CAMDEN COUNTY TECHNICAL SCHOOL DISTRICT COUNTY OF CAMDEN

AUDITOR'S MANAGEMENT REPORT ON ADMINISTRATIVE FINDINGS-FINANCIAL, COMPLIANCE AND PERFORMANCE

> FOR THE FISCAL YEAR ENDED JUNE 30, 2015



CAMDEN COUNTY TECHNICAL SCHOOL DISTRICT

Auditor's Management Report on Administrative Findings - Financial, Compliance and Performance

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<u>AUDITOR'S MANAGEMENT REPORT ON ADMINISTRATIVE</u> FINDINGS - FINANCIAL, COMPLIANCE, AND PERFORMANCE

The Honorable President and Members of the Board of Education Camden County Technical School District County of Camden, New Jersey

We have audited, in accordance with auditing standards generally accepted in the United States of America and *Government Auditing Standards* issued by the Comptroller General of the United States, the basic financial statements of the Board of Education of the Camden County Technical School District, in the County of Camden, State of New Jersey, as of and for the fiscal year ended June 30, 2015, which were separately issued in the Comprehensive Annual Financial Report dated November 30, 2015.

As part of our audit, we also performed procedures required by the Division of Administration and Finance, Department of Education, State of New Jersey, and the findings and results thereof are disclosed on the following pages, as listed in the accompanying table of contents.

This report is issued in conjunction with the Comprehensive Annual Financial Report of the Board of Education of the Camden County Technical School District, for the fiscal year ended June 30, 2015, and is intended for the information of the School District's management and the New Jersey Department of Education and should not be used by anyone other than these specified parties.

Respectfully submitted,

BOWMAN & COMPANY LLP Certified Public Accountants

Nolut S. Maure

Bowman & Company LLP

& Consultants

Robert S. Marrone

Public School Accountant No. CS00111300

Voorhees, New Jersey November 30, 2015

ADMINISTRATIVE FINDINGS - FINANCIAL, COMPLIANCE, AND PERFORMANCE

SCOPE OF AUDIT

The audit covered the financial transactions of the Board Secretary / School Business Administrator, the activities of the School District, and the records of the various funds under the auspices of the School District.

ADMINISTRATIVE PRACTICES AND PROCEDURES

Insurance

Fire insurance coverage was carried in the amounts as detailed on Exhibit J-20, Insurance Schedule, contained in the School District's Comprehensive Annual Financial Report ("CAFR").

Official Bonds (N.J.S.A. 18A: 17-26, 18A:17-32, 18A:13-13)

<u>Name</u>	<u>Position</u>	<u>Amount</u>

Scott Kipers Board Secretary / School

Business Administrator \$ 275,000.00

Tuition Charges

A comparison of tentative tuition charges and actual certified tuition charges was made. The actual costs were less than estimated costs. The School District made a proper adjustment to the billings to sending districts for the decrease in per pupil costs in accordance with N.J.A.C. 6A:23A-17.1(f)3.

FINANCIAL PLANNING, ACCOUNTING, AND REPORTING

Examination of Claims

Sampled claims paid during the fiscal year under audit did not indicate any reportable noncompliance with respect to signatures, certification, or supporting documentation.

Payroll Account

The net salaries of sampled employees of the School District were deposited in the Net Payroll Account. Employees' payroll deductions and the employer's share of fringe benefits were deposited in the Agency Payroll Account.

Sampled payrolls were approved by the Superintendent and were certified by the President of the Board and the Board Secretary / School Business Administrator.

Sampled salary withholdings were promptly remitted to the proper agencies, including health benefit premium withholdings due to the General Fund.

Payrolls were delivered to the Board Secretary / School Business Administrator who then deposited warrants in separate bank accounts for net payroll and withholdings.

Employee Position Control Roster

A sample of the Employee Position Control Roster indicated that it was in satisfactory condition.

FINANCIAL PLANNING, ACCOUNTING, AND REPORTING (CONT'D)

Encumbrances and Accounts Payable

A sample of outstanding issued purchase orders was made as of June 30 for proper classification of orders as encumbrances and accounts payable. Our sample did not indicate any reportable noncompliance with respect to classification of orders.

Travel

A sample of travel expenditures during the fiscal year under audit did not indicate any reportable noncompliance.

Classification of Expenditures

The coding of expenditures was reviewed for proper classification in accordance with N.J.A.C. 6A:23A-16.2(f) as part of our randomly sampled expenditure transactions. We also reviewed the coding of all expenditures included in our compliance and single audit sampling procedures. In addition, a sample was selected that specifically targeted administrative coding classifications to determine overall reliability and compliance with N.J.A.C. 6A:23A-8.3. Our samples did not indicate any reportable noncompliance with respect to classification of expenditures.

Board Secretary's Records

Our audit of the financial and accounting records maintained by the Board Secretary indicated that they were in satisfactory condition.

Treasurer of School Moneys' Records

Our audit of the financial and accounting records maintained by the Treasurer of School Moneys indicated that they were in satisfactory condition.

Elementary and Secondary Education Act (E.S.E.A.) / Improving America's Schools Act (I.A.S.A.) as reauthorized by the No Child Left Behind Act (N.C.L.B.) of 2001

The E.S.E.A. / N.C.L.B. financial exhibits are contained within the Special Revenue Section of the CAFR. This section of the CAFR documents the financial position pertaining to the projects under Titles I and IIA of the Elementary and Secondary Education Act as amended and reauthorized.

The audit of compliance for E.S.E.A. did not indicate any reportable noncompliance.

Other Special Federal and / or State Projects

The School District's Other Special Projects were approved as listed on Exhibits K-3 and K-4 located in the CAFR.

Our audit of the federal and state funds on a sample basis indicated that obligations and expenditures were incurred during the fiscal year or project period for which the project was approved.

The financial exhibits are contained within the Special Revenue Section of the CAFR. This section of the CAFR documents the financial position pertaining to the aforementioned other special projects.

The audit of compliance for Other Special Projects did not indicate any reportable noncompliance.

FINANCIAL PLANNING, ACCOUNTING, AND REPORTING (CONT'D)

T.P.A.F. Reimbursement

Our audit procedures included a sample of the biweekly reimbursements filed with the Department of Education for School District employees who are members of the Teachers' Pension and Annuity Fund. No exceptions were noted.

TPAF Reimbursement to the State for Federal Salary Expenditures

The amount of the expenditure charged to the current year's Final Report(s) for all federal awards for the School District to reimburse the State for the TPAF/FICA payments made by the State on-behalf of the School District for those employees whose salaries are identified as being paid from federal funds was made prior to the end of the 60 day grant liquidation period required by the Office of Grants Management. The expenditure was reviewed subsequent to the reimbursement and we noted that School District had overpaid the State by \$3,349.52 as the result of an adjustment made on one of the grants final report.

SCHOOL PURCHASING PROGRAMS

Contracts and Agreements Requiring Advertisement for Bids

N.J.S.A. 18A:18A-1 et seq. (Public School Contracts Law), the associated rules and related information on the statute, and the school contracts in general, are available on the following website:

http://www.state.nj.us/dca/divisions/dlgs/programs/lpcl.html

Current statute is posted on the New Jersey Legislature website at:

http://lis.njleg.state.nj.us/cgi-bin/om_isapi.dll?clientID=1319801&depth=2&expandheadings=off&headingswithhits=on&infobase=statutes.nfo&softpage=TOC_Frame_Pg42

Based on the results of our audit, we did not note any individual payments, contracts, or agreements made for the performance of any work or goods or services, in excess of the statutory thresholds where there had been no advertising for bids in accordance with the provision of N.J.S.A. 18A:18A-4, amended.

Resolutions were adopted authorizing the awarding of contracts or agreements for "Professional Services" per N.J.S.A. 18A:18A-5.

SCHOOL FOOD SERVICE

The financial transactions and statistical records of the school food service fund were audited. The financial accounts, meal count records, and eligibility applications were reviewed on a sample basis. No exceptions were noted.

Cash receipts and bank records were sampled for timely deposit. No exceptions were noted.

The School District utilizes a food service management company (FSMC) and is depositing and expending program monies in accordance with N.J.S.A. 18A:17-34, and 19-1 through 19-4.1. Provisions of the FSMC contract / addendum were reviewed and audited. The FSMC contract includes an operating results provision which guarantees that the food service program return a profit of at least \$120,000.00. The operating results provision has not been met, which resulted in a reduction in the management fee as provided for in the contract.

Expenditures should be separately recorded as food, labor, and other costs. Vendor invoices were sampled and costs verified. Inventory records on food and supply items were currently maintained and properly applied in determining the cost of food and supplies used.

The cash disbursements records reflected expenditures for program related goods and services. The appropriate revenue and expenditure records were maintained in order to substantiate the non-profit status of the school food service. Net cash resources did not exceed three months average expenditures.

Sampled time sheets were reviewed and labor costs verified. Payroll records were maintained on all School food service employees authorized by the School District. No exceptions were noted.

SCHOOL FOOD SERVICE (CONT'D)

The number of meals claimed for reimbursement was compared to sales and meal count records. As part of the claims review process, the Edit Check Worksheet was completed, with immaterial differences noted. Reimbursement claims were submitted / certified in a timely manner.

Sampled applications for free and reduced price meals were reviewed for completeness and accuracy. The free and reduced price meal and free milk policy was reviewed for uniform administration throughout the school system. Sites approved to participate in Provisions I and II were examined for compliance with all counting and claiming requirements. The required verification procedures for free and reduced price applications were completed and available for audit.

USDA Food Distribution Program (food and / or commodities) were received and a single inventory was maintained on a first-in, first-out basis. No exceptions were noted.

Exhibits reflecting Child Nutrition Program operations are included in the section entitled Enterprise Funds, Section G of the CAFR.

STUDENT BODY ACTIVITIES

Our audit of the financial and accounting records for student activities indicated that they were in satisfactory condition.

APPLICATION FOR STATE SCHOOL AID

Our audit procedures included a sample of information reported in the October 15, 2014 Application for State School Aid ("A.S.S.A.") for on-roll, private schools for the disabled, low-income, and bilingual. We also performed an inspection of the School District procedures related to its completion. The information on the A.S.S.A. was compared to the School District workpapers without exception. The information that was included on the workpapers was verified without exception. The results of our procedures are presented in the Schedule of Audited Enrollments.

The School District maintained workpapers on the prescribed State forms or their equivalent.

The School District has adequate written procedures for the recording of student enrollment data.

PUPIL TRANSPORTATION

Our procedures included a sample of transportation related contracts and purchases. Based on our sample, the School District complied with proper bidding procedures and award of contracts. No exceptions were noted in our sample of transportation related purchases of goods and services.

MISCELLANEOUS

Continuing Disclosure Agreements

Not applicable - no outstanding bonds

FOLLOW-UP ON PRIOR YEAR'S FINDINGS

In accordance with Government Auditing Standards, our procedures included a review of all prior year recommendations. Corrective action had been taken on all prior year findings.

There were no Office of Fiscal Accountability and Compliance audit reports issued during the fiscal year ended June 30, 2015.

ACKNOWLEDGMENT

We received the complete cooperation of all of the officials of the School District and we greatly appreciate the courtesies extended to the members of the audit team.

Respectfully submitted,

BOWMAN & COMPANY LLP Certified Public Accountants & Consultants

Nobut S. Maure

Robert S. Marrone

Public School Accountant No. CS00111300

Schedule of Meal Count Activity
Food Service Fund
Number of Meals Served and (Over) / Underclaim - Federal
Enterprise Fund
For the Fiscal Year Ended June 30, 2015

<u>Program</u>	Meal <u>Category</u>	Meals <u>Claimed</u>	Meals <u>Tested</u>	Meals <u>Verified</u>	<u>Difference</u>	<u>Rate</u>	Estimated (Over) / Under <u>Claim</u>
National School Lunch	Paid	26,694	749	760	11	\$ 0.30	\$ 3.30
(High Rate)	Reduced	26,053	761	1,136	375	2.55	956.25
	Free	171,798	5,027	4,582	(445)	2.95	(1,312.75)
	HHFKA*	227,205	6,537	6,478	(59)	0.06	(3.54)
	Total	451,750	13,074	12,956	(118)		(356.74)
School Breakfast	Paid	29,019	1,044	1,044	-	0.28	-
(Severe Need Rate)	Reduced	15,098	445	445	-	1.59	-
	Free	107,519	2,866	2,866		1.89	
	Total	151,636	4,355	4,355			
Special Milk	Paid				-	0.1925	-
	Free					Average Cost	
	Total						
After School Snacks At Risk / Area Eligible (No Charge)	Total	13,020		<u> </u>	-	0.80	
Total Net Underclaim / (Overclaim)							\$ (356.74)

^{*} For "Federal PB Lunch" Healthy Hunger-Free Kids Act of 2010

CAMDEN COUNTY TECHNICAL SCHOOL DISTRICT

Schedule of Net Cash Resources
Net Cash Resources Did/Did Not Exceed Three Months of Expenditures
Proprietary Funds - Food Service Fund
For the Fiscal Year Ended June 30, 2015

Net Cash Resources:			Food Service B - 4/5	
04 ED	O manuf Assots			
CAFR D.4	Current Assets	¢	40E 640 47	
B-4	Cash & Cash Equivalents	\$	105,642.47	
B-4	Due from Other Governments		156,805.40	
B-4	Due from Other Funds		70 404 50	
B-4	Other Accounts Receivable		73,124.52	
CAFR	Current Liabilities			
B-4	Less Accounts Payable		(64,853.87)	
B-4	Less Accruals		, ,	
B-4	Less Due to Other Funds		(289,914.76)	
B-4	Less Deferred Revenue		(3,741.49)	
	Net Cash Resources	\$	(22,937.73)	(A)
B-5 B-5	Total Operating Expenditures Less Depreciation	\$	1,096,916.06 (37,311.42)	
	Adjusted Total Operating Expense	\$	1,059,604.64	(B)
Average Monthly Operating	<u> 3 Expense:</u>			
	B / 10	\$	105,960.46	(C)
Three Times Monthly Avera	age:			
	3 X C	\$	317,881.39	(D)
TOTAL IN BOX A	\$ (22,937.73)			
LESS TOTAL IN BOX D	\$ (22,937.73) \$ 317,881.39 \$ 340,819.12			
NET	\$ 340,819.12			
From above:				
i ioiii above.	seeds 3 X average monthly operating expenses.			

Application for State School Aid Summary Schedule of Audited Enrollments Enrollment as of October 15, 2014

		15-2016 Applicati		School Aid		Sample for Verification				Private Schools for the Disabled					
	Reported A.S.S.A On Rol <u>Full</u> <u>S</u>	٠. Wor	orted on kpapers n Roll <u>Shared</u>	Err <u>Full</u>	ors <u>Shared</u>	Selec	mple ted from papers <u>Shared</u>	Reg	ied per gisters n Roll <u>Shared</u>	Reg	rs per isters Roll <u>Shared</u>	Reported on A.S.S.A. as Private <u>Schools</u>	Sample for Verifi- <u>cation</u>	Sample <u>Verified</u>	Sample <u>Errors</u>
Half Day Preschool Full Day Preschool Half Day Kindergarten Full Day Kindergarten One Two Three Four Five Six Seven Eight Nine Ten Eleven Twelve Post-Graduate Adult H.S. (15+CR.) Adult H.S. (1-14CR.)															
Subtotal										-					
Special Education-Elementary Special Education-Middle School Special Education-High School Subtotal	<u>576</u> 576	<u>576</u> - 576				<u>576</u>		576 576	- ———		· ——			- -	
Co. Voc Regular	1,550	1,550				1,550		1,550							
Co. Voc. Ft. Post Sec.											-				
Subtotal	1,550	1,550				1,550		1,550		-					
Totals	2,126	- 2,126				2,126		2,126		-	-				
Percentage Error					0.0%						0.0%				0.09

Application for State School Aid Summary Schedule of Audited Enrollments Enrollment as of October 15, 2014

		sident Low Income		Sam	ple for Verificatio	<u>n</u>		ent LEP Low Incom	e	Sam	ple for Verification	ı
Half Day Preschool	Reported on A.S.S.A. as Low <u>Income</u>	Reported on Workpapers as Low <u>Income</u>	<u>Errors</u>	Sample Selected from Workpapers	Verified to Application and Register	Sample <u>Errors</u>	Reported on A.S.S.A. as LEP Low Income	Reported on Workpapers as LEP Low <u>Income</u>	<u>Errors</u>	Sample Selected from Workpapers	Verified to Application, Test Score and Register	Sample <u>Errors</u>
Full Day Preschool Half Day Kindergarten Full Day Kindergarten One Two Three Four Five Six Seven Eight Nine Ten Eleven												
Twelve Post-Graduate Adult H.S. (15+CR.) Adult H.S. (1-14CR.)												
Subtotal												
Special Education-Elementary Special Education-Middle School Special Education-High School	398	398		63	63			1	(1)	1	1	
Subtotal	398	398		63	63			1	(1)	1	1	. <u></u>
Co. Voc Regular Co. Voc. Ft. Post Sec.	1,127	1,128	(1)	209	209		4	2	2	2	2	
Subtotal	1,127	1,128	(1)	209	209		4	2	2	2	2	- -
Totals	1,525	1,526	(1)	272	272		4	3	1	3	3	
Percentage Error			-0.07%			0.0%			25.00%			0.0%
			Transp	ortation								
	Reported on DRTRS by DOE/County	Reported on DRTRS by <u>District</u>	<u>Errors</u>	<u>Tested</u>	<u>Verified</u>	Errors					Reported	Re- <u>Calculate</u>
Reg Public Schools, Col. 1 Reg SpEd, Col. 4 Transported - Non-Public, Col. 3 Special Needs, Col. 6							Reg. Avg. (Milea	age) = Regular Inclu age) = Regular Excl age) = Special Ed.	uding Grade I	PK students (Part B		
Totals												
Percentage Error		·	0.0%			0.0%						

Application for State School Aid Summary Schedule of Audited Enrollments Enrollment as of October 15, 2014

		ident LEP NOT Low Income		Sample for Verification			
	Reported on A.S.S.A. as NOT Low Income	Reported on Workpapers as NOT Low <u>Income</u>	<u>Errors</u>	Sample Selected from Workpapers	Verified to Test Score and Register	Sample <u>Errors</u>	
Half Day Preschool Full Day Preschool Half Day Kindergarten Full Day Kindergarten One Two Three Four Five Six Seven Eight Nine Ten Eleven Twelve Post-Graduate Adult H.S. (15+CR.) Adult H.S. (1-14CR.)	income	income	Errors	workpapers	and Register	Errors	
Subtotal							
Special Education-Elementary Special Education-Middle School Special Education-High School							
Subtotal							
Co. Voc Regular Co. Voc. Ft. Post Sec.	1		1				
Subtotal	1	. <u> </u>	1				
Totals	1		1				
Percentage Error			100.00%			0.0%	

EXCESS SURPLUS CALCULATION

COUNTY VOCATIONAL DISTRICTS

A. 6% Calculation of Excess Surplus (2014-15 expenditures of \$100 million or less)

SECTION 1

7.1	
2014-15 Total General Fund Expenditures Reported on CAFR Exhibit C-1 Increased by:	\$ 42,094,514.93 (B)
Transfer from Capital Outlay to Capital Projects Fund	475,000.00 (B1a)
Transfer from Capital Reserve to Capital Projects Fund	(B1b)
Decreased by: On-Behalf TPAF Pension & Social Security	3,433,657.99 (B2a)
Assets Acquired Under Capital Leases	(B2b)
Adjusted 2014-15 General Fund Expenditures [(B)+(B1s)-(B2s)]	\$ 39,135,856.94 (B3)
6% of Adjusted 2014-15 General Fund Expenditures [(B3) times .06]	\$ 2,348,151.42 (B4)
Enter Greater of (B4) or \$250,000 Increased by: Allowable Adjustment *	2,348,151.42 (B5) - (K)
Maximum Unassigned Fund Balance [(B5) + (K)]	\$ 2,348,151.42 (M)
B. 6% Calculation of Excess Surplus (2014-15 expenditures greater than \$100 million)	
2014-15 Total General Fund Expenditures Reported on CAFR Exhibit C-1 Increased by:	(B)
Transfer from Capital Outlay to Capital Projects Fund Transfer from Capital Reserve to Capital Projects Fund	- (B1a) - (B1b)
	(515)
Decreased by: On-Behalf TPAF Pension & Social Security	(B2a)
Assets Acquired Under Capital Leases	(B2b)
Adjusted 2014-15 General Fund Expenditures [(B)+(B1s)-(B2s)]	(B3)
2014-15 General Fund Expenditures in excess of \$100 million [(B3) minus \$100,000,000]	(B4)
3% of General Fund Expenditures in excess of \$100 million	
[(B4) times .03]	(B5)
(B5) Plus \$6,000,000 Increased by: Allowable Adjustment *	- (B6)
	(K)
Maximum Unassigned Fund Balance [(B6) + (K)]	(M)
SECTION 2	
Total General Fund - Fund Balances at June 30, 2015 (Per CAFR Budgetary Comparison Schedule C-1)	\$ 10,822,150.77 (C)
Decreased by: Year-end Encumbrances	493,953.55 (C1)
Legally Restricted - Designated for Subsequent Year's Expenditures Legally Restricted - Excess Surplus - Designated for Subsequent Year's Expenditures **	- (C2) 2,305,016.40 (C3)
Other Restricted Fund Balances **** Assigned Fund Balance - Designated for Subsequent Year's Expenditures	730,895.67 (C4) 524,410.81 (C5)
Total Unassigned Fund Balance [(C)-(C1)-(C2)-(C3)-(C4)-(C5)]	<u>\$ 6,767,874.34</u> (U)

EXCESS SURPLUS CALCULATION (CONT'D)

COUNTY VOCATIONAL DISTRICTS

SECTION 3

restricted Fund Balance - Excess Sulpius [(0)-(m)] If NEGATIVE ENTER -0-	\$ 4,419,722.92 (L)
Recapitulation of Excess Surplus as of June 30, 2015	
Restricted - Excess Surplus - Designated for Subsequent Year's Expenditures ** Restricted - Excess Surplus *** [(E)]	\$ 2,305,016.40 (C3) 4,419,722.92 (E)
Total Excess Surplus [(C3) + (E)]	\$ 6,724,739.32 (D)

\$ 4 410 722 92 (F)

Footnotes:

* This adjustment line (as detailed below) is to be utilized when applicable for:

Restricted Fund Balance - Excess Surplus *** [/I I)-(M)] IF NEGATIVE ENTER -0-

Federal Impact Aid. The passage of P.L.2015, c46 amended N.J.S.A. 18A:7F-41 to permit a board of education to appropriate federal impact aid funds to establish or supplement a federal impact aid legal reserve in the general fund. Accordingly, effective for the year ending June 30, 2015 the Federal Impact Aid adjustment to expenditures is limited to the portion of Federal Impact Aid Section 8002 and Section 8003 received during the fiscal year and recognized as revenue on the General Fund Budgetary Comparison Schedule, but not transferred to the Federal Impact Aid Reserve - General (8002 or 8003) by board resolution during June 1 to June 30 of the fiscal year under audit. Amounts transferred to the reserve are captured on line (C4).

Sale & Lease-back, Extraordinary Aid, Additional Nonpublic School Transportation Aid, Recognized current year School Bus Advertising Revenue, and Family Crisis Transportation Aid. Refer to the Audit Program Section II, Chapter 10

Detail of Allowable Adjustments

Federal Impact Aid	- (H)
Sale & Lease-back	(l)
Extraordinary Aid	(J1)
Additional Nonpublic School Transportation Aid	- (J2)
Current Year School Bus Advertising Revenue Recognized	- (J3)
Family Crisis Transportation Aid	(J4)
Total Adjustments [(H)+(I)+(J1)+(J2)+(J3)+(J4)]	- (K)

^{*} This amount represents the June 30, 2014 Excess Surplus (C3 above) and must be included in the Audit Summary Line 90031. This amount was to be appropriated in the 2015-2016 general fund budget.

Detail of Other Restricted Fund Balance

Statutory restrictions:	
Approved unspent separate proposal	
Sale/lease-back reserve	<u> </u>
Capital reserve	\$ 730,895.67
Maintenance reserve	-
Emergency reserve	<u> </u>
Tuition reserve	<u> </u>
School bus advertising 50% fuel offset reserve - current year	<u> </u>
School bus advertising 50% fuel offset reserve - prior year	
Impact Aid General Fund Reserve (Sections 8002 and 8003)	
Impact Aid Capital Fund Reserve (Sections 8007 and 8008)	<u> </u>
Other state/government mandated reserves	<u> </u>
[Other Restricted Fund Balance not noted above]****	<u> </u>
Total Other Restricted Fund Balance	\$ 730,895.67 (C4

^{***} Amounts must agree to the June 30, 2015 CAFR and must agree to Audit Summary Line 90030.

^{****} Amount for Other Restricted Fund Balances must be detailed for each source. Use in the excess surplus calculation of any legal reserve that is not State mandated or that is not legally imposed by another type of government, such as the judicial branch of government, must have departmental approval. District requests should be submitted to the Division of Administration and Finance prior to September 30.