Auditor's Management Report

for the

City of Rahway School District

in the

County of Union New Jersey

for the

Fiscal Year Ended June 30, 2022

AUDITOR'S MANAGEMENT REPORT OF ADMINISTRATIVE FINDINGS-FINANCIAL AND COMPLIANCE

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INDEPENDENT AUDITOR'S REPORT

Honorable President and Members of the Board of Education City of Rahway School District County of Union Rahway, New Jersey 07065

We have audited, in accordance with U.S. generally accepted auditing standards and Government Auditing Standards issued by the Comptroller General of the United States, the basic financial statements of the City of Rahway School District in the County of Union for the year ended June 30, 2022 and have issued our report dated March 3, 2023.

As part of our audit, we performed procedures required by the New Jersey Department of Education, and the findings and results are disclosed on the following pages, as listed in the accompanying table of contents.

This report is intended solely for the information of the City of Rahway School District, County of Union, New Jersey and the New Jersey Department of Education. However, this report is a matter of public record and its distribution is not limited.

CERTIFIED PUBLIC ACCOUNTANTS

PUBLIC SCHOOL ACCOUNTANT NO. 948

March 3, 2023

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 Roselle Board of Education, and the records of the various funds under the auspices of the Board of Education.

ADMINISTRATIVE PRACTICES AND PROCEDURES

Insurance (N.J.S.A. 18A:17-26, 18A: 17-32)

Insurance coverage was carried in the amounts as detailed in the District's ACFR (See Exhibit "J-20").

Official Bonds

NAME POSITION OF BONDS
Stephen Fried School Business Administrator \$400,000.00

There is a Public Employees' Faithful Performance Blanket Position Bond with Selective Insurance covering all other employees with coverage of \$250,000.

Adequacy of insurance coverage is the responsibility of the Board of Education.

P.L. 2020, c.44

Our audit procedures included an inquiry and subsequent review of health benefit data required per N.J.S.A 18A:16-13.3 (Chapter 44) submitted for the fiscal year of audit. The Chapter 44 summary report was reviewed for reasonableness and timeliness.

The data submitted did include all health benefit plans offered by the school district. The school district data certification was completed by the chief school administrator and was submitted timely.

Financial Planning, Accounting and Reporting

Examination of Claims

Our audit of claims paid during the period under review did not indicate any discrepancies with respect to signatures, certification or supporting documentation.

Financial Planning, Accounting and Reporting (Continued)

Payroll Accounts

The net salaries of all employees of the Board were deposited in the Net Payroll Account. Employees' payroll deductions and employer's share of fringe benefits were deposited in the Payroll Agency Account.

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

Salary withholdings were promptly remitted to the proper agencies including health benefits premium amounts withheld due to the general fund.

Payrolls were delivered to the secretary of the board with a warrant made to his order for the full amount of each payroll.

Position Control Roster

The Position Control Roster was reviewed and compared to payroll records, employee benefit records and charges made to the general ledger to ensure proper and consistent financial reporting and that employee benefits are only offered to current employees.

Reserve for Encumbrances and Accounts Payable

A review of outstanding issued purchase orders was made as of June 30, for goods not yet received or services not yet rendered and it was determined that no blanket purchase orders were included in the balance of the reserve for encumbrances. Also, unpaid purchase orders included in the balance of accounts payable were reviewed for propriety and to determine that goods were received and services were rendered, as of June 30.

Classification of Expenditures

The coding of expenditures was tested for proper classification in accordance with N.J.A.C. 6A:23A-16.2(f) as part of our test of transactions of randomly selected expenditure items. We also reviewed the coding of all expenditures included in our compliance and single audit testing procedures. In addition to randomly selecting a test sample, our sample selection specifically targeted administrative coding classifications to determine overall reliability and compliance with N.J.A.C. 6A:23A-8.3. As a result of the procedures performed, no errors were noted and no additional procedures were deemed necessary to the test the propriety of expenditure classification.

Board Secretary's Records

The records maintained by the Board Secretary were in agreement with the records maintained by the Treasurer.

<u>Elementary and Secondary Education Act (E.S.E.A.) as Amended by the Every Student Succeeds Act (ESSA)</u>

The E.S.E.A. financial exhibits are contained within the Special Revenue Section of the ACFR. This section of the ACFR documents the financial position pertaining to the projects under Title I and Title VI 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 Exhibits K-3 and K-4 located in the ACFR.

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 ACFR. This section of the ACFR documents the financial position pertaining to the aforementioned special projects.

T.P.A.F. Reimbursement

Our audit procedures included a test of the semi-monthly reimbursement filed with the Department of Education for district employees who are members of the Teachers Pension and Annuity Fund.

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

The amount of the expenditure charged to the current year's Final Report(s) for all federal awards for the school district to reimburse the State for the TPAF/FICA payments made by the State on-behalf of the school district for those employees whose salaries are identified as being paid from federal funds was made prior to the end of the 60 day grant liquidation period required by the Office of Grants Management. The expenditure was reviewed subsequent to the reimbursement.

2022-001 Finding: We noted that due to an adjustment to salaries charged to federal awards, the payment to the State of New Jersey for reimbursement of TPAF/FICA was made after the 90 day grant liquidation period.

2022-001 Recommendation: That payment to the State of New Jersey for reimbursement of TPAF/FICA be made before the 90 day grant liquidation period.

School Purchasing Programs

Contracts and Agreements Requiring Advertisement for Bids

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 therefor, except as is provided otherwise in this chapter or specifically by any other law.

The Board of Education may, by resolution, approve by the majority of the board of education and subject to subsections b. and c. of this section, disqualify a bidder who would otherwise be determined to be the lowest responsible bidder, if the board of education finds that it has had negative prior experience with the bidder."

Effective July 1, 2021, the bid threshold in accordance with N.J.S.A. 18A:18A-3(a) and (c) is \$32,000.00. In accordance with N.J.S.A. 40A:11-9 (b) the bid threshold for all purchases made by the District's qualified purchasing agent is \$44,000.00. The law regulating bidding for public school student transportation contracts under N.J.S.A. 18:39-3 is currently \$20,200.00.

The Board of Education has the responsibility of determining whether the expenditures in any category will exceed the statutory thresholds within the fiscal year. Where question arises as to whether any contract or agreement might result in violation of the statute, the solicitor'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.

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 provisions 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. Our examination did reveal however, that the district made purchases through the use of state contracts.

School Food Service

PUBLIC HEALTH EMERGENCY

In accordance with the Governor's Declaration of Emergency pertaining to the public health emergency, all Public, Charter and Non-Public schools were ordered to close effective as of March 18, 2021 for an undetermined period to limit the spread of the virus. As a result, School Food Authorities (SFAs) were required to institute alternate procedures to provide meals to eligible students during the period of school closures. Governor Murphy's emergency declaration ended June 4, 2021; however, the United States Department of Agriculture's federal waiver continued through June 30, 2022. Food Service Agencies operated under this federal waiver.

As a result, School Food Authorities (SFAs) were required to provide meals in accordance with the regulations governing the National School Nutrition Seamless Summer Option (SSO). SFAs could also choose to participate in the National School Lunch Program utilizing standard counting and claiming practices.

SFAs were authorized to solicit and award emergency noncompetitive procurements and contracts with Food Service Management Companies in accordance with 2 CFR 200.320 and N.J.S.A.18A:18A-7. The SFAs were also authorized to submit contract modifications to their existing Cost Reimbursable or Fixed Price contracts as necessary to ensure the feeding of all children throughout the age of 18, as well as persons over 18 with disabilities as defined in the regulations.

SFAs were notified of the requirement to maintain and report separate meal count records and financial records of all applicable costs incurred in providing meals to all students during the emergency.

The financial transactions and statistical records of the school food service fund were reviewed. The financial accounts, meal count records were reviewed on a test-check basis.

Cash receipts and bank records were reviewed for timely deposit.

The district utilizes a food service management company (FSMC) and is depositing and expending program monies in accordance with *N.J.S.A. 18A:17-34*, and 19-1 through 19-4.1. Provisions of the FSMC Cost Reimbursable Fixed Price or Non- Competitive Emergency Procurement contract/addendum were reviewed and audited. The FSMC contract includes an operating results provision which guarantees that the food service program will break even. The operating results provision has been met. All vendor discounts, rebates, and credits from vendors and/or the FSMC were tracked and credited to the Food Service Account and reconciled to supporting documentation at least annually.

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

School Food Service (Continued)

The cash disbursements records reflected expenditures for program related goods and services. The appropriate revenue and expenditure records were maintained in order to substantiate the non-profit status of the school food service.

The SFA recorded and maintained separate supporting documentation for additional costs (food, supplies, transportation, etc.) applicable to the implementation of the COVID-19 meal service under SSO or SFSP program requirements.

The FSMC did apply for and receive a loan in accordance with the Payroll Protection Plan and did use the funds to pay for costs applicable to the Food Service Programs. The FSMC has told the District that the PPP loan has not been subsequently forgiven as of the date of this report.

Time sheets were reviewed, and labor costs verified. Payroll records were maintained on all School Food Services employees authorized by the board of education/board of trustees. No exceptions were noted.

The number of meals claimed for reimbursement was compared to sales and meal count records. As part of the claims review process the Edit Check Worksheet was completed. Reimbursement claims were/were not submitted/certified in a timely manner.

Applications for free and reduced price meals were reviewed for completeness and accuracy. The number of free and reduced price meals claimed as served was compared to the number of valid applications /or to the list of directly certified students on file, times the number of operating days, on a school-by-school basis. The free and reduced price meal and free milk policy was reviewed for uniform administration throughout the school system. Sites approved to participate in Provisions I and II were examined for compliance with all counting and claiming requirements. The required verification procedures for free and reduced price applications were completed and available for review.

USDA Food Distribution Program (food and/or commodities) were received and a single inventory was maintained on a first-in, first-out basis. No exceptions were noted.

The Statement of Revenues, Expenses and Changes in Fund Net Position (ACFR Schedule B-5) does separate program and non-program revenue and program and non-program costs of goods sold.

Exhibits reflecting Child Nutrition Program operations are included in the section entitled Enterprise Funds, Section G of the ACFR.

2022-002 Finding: Net cash resources exceeded three months average expenditures.

2022-002 Recommendation: Appropriate action be taken to ensure that net cash resources of the Food Service Fund do not exceed (3) months average expenditures.

Student Body Activities

Our review of the student activity funds disclosed the following findings:

<u>2022-003 Finding</u>: Our examination of the District's student activity funds revealed that the bank reconciliation for the Middle School Account contained several deposits in transit and outstanding checks in excess of one year old.

2022-003 Recommendation: Internal Controls over the maintenance and utilization of the Student Activity funds be reviewed and enhanced.

Application for State School Aid

Our audit procedures included a test of information reported in the October 15, 2021 Application for State School Aid (A.S.S.A.) for on-roll, private schools for the handicapped, low-income and bilingual. 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 with 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 had written procedures for the recording of student enrollment.

Pupil Transportation

Our audit procedures included a test of on-roll status reported in the 2021-2022 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.

Capital Assets and Facilities

Our procedures included a review of the SDA grant agreements for consistency with recording of SDA revenue, transfer of local funds from the general or capital reserve account, and awarding of contracts for eligible facilities construction.

Miscellaneous

The school district adhered to the requirements of N.J.A.C. 26-1.2 and 12.4 related to the testing for lead of all drinking water in educational facilities. The District submitted the annual Statement of Assurance to the Department of Education, pursuant to N.J.A.C. 6A:26-12.4(g).

FOLLOW-UP ON PRIOR YEAR'S FINDINGS

Prior year findings were corrected with the exception of items marked with "*" on the following page.

Recommendations

	1.	Administrative	Practices	and Procedures
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None

2. Financial Planning, Accounting and Reporting

2022-001 Recommendation: That payment to the State of New Jersey for reimbursement of TPAF/FICA be made before the 90 day grant liquidation period.

3. School Purchasing Program

None

4. School Food Service

2022-002 Recommendation: Appropriate action be taken to ensure that net cash resources of the Food Service Fund do not exceed (3) months average expenditures.

5. Student Body Activities

*2022-003 Recommendation: Internal Controls over the maintenance and utilization of the Student Activity funds be reviewed and enhanced.

6. Application for State School Aid

None

7. Pupil Transportation

None

8. Capital Assets and Facilities

None

9. Miscellaneous

None

10. Status of Prior Year's Findings/Recommendations

None

CITY OF RAHWAY SCHOOL DISTRICT SCHEDULE OF AUDITED ENROLLMENTS APPLICATION FOR STATE SCHOOL AID SUMMARY ENROLLMENT AS OF OCTOBER 15, 2022

		2022-23	Application for	2022-23 Application for State School Aid	ol Aid			•	Sample for Verification	/erification			Priva	ate School fo	Private School for Handicapped	eq
	Reported	rted	Reported on	no pe			Sample	ple	Verified per	d per	Errors per	per	Reported	Sample		
	on A.S.S.A.	S.A.	Workpapers	spers			Selected from	t from	Registers	ters	Registers		on A.S.S.A.	for		
	as on Roll	Roll	on Roil		Errors	SJC	Workpapers	pers	on Roll	io:	on Roll	lo!	as Private	Verifi-	Sample	Sample
	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Full	Shared	Schools	cation	Verified	Errors
Full Day PreSchool	208		208		0		19		19		0					
Fuil Day Kindergarten	240		240		0		17		17		0					
One	245		245		0		21		21		0					
Two	223		223		0		10		10		0					
Three	240		240		0		4		14		0					
Four	206		206		0		15		15		O					
Five	240		240		0		12		12		0					
Six	239		539		0		18		18		0					
Seven	250		250		0		13		13		0					
Eight	249		249		0		4		4		٥					
Nine	297		297		0		Θ		9		0					
Ten	231		231		0		15		15		0					
Eleven	219	7	219	-	0	0	7	ო	#	m	0	O				
Twelve	186	14	186	14	0	0	15	4	15	4	0	0				
Subtotal	3273	25	3273	25	0	0	200	7	200	7	0	0	0	0	0	0
SpEd Elementary	259		259		0		25		25		0		23	72	15	0
SpEd Middle School	146		146		0		30		30		0		1,	10	5	0
SpEd High School	186	21.0	186	21.0	0	0	31	9	31	9	0	0	23.0	15	15	0
Subtotal	591	21	591	21	0	0	86	9	86	9	0	0	52.0	40	40	0
Totals	3864	46	3864	46	0	0	286	13	286	13	0	0	52.0	40	40	٥
Percentage				14	0.00%	%00'0				н	0.00%	0.00%				%00.0

CITY OF RAHWAY SCHOOL DISTRICT SCHEDULE OF AUDITED ENROLLMENTS APPLICATION FOR STATE SCHOOL AID SUMMARY ENROLLMENT AS OF OCTOBER 15, 2022

		Low Income		Sai	Sample for Verification	lion	Res	Resident ELL Low Income	me	Sa	Sample for Verification	on C
	Reported on	Reported on		Sample	Verified to		Reported on	Reported on		Sample	Verified to	
	A.S.S.A. as	Workpapers as		Selected	Application		A.S.S.A. as	Workpapers as		Selected	Application	
	Low	Low		from	and	Sample	LEP LOW	LEP Low		from	and	Sample
	Income	income	Errors	Workpapers	Register	Errors	Income	Income	Errors	Workpapers	Register	Errors
Full Day Kindergarten	98	98	0	10	10	0	15	15	0	10	10	O
One	116	116	0	16	16	0	20	20	0	17	17	0
Two	117	117	0	17	17	0	31	31	0	5	15	0
Three	126	126	0	6	Ø	0	28	28	0	13	13	0
Four	106	106	0	18	85	0	21	21	0	17	17	0
Tive	121	121	0	5	5	0	0	6	0	v.	ស	0
Six	135	135	0	13	13	0	ιn	S	0	က	က	0
Seven	129	129	0	18	18	0	S	\$	0	ი	ო	0
Eight	125	125	0	24	24	0	4	4	0	•	-	0
Nine	156	156	0	19	19	0	80	80	0	r.	ĸ	0
Ten	115	115	0	21	21	0	80	φ	0	ო	က	0
Eleven	115	115	0	18	18	0	7	7	0	Ś	S	0
Twelve	94	2	0	13	13	0	4	4	0	8	7	0
Subtotal	1541	1541	0	211	211	0	165	165	0	66	66	0
							;					
SpEd Elementary	155	155	0	ໍ້ຕິ	15	0	58	53	0	4	4	0
SpEd Middle School	95	26	0	53	23	0	13	ŧ,	0	တ	9	0
SpEd High School	124.5	124.5	0	30	30	0	2	2	0	-	-	0
Subtotal	373.5	373.5	0	68	68	0	44	44	0	21	21	0
Totals	1914.0	1914.0	0	279	279	0	209	209	0	120	120	0
Percentage Error			%00.0			%00.0			0.00%			%00.0
			Transportation	rtation								
	Reported on	Reported on	A TOTAL AND A	The state of the s								
	DRTRS by DOE	DRTRS by District	Errors	Tested	Verified	Errors						
		The state of the s										
Reg. Public Schools, col. 1	184	184	o ć	92	65	0 0						
Noripublic - All, cd., 3	200	8 8	Ď.	3 :	9 :	> (
Reg SpEd, col.4	20	20	0 (15	15	0 (
Special Ed Spec, col.6	204	204	0 1-19	197	197	0 0						
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Percentage Error			-3.47%			%00.0						

CITY OF RAHWAY SCHOOL DISTRICT
SCHEDULE OF AUDITED ENROLLMENTS
APPLICATION FOR STATE SCHOOL AID SUMMARY
ENROLLMENT AS OF OCTOBER 15, 2022

	Reside	Resident ELL NOT Low Income	come	Sar	Sample for Verification	on
	Reported on	Reported on		Sample	Verified to	
	A.S.S.A. as	Workpapers as		Selected	Application	
	NOT Low	NOT Low		from	and	Sample
	Income	Income	Errors	Workpapers	Register	Errors
Half Day Preschool	0	0	0	0	0	0
Full Day Kindergarten	24	24	0	10	10	0
One	16	16	0	41	14	0
Two	4	4	0	=	-	0
Three	13	13	0	12	12	0
Four	S	ťΩ	0	4	4	0
Five	∞	∞	0	o	9	0
Six	ß	2	0	ო	က	0
Seven	4	4	0	2	2	0
Eight	9	9	0	ß	2	0
Nine	O	တ	0	7	7	0
Ten	-	~~	0	~	-	0
Eleven	7	7	0	ო	က	0
Twelve	4	4	0	က	က	0
Subtotal	116	116	0	81	81	0
SpEd Elementary	80	∞	0	4	4	0
SpEd Middle School	က	က	0	7	7	0
SpEd High School	0	0	0	0	0	0
Subtotal		7-	0	9	9	0
Totals	127	127	0	87	87	0
Percentage Error		·	%00:0			0.00%

CITY RAHWAY SCHOOL DISTRICT SCHEDULE OF CALCULATION OF EXCESS SURPLUS FOR THE FISCAL YEAR ENDED JUNE 30, 2022

SECTION 1

4% Calculation of Excess Surplus		
2021 - 2022 Total General Fund Expenditures Increased by:	\$88,759,930.20	
Transfer from General Fund to SRF for PreK-Inclusion Decreased by:	389,480.00	
On-Behalf TPAF Pension & Social Security Adjusted 2021 - 2022 General Fund Expenditures	17,407,389.89	\$71,742,020.31
4% of Adjusted 2021 - 2022 General Fund Expenditures		2,869,680.81
Greater of line above or \$250,000.00		2,869,680.81
Increased by: Allowable Adjustment		1,368,884.00
Maximum Unreserved/Undesignated Fund Balance		4,238,564.81
SECTION 2		
Total General Fund Balances @ 6-30-22 Decreased by:	18,882,680.47	
Year End Encumbrances	558,249.58	
Legally Restricted-Excess Surplus-Designated For Subsequent Year's Expenditures	1,800,000.00	
Other Restricted Fund Balances (Capital Reserve, Maintenance Reserve, Emergency Reserve, Unemployment)	10,485,866.08	
Total Unassigned Fund Balance		6,038,564.81
SECTION 3		
Restricted Fund Balance-Excess Surplus		1,800,000.00
Recapitulation of excess surplus as of June 30, 2022		
Restricted Excess Surplus - Designated for Subsequent Year's Exper	nditures	1,800,000.00
Restricted Excess Surplus		1,800,000.00
Total Excess Surplus		\$3,600,000.00

CITY RAHWAY SCHOOL DISTRICT SCHEDULE OF CALCULATION OF EXCESS SURPLUS FOR THE FISCAL YEAR ENDED JUNE 30, 2022

Detail of Allowable Adjustments

Additional/Unbudgeted Extraordinary Aid	\$1,321,324.00
Additional/Unbudgeted Non-Public School Transportation Aid	47,560.00
	1,368,884.00
Detail of Other Restricte Fund Balance	
Statutory //restrictionsl.	
Capital reserve	9,261,757.08
Maintenance reserve	875,668.00
Other state/government mandated reserve	15,099.00
Reserve for Unemployment Fund	333,342.00
Total Restricted Fund Balane	\$10,485,866.08

