GREEN TOWNSHIP SCHOOL DISTRICT
COUNTY OF SUSSEX
AUDITORS' MANAGEMENT REPORT ON
ADMINISTRATIVE FINDINGS - FINANCIAL,
COMPLIANCE AND PERFORMANCE
FISCAL YEAR ENDED JUNE 30, 2020

$\frac{\text{GREEN TOWNSHIP SCHOOL DISTRICT}}{\text{COUNTY OF SUSSEX}}$

AUDITORS' MANAGEMENT REPORT ON ADMINISTRATIVE

FINDINGS - FINANCIAL,

COMPLIANCE AND PERFORMANCE

FISCAL YEAR ENDED JUNE 30, 2020

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Independent Member BKR International

December 7, 2020

The Honorable President and Members of the Board of Education Green Township School District County of Sussex, 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 financial statements of the Board of Education of the Green Township School District in the County of Sussex for the fiscal year ended June 30, 2020, and have issued our report thereon dated December 7, 2020.

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 December 7, 2020, 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 and suggestions, if any, 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 Green Township 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

Man C Lee

Nisivoccia LLP

Man C. Lee

Licensed Public School Accountant #2527

Certified Public Accountant

Scope of Audit

The audit covered the financial transactions of the Board Secretary/School Business Administrator and Treasurer of School Monies, 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

<u>Insurance</u>

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

<u>Name</u>	<u>Position</u>	Coverage
Linda Padula	Treasurer of School Monies	\$ 250,000
Sallyann McCarty	Business Administrator	\$ 250,000
Vincent Occhino	Interim Business Administrator	\$ 250,000

Tuition Charges

A comparison of tentative tuition charges and actual certified tuition charges was made. The actual costs were less than estimated costs. The Board made a proper adjustment to the billings to sending districts for the difference in per pupil costs in accordance with N.J.A.C.6:23-3.1(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 certified by the President of the Board and the School Business Administrator, and the Superintendent.

Salary withholdings were promptly remitted to the proper agencies, including health benefits withholding due to the general fund.

The required certification (ECERT1) of compliance with requirements for income tax on compensation of administrators (superintendent, assistant superintendents and business administrators) to the NJ Department of Treasury was filed by the March 15 due date.

(Continued)

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. 6:23-2.2(g) 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 as a test sample, our sample selection specifically targeted administrative coding classifications to determine overall reliability and compliance with N.J.A.C. 6A:23A-2.4. As a result of the procedures performed, no transaction errors were 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 below.

Finding:

The District did not obtain the County Superintendent approval for transfers from general fund line items that on a cumulative basis exceed 10% or transfer to capital outlay line items, excluding equipment.

Recommendation:

It is recommended that County Superintendent approval be obtained for transfers from general fund line items that on a cumulative basis exceed 10% or transfer to capital outlay line items, excluding equipment.

Management's Response:

The District will ensure it obtains County Superintendent approval for transfers when required.

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.

(Continued)

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 Title I, Title II, and Title IV of the Elementary and Secondary Education Act.

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.

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, 2020. The reimbursement form was reviewed and no exceptions were noted.

Travel Expenses

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 include requirements for the District to establish a maximum travel amount for the year and to ensure that the maximum amount is not exceeded. The regulations also require that all travel must be preapproved by the Board of Education and Superintendent and that a brief report detailing the key issues addressed at the travel event must be submitted after the travel event has occurred. Based upon the results of our testing, we have no comments.

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).

(Continued)

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, 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 currently \$19,000.

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.

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.

(Continued)

School Purchasing Programs (Cont'd)

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

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. However, the program expenditures exceeded \$100,000 in federal and/or State support. Accordingly, we inquired of school management, or the appropriate school food service personnel, as to whether the School Food Authority (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.

We also inquired of management about the emergency COVID-19 procedures/practices that the SFA instituted to provide meals to eligible students, maintenance of all applicable production records, meal counts, noncompetitive procurements, modification of existing contracts and applicable financial records to document the specific costs applicable to the emergency operations.

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 below.

Findings:

- 1.) Not all student activities receipts collected by advisors were turned over to the finance office for deposit in a timely manner.
- 2.) We noted several instances where receipt of goods signatures and invoices were not obtained for student activity vouchers.

Recommendations:

- 1.) It is recommended that student activities receipts be turned over to the finance office for deposit in a timely manner.
- 2.) It is recommended that receipt of goods signature and invoices be obtained for student activities vouchers before payments are made.

(Continued)

Student Body Activities (Cont'd)

Management's Response:

Extra care will be taken to ensure that receipts are turned over and deposited in a timely manner and that the required signatures and invoices are obtained before payments are made.

Application for State School Aid

Our audit procedures included a test of enrollments and related services reported in the October 15, 2019 Application for State School Aid (A.S.S.A.) for on-roll, private schools for the handicapped, and low income 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 exceptions. The information that was included on the workpapers was verified on a test basis with 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 has adequate written procedures for the recording of student enrollment data.

Finding:

It was noted that 10 students reported as regular students on the A.S.S.A. were classified as special education students according to the workpapers maintained by the District. It was also noted that the number of students reported as resident low income on the A.S.S.A did not agree to the District's workpapers.

Recommendation:

It is recommended that extra care be taken to ensure that on-roll and resident low income students reported on the A.S.S.A. agree with the workpapers maintained by the District.

Management's Response:

The District will ensure that better care is taken when classifying and reporting students.

Pupil Transportation

Our audit procedures included a test of on-roll status reported in the 2019-2020 District Report of Transported Resident Students (DRTRS). The information that was included on the DRTRS was verified to the DRTRS Eligibility Summary Report with no 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. 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.

(Continued)

Management Suggestions:

Governmental Accounting Standards Board (GASB) Statements

Due to COVID-19, the GASB postponed the implementation of GASB Statement No. 84, *Fiduciary Activities*, until the fiscal year ended June 30, 2021. Based on guidance from the NJ Department of Education and GASB, the activity for student activities, payroll agency, unemployment compensation trust, flexible spending trust and private purpose scholarship trust funds will no longer be reported in the Fiduciary Fund financial statements. This activity will now be reported in the General (payroll agency, flexible spending and unemployment compensation) and Special Revenue (student activities and scholarship) Funds.

Effect on Internal Controls due to COVID-19

With the increase in employees working remotely due to COVID-19 especially those in the Business Office it is vital that the District routinely reviews the internal controls in place especially with respect to security of passwords as well as access rights to accounting software and bank information including bank wire transfers and the timely back-up of records.

Status of Prior Year's Findings/Recommendations

There were no prior year audit findings or recommendations.

	2	2020-2021 Application for State School Aid	Applicatic	n for State	School Ai	p		Se	ample for	Sample for Verification	u	
	Repor	Reported on	Repor	Reported on			Sample	ıple	Verifi	Verified per	Errors per	s per
	AS	ASSA	Work	Workpapers			Selecte	Selected from	Regi	Registers	Registers	sters
	On	On Roll	On	On Roll	Err	Errors	Work	Workpapers	On	On Roll	on Roll	llos
	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared
Full Day Kindergarten	46		47		(1)		47		47			
Grade One	39		39				39		39			
Grade Two	30		31		(1)		31		31			
Grade Three	26		29		(3)		29		29			
Grade Four	36		39		(3)		39		39			
Grade Five	46		46				46		46			
Grade Six	42		43		(1)		43		43			
Grade Seven	46		46				46		46			
Grade Eight	40		41		(1)		41		41			
Subtotal	351		361		(10)		361		361			
Special Education:												
Elementary School	34		26		%		5		5			
Middle School	14		13		3		3		3			
Subtotal	64		52		11		11		8			
Totals	415	-0-	413	0-	_	-0-	372	-0-	369	0-	-0-	-0-
Percentage Error					0.24%	0.00%				"	%00.0	%00.0

		Private Schools for	s for Disabled				Resident L	Resident Low Income		
	Reported on ASSA	Sample			Reported on ASSA	Reported on Workpapers		Sample Selected	Verified to Application	
	as Private	for	Sample	Sample	as Low	as Low		from	and	Sample
	Schools	Verification	Verified	Errors	Income	Income	Errors	Workpapers	Register	Errors
Full Day Kindergarten					3	2	1	1	1	
Grade One					8	2	1			
Grade Two					1	1		1	1	
Grade Three					1	2	(1)			
Grade Four					1	2	(1)	1	1	
Grade Five					4	3	1	1	1	
Grade Six					8	4	(1)	1	1	
Grade Seven										
Grade Eight					B	3		1	1	
Grade Nine					4		(4)			
Grade Ten					B		(3)			
Grade Eleven					1		(1)			
Grade Twelve					4		(4)			
Subtotal					31	19	(12)	9	9	
Special Education:										
Elementary					∞	3	(5)	1	1	
Middle School	1	1			2		(2)			
High School	1									
Subtotal	2	1	1		10	3	(7)	1	1	
Totals	2	1	-		41	22	(19)	٢	7	
Percentage Error				0.00%			-46.34%			0.00%

	Resident	t LEP Not Low I	ncome	Sam	ple for Verificati	on
	Reported on	Reported on		Sample	Verified to	
	ASSA as	Workpapers		Selected	Test Scores,	
	LEP Not	as LEP Not		from	Application	Sample
	Low Income	Low Income	Errors	Workpapers	and Register	Errors
Full Day Kindergarten						
Grade Eight						
Grade Ten	1		1			
Totals	1	-0-	1	-0-	-0-	-0-
Percentage Error			100.00%			0.00%

ran		

			Transpo	rtution		
	Reported	Reported				
	on DRTRS	on DRTRS				
	by DOE	by District	Errors	Tested	Verified	Errors
Regular - Public Schools	445	445		25	25	
Regular - Special Education	37	37		7	7	
Transported - Non Public	33	33		5	5	
AIL - Non Public	13	13		3	3	
Special Needs - Public	7	7		3	3	
Special Needs - Private	1	1		1	1	
Totals	536	536	-0-	44	44	-0-
Percentage Error			0.00%			0.00%

		Re-
	Reported	calculated
Average Mileage - Regular Including Grade PK Students	6.5	6.5
Average Mileage - Regular Excluding Grade PK Students	6.5	6.5
Average Mileage - Special Education with Special Needs	13.8	13.8

GREEN TOWNSHIP SCHOOL DISTRICT EXCESS SURPLUS CALCULATION FISCAL YEAR ENDED JUNE 30, 2020

REGULAR DISTRICT

SECTION 1

2% Calculation	of Excess	Surplus

2019-2020 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	\$ -0- \$ 1,312,848	(B1a) (B1b)	
Adjusted 2019-2020 General Fund Expenditures [(B)+(B1's)-(B2's)]	\$ 12,413,910	• ` ′	
2% of Adjusted 2019-2020 General Fund Expenditures [(B5) times .02] Enter Greater of (B4) or \$250,000 Increased by: Allowable Adjustment	\$ 248,278 \$ 250,000 \$ 78,036	(B5)	
Maximum Unassigned Fund Balance [(B5)+(K)]		\$	328,036 (M)
Section 2			
Total General Fund - Fund Balances @ 6/30/2020 (Per CAFR Budgetary Comparison Schedule C-1) Decreased by:	\$ 1,179,227	(C)	
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		(C2) (C3) (C4)	
Total Unassigned Fund Balance [(C)-(C1)-(C2)-(C3)-(C4)-(C5)]		\$	578,036 (U1)
Section 3			
Restricted Fund Balance-Excess Surplus [(U1)-(M)] IF NEGATIVE, ENTER	<u> </u>	\$	250,000 (E)

GREEN TOWNSHIP SCHOOL DISTRICT EXCESS SURPLUS CALCULATION FISCAL YEAR ENDED JUNE 30, 2020

Recapitulation of Excess Surplus as of June 30, 2020

Excess Surplus - Designated for Subsequent Year's Expenditures Excess Surplus [(E)]	\$ -0- (C3) \$ 250,000 (E)
Total [(C3)+(E)+(F)]	\$ 250,000 (D)
Detail of Allowable Adjustments	
Impact Aid	\$ -0(H)
Sale and Lease Back	\$ -0- (I)
Extraordinary Aid	\$ 70,911 (J1)
Additional Nonpublic School Transportation Aid	\$ 7,125 (J2)
Total Adjustments [(H)+(I)+(J1)+(J2)]	\$ 78,036 (K)
Detail of Other Restricted Fund Balance	
Statutory Restrictions	\$ -0-
Approved Unspent Separate Proposal	\$ -0-
Sale/Lease-Back Reserve	\$ -0- \$ -0- \$ 234,823
Capital Reserve	
Emergency Reserve	\$ -0- \$ 115,752
Maintenance Reserve	
Tuition Reserve	\$ 151,738
Other State/Governmental Mandated Reserve	\$ -0-
Other Restricted Fund Balance not Noted Above	\$ -0-
Total Other Restricted Fund Balance	\$ 502,313 (C4)

GREEN TOWNSHIP SCHOOL DISTRICT SUMMARY OF RECOMMENDATIONS FISCAL YEAR ENDED JUNE 30, 2020

It is recommended that:

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

None

2. Financial Planning, Accounting and Reporting

a. County Superintendent approval be obtained for transfers from general fund line items that on a cumulative basis exceed 10% or transfer to capital outlay line items, excluding equipment.

3. School Purchasing Program

None

4. School Food Service

None

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

- a. Student activities receipts be turned over to the finance office for deposit in a timely manner.
- b. Receipt of goods signature and invoices be obtained for student activities vouchers before payments are made.

6. Application for State School Aid

a. Extra care be taken to ensure that on-roll and resident low income students reported on the A.S.S.A. agree with the workpapers maintained by the District.

7. <u>Pupil Transportation</u>

None

8. <u>Facilities and Capital Assets</u>

None

9. <u>Miscellaneous</u>

None

10. Status of Prior Year's Findings/Recommendations

There were no prior year audit findings or recommendations.