WARREN HILLS REGIONAL SCHOOL DISTRICT COUNTY OF WARREN AUDITORS' MANAGEMENT REPORT ON ADMINISTRATIVE FINDINGS - FINANCIAL, COMPLIANCE AND PERFORMANCE FISCAL YEAR ENDED JUNE 30, 2020

<u>WARREN HILLS REGIONAL SCHOOL DISTRICT</u> <u>COUNTY OF WARREN</u> <u>AUDITORS' MANAGEMENT REPORT ON ADMINISTRATIVE</u> <u>FINDINGS - FINANCIAL,</u> <u>COMPLIANCE AND PERFORMANCE</u> <u>FISCAL YEAR ENDED JUNE 30, 2020</u>

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Independent Member BKR International

November 10, 2020

The Honorable President and Members of the Board of Education Warren Hills Regional School District County of Warren, 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 Warren Hills Regional School District in the County of Warren for the fiscal year ended June 30, 2020, and have issued our report thereon dated November 10, 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 November 10, 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 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 Warren Hills Regional 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

Man C Lee

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 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	<u> </u>	loverage
Judith Favino	Treasurer of School Monies	\$	300,000
Donnamarie Palmiere	Board Secretary/School Business Administrator		300,000

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, the Board Secretary/School 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 not filed in a timely manner.

Finding:

It was noted that the required certification (E-CERT1) report of compliance with requirements for income tax on compensation of administrators was not filed with the NJ Department of Treasury by March 15th. However, since the required certification was subsequently submitted after the deadline, no formal recommendation is deemed warranted.

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. 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-8.2. 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, no exceptions were noted.

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

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.

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 currently \$19,000 for 2019-2020.

As per N.J.S.A. 18A:18A-3, the Board passed a resolution at its January 3, 2019 meeting, authorizing the Business Administrator as a qualified purchasing agent and increasing the bid threshold to \$40,000.

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. No exceptions were noted.

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

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

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.

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.

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.

Finding:

Net cash resources of the Food Service Fund exceeded three months average expenditures by \$46,028. The District has attempted to bring net cash resources to the required level over the past few years, despite increasing prices in accordance with State regulations. The District plans to continue to redistribute additional salaries and overhead expenses to the Food Service Fund in future years. Therefore, a formal recommendation is not warranted.

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, 2019 Application for State School Aid (A.S.S.A.) for on-roll, private schools for the handicapped, low income and bilingual education 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 without exception. The information that was included on the workpapers was verified on a test basis with no 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 for the recording of student enrollment data appear to be adequate.

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. No exceptions were noted in our review of transportation related purchases of goods and services.

Facilities and Capital Assets

There are no active SDA projects.

Travel Expenses and Travel 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 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. Overall compliance was noted in our testing, with the exception of the following.

Travel Expenses and Travel Reimbursement Policy

Finding:

During our testing, it was noted that prior approval for board member travel as required per *N.J.S.A.* 18A:11-12 was not obtained.

Recommendation:

It is recommended that prior approval for board member travel as per N.J.S.A. 18A:11-12 is obtained.

Management's Response:

Prior approval for board member travel as per N.J.S.A. 18A:11-12 will be obtained.

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

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 purchase orders being prepared for the Athletics account and all authorizing signatures being obtained prior to payment has been resolved during the current fiscal year.

	. 1	2020-2021 Application for State School Aid	Application	n for State	School Ai	d		S	ample for	Sample for Verification	n	
	Repoi	Reported on	Reported on	ted on			San	Sample	Verifi	Verified per		
	AS	ASSA	Work	Vorkpapers			Selecté	Selected from	Regi	Registers		
	On	On Roll	On Roll	Roll	En	Errors	Work	Workpapers	On Roll	Roll	En	Errors
	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared
Grade Seven	246		246				246		246			
Grade Eight	221		221				221		221			
Grade Nine	236		236				236		236			
Grade Ten	261		261				261		261			
Grade Eleven	291		291				291		291			
Grade Twelve	248		248				248		248			
Subtotal	1,503		1,503				1,503		1,503			
Special Education:												
Middle School	89		89				6		6			
High School	154		154				16		16			
Subtotal	243		243				25		25			
Totals	1,746	-0-	1,746	-0-	-0-	-0-	1,528	-0-	1,528	-0-	-0-	-0-
Percentage Error					0.00%	0.00%					0.00%	0.00%

WARREN HILLS REGIONAL SCHOOL DISTRICT SCHEDULE OF AUDITED ENROLLMENT APPLICATION FOR STATE SCHOOL AID SUMMARY ENROLLMENT AS OF OCTOBER 15, 2019

Reported on ASSA as Private as Private Schools Grade Seven Grade Eight Grade Ten Grade Ten Grade Eleven		T II I MIC DAILADI TAL FINAL				Kesideni,	Vesident LOW Income		
I	Sample			Reported on ASSA	Reported on Workpapers		Sample Selected	Verified to Application	
Grade Seven Grade Eight Grade Nine Grade Ten Grade Eleven	for Verification	Sample Verified	Sample Errors	as Low Income	as Low Income	Errors	from Workpapers	and Register	Sample Errors
Grade Eight Grade Nine Grade Ten Grade Eleven				61	61		4	4	
jrade Nine jrade Ten jrade Eleven				35	35		ω	С	
irade Ten irade Eleven				43	43		ŝ	С	
irade Eleven				51	51		4	4	
				37	37		ŝ	б	
Grade Twelve				34	34		2	2	
Subtotal				261	261		19	19	
Special Education:				2	2				
lo	¢	¢		42	42		<i>ი</i> , ი	<i>ი</i> ი თ	
High School 14	3	3		42	42		3	3	
Subtotal 14	3	ω		84	84		9	9	
Totals 14	ю	ε	-0-	345	345	-0-	25	25	-0-
Percentage Error			0.00%			0.00%			0.00%

WARREN HILLS REGIONAL SCHOOL DISTRICTSCHEDULE OF AUDITED ENROLLMENTAPPLICATION FOR STATE SCHOOL AID SUMMARYENROLLMENT AS OF OCTOBER 15, 2019

WARREN HILLS REGIONAL SCHOOL DISTRICT SCHEDULE OF AUDITED ENROLLMENT	APPLICATION FOR STATE SCHOOL AID SUMMARY	ENROLLMENT AS OF OCTOBER 15, 2019
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		Re	esident LEP	Resident LEP Low Income				Resi	ident LEP N	Resident LEP Not Low Income		
	Reported on			Sample	Verified to		Reported on	Reported on		Sample	Monified to	
	I FP I ow	as I FD I ow		from	Annlication	Sample	1 FP Not	w ULKPAPELS as I FP Not		from	Veillieu to Test Scores	Sample
	Income	Income	Errors	Workpapers	and Register	Errors	Low Income	Low Income	Errors	Workpapers	and Register	Errors
				4						e e		
Grade Seven	2	2										
Grade Eight	1	1										
Grade Nine	б	б		1	1							
Grade Ten	8	8		2	2							
Grade Eleven	9	9		1	1		1	1		1	1	
Grade Twelve	ŝ	ς		1	1		2	2		1	1	
Subtotal	23	23		5	5		3	3		2	2	
Special Education:												
Middle School	1	1										
Subtotal	1	1										
-1-1-5 F	ç	č	Ċ	ų	u	C	ç	ç	Ċ	ç	ç	C
101415	74	74		C	C		C I	n	-0-	7	7	
Percentage Error			0.00%			0.00%			0.00%			0.00%

<u>WARREN HILLS SCHOOL DISTRICT</u> <u>SCHEDULE OF AUDITED ENROLLMENT</u> <u>APPLICATION FOR STATE SCHOOL AID SUMMARY</u> <u>ENROLLMENT AS OF OCTOBER 15, 2019</u>

			Transpo	ortation		
	Reported on DRTRS by DOE	Reported on DRTRS by District	Errors	Tested	Verified	Errors
Regular - Public Schools	811	811		16	16	
Regular - Special Education	106	106		4	4	
Transported - Non Public	3	3		1	1	
AIL - Non Public	19	19		1	1	
Special Needs - Public	29	29		2	2	
Special Needs - Private	11	11		1	1	
Totals	979	979	-0-	25	25	-0-
Percentage Error			0.00%			0.00%

	Reported	Recalculated
Average Mileage - Regular Including Grade PK Students	7.6	7.6
Average Mileage - Regular Excluding Grade PK Students	7.6	7.6
Average Mileage - Special Education with Special Needs	15.4	15.4

WARREN HILLS REGIONAL SCHOOL DISTRICT EXCESS SURPLUS CALCULATION FISCAL YEAR ENDED JUNE 30, 2020

EXCESS SURPLUS CALCULATION AT 6/30/2020

REGULAR DISTRICT

SECTION 1

A. 2% Calculation of Excess Surplus

2019/2020 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	$\begin{array}{c c} \$ & 42,568,225 \\ \hline \$ & -0- \\ \hline \end{array} (B1c)$
Decreased by: On-Behalf TPAF Pension and Social Security Assets Acquired Under Capital Leases	\$ 5,167,556 (B2a) \$ -0- (B2b)
Adjusted 2019-2020 General Fund Expenditures [(B)+(B1's)-(B2's)]	\$37,400,669 (B3)
2% of Adjusted 2019-2020 General Fund Expenditures [(B3) times .02] Enter Greater of (B4) or \$250,000 Increased by: Allowable Adjustment	\$ 748,013 (B4) \$ 748,013 (B5) \$ 209,655 (K)
Maximum Unassigned Fund Balance [(B5)+(K)]	\$ 957,668
SECTION 2	
Total General Fund - Fund Balances @ 6/30/2020 (Per CAFR Budgetary Comparison Schedule C-1) Decreased by:	<u>\$ 7,812,938</u> (C)
Year End for Encumbrances Legally Restricted - Designated for Subsequent Year's Expenditures Legally Restricted - Excess Surplus - Designated for	\$ 1,537,638 (C1) \$ -0- (C2)
Subsequent Year's Expenditures Other Restricted Fund Balances Assigned Fund Balance - Unreserved - Designated for	\$ 1,000,000 (C3) \$ 3,467,632 (C4)
Subsequent Year's Expenditures Additional Assigned Fund Balance:	<u>\$ -0-</u> (C5)
Unreserved - Designated for Subsequent Year's Expenditures July 1, 2020 - August 1, 2020	\$ -0- (C6)
	<u> </u>

(U1)

WARREN HILLS REGIONAL SCHOOL DISTRICT EXCESS SURPLUS CALCULATION FISCAL YEAR ENDED JUNE 30, 2020 (Continued)

SECTION 3

Restricted Fund Balance - Excess Surplus [(U2)-(M)] IF NEGATIVE, ENTER -0-\$ 850,000 (E) Recapitulation of Excess Surplus as of June 30, 2020 Restricted Excess Surplus - Designated for Subsequent Year's Expenditures \$1,000,000 (C3) Restricted Excess Surplus [(E)] \$ 850,000 (E) Total [(C3)+(E)]\$1,850,000 (D) Detail of Allowable Adjustments Impact Aid \$ -0- (H) Sale and Lease Back \$ -0- (I) \$ 208,785 (J1) Extraordinary Aid \$ Additional Nonpublic School Transportation Aid 870 (J2) \$ Current Year School Bus Advertising Revenue Recognized -0- (J3) \$ Family Crisis Transportation Aid -0- (J4) Total Adjustments ((H)+(J)+(J1)+(J2)+(J3)+(J4))\$ 209,655 (K) Detail of Other Restricted Fund Balance Statutory restrictions: Approved unspent separate proposal -0-\$ \$ -0-Sale/lease-back reserve \$2,885,988 Capital reserve 299,431 Emergency reserve \$ 282,213 Maintenance reserve \$ \$ Tuition reserve -0-\$ School Bus Advertising 50% Fuel Offset Reserve - current year -0-\$ School Bus Advertising 50% Fuel Offset Reserve - prior year -0-\$ -0-Impact Aid General Fund Reserve (Sections 8002 and 8003) \$ Impact Aid Capital Fund Reserve (Sections 8007 and 8008) -0-\$ Other state/governmental mandated reserve -0-Other Restricted Fund Balance not noted above \$ -0-Total Other Restricted Fund Balance \$3,467,632 (C4)

WARREN HILLS REGIONAL SCHOOL DISTRICT SUMMARY OF RECOMMENDATIONS FISCAL YEAR ENDED JUNE 30, 2020

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 Policy</u>

Prior approval for board member travel as per N.J.S.A. 18A:11-12 is obtained.

10. <u>Testing of Lead of all Drinking Water in Educational Facilities</u>

None

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

The prior year recommendation regarding purchase orders being prepared for the Athletics account and all authorizing signatures being obtained prior to payment has been resolved during the current fiscal year.