INDEPENDENT AUDITOR’S REPORT

To the School Board and Management of
Independent School District No. 272
Eden Prairie, Minnesota

REPORT ON THE FINANCIAL STATEMENTS

We have audited the accompanying financial statement of Independent School District No. 272 (the District), which comprises the statement of cash receipts and disbursements of the extracurricular student activity accounts as of and for the year ended June 30, 2019, and the related notes to the extracurricular student activity accounts financial statement.

MANAGEMENT’S RESPONSIBILITY FOR THE FINANCIAL STATEMENTS

The District’s extracurricular student activities management is responsible for the preparation and fair presentation of this financial statement in accordance with the financial reporting provisions of the Minnesota Department of Education (MDE), as described in Note 1 of the notes to extracurricular student activity accounts financial statement; this includes determining that the regulatory basis of accounting is an acceptable basis for the preparation of the financial statement in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of the financial statement that is free from material misstatement, whether due to fraud or error.

AUDITOR’S RESPONSIBILITY

Our responsibility is to express an opinion on the financial statement based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statement. The procedures selected depend on the auditor’s judgment, including the assessment of the risks of material misstatement of the financial statement, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the District’s preparation and fair presentation of the financial statement in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the District’s internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statement.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

(continued)
BASIS FOR QUALIFIED OPINION

The District has not established procedures to provide assurance that all cash collections are recorded in the accounting records. Accordingly, it was not practicable for us to extend our audit of such cash collections beyond the amounts recorded.

QUALIFIED OPINION

In our opinion, except for the possible effects of the matter discussed in the “Basis for Qualified Opinion” paragraph, the financial statement referred to on the previous page presents fairly, in all material respects, the cash balances of the District’s extracurricular student activity accounts as of June 30, 2019, and the cash receipts and disbursements for the year then ended, in accordance with the financial reporting provisions of the MDE described in Note 1 of the notes to extracurricular student activity accounts financial statement.

EMPHASIS OF MATTER

As described in Note 3 of the notes to extracurricular student activity accounts financial statement, the District is required to implement Governmental Accounting Standards Board (GASB) Statement No. 84, Fiduciary Activities, during the year ending June 30, 2020. The implementation of this standard will require the District’s extracurricular student activity accounts to be operated under School Board control. As a result, the account balances and transactions included in these financial statements must instead be reported within the District’s financial statements going forward. Our opinion is not modified with respect to this matter.

BASIS OF ACCOUNTING

We draw attention to Note 1 of the notes to extracurricular student activity accounts financial statement, which describes the basis of accounting. The financial statement is prepared on the basis of the financial reporting provisions of the MDE, which is a basis of accounting other than accounting principles generally accepted in the United States of America, to comply with the requirements of the MDE. Our opinion is not modified with respect to this matter.

RESTRICTION ON USE

This report is intended solely for the information and use of those charged with governance, management of the District, the MDE, and the state of Minnesota and is not intended to be, and should not be, used by anyone other than these specified parties.

Minneapolis, Minnesota
November 13, 2019
## Extracurricular Student Activity Accounts

Statement of Cash Receipts and Disbursements
Year Ended June 30, 2019

<table>
<thead>
<tr>
<th></th>
<th>Balance – June 30, 2018</th>
<th>Receipts and Transfers In</th>
<th>Disbursements and Transfers Out</th>
<th>Balance – June 30, 2019</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Eden Prairie High School</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Class of 2018</td>
<td>5,189</td>
<td>8,499</td>
<td>1,883</td>
<td>11,805</td>
</tr>
<tr>
<td>Key Club</td>
<td>8,248</td>
<td>9,095</td>
<td>8,024</td>
<td>9,319</td>
</tr>
<tr>
<td>National Honor Society</td>
<td>5,008</td>
<td>6,521</td>
<td>5,025</td>
<td>6,504</td>
</tr>
<tr>
<td>Prom</td>
<td>3,955</td>
<td>56,840</td>
<td>57,842</td>
<td>2,953</td>
</tr>
<tr>
<td>Student Council</td>
<td>4,503</td>
<td>2,135</td>
<td>11,149</td>
<td>(4,511)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>26,903</td>
<td>83,090</td>
<td>83,923</td>
<td>26,070</td>
</tr>
<tr>
<td><strong>Central Middle School</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Student Council</td>
<td>6,000</td>
<td>–</td>
<td>379</td>
<td>5,621</td>
</tr>
<tr>
<td><strong>Administration</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Interest</td>
<td>3,976</td>
<td>1,068</td>
<td>1,005</td>
<td>4,039</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>$ 36,879</td>
<td>$ 84,158</td>
<td>$ 85,307</td>
<td>$ 35,730</td>
</tr>
</tbody>
</table>

See notes to extracurricular student activity accounts financial statement
NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Extracurricular student activity fund transactions are defined as extracurricular programs conducted for
the motivation and enjoyment of students. These programs and activities are not offered for school credits
nor required for graduation. Activities are generally conducted outside of school hours. The content of the
activities is determined primarily by the students, under the guidance of a staff member or other adult.

Extracurricular student activities are to be self-sustaining with all expenses paid by dues, admissions, or
other student fundraising events.

The accounts of Independent School District No. 272’s (the District) extracurricular student activity
accounts are maintained, and the accompanying financial statement has been prepared, in accordance with
financial reporting provisions of the Minnesota Department of Education (MDE), which constitutes a
regulatory basis of accounting that differs from accounting principles generally accepted in the United
States of America. Under this regulatory basis of accounting, receipts are recorded when received rather
than when earned, and disbursements are recognized when paid rather than when the obligations are
incurred.

NOTE 2 – CASH AND INVESTMENTS

The District has the following investments at year-end:

<table>
<thead>
<tr>
<th>Investment Type</th>
<th>Rating</th>
<th>Agency</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>MNTrust Investment Shares Portfolio</td>
<td>AAA</td>
<td>S&amp;P</td>
<td>$3,271</td>
</tr>
<tr>
<td>Minnesota School District Liquid Asset Fund</td>
<td>AAAm</td>
<td>S&amp;P</td>
<td>$32,459</td>
</tr>
<tr>
<td>Total investments</td>
<td></td>
<td></td>
<td>$35,730</td>
</tr>
</tbody>
</table>

The Minnesota School District Liquid Asset Fund and the MNTrust Investment Shares Portfolio are
external investment pools not registered with the Securities and Exchange Commission regulated by
Minnesota Statutes. The District’s investments in these investment pools are measured at the net asset
value per share provided by the pool, which is based on an amortized cost method that approximates fair
value. For these investment pools, there are no unfunded commitments, redemption frequency is daily,
and there is no redemption notice required.

Investments are subject to various risks, the following of which are considered the most significant:

**Custodial Credit Risk** – For investments, this is the risk that in the event of a failure of the
counterparty to an investment transaction (typically a broker-dealer) the District would not be able to
recover the value of its investments or collateral securities that are in the possession of an outside
party. Although the District’s investment policies do not directly address custodial credit risk, it
typically limits its exposure by purchasing insured or registered investments, or by the control of who
holds the securities.
NOTE 2 – CASH AND INVESTMENTS (CONTINUED)

Credit Risk – This is the risk that an issuer or other counterparty to an investment will not fulfill its obligations. Minnesota Statutes limit the District’s investments to direct obligations or obligations guaranteed by the United States or its agencies; shares of investment companies registered under the Federal Investment Company Act of 1940 that receive the highest credit rating, are rated in one of the two highest rating categories by a statistical rating agency, and all of the investments have a final maturity of 13 months or less; general obligations rated “A” or better; revenue obligations rated “AA” or better; general obligations of the Minnesota Housing Finance Agency rated “A” or better; bankers’ acceptances of United States banks eligible for purchase by the Federal Reserve System; commercial paper issued by United States corporations or their Canadian subsidiaries, rated of the highest quality category by at least two nationally recognized rating agencies, and maturing in 270 days or less; Guaranteed Investment Contracts guaranteed by a United States commercial bank, domestic branch of a foreign bank, or a United States insurance company, and with a credit quality in one of the top two highest categories; repurchase or reverse purchase agreements and securities lending agreements with financial institutions qualified as a “depository” by the government entity, with banks that are members of the Federal Reserve System with capitalization exceeding $10,000,000; that are a primary reporting dealer in U.S. government securities to the Federal Reserve Bank of New York; or certain Minnesota securities broker-dealers. The District’s investment policies do not further restrict investing in specific financial instruments.

Concentration Risk – This is the risk associated with investing a significant portion of the District’s investments (considered 5 percent or more) in the securities of a single issuer, excluding U.S. guaranteed investments (such as treasuries), investment pools, and mutual funds. The District’s investment policies do not address concentration risk.

Interest Rate Risk – This is the risk of potential variability in the fair value of fixed rate investments resulting from changes in interest rates (the longer the period for which an interest rate is fixed, the greater the risk). The District’s investment policies do not limit the maturities of investments; however, when purchasing investments, the District considers such things as interest rates and cash flow needs.

NOTE 3 – GASB STANDARDS ISSUED BUT NOT YET IMPLEMENTED

GASB Statement No. 84, Fiduciary Activities, is intended to enhance consistency and comparability of fiduciary activity reporting by state and local governments. It is also meant to improve the usefulness of fiduciary activity information primarily for assessing the accountability of governments in their roles as fiduciaries.

This statement establishes criteria for identifying fiduciary activities of all state and local governments. The focus of the criteria generally is on (1) whether a government is controlling the assets of the fiduciary activity and (2) the beneficiaries with whom a fiduciary relationship exists. An activity meeting the criteria should be reported in a fiduciary fund in the basic financial statements. This statement describes four fiduciary funds that should be reported, if applicable: (1) pension (and other employee benefit) trust funds, (2) investment trust funds, (3) private-purpose trust funds, and (4) custodial funds. Custodial funds generally should report fiduciary activities that are not held in a trust or equivalent arrangement that meets specific criteria.

The MDE has also issued guidance for implementing this standard, which will impact the reporting of extracurricular student activity accounts previously not under School Board control, beginning in the 2019–2020 fiscal year. This new guidance provided by the MDE will require the activities currently presented separately in this financial statement to be operated under School Board control and reported as part of the District’s General Fund for the year ending June 30, 2020.
OTHER REQUIRED REPORTS
INDEPENDENT AUDITOR’S REPORT ON
INTERNAL CONTROL OVER FINANCIAL REPORTING

To the School Board and Management of
Independent School District No. 272
Eden Prairie, Minnesota

In planning and performing our audit of the statement of cash receipts and disbursements of the extracurricular student activity accounts of Independent School District No. 272 (the District) as of and for the year ended June 30, 2019, in accordance with auditing standards generally accepted in the United States of America, we considered the District’s internal control over financial reporting (internal control) as a basis for designing our audit procedures for the purpose of expressing our opinions on the financial statement, but not for the purpose of expressing an opinion on the effectiveness of the District’s internal control. Accordingly, we do not express an opinion on the effectiveness of the District’s internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as described below, we identified a deficiency in internal control that we consider to be a material weakness.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the District’s financial statement will not be prevented, or detected and corrected, on a timely basis. We consider the deficiency described in the accompanying Schedule of Findings and Corrective Action as finding 2019-001 to be a material weakness.

The District’s response to the finding identified in our audit has been included in the Schedule of Findings and Corrective Action. The District’s response was not subject to the auditing procedures applied in our audit of the financial statement and, accordingly, we express no opinion on it.

This report is intended solely for the information and use of those charged with governance, management of the District, the Minnesota Department of Education, and the state of Minnesota and is not intended to be, and should not be, used by anyone other than these specified parties.

Minneapolis, Minnesota
November 13, 2019
INDEPENDENT AUDITOR’S REPORT ON COMPLIANCE

To the School Board and Management of
Independent School District No. 272
Eden Prairie, Minnesota

We have audited, in accordance with auditing standards generally accepted in the United States of America, the statement of cash receipts and disbursements of the extracurricular student activity accounts of Independent School District No. 272 (the District) as of and for the year ended June 30, 2019, and the related notes to the extracurricular student activity accounts financial statement, and have issued our report thereon dated November 13, 2019. The financial statement is prepared, in a manner that demonstrates compliance with the regulatory basis of accounting prescribed by the Minnesota Department of Education (MDE), which differs from accounting principles generally accepted in the United States of America. Our report on the regulatory basis of accounting is qualified for a restriction on the scope of our audit resulting from the accounting system relating to cash receipts, which allows us only to audit cash collections that are recorded.

The provisions of the Manual for Activity Fund Accounting (MAFA), issued by the MDE, provides uniform financial accounting and reporting standards for student activities. Compliance with student activity laws and regulations is the responsibility of the District’s extracurricular student activity accounts management. We have performed auditing procedures to test compliance with the provisions of this manual. However, our objective was not to provide an opinion on overall compliance with such provisions. Accordingly, we do not express such an opinion.

In connection with our audit, nothing came to our attention that caused us to believe that the District failed to comply with the provisions of the MAFA, except as described in the Schedule of Findings and Corrective Action as finding 2019-002. However, our audit was not directed primarily toward obtaining knowledge of such noncompliance. Accordingly, had we performed additional procedures, other matters may have come to our attention regarding the District’s noncompliance with the above referenced provisions.

The District’s response to the legal compliance finding identified in our audit has been included in the Schedule of Findings and Corrective Action. The District’s response was not subject to the auditing procedures applied in our audit of the financial statement and, accordingly, we express no opinion on it.

This report is intended solely for the information and use of those charged with governance, management of the District, the MDE, and the state of Minnesota and is not intended to be, and should not be, used by anyone other than these specified parties.

Minneapolis, Minnesota
November 13, 2019
FINDINGS AND CORRECTIVE ACTION

2019-01(180,318),(273,336) MATERIAL WEAKNESS IN INTERNAL CONTROLS – CASH RECEIPTS

Criteria – Management is responsible for establishing and maintaining a system of internal controls sufficient to reduce to an acceptable level, the possibility that a material misstatement of Independent School District No. 272’s (the District) financial statement will not be prevented, or detected and corrected, on a timely basis.

Condition – The District reports the cash receipts and disbursements of its extracurricular student activity accounts on the cash basis. The internal controls at the District’s school sites are not sufficient to assure that all cash receipts have been recorded.

Type of Finding – Current year and prior year finding.

Recommendation – We recommend that the District continue to review the internal controls over extracurricular student activity accounts at its various school sites, and consider adding procedures to strengthen the controls over the recording of cash receipts, such as the use and reconciliation of prenumbered receipts, the use and reconciliation of prenumbered admission tickets for events, and inventory controls over items sold for fundraisers. As is the case with all internal controls, the potential benefit of any contemplated procedural modifications in this area should be weighed against the cost.

Corrective Action Plan

Actions Planned – The District’s Director of Finance regularly reviews and communicates internal controls over extracurricular student activity account transactions along with the personnel at the District’s school sites that maintain such accounts. The District will continue this process, and will be implementing these changes to be consistent and compliant with other General Fund receipts with the required transition to account for student activities within the General Fund for the year ending June 30, 2020.

Official Responsible – The District’s Director of Finance.

Planned Completion Date – June 30, 2020.

Disagreement With or Explanation of Finding – The District is in agreement with this finding.

Plan to Monitor – The District’s Director of Finance will oversee the continued review, training, and evaluation of internal controls over the recording of extracurricular student activity account receipts at the District’s school sites, and the implementation of any control procedure modification.
FINDINGS AND CORRECTIVE ACTION (CONTINUED)

2019-002 CHECK REQUEST AUTHORIZATION


Condition – The MAFA requires check requests to be approved by the student representative, the advisor, and the building principal (or his/her designee). We noted 1 of 5 disbursement transactions we tested within the student activity accounts that lacked having all three approvals as required.

Type of Finding – Current year finding.

Recommendation – It is our recommendation that the individuals responsible for overseeing these accounts review the guidelines for proper approval of check requests per the MAFA.

Corrective Action Plan

Actions Planned – The District will work with the individuals responsible for overseeing student activities to improve controls and correct findings identified during the audit. The District will be implementing these changes to be consistent and compliant with other General Fund check requests with the required transition to account for student activities within the General Fund for the year ended June 30, 2020.

Official Responsible – The District’s Director of Finance and Student Activity Advisors.

Planned Completion Date – June 30, 2020.

Disagreement With or Explanation of Finding – The District is in agreement with this finding.

Plan to Monitor – The District’s Director of Finance and Student Activity Advisors will review the procedures and internal controls over student activity funds at each site where student activity accounts are maintained, in order to comply with requirements of the MAFA.