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

SPARTA TOWNSHIP SCHOOL DISTRICT 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

The Honorable President and Members of the Board of Education Sparta Township 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 financial statements of the Board of Education of the Sparta Township School District in the County of Sussex for the fiscal year ended June 30, 2020, and have issued our report thereon dated December 15, 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 15, 2020, on the financial statements of the Board.

We will review the status of the comments and recommendation during our next audit engagement. We have already discussed these comments 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 suggestions and recommendation.

This report is intended for the information of the Sparta 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.

December 15, 2020 Mount Arlington, New Jersey NISIVOCCIA, LLP

Visivoccia, LLP

Kathryň L. Mantell

Licensed Public School Accountant #884

Certified Public Accountant

Kathryn L. Mantell

Scope of Audit

The audit covered the financial transactions of the Board Secretary/School Business Administrator and Treasurer, 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
Kerry A. Keane	Treasurer	\$ 500,000
Pamela Hinman	Business Administrator/Board Secretary	500,000

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. 6:20-3.1(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 tested 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.

(Continued)

Financial Planning, Accounting and Reporting (Cont'd)

Classification of General and Administrative 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 a test sample, we reviewed administrative coding classifications to determine overall reliability and compliance with N.J.A.C 6A:23A-24. Overall compliance was noted.

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 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, Title IIA and Title IV of the Elementary and Secondary Education Act as amended and reauthorized.

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

(Continued)

Financial Planning, Accounting and Reporting (Cont'd)

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.

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 2019-20.

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.

(Continued)

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 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 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.

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

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.

(Continued)

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.

Finding:

During our review of student activities, it was noted that deposits were not always made on a timely basis for the Alpine School student activities account and Middle School student activities account.

Recommendation:

It is recommended that all deposits for the Alpine School student activities account and Middle School student activities account are consistently made on a timely basis.

Management's Response:

The District will ensure that all deposits for the Alpine School student activities account and Middle School student activities account are consistently made on a timely basis.

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 disabled, low income and bilingual students. We also performed a review of the District procedures related to its completion. The information reported on the A.S.S.A. was compared to the District work papers with three minor errors. The information included on the work papers was verified on a test basis with one minor exception. 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.

Pupil Transportation

Our audit procedures included a test of on-roll status reported in the 2019-20 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)

Facilities and Capital Assets

Our procedures included a review of the transfer of local funds from the General Fund and the Capital Reserve Account as well as 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 separately that the maximum is not exceeded. The regulations also require that all travel 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.

Our review of the travel policies and records revealed that the District is in 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 Suggestion

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

The prior year recommendation regarding deposits being consistently made on a timely basis in the various student activities accounts, was not completely resolved and has been included in the current year findings/recommendations.

	202	20-2021	Application	2020-2021 Application for State School Aid	School Aid				Sample for Verification	Verification	_	
	Reported on Revised ASSA On Roll	on SA	Reported on Workpapers On Roll	ed on apers	Err	Errors	Sample Selected from Workpapers	ple d from apers	Verified per Registers On Roll	ed per sters Soll	Errors	ors
	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared
Half Day Preschool 3 Years Old	7		7				7		7			
Half Day Preschool 4 Years Old	16		16				16		16			
	180		180				180		180			
	205		205				205		205			
	194		194				194		194			
	183		183				183		183			
	174		175		(1)		174		175		(1)	
	174		174				174		174			
	200		200				200		200			
	217		217				217		217			
	197		197				197		197			
	235		235				235		235			
	207	1	207	-			207	-	207	-		
	236		236				236		236			
	236		236				236		236			
	2,661	-	2,662		(1)		2,661	1	2,662	1	(1)	
	180		180				10		10			
	109		109				7		7			
	163	2	163	2			∞		8			
	452	2	452	2			25		25			
	3,113	8	3,114	3	(1)	-0-	2,686	-	2,687	-	(1)	- 0 -
					-0.03%	0.00%					-0.04%	0.00%

		Privat	Private Schools for Disabled	or Disablec	1				Residen	Resident Low Income		
	Reported	Reported on		Sample			Reported	Reported on		Sample	Verified to	
	on ASSA	Workpapers		for			on ASSA	Workpapers		Selected	Application	
	as Private	as Private		Veri-	Sample	Sample	as Low	as Low		from	and	Sample
	Schools	Schools	Errors	fication	Verified	Errors	Income	Income	Errors	Workpapers	Register	Errors
Full Day Kindergarten							6	6		2	2	
Grade One							10	10		2	2	
Grade Two							6	6		2	2	
Grade Three							4	4		2	2	
Grade Four							2	2		1	1	
Grade Five							13	13		2	2	
Grade Six							5	S		1	1	
Grade Seven							7	9	(1)	1	1	
Grade Eight							6	6		2	2	
Grade Nine							9	9		1	1	
Grade Ten							10	6	(1)	2	2	
Grade Eleven							4	4		1	1	
Grade Twelve							13	13		1	1	
Subtotal							101	66	(2)	20	20	
Special Education:												
Elementary School	3	3			1		14	14		2	2	
Middle School	4	4		2	2		18	18		2	7	
High School	11	11		3	3		12	12		1	1	
Subtotal	18	18		9	9		44	44		9	5	
Totals	18	18	- 0 -	9	9	- 0 -	145	143	(2)	26	25	-0-
Percentage Error			0.00%			0.00%			-1.38%			0.00%
		•			•							

Resident LI	EP Low	Income
-------------	--------	--------

	Reported on	Reported on		Sample	Verified to	
	ASSA as	Workpapers		Selected	Test Scores,	
	LEP Low	as LEP Low		from	Application	Sample
	Income	Income	Errors	Workpapers	and Register	Errors
Full Day Kindergarten	1	1				
Grade One	1	1		1	1	
Grade Two	4	4		2	2	
Grade Three	1	1		1	1	
Grade Five	1	1				
Grade Ten	3	3		1	1	
Subtotal	11	11		5	5	
Totals	11	11	- 0 -	5	5	- 0 -
Percentage Error			0.00%			0.00%

	Reported on ASSA as LEP Not Low Income	Reported on Workpapers as LEP Not Low Income	Errors	Sample Selected from Workpapers	Verified to Test Scores and Register	Sample Errors
Full Day Kindergarten	1	1				
Grade One	1	1		1	1	
Grade Two	4	4		2	2	
Grade Six	1	1		1	1	
Grade Twelve	1	1		1	1	
Subtotal	8	8		5	5	
Totals	8	8	- 0 -	5	5	- 0 -
Percentage Error			0.00%			0.00%

			Transport	ation		
	Reported	Reported				
	on DRTRS	on DRTRS				
	by DOE	by District	Errors	Tested	Verified	Errors
Regular - Public Schools	2,303	2,303		25	25	
Regular - Special Education	360	360		25	25	
Transported - Non Public	250	250		25	25	
AIL - Non Public	33	33		5	5	
Special Nees - Public	74	74		7	7	
Special Nees - Private	17	17		3	3	
Totals	3,037	3,037	- 0 -	90	90	- 0 -
Percentage Error			0.00%			0.00%

	Reported	Recalculated
Average Mileage - Regular Including Grade PK Students	4.5	4.5
Average Mileage - Regular Excluding Grade PK Students	4.5	4.5
Average Mileage - Special Education with Special Needs	10.1	10.1

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

EXCESS SURPLUS CALCULATION

Section 1 - REGULAR DISTRICT

IF NEGATIVE, ENTER \$ - 0 -

2019-2020 Total General Fund Expenditures per the CAFR	\$76,155,244 (B)
Increased by:	(D1.)
Transfer from Capital Outlay to Capital Projects Fund	(B1a)
Transfer from Capital Reserve to Capital Projects Fund	(B1b)
Decreased by:	
On-Behalf TPAF Pension and Social Security	\$ 10,310,059 (B2a)
Assets Acquired Under Capital Leases	\$ 227,501 (B2b)
Adjusted 2019-2020 General Fund Expenditures $[(B) + (B1's) - (B2's)]$	\$ 65,617,684 (B3)
2% of Adjusted 2019-2020 General Fund Expenditures [(B3) times .02]	\$ 1,312,354 (B4)
Enter Greater or (B4) or \$250,000	\$ 1,312,354 (B5)
Increased by: Allowable Adjustments	\$ 190,100 (K)
Maximum Unassigned Fund Balance [(B5) + (K)	\$ 1,502,454 (M)
Section 2	
Total General Fund - Fund Balances @ 6/30/2020	\$ 9,903,559 (C)
(Per CAFR Budgetary Comparison Schedule C-1)	
Decreased by:	
77 I D I	
Year-end Encumbrances	\$ 735,188 (C1)
Year-end Encumbrances Legally Restricted - Designated for Subsequent Year's Expenditures	\$ -0- (C2)
	\$ -0- (C2) \$ 750,000 (C3)
Legally Restricted - Designated for Subsequent Year's Expenditures	\$ -0- (C2)
Legally Restricted - Designated for Subsequent Year's Expenditures Excess Surplus - Designated for Subsequent Year's Expenditures	\$ -0- (C2) \$ 750,000 (C3)
Legally Restricted - Designated for Subsequent Year's Expenditures Excess Surplus - Designated for Subsequent Year's Expenditures Other Restricted Fund Balances	\$ -0- (C2) \$ 750,000 (C3) \$ 6,017,324 (C4)
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	\$ -0- (C2) \$ 750,000 (C3) \$ 6,017,324 (C4)
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 Additional Assigned Fund Balance - Designated for Subsequent	\$ -0- (C2) \$ 750,000 (C3) \$ 6,017,324 (C4) \$ 148,593 (C5) \$ -0- (C6)
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 Additional Assigned Fund Balance - Designated for Subsequent Year's Expenditures July 1, 2020 - August 1, 2020	\$ -0- (C2) \$ 750,000 (C3) \$ 6,017,324 (C4) \$ 148,593 (C5) \$ -0- (C6)
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 Additional Assigned Fund Balance - Designated for Subsequent Year's Expenditures July 1, 2020 - August 1, 2020 Total Unassigned Fund Balance [(C1) - (C1) - (C2) - (C3) - (C4) - (C5)-(C5)-(C5)-(C5)-(C5)-(C5)-(C5)-(C5)-	\$ -0- (C2) \$ 750,000 (C3) \$ 6,017,324 (C4) \$ 148,593 (C5) \$ -0- (C6)

750,000 (E)

SPARTA TOWNSHIP SCHOOL DISTRICT EXCESS SURPLUS CALCULATION FISCAL YEAR ENDED JUNE 30, 2020 (Continued)

EXCESS SURPLUS CALCULATION

Recapitulation of Excess Surplus as of June 30, 2020

Restricted Excess Surplus - Designated for Subsequent Year's Expenditures Restricted Excess Surplus [(E)]	\$	750,000 750,000	• ` ′
Total $[(C3) + (E) + (F)]$	\$	1,500,000	(D)
Detail of Allowable Adjustments			
Impact Aid	\$	-0-	(H)
Sale and Lease-Back	\$	-0-	(I)
Extraordinary Aid	\$	163,310	(J1)
Additional Nonpublic School Tranportation Aid	\$	26,790	(J1)
Total Adjustments $[(H) + (I) + (J1) + (J2)]$	\$	190,100	(K)
Detail of Other Restricted Fund Balance			
Statutory Restrictions	\$	-0-	
Approved Unspent Separate Proposal	\$	-0-	_
Sale/Lease-Back Reserve	\$	-0-	-
Capital Reserve	\$	5,105,691	_
Maintenance Reserve	\$	911,633	_
Tuition Reserve	\$ \$	-0-	_
Other State/Governmental Mandated Reserve	\$	-0-	_
Other Restricted Fund Balance not Noted Above	\$	-0-	_
Total Other Restricted Fund Balance	\$	6,017,324	(C4)

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

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. School Food Service

None

5. Student Body Activities

All deposits for the Alpine School student activities account and Middle School student activities account are consistently made on a timely basis.

6. Application for State School Aid

None

7. <u>Pupil Transportation</u>

None

8. Facilities and Capital Assets

None

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

The prior year recommendation regarding deposits being consistently made on a timely basis in the various student activities accounts, was not completely resolved and has been included in the current year findings/recommendations.