Minneapolis Public Schools Special District No. 1

Reports on *Government Auditing Standards*, Uniform Guidance,
and Legal Compliance

June 30, 2020



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#### Minneapolis Public Schools Special District No. 1 Schedule of Expenditures of Federal Awards Year Ended June 30, 2020

| Federal Agency/Pass Through Agency/Program Title                       | CFDA<br>Number | Expenditures |
|--|----------------|--------------|
| U.S. Department of Agriculture   |                |              |
| Through Minnesota Department of Education                              |                |              |
| Child Nutrition Cluster  |                |              |
| School Breakfast Program   | 10.553         | \$ 2,642,609 |
| National School Lunch Program  | 10.555         | 7,251,332    |
| Commodities Programs - Non Cash  | 10.555         | 1,292,187    |
| COVID - Summer Food Service Program for Children                       | 10.559         | 7,329,312    |
| Total Child Nutrition Cluster  |                | 18,515,440   |
| Cash in Lieu of Child and adult Care Food Program                      | 10.558         | 1,280,895    |
| Fresh Fruits and Vegetables Program                                    | 10.582         | 438,153      |
| Total U.S. Department of Agriculture                                   |                | 20,234,488   |
| U.S. Department of Education Through Minnesota Department of Education |                |              |
| Adult Education - Basic Grants to States                               | 84.002         | 705,707      |
| Title I Counts To I seel Educational Acameias                          |                |              |
| Title I Grants To Local Educational Agencies Title I, Part A           | 84.010         | 21,354,513   |
| Title I, Part A Title I, Part D  | 84.010         | 124,976      |
| Total Title I Grants To Local Educational Agencies                     | 64.010         | 21,479,489   |
| Special Education Cluster  |                |              |
| Special Education  Special Education                                   | 84.027         | 8,069,265    |
| Special Education - Preschool Grants                                   | 84.173         | 298,163      |
| Total Special Education Cluster  |                | 8,367,428    |
| Special Education - Grants for Infants and Families                    | 84.181         | 293,878      |
| Career and Technical Education - Basic Grants to States                | 84.048         | 668,877      |
| Education for Homeless Children and Youth                              | 84.196         | 98,651       |
| 21st Century Community Learning Centers                                | 84.287         | 30,976       |
| Special Education - State Personnel Development                        | 84.323         | 124,443      |
| English Language Acquisition   | 84.365         | 891,071      |
| Title II, Part A - Supporting Effective Instruction                    | 84.367         | 1,987,077    |
| School Improvement Grants  | 84.377         | 1,797,736    |
| Title IV, Part A - Student Support and Academic Enrichment Program     | 84.424         | 1,909,386    |

#### Minneapolis Public Schools Special District No. 1 Schedule of Expenditures of Federal Awards Year Ended June 30, 2020

| Federal Agency/Pass Through Agency/Program Title                 | CFDA<br>Number | Expenditures  |
|--|----------------|---------------|
| rederal Agency/Lass Through Agency/Hogram True                   | Nullioei       | Expenditures  |
| U.S. Department of Education (Continued)                         |                |               |
| Through YMCA   |                |               |
| 21st Century Community Learning Centers                          | 84.287         | 48,578        |
| Direct   |                |               |
| Gaining Early Awareness and Readiness for Undergraduate Programs | 84.334         | 1,565,843     |
| 21st Century Community Learning Centers                          | 84.287         | 586,798       |
| Fund for Improvement of Education                                | 84.215         | 403,714       |
| Indian Education Grants to Local Educational Agencies            | 84.060         | 264,291       |
| Arts in Education - Professional Development for Arts Educators  | 84.351         | 252,531       |
| Total U.S. Department of Education                               |                | 41,476,474    |
| U.S. Department of Justice                                       |                |               |
| Direct   |                |               |
| COPS Lock Replacement  | 16.710         | 71,284        |
| STOP School Violence   | 16.839         | 169,242       |
| Total U.S. Department of Justice                                 |                | 240,526       |
| Corporation for National and Community Service                   |                |               |
| Through Serve Minnesota  |                |               |
| AmeriCorps   | 94.006         | 67,522        |
| U.S. Department of Education                                     |                |               |
| AmeriCorps   | 94.006         | 289,918       |
| Total Corporation for National and Community Service             |                | 357,440       |
| Total Federal Expenditures                                       |                | \$ 62,308,928 |

## Minneapolis Public Schools Special District No. 1 Notes to the Schedule of Expenditures of Federal Awards

#### **NOTE 1 – BASIS OF PRESENTATION**

The accompanying Schedule of Expenditures of Federal Awards includes the federal grant activity of the District and is presented on the modified accrual basis of accounting. The information in this Schedule is presented in accordance with the requirements of the Uniform Guidance. Therefore, some amounts presented in this Schedule may differ from amounts presented in, or used in the preparation of the financial statements.

#### **NOTE 2 – INVENTORY**

Inventories of commodities donated by the U.S. Department of Agriculture are recorded at market value in the Food Service Fund as inventory. Revenue and expenditures are recorded when commodities are used.

#### **NOTE 3 – NONMONETARY ASSISTANCE**

Nonmonetary assistance is reported in this schedule at the fair market value of commodities received and disbursed for the USDA Commodities Program (CFDA #10.555).

#### NOTE 4 – PASS-THROUGH GRANT NUMBERS

All pass-through entities listed above use the same CFDA numbers as the federal grantors to identify these grants and have not assigned any additional identifying numbers.

#### **NOTE 5 – INDIRECT COST RATE**

The District did not elect to use the 10 percent de minimis indirect cost rate.

#### Report on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards

#### **Independent Auditor's Report**

To the School Board Minneapolis Public Schools Special District No. 1 Minneapolis, Minnesota

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of Minneapolis Public Schools, Special District No. 1 Minneapolis, Minnesota, as of and for the year ended June 30, 2020, and the related notes to financial statements, which collectively comprise the District's basic financial statements and have issued our report thereon dated November 23, 2020.

#### **Internal Control over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the District's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, 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.

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 a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the District's financial statements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section 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. We did identify certain deficiencies in internal control, described in the accompanying Schedule of Findings and Questioned Costs as audit finding 2020-001, that we consider to be a material weakness.

#### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the District's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and, accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

#### **District's Response to the Findings**

The District's responses to the findings identified in our audit are described in the accompanying Schedule of Findings and Questioned Costs in Accordance with the Uniform Guidance. The District's responses were not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on them.

#### **Purpose of this Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the District's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the District's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Minneapolis, Minnesota

Bergan KOV Ltd.

December 1, 2020

#### Report on Compliance for each Major Federal Program and on Internal Control Over Compliance Required by the Uniform Guidance

#### **Independent Auditor's Report**

To the School Board Minneapolis Public Schools Special District No. 1 Minneapolis, Minnesota

#### Report on Compliance for Each Major Federal Program

We have audited the compliance of Minneapolis Public Schools Special District No. 1, Minneapolis, Minnesota, with the types of compliance requirements described in the U.S. *Office of Management and Budget (OMB) Compliance Supplement* that could have a direct and material effect on each of the District's major federal programs for the year ended June 30, 2020. The District's major federal programs are identified in the summary of auditor's results section of the accompanying Schedule of Findings and Questioned Costs in accordance with the Uniform Guidance.

#### Management's Responsibility

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

#### **Auditor's Responsibility**

Our responsibility is to express an opinion on compliance for each of the District's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements of Federal Awards (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the District's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of the District's compliance.

#### **Opinion on Each Major Federal Program**

In our opinion, Minneapolis Public Schools Special District No. 1 complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2020.

#### **Report on Internal Control over Compliance**

Management of the District is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the District's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the District's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control over compliance is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that were not identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

#### Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

We have audited the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of the District, as of and for the year ended June 30, 2020, and the related notes to financial statements, which collectively comprise the District's basic financial statements. We issued our report thereon dated December 1, 2020, which contained unmodified opinions on those financial statements. Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the basic financial statements. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the basic financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the basic financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards is fairly stated in all material respects in relation to the basic financial statements as a whole.

Minneapolis, Minnesota December 1, 2020

Bergan KOV Ltd.

#### **Minneapolis Public Schools** Special District No. 1 **Schedule of Findings and Questioned Costs** in Accordance with the Uniform Guidance

#### SECTION I – SUMMARY OF AUDITOR'S RESULTS

#### **Financial Statements**

Unmodified Type of auditor's report issued:

Internal control over financial reporting:

Yes, Audit Finding 2020-001 Material weakness(es) identified?

Significant deficiency(ies) identified? No

Noncompliance material to financial statements

noted?

No

#### **Federal Awards**

Type of auditor's report issued on compliance for

major programs: Unmodified

Internal control over major programs:

Material weakness(es) identified? No Significant deficiency(ies) identified? No

Any audit findings disclosed that are required to be

reported in accordance with 2 CFR 200.516? No

#### **Identification of Major Programs**

CFDA No: 10.553, 10.555, 10.559 Child Nutrition Cluster Name of Federal Program or Cluster:

84.027, 84.173 CFDA No:

Name of Federal Program or Cluster: **Special Education Cluster** 

CFDA No: 84.424

Name of Federal Program or Cluster: Title IV, Part A

CFDA No: 84.367 Name of Federal Program or Cluster: Title II

CFDA No: 84.048A Carl Perkins Name of Federal Program or Cluster:

Dollar threshold used to distinguish between

type A and type B programs: \$1,869,268

Auditee qualified as low risk auditee? No

# Minneapolis Public Schools Special District No. 1 Schedule of Findings and Questioned Costs in Accordance with the Uniform Guidance

#### SECTION II - FINANCIAL STATEMENT FINDINGS

#### **Audit Finding 2020-001 – Segregation of Duties**

#### Criteria or Specific Requirement:

Internal control that supports the District's ability to initiate, record, process and report financial data consistent with the assertions of management in the financial statements requires adequate segregation of accounting duties.

#### Condition:

We noted during review of the District's internal controls that there is a lack of segregation of duties over certain processes. A lack of segregation occurs when there is an individual who has responsibility to perform multiple functions in four key areas: initiation/authorization, processing/recording, reconciling/reporting of financial data, and custody of assets.

We noted lack of segregation of duties, to various degrees, in the following areas:

- SAP User Rights: A number of employees have excessive access to accounts payable functions, purchasing functions, and the general ledger. Also, there were instances identified where individuals have excessive access to perform many responsibilities within a process (e.g. create a vendor, enter an invoice for payment, and cut a check). There are also some employees who have the ability to make journal entries without review as a result of SAP user rights allocated to them. We recommend that the District review all user roles and the permissions granted to each role for appropriateness, taking into consideration adequate segregation of duties. The District should also validate that adequate compensating controls are implemented to review and detect irregular or fraudulent activity performed by users with elevated permissions. Additionally, individuals in a position of authority should have limited transactional ability within the SAP application to further prevent management override of controls.
- <u>Financial Closing Process</u>: Certain employees record transactions and reconcile balances at the end of the year without evidence of review by another employee in a timely manner. As a result of this condition, material audit adjustments were required for state aids and property taxes.

#### Context:

This finding impacts the internal control for all significant accounting functions.

#### Effect or Potential Effect:

The lack of adequate segregation of accounting duties adversely affected the District's ability to initiate, record, process, and report financial data consistent with the assertions of management in the financial statements as material audit adjustments were required for state aids and property taxes. Financial information could contain inaccurate information if reconciliations are not reviewed timely.

# Minneapolis Public Schools Special District No. 1 Schedule of Findings and Questioned Costs in Accordance with the Uniform Guidance

#### SECTION II – FINANCIAL STATEMENT FINDINGS (CONTINUED)

#### **Audit Finding 2020-001 – Segregation of Duties (Continued)**

#### Cause:

Process flows and SAP user access rights are not designed to provide for proper segregation of duties in each area. Changes in roles and responsibilities of finance staff contributed to reconciliations of account balances not being reviewed timely which resulted in material misstatements.

Management's Response:

#### **CORRECTIVE ACTION PLAN (CAP):**

#### 1. Explanation of Disagreement with Audit Finding

There is no disagreement with the finding.

#### 2. Actions Planned in Response to Finding

SAP User Rights – The Executive Director – IT has been working on system audits and some corrective action has already been implemented on user rights and we will keep monitoring the process.

Financial Closing Process – The process for the financial closing process will improve after changes in roles and responsibilities in the Finance Department.

#### 3. Official Responsible for Ensuring CAP

SAP User Rights – Executive Director – IT

Financial Closing Process – Chief Financial Officer

#### 4. Planned Completion Date for CAP

The planned completion date for the CAP is June 30, 2021.

#### 5. Plan to Monitor Completion of CAP

The Finance and IT Department management will be monitoring the corrective action plan.

#### SECTION III - PRIOR YEAR FINDINGS

None

#### SECTION IV - FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

None

#### **Minnesota Legal Compliance**

#### **Independent Auditor's Report**

To the School Board Minneapolis Public Schools Special District No. 1 Minneapolis, Minnesota

We have audited, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of the governmental activities, each major fund, and the aggregate remaining fund information of Minneapolis Public Schools Special District No. 1, Minneapolis, Minnesota, as of and for the year ended June 30, 2020, and the related notes to financial statements, and have issued our report thereon dated December 1, 2020.

The *Minnesota Legal Compliance Audit Guide for School Districts* promulgated by the State Auditor pursuant to *Minnesota Statutes* § 6.65, contains seven categories of compliance to be tested: contracting and bidding, deposits and investments, conflicts of interest, public indebtedness, claims and disbursements, miscellaneous provisions, and uniform financial accounting and reporting standards for school districts. Our audit considered all of the listed categories.

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 *Minnesota Legal Compliance Audit Guide for School Districts*, except as described in the Schedule of Findings and Corrective Action Plans on Legal Compliance. 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 purpose of this report is to describe the scope of our testing of compliance and the result of that testing, and not to provide an opinion on compliance. Accordingly, this communication is not suitable for any other purpose.

Minneapolis, Minnesota December 1, 2020

Bergan KOV Ltd.

# Minneapolis Public Schools Special District No. 1 Schedule of Findings and Corrective Action Plans on Legal Compliance

#### **CURRENT YEAR LEGAL COMPLIANCE FINDING:**

#### Audit Finding 2020-002 - Prompt Payment of Local Government Bills

*Minnesota Statute* 471.425 requires that school districts must pay each vendor obligation according to the terms of the contract or, if no contract terms apply, within the standard payment period. For school districts with governing boards that have regular meetings at least once a month, the standard payment period is within 35 days of the date of receipt.

During our audit, we noted invoices in our sample selection were not paid within the standard payment period of 35 days.

#### **CORRECTIVE ACTION PLAN (CAP):**

1. Explanation of Disagreement with Audit Finding There is no disagreement with the finding.

#### 2. Actions Planned in Response to Finding

The District will ensure that payments are made promptly in accordance with *Minnesota Statute* 471.425.

#### 3. Official Responsible for Ensuring CAP

The Chief Financial Officer is responsible for ensuring corrective action.

#### 4. Planned Completion Date for CAP

The planned completion date for the CAP is June 30, 2021.

#### 5. Plan to Monitor Completion of CAP

The Finance Department management will be monitoring the corrective action plan.