LAKELAND REGIONAL HIGH SCHOOL DISTRICT <u>COUNTY OF PASSAIC</u> AUDITORS' MANAGEMENT REPORT ON <u>ADMINISTRATIVE FINDINGS - FINANCIAL,</u> <u>COMPLIANCE AND PERFORMANCE</u> <u>YEAR ENDED JUNE 30, 2018</u>

LAKELAND REGIONAL HIGH SCHOOL DISTRICT <u>COUNTY OF PASSAIC</u> <u>AUDITORS' MANAGEMENT REPORT ON ADMINISTRATIVE</u> <u>FINDINGS - FINANCIAL,</u> <u>COMPLIANCE AND PERFORMANCE</u> <u>YEAR ENDED JUNE 30, 2018</u> <u>TABLE OF CONTENTS</u>

Cover Letter	1
General Comments:	2
Scope of Audit	2
Administrative Practices and Procedures:	2
Insurance	2
Officials in Office and Surety Bonds	2
Tuition Charges	2
Financial Planning, Accounting and Reporting:	2
Examination of Claims	2
Payroll Account and Position Control Roster	2
Reserve for Encumbrances and Accounts Payable	3
Classification of Expenditures	3
Board Secretary's Records	3
Treasurer's Records	3
Elementary and Secondary Education Act (E.S.E.A.) as amended by the	
Every Student Succeeds Act	3
Other Special Federal and/or State Projects	3
T.P.A.F. Reimbursement	4
School Purchasing Programs:	4
Contracts and Agreements Requiring Advertisement for Bids	4
School Food Service Fund	5
Student Body Activities	5
Application for State School Aid	6
Pupil Transportation	6
Facilities and Capital Assets	6
Travel Expense and Reimbursement Policy	6
Testing for Lead of all Drinking Water in Educational Facilities	6
Management Suggestions	7
Status of Prior Year's Findings/Recommendations	7
Schedule of Meal Count Activity (Not Applicable)	
Schedule of Net Cash Resources (Not Applicable)	
Schedule of Audited Enrollments	8
Excess Surplus Calculation	11
Summary of Recommendations	13



Mount Arlington Corporate Center 200 Valley Road, Suite 300 Mt. Arlington, NJ 07856 973-328-1825 | 973-328-0507 Fax Lawrence Business Center

11 Lawrence Road Newton, NJ 07860 973-383-6699 | 973-383-6555 Fax

January 18, 2018

The Honorable President and Members of the Board of Education Lakeland Regional High School District County of Passaic, 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 financial statements of the Board of Education of the Lakeland Regional High School District in the County of Passaic for the fiscal year ended June 30, 2018, and have issued our report thereon dated January 18, 2018.

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 January 18, 2018, 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, recommendations and suggestions 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, if any.

This report is intended for the information of the Lakeland 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 NISIVOCCIA LLP

Francis Jones of Nisiwoccia LLP Francis Jones

Licensed Public School Accountant #1154 Certified Public Accountant

www.nisivoccia.com Independent Member of BKR International

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
Virginia Merlino	Treasurer of School Monies	\$250,000
Kathryn Davenport	Business Administrator/Board Secretary	\$250,000

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. All payrolls were approved by the Superintendent and were certified by the President of the Board, Board Secretary/School Business Administrator and Superintendent. Salary withholdings were promptly remitted to the proper agencies, including health benefit withholdings due to the General Fund. The required certification (E-CERT1) of compliance with requirements for income tax on compensation of administrators (chief school administrator and business administrator) to the New Jersey Department of Treasury was filed by the March 15th due date.

Financial Planning, Accounting and Reporting (Cont'd)

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. 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. We also reviewed the coding of all expenditures included in our compliance and single audit testing procedures. As a result of the procedures performed, a transaction error rate of 0% was noted and no additional procedures were deemed necessary to test the propriety of expenditure classification.

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 except as noted herein.

Elementary and Secondary Education Act (E.S.E.A.) as amended by the Every Student Succeeds Act (ESSA)

The E.S.E.A. financial exhibits are contained within the Special Revenue Section of the District's CAFR. This section of the CAFR documents the financial position pertaining to projects under Titles I and II of the Elementary and Secondary Education Act as amended and reauthorized.

The study of compliance for the E.S.E.A. 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 reimbursements filed with the Department of Education for district employees who are members of the Teachers' Pension and Annuity Fund. No exceptions were noted.

T.P.A.F. Reimbursement to the State for Federal Salary Expenditures

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, 2018. 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, 2015 and thereafter the bid thresholds in accordance with N.J.S.A. 18A:18A-2 and 18A:18A-3(a) are \$40,000 (with a Qualified Purchasing Agent) and \$29,000 (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 \$19,000 for 2017-2018.

As per N.J.S.A. 18A:18A-3, the Board passed a resolution authorizing the Business Administrator as a qualified purchasing agent and increasing the bid threshold to \$40,000.

School Purchasing Programs (Cont'd)

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

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.

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 school food service program was not selected as a major federal and/or state program. We inquired of school management, or the appropriate school food service personnel, as to whether the SFA had any Child Nutrition Program reimbursement overclaims or underclaims. No exceptions were noted.

We also inquired of school management, or appropriate school food service personnel, as to whether the SFA's expenditures of school food service revenues were limited to allowable direct and indirect costs. No exceptions were noted.

Non-program foods were purchased, prepared or offered for sale. The Statement of Revenue, Expenses and Changes in Net Position in the CAFR Schedule B-5 does separate program and non-program revenue and program and non-program cost of goods sold.

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 except as noted herein.

Application for State School Aid

Our audit procedures included a test of information reported in the October 13, 2017 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 a few minor exceptions. The information that was included on the workpapers was verified on a test basis with a few minor exceptions. The results of our procedures are presented in the Schedule of Audited Enrollments.

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

The District's written procedures appear to be adequate for the recording of student enrollment data.

Pupil Transportation

Our audit procedures included a test of on-roll status reported in the 2017-2018 District Report of Transported Resident Students (DRTRS). The information that was included on the DRTRS was verified to the DRTRS Eligibility Summary Report without exception. 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. The bid specifications for the purchase of buses were in compliance with applicable statutes. No exceptions were noted in our review of transportation related purchases of goods and services.

Facilities and Capital Assets

Our procedures included a review of the Schools Development Authority ("SDA") grant agreements 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. No exceptions were noted.

Travel Expense and Reimbursement Policy

Travel regulations require each District to adopt a formal policy and procedure pertaining to travel and expense reimbursement 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 prior by the Board of Education and the Superintendent and that the approval must be itemized by event, event total cost, and individuals attending. A brief report detailing the key issues addressed at the travel event must be submitted after the travel event has occurred.

Our review of the travel policies and records revealed that the District is in general compliance with the travel regulations.

Testing for Lead of All Drinking Water in Educational Facilities

The District did submit the annual Statement of Assurance to the NJ Department of Education, pursuant to N.J.A.C. 6A:26-12.4(g).

Management Suggestions

Capital Projects

We have noted that the referendum project contained within the Capital Projects Fund has been fully completed. The District should address the balance remaining in the referendum project that is completed and return the remaining funds to the appropriate fund. The Capital Projects Fund should only contain active projects and all completed projects should be removed from the fund.

Student Activities

It has recently been determined that School District personnel may not be completely aware of the limitations and restrictions on the use of Student Activity Funds. We believe it is important that the District be aware that any pupil organization which is part of the activity program of the School District, places at least indirect responsibility for supervision and control of that organization with the Board of Education. We suggest that the Board formally approve each school club or activity. As directed by the New Jersey Department of Education, collections related to fund raising for outside organizations should not be maintained in the District's Student Activity Funds.

Additionally, the District should ensure that District-wide standard policies and procedures are implemented for all Student Activity Funds. These policies should indicate the student activities funds are to be utilized for the benefit of the student activity or club and not to be utilized for enhancement of instructional programs or school facilities. The District should at least at a minimum communicate to school personnel on an annual basis the District's policies and procedures regarding Student Activity Funds. We suggest that these policies include guidance regarding timely deposits of funds and the safeguarding of funds prior to deposit as well as the appropriate purchasing guidelines for student activities disbursements.

Service Providers

Many school districts contract with service providers to perform functions such as the processing of payroll and provision of food service management services. In conjunction with these services, the service provider will engage an auditor to perform a SOC 1 (System and Organization Controls) engagement which results in a SOC 1 report. There are two different types of SOC 1 reports - a Type 1 and a Type 2 report. Both report on the fairness of the presentation of management's description of the service organization's system and the design of the controls to achieve the related control objectives. The Type 1 report is through a specific period. The Type 2 report also reviews the operating effectiveness of the controls included in the description throughout a specified period. Included in the Type 2 report will be the individual controls, what was tested and the results of the testing.

We suggest that the District review these SOC 1 reports to determine if there are any exceptions noted in the opinion in the Independent Auditors' Report. Additionally, for SOC 1 Type 2 reports we suggest that the District review the test results related to the individual control testing to determine if there were any exceptions noted. If exceptions are noted in the report the District should contact the service provider and inquire what steps the service provider is taking to address these exceptions.

Status of Prior Year's Findings/Recommendations

There were no prior year findings/recommendations.

	2018	18 - 2019 A _l	oplication	- 2019 Application for State School Aid	School A	id		Sa	imple for	Sample for Verification	on	
	Repor	Reported on	Repor	Reported on			San	Sample	Verifi	Verified per	Erroi	Errors per
	ASSA	SA	Work	Workpapers			Select	Selected from	Regi	Registers	Regi	Registers
	On Roll	Roll	On Roll	Roll	En	Errors	Work	Workpapers	On	On Roll	on Roll	Roll
	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared
Grade Nine	179		179				179		179			
Grade Ten	193		193				193		193			
Grade Eleven	189		191		-2		189		191		-7	
Grade Twelve	183		183				183		183			
Subtotal	744		746		-2		744		746		-2	
Special Education: High School	184		184				184		184			
Subtotal	184		184				184		184			
Totals	928		930		-2	-0-	928		930		-2	-0-
Percentage Error					-0.22%	0.00%					-0.22%	0.00%
	Private	ate Schools for Disabled	for Disab	led								
	Reported											
	uo	Sample										
	ASSA as	for										

Sample Sample Verified Errors 0.00% -0- ∞ Э m cation for Verifiς \mathcal{C} ξ ASSA as Private Schools 17 17 17 Percentage Error Special Education: High School Subtotals Totals

Page 8

١

LAKELAND REGIONAL HIGH SCHOOL DISTRICT SCHEDULE OF AUDITED ENROLLMENT APPLICATION FOR STATE SCHOOL AID SUMMARY ENROLLMENT AS OF OCTOBER 13, 2017

	Resi	dent Low Income		Sample for Verification		
	Reported on	Reported on		Sample	Verified to	
	ASSA	Workpapers		Selected	Application	
	as Low	as Low		from	and	Sample
	Income	Income	Errors	Workpapers	Register	Errors
Grade Nine	25	25		3	3	
Grade Ten	17	17		1	1	
Grade Eleven	21	21		3	3	
Grade Twelve	12	12		1	1	
Subtotal	75	75	-0-	8	8	-0-
Subtotal						
Special Education:						
High School	41.0	41.0		4	4	
Subtotal	41.0	41.0	-0-	4	4	-0-
		·····				6 ,
Totals	116.0	116.0	-0-	12	12	-0-
Percentage Error			0.00%			0.00%
i ereentage Error						
	Reside	nt LEP Low Incon	ne	Sampl	e for Verification Verified to	1
	Reported on	Reported on		Sample	Test Scores,	
	ASSA	Workpapers		Selected	Application	
	as LEP	as LEP		from	and	Sample
	Low Income	Low Income	Errors	Workpapers	Register	Errors
Grade Twelve	2	2		1	1	<u></u>
Totals	2	2	-0-	1	1	-0-
Percentage Error			0.00%			0.00%
	Resident	LEP Not Low Inc	ome	Sampl	e for Verificatior	1
	Reported on	Reported on		Sample	Verified to	
	ASSA	Workpapers		Selected	Test Scores	
	as LEP NOT	as LEP NOT		from	and	Sample
	Low Income	Low Income	Errors	Workpapers	Register	Errors
Totals	4	4	0-	1	1	-0-
Percentage Error			0.00%			0.00%

LAKELAND REGIONAL HIGH SCHOOL DISTRICT SCHEDULE OF AUDITED ENROLLMENT APPLICATION FOR STATE SCHOOL AID SUMMARY ENROLLMENT AS OF OCTOBER 13, 2017

			Transpor	tation		
	Reported on	Reported on				
	DRTRS	DRTRS				
	by DOE	by District	Errors	Tested	Verified	Errors
Regular - Public Schools	481	481		25	25	
Regular - Special Ed	88	88		9	9	
AIL	101	101		10	10	
Special Needs - Public	19	19		4	4	
Special Needs - Private	31	31		7	7	
Totals	720	720		55	55	-0-
Percentage Error			0.00%			0.00%

		Re-
	Reported	calculated
Average Mileage:		
Regular Including Grade PK Students	6.2	6.2
Regular Excluding Grade PK Students	6.2	6.2
Special Education with Special Needs	19.9	19.9

LAKELAND REGIONAL HIGH SCHOOL DISTRICT <u>EXCESS SURPLUS CALCULATION</u> <u>YEAR ENDED JUNE 30, 2018</u>

REGULAR DISTRICT

SECTION 1

2% Calculation of Excess Surplus

2017-2018 Total General Fund Expenditures per the CAFR, Ex. C-1 Increased by: Transfer from Capital Outlay to Capital Projects Fund Transfer from Capital Reserve to Capital Projects Fund Transfer from General Fund to SRF for PreK - Regular Transfer from General Fund to SRF for PreK - Inclusion	\$ 26,531,588 (B) \$ (B1a) \$ 365,000 (B1b) \$ (B1c) (B1d)
Decreased by: On-Behalf TPAF Pension and Social Security Assets Acquired Under Capital Leases	\$ 2,961,815 (B2a) \$ (B2b)
Adjusted 2017-2018 General Fund Expenditures [(B)+(B1's)-(B2's)]	<u>\$ 23,934,773</u> (B3)
2% of Adjusted 2017-2018 General Fund Expenditures [(B3) times .02] Enter Greater of (B4) or \$250,000 Increased by: Allowable Adjustments	\$ 478,695 (B4) \$ 478,695 (B5) \$ 141,486 (K)
Maximum Unassigned/Undesignated-Unreserved Fund Balance [(B5)+(K	(M) <u>\$ 620,181</u>
Maximum Unassigned/Undesignated-Unreserved Fund Balance [(B5)+(K SECTION 2	[X)] <u>\$ 620,181</u> (M)
	$\begin{array}{c} \underline{\$ \ 4,884,730} \ (C \) \\ \underline{\$ \ 4,694} \ (C1) \\ \underline{\$ \ 469,780} \ (C2) \\ \underline{\$ \ 469,780} \ (C3) \\ \underline{\$ \ 3,330,295} \ (C4) \\ \underline{\$ \ (C5)} \\ \underline{\$ \ (C6)} \end{array}$

LAKELAND REGIONAL HIGH SCHOOL DISTRICT EXCESS SURPLUS CALCULATION YEAR ENDED JUNE 30, 2018 (Continued)

SECTION 3

Restricted Fund Balance - Excess Surplus [(U1)-(M)] IF NEGATIVE, ENTER -0-	<u>\$ 459,780</u> (E)
<u>Recapitulation of Excess Surplus as of June 30, 2018</u>	
Restricted Excess Surplus - Designated for Subsequent Year's Expenditures Restricted Excess Surplus [(E)]	\$ 469,780 (C3) \$ 459,780 (E)
Total Excess Surplus [(C3)+(E)]	<u>\$ 929,560</u> (D)
Detail of Allowable Adjustments	
Impact Aid Sale & Lease-back Extraordinary Aid Additional Nonpublic School Transportation Aid Current Year School Bus Advertising Revenue Realized Family Crisis Transportation Aid Total Adjustments [(H)+(I)+(J1)+(J2)+(J3)+(J4)]	\$ -0- (H) \$ -0- (I) \$ 112,196 (J1) \$ 29,290 (J2) \$ -0- (J3) \$ -0- (J4) \$ 141,486 (K)
Detail of Other Restricted Fund Balances	
Statutory Restrictions: Approved Unspent Separate Proposal Sale/Lease-back Reserve Capital Reserve Maintenance Reserve Emergency Reserve Tuition Reserve School Bus Advertising 50% Fuel Offset Reserve - Current Year School Bus Advertising 50% Fuel Offset Reserve - Prior Year Impact Aid General Fund Reserve (Sections 8002 and 8003) Impact Aid General Fund Reserve (Sections 8007 and 8008) Other State/Government Mandated Reserve Other Restricted Fund Balances Not Noted Above	$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$
Total Other Restricted Fund Balances	\$3,330,295 (C4)

LAKELAND REGIONAL HIGH SCHOOL DISTRICT SUMMARY OF RECOMMENDATIONS YEAR ENDED JUNE 30, 2018

It is recommended that:

1. <u>Administrative Practices and Procedures</u>

None

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

None

3. <u>School Purchasing Program</u>

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>Facilities and Capital Assets</u>

None

9. <u>Travel Expense and Reimbursement</u>

None

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

There were no prior year findings/recommendations.