HIGH POINT REGIONAL <u>HIGH SCHOOL DISTRICT</u> <u>COUNTY OF SUSSEX</u> <u>AUDITORS' MANAGEMENT REPORT ON</u> <u>ADMINISTRATIVE FINDINGS - FINANCIAL,</u> <u>COMPLIANCE AND PERFORMANCE</u> <u>FISCAL YEAR ENDED JUNE 30, 2015</u>

HIGH POINT REGIONAL HIGH SCHOOL DISTRICT <u>COUNTY OF SUSSEX</u> <u>AUDITORS' MANAGEMENT REPORT ON ADMINISTRATIVE</u> <u>FINDINGS - FINANCIAL,</u> <u>COMPLIANCE AND PERFORMANCE</u> <u>FISCAL YEAR ENDED JUNE 30, 2015</u> <u>TABLE OF CONTENTS</u>

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November 19, 2015

The Honorable President and Members of the Board of Education High Point Regional High School District County of Sussex, NJ

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 High Point Regional High School District in the County of Sussex for the fiscal year ended June 30, 2015, and have issued our report thereon dated November 19, 2015.

As part of our audit, we performed procedures required by the New Jersey Department of Education, and the findings and results thereof are disclosed on the following pages, as listed in the accompanying table of contents. This letter does not affect our report dated November 19, 2015, on the financial statements of the Board.

We will review the status of the comments during our next audit engagement. We have already discussed these comments with various management personnel, and we will be pleased to discuss them in further detail at your convenience, to perform any additional study of these matters, or to assist you in implementing the recommendations.

This report is intended for the information of the High Point Regional High School District's management and the New Jersey Department of Education. However, this report is a matter of public record and its distribution is not limited.

NISIVOCCIA LLP

Valerie A. Dolan Licensed Public School Accountant #2526 Certified Public Accountant

Scope of Audit

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

Administrative Practices and Procedures

Insurance

Multi-peril insurance coverage was carried in the amounts as detailed on Exhibit J-20, Insurance Schedule contained in the district's CAFR.

Officials in Office and Surety Bonds

Name	Position	Coverage
Michelle LaStarza	Treasurer of School Monies	\$290,000
Carolyn B. Joseph	Interim Business Administrator/Board Secretary	290,000

Tuition Charges

A comparison of tentative tuition charges and actual certified tuition charges was made. The actual costs were different than estimated costs. The Board made a proper adjustment to the billings to sending districts for the change in per pupil costs in accordance with N.J.A.C. 6A:23A-3.1(f)3.

Financial Planning, Accounting and Reporting

Examination of Claims

An examination of claims paid on a test basis, during the period under review did not indicate any discrepancies with respect to signatures, certification or supporting documentation.

Payroll Account and Position Control Roster

The net salaries of employees of the Board were deposited in the Payroll Account. Employees' payroll deductions and employer's share of fringe benefits were deposited in the Payroll Agency Account. Salary withholdings were promptly remitted to the proper agencies, including health benefits withholding due to the General Fund.

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

The required certification (E-CERT1) of compliance with requirements for income tax on compensation of administrators (superintendent, assistant superintendent, and business administrator) to the NJ Department of Treasury was filed in a timely manner.

Reserve for Encumbrances and Accounts Payable

A review of outstanding issued purchase orders was made on a test basis as of June 30, for proper classification of orders as reserve for encumbrances and accounts payable.

Classification of Expenditures

The coding of expenditures was tested for proper classification in accordance with N.J.A.C. 6A:23A-16.2(f) as part of our test of transactions of randomly selected expenditure items. We also reviewed the coding of all expenditures included in our compliance and single audit testing procedures. In addition to randomly selecting a test sample, our sample selection specifically targeted administrative coding classifications to determine overall reliability and compliance with N.J.A.C. 6A:23A-8.2. As a result of the procedures performed, no errors were noted and no additional procedures were deemed necessary to test the propriety of expenditure classifications.

Board Secretary's Records

In planning and performing our audit of the financial statements of the Board, we considered the condition of the Board Secretary's records for the purpose of expressing our opinion on the financial statements and not to provide specific assurance on the condition of the records. Based on these procedures, we have no comments except as noted herein.

Treasurer's Records

In planning and performing our audit of the financial statements of the Board, we considered the condition of the Treasurer's records for the purpose of expressing our opinion on the financial statements and not to provide specific assurance on the condition of the records. Based on these procedures, we have no comments.

No Child Left Behind (N.C.L.B.)

The N.C.L.B. financial exhibits are contained herein within the Special Revenue Section of the District's CAFR. This section of the CAFR documents the financial position pertaining to projects under Title I and Title II of the No Child Left Behind Act.

The study of compliance for the N.C.L.B. did not indicate any area of noncompliance.

Other Special Federal and/or State Projects

The District's Special Projects were approved as listed on Schedule A and Schedule B located in the CAFR.

Our audit of the federal and state funds on a test 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 special projects.

T.P.A.F. Reimbursement

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

The T.P.A.F. Reimbursement to the State for Federal Salary Expenditures was remitted to the State of New Jersey prior to the required deadline of October 1, 2015. The reimbursement form was reviewed and no exceptions were noted.

School Purchasing Programs

Contracts and Agreements Requiring Advertisement for Bids

N.J.S.A. 18A:18A-3 states:

a. "When the cost or price of any contract awarded by the purchasing agent in the aggregate, does not exceed in a contract year the total sum of \$17,500, the contract may be awarded by a purchasing agent when so authorized by resolution of the Board of Education without public advertising for bids and bidding therefore, except that the Board of Education may adopt a resolution to set a lower threshold for the receipt of public bids or the solicitation of competitive quotations. If the purchasing agent is qualified pursuant to subsection b. of section 9 of P.L.1971, c. 198 the Board of Education may establish that the bid threshold may be up to \$25,000. Such authorization may be granted for each contract or by a general delegation of the power to negotiate and award such contracts pursuant to this section.

b. Commencing in the fifth year after the year in which P.L.1999, c. 440 takes effect and every five years thereafter, the Governor, in consultation with the Department of Treasury, shall adjust the threshold amount and the higher threshold amount which the Board of Education is permitted to establish as set forth in subsection a. of this section or the threshold amount resulting from any adjustment under this subsection, in direct proportion to the rise or fall of the index rate as that term is defined in N.J.S.A. 18A:18A-2, and shall round the adjustment to the nearest \$1,000. The Governor shall notify all local school districts of the adjustment no later than June 1 of every fifth year. The adjustment shall become effective on July 1 of the year in which it is made"

N.J.S.A. 18A:18A-4 states, "Every contract for the provision or performance of any goods or services the cost of which in the aggregate exceeds the bid threshold, shall be awarded only by resolution of the Board of Education to the lowest responsible bidder after public advertising for bids and bidding therefore, except as is provided otherwise in this chapter or specifically by any other law"

Effective July 1, 2010 and thereafter the bid thresholds in accordance with N.J.S.A. 18A:18A-2 and 18A:18A-3(a) are \$36,000 (with a Qualified Purchasing Agent) and \$26,000 (without a Qualified Purchasing Agent), respectively. The law regulating bidding for public school student transportation contracts under N.J.S.A 18A:39-3 is currently \$18,300.

As per N.J.S.A. 18A:18A-3, the Board passed a resolution, recognizing the Business Administrator as a qualified purchasing agent and increasing the bid threshold to \$36,000.

The Board of Education has the responsibility of determining whether the expenditures in any category will exceed the statutory thresholds within the contract year. Where question arises as to whether any contract or agreement might result in violation of the statute, the Attorney's opinion should be sought before a commitment is made.

School Purchasing Programs (Cont'd)

Contracts and Agreements Requiring Advertisement for Bids (Cont'd)

Inasmuch as the system of records did not provide for an accumulation of payments for categories for the performance of any work or the furnishing or hiring of any materials or supplies, the results of such an accumulation could not reasonably be ascertained. Disbursements were reviewed, however, to determine whether any clear-cut violations existed. General compliance was noted.

The results of our examination indicated that no individual payments, contracts, or agreements were made "for the performance of any work or the furnishing or hiring of any materials or supplies", 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.

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

The system of records did not provide for an accumulation of purchases for which the school board used contracts entered into by the State Department of Purchase and Property pursuant to Ch. 114, P.L. 1977, therefore, the extent of such purchases could not reasonably be ascertained.

School Food Service

The financial transactions and statistical records of the School Food Service Fund were reviewed. The financial accounts, meal count records, and eligibility applications were reviewed on a test basis. Food Service accounting records maintained by the District's central administration office were reconciled with the records maintained by the food service contractor.

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. Reimbursement claims were submitted/certified in a timely manner.

Applications for free and reduced price meals were reviewed for completeness and accuracy. The number of free and reduced price meals claimed as served was compared to the number of valid applications on file, times the number of operating days, on a school-by-school basis. The free and reduced price was reviewed for uniform administration throughout the school system. Sites approved to participate in Provisions 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 review.

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

Cash receipts and bank records were reviewed for timely deposit.

School Food Service (Cont'd)

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 nonprofit status of the School Food Service Fund.

The 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 and operating results provision which guarantees that the food service program will generate a \$45,654 profit. The operating results provision has been met.

Time sheets and payroll records provided to the District from the Food Service contractor were reviewed on a test basis.

Food distribution program commodities were received and a separate inventory was maintained on a first-in, first-out basis.

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

The District has a Type 2 SOC 1 report. (Service Organization Controls report) of the food service management company on file as required by state requirements.

Student Body Activities

In planning and performing our audit of the financial statements of the Board, we considered the condition of the records of the Student Activities Fund for the purpose of expressing our opinion on the financial statements and not to provide specific assurance on the condition of the records. Based on these procedures, we have no comments.

Application for State School Aid

Our audit procedures included a test 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 students. We also performed a review of the District procedures related to its completion. The information on the A.S.S.A. was compared to the District workpapers with exception, as noted below. The information that was included on the workpapers was verified on a test basis with offsetting exceptions. The results of our procedures are presented in the Schedule of Audited Enrollments.

Pupil Transportation

Our audit procedures included a test of on-roll status reported in the 2014-15 District Report of Transported Resident Students (DRTRS). The information that was included on the DRTRS was verified to the DRTRS Eligibility Summary Report without minor exceptions. The results of our procedures are presented in the Schedule of Audited Enrollments.

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

Travel Expense and Reimbursement Policy

Travel regulations require each District to adopt a formal travel policy and procedure pertaining to travel expenses and reimbursements for its employees and board members. The regulations require the District to establish a maximum travel amount for the year and to account for these expenses within a separate account in the budget to ensure that the maximum is not exceeded. The regulations also require that all travel be approved by the Board prior to the event and that the approval list the event, total event cost and the individuals attending. Employees and board members attending an event are then required to complete a post event report to be submitted to a designated person within the District.

Facilities and Capital Assets

Our procedures included a review of the SDA grant agreement for consistency with recording SDA revenue, transfer of local funds from the General Fund or from the Capital Reserve Account, and awarding of contracts for eligible facilities construction. Based on these procedures, we have no comments.

Management Suggestions:

Single Audit

Effective for the fiscal year ended June 30, 2016, there will be significant changes to the Single Audit. These changes include the following:

- An increase in the single audit threshold
- Low risk auditee criteria
- Type A and B threshold
- Coverage requirements for major programs tested for both low risk and non-low risk auditees.

Additionally, the cost principles and administrative requirements such as A-87 have been consolidated under the *OMB Uniform Guidance: Cost Principles, Audit and Administrative Requirements for Federal Awards.* This guidance was effective December 26, 2014 for all new federal awards and for any additional funding for existing awards made after December 26, 2014.

Governmental Accounting Standards Board Statements:

The next Governmental Accounting Standards Board ("GASB") statement which will have a significant impact on the District will be GASB#75, *Accounting and Financial Reporting for Postemployment Benefits Other than Pensions*, will be effective for the fiscal year ending June 30, 2018. This standard replaces GASB#45, *Accounting and Financial Reporting for Postemployment Benefits Other than Pensions*. It is similar to GASB Statement No. 68, *Accounting and Financial Reporting for Pensions* GASB#68 in that successful implementation of this standard will require the provision of certain key financial and non-financial information from the New Jersey Division of Pensions.

Deferred Compensation Plans

The District has a fiduciary responsibility to its employees related to the deferred compensation plans offered by the District. The District should consider a periodic review of the benefits, features, costs, and performance of its deferred compensation plans and make that information available to employees to assist employees in making suitable choices for investing their retirement funds while fulfilling the District's fiduciary responsibilities.

Management Suggestions: (Cont'd)

Independent Contractors vs. Employees

The District should consider reviewing the status of "Independent Contractors" utilized by the District with Internal Revenue Service guidelines for determination of employment status. The IRS has been reviewing employers, including governments, to determine compliance. A proactive approach may help to minimize or eliminate potential penalties related to incorrect employment status determination.

Status of Prior Year's Findings/Recommendations

The prior year recommendations regarding purchase orders being prepared/approved prior to the purchase of goods or services, Food Service Fund net cash not exceeding three months average expenditures, and the District maintaining original supporting documentation for students reported on the District's Application for State School Aid were all resolved in the current year. The recommendation regarding school store receipts being deposited within forty-eight hours was resolved in the current year.

NOT APPLICABLE

HIGH POINT REGIONAL HIGH SCHOOL DISTRICT SCHEDULE OF NET CASH RESOURCES FOOD SERVICE FUND ENTERPRISE FUND FOR THE FISCAL YEAR ENDED JUNE 30, 2015 (MEMORANDUM ONLY)

NOT APPLICABLE

	2015-2016 Application for State School Aid				Sample for Verification							
	Repor		Repor				Sample		Verified per		Errors	s per
	A.S.	S.A.	Workpapers On Roll					Selected from		Registers		sters
	On I	Roll			Errors		Workpapers		On Roll		On Roll	
	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared
Grade Nine	196	3	196	3			196	3	196	3		
Grade Ten	208	1	208	1			208	1	209	1	(1)	
Grade Eleven	211		211				211		212		(1)	
Grade Twelve	220	1	220	1			220	1	220	1		. <u></u>
Subtotal	835	5	835	5			835	5	837	5	(2)	
Special Ed - High School	160	2	160	2			16		14		2	
Subtotal	160	2	160	2			16		14		2	
Totals	995	7	995	7	-0-	-0-	851	5	851	5	-0-	-0-
Percentage Error					0.00%	0.00%					0.00%	0.00%

	Private Schools for Disabled			Resident Low Income						
	Reported on A.S.S.A. as Private Schools	Sample for Verification	Sample Verified	Sample Errors	Reported on A.S.S.A. as Low Income	Reported on Workpapers as Low Income	Errors	Sample Selected from Workpapers	Verified to Application and Register	Sample Errors
Grade Nine Grade Ten Grade Eleven Grade Twelve Subtotal					29 28 27 11 95	23 28 23 9 83	(6) (4) (2) (12)	3 3 2 2 10	3 3 2 2 10	
Special Ed - High School Subtotal	9	2	2 2		<u>45</u> 45	46	<u> 1 1 </u>	4	4	
Totals	9	2	2	_0-	140	129	(11)	14	14	-0-
Percentage Error				0.00%			-7.86%			0.00%

			Resident LEP	Low Income		
	Reported on	Reported on		Sample	Verified to	
	A.S.S.A. as	Workpapers		Selected	Test Scores,	
	LEP Low	LEP Low		from	Application	Sample
	Income	Income	Errors	Workpapers	and Register	Errors
Grade Nine	1	1		1	1	
Grade Ten	2	2		1	1	
Grade Eleven	2	2		1	1	
Grade Twelve						
Subtotal	5	5		3	3	
Special Ed - High School Subtotal						
Totals	5	5	-0-	3	3	-0-
Percentage Error			0.00%			0.00%

		Resident LEP N	lot Low Income		
Reported on	Reported on		Sample		
A.S.S.A. as	Workpapers		Selected	Verified to	
LEP Not Low	LEP Not Low		from	Test Scores	Sample
Income	Income	Errors	Workpapers	and Register	Errors

NOT APPLICABLE

		Transportation							
	Reported on DRTRS by DOE	Reported on DRTRS by District	Errors	Tested	Verified	Errors			
Regular - Public Schools	829	829		25	28	(3)			
Regular - Special Education	108	108		10	8	2			
Transported - Non Public	93	93		9	9				
AIL - Non Public	8	8		2	2				
Special Needs - Public	72	72		7	5	2			
Special Needs - Private	9	9		2	2				
Totals	1,118	1,118	-0-	55	54	1			
Percentage Error			0.00%			1.82%			

		Re-
	Reported	calculated
Access on Milanon - Decular Including Cando DK Students	6.77	6.77
Average Mileage - Regular Including Grade PK Students Average Mileage - Regular Excluding Grade PK Students	6.77	6.77
Average Mileage - Special Education with Special Needs	12.10	12.10

HIGH POINT REGIONAL HIGH SCHOOL DISTRICT <u>EXCESS SURPLUS CALCULATION</u> <u>FISCAL YEAR ENDED JUNE 30, 2015</u>

Section 1 - REGULAR DISTRICT

2014-15 Total General Fund Expenditures per the CAFR Increased by: Transfer from Capital Outlay to Capital Projects Fund Transfer from Capital Reserve to Capital Projects Fund Decreased by: On-Behalf TPAF Pension and Social Security Assets Acquired Under Capital Leases	\$ 24,764,628 (B) \$ -0- (B1a) \$ 1,050,090 (B1b) \$ 2,013,161 (B2a) \$ -0- (B2b))	
Adjusted 2014-15 General Fund Expenditures [(B)+(B1's)-(B2's)]	\$ 23,801,557 (B3)		
2% of Adjusted 2014-15 General Fund Expenditures [(B5) times .02] Enter Greater of (B4) or \$250,000 Increased by: Allowable Adjustment	\$ 476,031 (B4) \$ 476,031 (B5) \$ 79,514 (K)		
Maximum Unassigned Fund Balance [(B5)+(K)]		\$	555,545 (M)
Section 2			
Total General Fund - Fund Balances @ 6/30/15 (Per CAFR Budgetary Comparison Schedule C-1) Decreased by:	\$ 3,343,815 (C)		
Assigned - Year End Encumbrances Legally Restricted - Designated for Subsequent Year's Expenditures Excess Surplus - Designated for Subsequent Year's Expenditures Other Restricted Fund Balances Assigned - Designated for Subsequent Year's Expenditures	\$ 83,524 (C1) \$ -0- (C2) \$ 100,000 (C3) \$ 2,604,746 (C4) \$ -0- (C5)		
Total Unassigned Fund Balance [(C)-(C1)-(C2)-(C3)-(C4)-(C5)]		\$	555,545 (U1)
Section 3			
Restricted Fund Balance - Excess Surplus [(U1)-(M)] IF NEGATIVE, E	ENTER -0-	\$	-0- (E)

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HIGH POINT REGIONAL HIGH SCHOOL DISTRICT EXCESS SURPLUS CALCULATION FISCAL YEAR ENDED JUNE 30, 2015 (continued)

Section 3

Recapitulation of Excess Surplus as of June 30, 2015

Restricted Excess Surplus - Designated for Subsequent Year's Expenditures Restricted Excess Surplus [(E)]	\$ 100,000 (C3) \$ -0- (E)
Total [(C3)+(E)+(F)]	<u>\$ 100,000</u> (D)
Detail of Allowable Adjustments	
Impact Aid	5 -0-(H)
Sale and Lease Back	\$ -0- (I)
Extraordinary Aid	\$ 69,093 (J1)
Additional Nonpublic School Transportation Aid	<u>\$ 10,421</u> (J2)
Total Adjustments [(H)+(I)+(J1)+(J2)]	\$ 79,514 (K)
Detail of Other Restricted Fund Balances	
Statutory Restrictions	\$-0-
Approved Unspent Separate Proposal	\$ -0-
Sale/Lease-Back Reserve	\$ -0-
Capital Reserve	\$ 1,226,984
Maintenance Reserve	\$ 1,377,762
Emergency Reserve	\$ -0-
Tuition Reserve	\$-0- \$-0- \$-0-
Other State/Governmental Mandated Reserve	\$ -0-
Other Restricted Fund Balance not Noted Above	\$ -0-
Total Other Restricted Fund Balances	\$ 2,604,746

HIGH POINT REGIONAL HIGH SCHOOL DISTRICT SUMMARY OF RECOMMENDATIONS FISCAL YEAR ENDED JUNE 30, 2015

It is recommended that:

1. Administrative Practices and Procedures

None

2. <u>Financial Planning, Accounting and Reporting</u>

None

3. School Purchasing Program

None

4. <u>School Food Service</u>

None

5. <u>Student Body Activities</u>

None.

6. <u>Application for State School Aid</u>

None

7. <u>Pupil Transportation</u>

None

8. <u>Travel Expense and Reimbursement Policy</u>

None

9. Facilities and Capital Assets

None

10. <u>Status of Prior Year's Findings/Recommendations</u>

The prior year recommendations regarding purchase orders being prepared/approved prior to the purchase of goods or services, Food Service Fund net cash not exceeding three months average expenditures, and the District maintaining original supporting documentation for students reported on the District's Application for State School Aid were all resolved in the current year. The recommendation regarding school store receipts being deposited within fortyeight hours was resolved during the current year.