000.00 for the period of July 13, 2012 to July 13, 2013.

8. Retirement Incentive Program

The District has an Early Retirement Incentive Program for active, regular full-time employees of the District with 25 years of creditable service, the last five (5) years of which must be consecutive service as a full-time employee. In order for the benefit to be automatically approved, the employee must notify the Superintendent between March 1 and April 1 for retirement to be effective at the end of the employee's current contract. The benefit shall be a one-time payment equal to 75% of the full-time employee's salary, not to exceed $10,000.00 on or before June 30 of the year retirement becomes effective. The payment shall be made by check through payroll. The employee and the District will pay FICA.

COMBINING FINANCIAL STATEMENTS

WICKLIFFE SCHOOL DISTRICT NO. C-35
COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES
SPECIAL REVENUE FUND - REGULATORY BASIS
JUNE 30, 2013

	Building Fund
ASSETS:	
Cash	$ 21,602.46
Investments	-
Total assets	$ 21,602.46
LIABILITIES AND FUND BALANCES:	
Liabilities:	
Outstanding warrants	$ -
Encumbrances	-
Total liabilities	$ -
Fund balance:	
Cash fund balance	$ 21,602.46
Total fund balance	$ 21,602.46
Total liabilities and fund balance	$ 21,602.46

WICKLIFFE SCHOOL DISTRICT NO. C-35
COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES PAID AND CHANGES IN FUND BALANCE
SPECIAL REVENUE FUND - REGULATORY BASIS
FOR THE YEAR ENDED JUNE 30, 2013

		Building Fund
Revenues collected:		
Local sources	$	8,235.43
Intermediate sources		-
State sources		-
Federal sources		25,000.00
Total revenue collected	$	33,235.43
Expenditures paid:		
Instruction	$	-
Support services		38,417.65
Non-instructional services		-
Capital outlay		-
Other outlays		-
Other uses		-
Repayments		-
Debt service:		
Principal retirement		-
Interest		-
Total expenditures paid	$	38,417.65
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	$	(5,182.22)
Adjustments to prior year encumbrances	$	-
Other financing sources (uses):		
Operating transfers in/(out)	$	-
Bank charges		-
Total other financing sources (uses)	$	-
Excess of revenues and other sources over (under) expenditures and other uses	$	(5,182.22)
Fund balance, beginning of year	$	26,784.68
Fund balance, end of year	$	21,602.46

WICKLIFFE SCHOOL DISTRICT NO. C-35
COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCES
FIDUCIARY FUND - REGULATORY BASIS
JUNE 30, 2013

	Agency Fund
	Activity Fund
ASSETS:	
Cash	$ 15,379.61
Investments	-
Total assets	$ 15,379.61
LIABILITIES AND FUND BALANCES:	
Liabilities:	
Outstanding warrants	$ -
Encumbrances	-
Total liabilities	$ -
Fund balance:	
Cash fund balance	$ 15,379.61
Total fund balance	$ 15,379.61
Total liabilities and fund balance	$ 15,379.61

SUPPLEMENTAL INFORMATION

WICKLIFFE SCHOOL DISTRICT NO. C-35
BUDGETARY COMPARISON SCHEDULE - REGULATORY BASIS
SPECIAL REVENUE FUND
FOR THE YEAR ENDED JUNE 30, 2013

	BUILDING FUND			
	Original Budget	Final Budget	Actual	Variance with Final Budget Favorable (Unfavorable)
Revenues collected:				
Local sources	$ 7,622.01	$ 7,622.01	$ 8,235.43	$ 613.42
Intermediate sources	-	-	-	-
State sources	-	-	-	-
Federal sources	-	25,000.00	25,000.00	-
Total revenues collected	$ 7,622.01	$ 32,622.01	$ 33,235.43	$ 613.42
Expenditures paid:				
Instruction	$ -	$ -	$ -	$ -
Support services	34,406.69	59,406.69	38,417.65	20,989.04
Non-instructional services	-	-	-	-
Capital outlay	-	-	-	-
Other Outlays	-	-	-	-
Other Uses	-	-	-	-
Repayment	-	-	-	-
Total expenditures	$ 34,406.69	$ 59,406.69	$ 38,417.65	$ 20,989.04
Excess of revenues collected over (under) expenses paid before adjustments to prior year encumbrances	$ (26,784.68)	$ (26,784.68)	$ (5,182.22)	$ 21,602.46
Adjustments to prior year encumbrances	$ -	$ -	$ -	$ -
Other financing sources (uses):				
Operating transfers in/out	$ -	$ -	$ -	$ -
Bank charges	-	-	-	-
Total other financing sources (uses)	$ -	$ -	$ -	$ -
Excess (definiency) of revenue collected over (under) expenditures paid and other financing sources (uses)	$ (26,784.68)	$ (26,784.68)	$ (5,182.22)	$ 21,602.46
Fund balances, beginning of year	$ 26,784.68	$ 26,784.68	$ 26,784.68	$ -
Fund balance, end of year	$ -	$ -	$ 21,602.46	$ 21,602.46

WICKLIFFE SCHOOL DISTRICT NO. C-35
SCHEDULE OF FEDERAL AWARDS EXPENDED
FOR THE YEAR ENDED JUNE 30, 2013

Federal Grantor/Pass-Through Grantor/ Program Title	Federal CFDA #	Grantor's Number	Balance at July 1, 2012	Receipts	Expenditures	Balance at June 30, 2013
U.S. Department of Education						
Direct Programs:						
2012-2013 Programs						
Title VIII, Impact Aid Operations	84.041	S041B20134281	$ 344,428.96	$ 309,440.16	$ 144,542.88	$ 509,326.24
Small Rural School Achievement Program	84.358A	S358A122970	-	17,548.37	17,548.37	-
Title VII, Indian Education	84.060A	S060A120072	-	19,152.00	19,152.00	-
Sub-Total			$ 344,428.96	$ 346,140.53	$ 181,243.25	$ 509,326.24
Passed-Through State Department of Education						
2012-2013 Programs						
Title I, Basic	84.010	N/A	$ -	$ 46,307.85	$ 46,307.85	$ -
IDEA-B Flow Through	84.027	N/A	-	33,068.48	33,068.48	-
Title II, Part A Training & Recruiting Fund	84.367	N/A	-	8,258.81	8,258.81	-
Preschool	84.173	N/A	-	776.00	776.00	-
Sub-Total			$ -	$ 88,411.14	$ 88,411.14	$ -
U. S. Department of Agriculture						
Passed-Through State Department of Education:						
Child Nutrition Cluster:						
Non-Cash Assistance (Commodities):						
National School Lunch Program	10.565	N/A	$ -	$ 3,986.84	$ 3,986.84	$ -
Non-Cash Assistance Sub-Total			$ -	$ 3,986.84	$ 3,986.84	$ -
Cash Assistance:						
School Breakfast Program	10.553	N/A	$ -	$ 50,122.52	$ 50,122.52	$ -
National School Lunch Program	10.555	N/A	-	24,370.76	24,370.76	-
Cash Assistance Sub- Total			$ -	$ 74,493.28	$ 74,493.28	$ -
Sub- Total for Child Nutrition Cluster			$ -	$ 78,480.12	$ 78,480.12	$ -
Other Federal Assistance						
2012-2013Programs						
Flood Control	12.112	N/A	$ -	$ 212.85	$ -	$ 212.85
Johnson O'Malley	15.130	N/A	-	1,114.15	4,200.68	(3,086.53)
Sub-Total			$ -	$ 1,327.00	$ 4,200.68	$ (2,873.68)
TOTAL FEDERAL ASSISTANCE			$ 344,428.96	$ 514,358.79	$ 352,335.19	$ 506,452.56

The accompanying notes are an integral part of this schedule

WICKLIFFE SCHOOL DISTRICT NO. C-35
MAYES COUNTY, OKLAHOMA
NOTES TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
FOR THE YEAR ENDED JUNE 30, 2013

1. For all federal programs, the District uses the fund types prescribed by the Oklahoma State Department of Education and conforms to the system of accounting authorized by the State of Oklahoma. General and Building Funds are used to account for resources restricted, or designated for, specific purposes by a grantor. Federal and state financial assistance generally is accounted for in the General and Building Funds.

2. The accounting and financial reporting treatment applied to a fund is determined by its' measurement focus. The Governmental Fund types are accounted for using a current financial measurement focus. All federal grant funds were accounted for in the General and Child Nutrition Funds, which are Governmental Fund types. With this measurement focus, only current assets and current liabilities and the fund balance are included on the balance sheet. Operating statements of these funds present increases and decreases in net current assets.

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

3. Positive amounts listed in the either "Balance at July 1, 2012" or "Balance at June 30, 2013" column represent funds received by the school and not yet expended or coded to the program. Negative amounts represent expenditures which have been claimed, but the revenue not yet collected.

4. The District received donated foods through the Federal Food Distribution Program (10.565). At June 30, 2012, the school maintained an immaterial amount of food commodities inventory. Per the Regulatory Basis of Accounting, the commodities received and used of $3.986.84 are not recognized as revenue or expenditures in the school's Financial Statements.

5. Reconciliation of the Revenue shown on the *Schedule of Expenditures of Federal Awards* to Statement of Revenue, Expenditures and Changes in Fund Balance is as follows:

		Revenue
Total Revenue per "Schedule of Expenditures of Federal Awards	$	514,358.79
Less Commodities		(3,986.84)
Net Total	$	510,371.95
Total Revenue per "Statement of Revenue, Expenditures, and Changes in Fund Balances"		
General Fund	$	485,371.95
Building Fund		25,000.00
Net Total	$	510,371.95

WICKLIFFE SCHOOL DISTRICT NO. C-35
SCHOOL ACTIVITY FUND
RECEIPTS, TRANSFERS, DISBURSEMENTS AND SUB-ACCOUNT BALANCES
FOR THE YEAR ENDED JUNE 30, 2013

Activities	Balance 7-1-12	Deposited	Net Transfers/ Adjustments	Disbursed	Balance 6-30-13
School Activity Program	$ 200.00	$ -	$ -	$ 200.00	$ -
Concession	4,672.99	7,293.56	-	8,020.87	3,945.68
Eighth Grade Fund	535.59	4,495.92	-	4,231.81	799.70
Christmas Fund	2,031.91	8,643.11	-	9,630.18	1,044.84
Library Fund	1,879.41	4,310.29	-	2,926.41	3,263.29
Cheerleaders	251.30	857.85	-	707.19	401.96
Athletics	2,455.99	8,362.55	-	7,039.51	3,779.03
Miscellaneous	977.29	4,499.27	-	3,649.59	1,826.97
Field Trip Fund	1,268.14	-	-	950.00	318.14
Total Activities	$ 14,272.62	$ 38,462.55	$ -	$ 37,355.56	$ 15,379.61

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
Wickliffe School District No. C-35
Mayes County, Oklahoma

I have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the accompanying fund type and account group financial statements-regulatory basis within the combined financial statements of Wickliffe School District No. C.35 , Mayes County, Oklahoma (District), as listed in the Table of Contents, as of and for the year ended June 30, 2013, 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, 2014, 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 over financial reporting that might be deficiencies, significant deficiencies, or material weaknesses. 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. I did identify certain deficiencies in internal control over financial reporting, described in the accompanying schedule of findings on page 24 of this report (2013-1) that I consider to be significant deficiencies in internal control over financial reporting.

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 26 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, 2014

WICKLIFFE SCHOOL DISTRICT NO. C-35
MAYES COUNTY, OKLAHOMA
SCHEDULE OF FINDINGS
FOR THE YEAR ENDED JUNE 30, 2013

FINDINGS – FINANCIAL STATEMENTS AUDIT – Significant Deficiency

[2013-1]

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

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

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

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

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

WICKLIFFE SCHOOL DISTRICT NO. C-35
MAYES COUNTY, OKLAHOMA
SUMMARY OF PRIOR AUDIT FINDINGS
JULY 1, 2012 TO JUNE 30, 2013

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.

2012-1

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

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

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

Recommendation: We recommend that the school district strive to implement an adequate segregation of duties

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

The auditor found the condition still existed during 2012-13.

WICKLIFFE SCHOOL DISTRICT NO. C-35
MAYES COUNTY, OKLAHOMA
SCHEDULE OF COMMENTS
JULY 1, 2012 TO JUNE 30, 2013

The following conditions, while not representing material weaknesses in the system of internal accounting control, 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:** We noted Activity Fund collections had source receipts but could not be traced to being deposited with the school Activity Fund custodian or with the bank.

Recommendation: At the time collected monies are deposited with the custodian, the sponsors should make a notation on the last receipt copy that makes up that custodian deposit. Also, custodian receipts should have the sponsor receipt numbers that comprise them written on their face (i.e., 101-124).

II. **Condition:** During the 2012-13 fiscal year the school board compensated the school board clerk $4,200.00 for board clerk services (General Fund purchase order number 303). O.S. 2011, Title 70, Section 5-119 states "The board shall also elect a clerk and, in its discretion, a deputy clerk, either of whom may be one of the members of the board, and each of whom shall hold office during the pleasure of the board and each of whom shall receive such compensation for services as the board may allow". During the 2012-13 fiscal year the superintendent of schools, sought and received legal advice from the school attorney on the matter of paying the school board clerk. That legal advice, copy of which was attached to 2012-13 purchase order no. 303, advised, in part "There is no authorization under Oklahoma law to pay a board member any kind of salary or bonus". Furthermore, the legal advice characterized the expenditure as "illegal" for which each board member could be personally liable for 3 times the amount of the expenditure.

Recommendation: As independent auditor for the school district, I have no authority, purpose or intent to make a legal determination related to this matter. It is my understanding that the board's payment for clerk services was and has been in the past based on the language in O.S. 2011, Title 70, Section 5-119. However, since the school's attorney has advised that the payment is not legal, I recommend the school board either follow their attorney's advice or seek additional legal clarification in order to protect the board in future expenditures for this purpose.

Previous Year's Audit Comments

There are no items in the school's 2011-12 audit report, which have been repeated in this report.

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

WICKLIFFE SCHOOL DISTRICT NO. C-35
MAYES COUNTY, OKLAHOMA
SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE AFFIDAVIT
JULY 1, 2012 TO JUNE 30, 2013

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 Wickliffe School District for the audit year 2012-13.

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

BY
AUTHORIZED AGENT

LINDA KELLICK
Notary Public
State of Oklahoma
Commission # 13010986
My Commission Expires Dec 9, 2017

Subscribed and sworn to before me on this

6 day of March, 2014

Linda Kellick
NOTARY PUBLIC

My commission expires on:

9 day of Dec, 2017