



Through Academic Achievement · Personal Well-Being · Career Readiness

November 15

<u>2021</u>

REPORT OF THE AUDIT COMMITTEE

The Audit Committee met on Wednesday, October 27, 2021, at 4:30 PM at the Cincinnati Public Schools Education Center, 2651 Burnet Avenue, 45219 in the Rosa E. Blackwell Interactive Learning Center.

ATTENDEES

Audit Committee Members - In Person

Christine Fisher; Tim Heldman, Chair; Dan Holthaus, Vice Chair; Elizabeth Gutridge; Clarice Warner; Carol Mitchell-Lawrence

<u>Audit Committee Members – Virtual</u> Jennifer Couser, Jim Crosset, David Foote

Budget, Finance and Growth Committee Members Eve Bolton, Chair; Melanie Bates <u>BKD CPAs & Advisors – Virtual</u> Christie Clements

Administration

Lauren Roberts, Chief Audit Executive; Jennifer Wagner, Treasurer/CFO; Kevin Ashley, Director of Finance Reporting; Susan Bunte, Assistant Superintendent; Jeremy Gollihue, Chief Information Officer; Isaac Karn, Internal Audit Staff; Ross Turpeau, Director of Talent Acquisitions and Staffing; Emma Williams, Internal Audit Supervisor

Welcome, Introductions and Audit Committee Member/Chair Reappointment Process

Tim Heldman, Audit Committee Chair, welcomed everyone to the meeting and led the group in the Pledge of Allegiance. He reported and discussed the following with the Committee:

- Audit Committee Chair Heldman reported that his and Audit Committee member David Foote's terms expire December 31, 2021, and that they both would like to be reappointed for another three years of service. Mr. Heldman would like a one-year extension as Committee Chair.
 - Lauren Roberts, Chief Audit Executive, reported that a formal motion for Mr. Heldman and Mr. Foote's three-year reappointment and Mr. Heldman's one-year extension as Audit Committee Chair will take place at the December 14, 2021, Audit Committee meeting.
- A new Chairman and Vice-Chairman will be elected in January 2023.
- Audit Committee member Britton has moved out of town and her position is open to be filled. *Board Policy 6835 – Audit Committee Charter* does not permit an out-of-town member to serve on the Committee. By law, members need to be in person to meet attendance requirements.
 - Ms. Roberts will ask the Office of Communications and Engagement to issue public notice requesting applications to fill Ms. Britton's position. The application window will close December 1, 2021, and the Audit Committee Chair and Vice Chair will complete interviews of prospective members, and bring forth a recommendation for appointment at the December 14, 2021, Audit Committee meeting.

- Audit Committee member Fisher motioned that individuals interested in serving on the Audit Committee must live in the Cincinnati Public Schools District. Mr. Heldman seconded the motion. The Committee agreed and the motion passed. This requirement will be embedded into Board Policy 6835.
- The Member Appointment Timeline (attached) was reviewed by the Committee.
- Budget, Finance and Growth Committee member Bates recommended to amend the *Audit Committee Chairs* section of the Charter to state that the Chair can be selected by a "*quorum*" of Audit Committee members.
- The Committee, at the December 14, 2021, Audit Committee meeting, will discuss amendments to cover expectations of members attending all Audit Committee meetings.

Benefits Audit Recommendations Update

Susan Bunte, Assistant Superintendent, reported that Christie Clements from BKD will update the Committee on the progress of CPS's benefits work. The focus of the presentation was on data verification, validation, and operational effectiveness.

Ms. Clements updated the Committee on the following Internal Audit findings and potential improvements.

IA Report Finding	Design Assessment Due Date Due Date Due Date	Control Frequency	Operational Effectiveness	Date for Testing Operational Effectiveness
Enrollment Eligibility Documentation	11/19/2021 Complete 11/22/2021	On Occurrence	Not Started	TBD
EDI Files to Include Terminations	9/23/2021 In Progress Not Started	TBD	Not Started	TBD
Provide Enrollment Docs Timely	8/20/2021 Complete 9/01/2021	Monthly	Not Started	12/31/2021
Accuracy of AFSCME System Data	8/20/2021 Complete 9/01/2021	Monthly	Effective	9/17/2021
Senefit are Correctly Accounted For	9/30/2021 Complete 9/17/2021	Weekly	Not Started	12/10/2021
Review ACFCME for Eligibility	11/12/2021 In Progress TBD	TBD	Not Started	TBD
Aaintaining Benefits Eligibility	10/29/2021 In Progress TBD	TBD	Not Started	TBD
Ferm Life Reconciliation	1/3/2022 In Progress TBD	Monthly	Not Started	TBD
Discrepancies in recordkeeping	9/30/2021 In Progress TBD	Monthly	Not Started	TBD
Data Validation	9/17/2021 Complete 9/17/2021	Monthly	Effective	9/17/2021
nterface of Terminations	9/30/2021 Complete 10/28/2021	On Occurrence	Not Started	11/12/2021
COBRA & LOA Amount Calculations	10/1/2021 Complete 8/31/2021	Monthly	Not Started	12/31/2021
COBRA and LOA Home Billing Collections	10/1/2021 In Progress Not Started	Monthly	Not Started	TBD
COBRA Billing Accuracy	10/1/2021 Complete 9/30/2021	Monthly	Not Started	11/12/2021
nsufficient Paychecks	9/30/2021 In Progress TBD	Bi-weekly	Not Started	TBD
OA and FMLA process	9/30/2021 In Progress Not Started	On Occurrence	Not Started	TBD

Ms. Clements reported that a full report about CPS' Benefits Process Improvement project will be provided in December 2021. The report will be presented at the December 14, 2021, Audit Committee meeting.

Audit Committee and Internal Audit Strategy Discussion

Ms. Roberts introduced Jeff Reese of Guidehouse to the Committee. Guidehouse is the selected cosourcing partner of the CPS Internal Audit Department. Mr. Reese reported that Guidehouse consults and specializes in helping educational, state and local governments deliver high quality audit services. Mr. Reese also has a professional background which includes leading an Internal Audit Department.

Ms. Roberts reiterated the Audit Committee's request to further the educational and engagement aspects of the Audit Committee and to learn about the roles that the Audit Committee, Administration, and Internal Audit play.

Ms. Roberts' and Mr. Reese's presentation (attached) included updates in the following areas:

- Internal Audit
 - o Mission
 - Overview of Services
 - o Internal Audit Cycle
- Audit Committee
 - o Governance Framework
 - o Roles
- Looking Ahead
 - Roadmap to the FY 2023 Internal Audit Plan

Ms. Roberts provided this presentation and engagement opportunity in response to the Audit Committee's request for greater involvement at the June 30, 2021, meeting. Ms. Roberts asked the Audit Committee to participate in the presentation and provide feedback regarding their preferred methods of engagement as it relates to the annual risk assessment and Internal Audit planning process.

As shown on the "Looking Ahead" slide of the *Internal Audit & Audit Committee Strategy Discussion* presentation, Ms. Roberts and Mr. Reese proposed Audit Committee engagement opportunities at each of the next meetings throughout fiscal year 2022, leading to the end result of an approved fiscal year 2023 Internal Audit Plan at the June 2022 meeting.

Ms. Roberts asked the Audit Committee members to think about areas of risks and areas for Internal Audit to address, and bring those items to the December 2021 Audit Committee meeting for further discussion. In response to the proposed engagement timeline, Audit Committee member Fisher asked to hear from the Interim Superintendent's Leadership Team about areas they feel need assessing. Ms. Fisher expressed the need for management to complete an Enterprise Risk Management framework that could be utilized by the Board of Education and Audit Committee. Ms. Fisher expressed the need for management to inform the Audit Committee of the critical risks areas. Ms. Roberts will bring the request to Treasurer Wagner's attention.

Further, Mr. Heldman responded to the proposed Audit Committee engagement plan and asked Internal Audit to bring options of audit projects back to the Audit Committee when the time comes.

Audit Committee member Mitchell-Lawrence suggested each department head provide standards for their department to determine what is needed to be audited. She also asked for an update on the TIFs (Tax Increment Financing) from Treasurer Wagner.

ESSER* Funding Advisory Project

Ms. Roberts and Isaac Karn, Internal Audit Staff, updated the Committee on the following elements contained in the presentation (attached).

- ESSER Funding Summary of Awards
- Advisory Project Overview
- ESSER Funding Population and Sampling as of 09/08/2021
- ESSER Regulation Testing ESSER 1 and 2 Results
- CPS Procurement Testing ESSER 1 and 2 Results

*Elementary and Secondary School Emergency Relief

Audit Status Report

Ms. Roberts updated the Committee on the following Board Committee Assignments to Internal Audit.

Preschool Workforce Development Council (PWDC) Charter Review - In Progress

During their September 15, 2021 meeting, the Budget, Finance, and Growth Committee asked Internal Audit to address the PWDC's request for assistance regarding their charter. The memos within **Attachment 1** summarize the request and initial action of Internal Audit. In terms of next steps, Internal Audit will perform a limited scope advisory project in partnership with members of management from General Counsel, Treasurer's Office, and Early Childhood. The project team will request documentation of how the PWDC has fulfilled each aspect of their charter to date. Based on the documentation provided, Internal Audit and management will jointly issue recommendations to the Budget, Finance, and Growth Committee regarding the execution and application of the charter requirements.

Board Policy Review - In Progress

The Policy and Equity Committee directed Internal Audit to perform a review of four Board Policies they selected during their September 24, 2021 meeting:

- 2255 Equity and Excellence in Education
- 2256 Anti-Racism
- 2261.01 Parent and Family Engagement in Federal Programs
- 6320 Purchasing of Goods and Services

The Policy and Equity Committee asked Internal Audit to devise a plan to complete the policy reviews and report back at their October 28, 2021 meeting. The memo within **Attachment 2** proposes a limited scope advisory project. The memo provides additional details regarding the suggested Internal Audit approach.

Financial Updates: Jennifer Wagner, Treasurer/CFO

Treasurer Wagner updated the Committee on her FY23 Budget Building Financial Report (attached). The report included the following information:

Activities done in October 2021 – December 2021 by the Performance Leadership Team that consist of the Interim Superintendent's direct reports and the Treasurer.

- Student Projections
- Staffing Formula Reviews

- Current Status
- National Standards
- COVID modifications
- FY23 Budget Initiatives (from the budget pillars)
- Determining the scope of investment
- Return on Investment
- Vendor Contract Review
- Outsource vs Insource
- Return on Investment
- Alignment with "FY23 Vital Few"

The Committee would like to see the enrollment projections and how they impact the Budget, after the Board adopts the projections.

Ms. Bolton advised the Administration to provide an update on the Metro and Yellow Bus transportation at the Audit Committee meeting on December 14, 2021.

Kevin Ashley, Director of Financial Reporting, updated the Committee with highlights on the monthly financial graphs through September 2021 and Fiscal Year 2022.

Mr. Ashley highlighted the following (as shown in the attached slides):

- General Fund Cash Balances as of September 30, 2021 are up over this point last year.
- General Fund Revenues through September 30, 2021 are down; however, this is directly related to the impact of the new State funding adopted for this fiscal year that eliminates pass-through funding for Community Schools and other scholarship programs. Therefore, the District is on-track, given that Revenues are down but the related Expenditures are down at a higher rate.
- General Fund Expenditures through September 30, 2021 as mentioned above are down related to the elimination of the pass-through funding. Salaries and Benefits expenditures are higher based on collective bargaining agreements.
- School Wide Pool Expenditures, salaries and benefits, are higher based on collective bargaining agreements.
- Preschool students funded through Tuition Assistance for September 2021 were 770 students vs. 564 at this point last year. United Way distributions are down due to the CPP underspend which offsets the quarterly payments due to United Way.

Finance Committee Chair Bolton updated the Committee on the status of the Board's Superintendent Search, along with assistance by the Alma Consulting Group.

Ms. Bolton also reported that a Special Public Meeting may take place on November 15, 2021, to release the Board's profile for a superintendent to the community.

Candidates will be narrowed down to about six or ten semifinalists. The community will then be provided an opportunity to meet the candidates and provide input.

The goal is vote on a new Superintendent by late December in order to allow current Board members to participate in the voting.

The next meeting is scheduled for Wednesday, December 14 from 4:30 – 6:00 pm.

The meeting adjourned at 6:00 PM.

Audit Committee

Tim Heldman, ChairJennifer WaDaniel E. Holthaus, Vice-ChairLauren RobChatika Britton, absentJennifer Couser, virtualJennifer Couser, virtualIm Crosset, virtualChristine FisherDavid Foote, virtualElizabeth GutridgeCarol Mitchell-LawrenceClarice WarnerEve Bolton (Budget, Finance and Growth Committee)Ryan Messer (Budget, Finance and Growth Committee), absent

Staff Liaisons

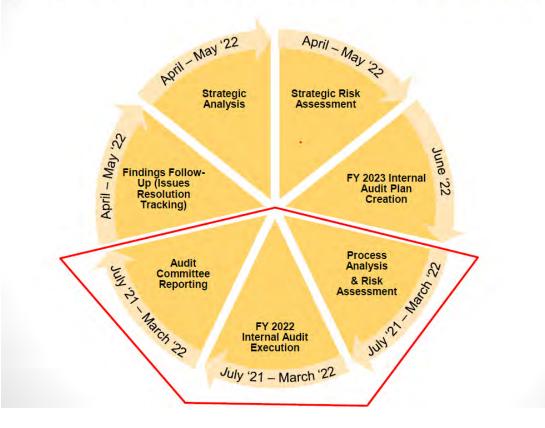
Jennifer Wagner, CFO/Treasurer Lauren Roberts, CPA, CFE, Chief Audit Executive

Member Appointment Timeline

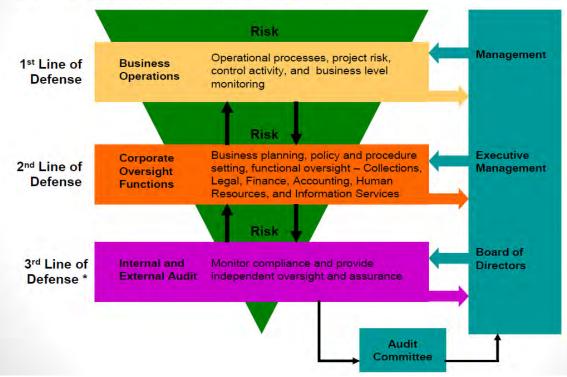
Key Meetings & Actions	Timeline for 2021-22
October 2021	
 Audit Committee meeting: Determine if existing members with expiring terms would like to serve for another three year term New term: 1/1/2022 – 12/31/2024 Members: David Foote & Tim Heldman If vacancies arise, the Committee determines the need for new members and public communications are issued for interested stakeholders to submit resumes. Inform all members of the option to extend the current term of the Chair one additional year (1/1/2022 – 12/31/2022) to complete a full three year term - Voting will occur at the December meeting. 	October 27, 2021
December 2021	
December 1st: o The window for accepting candidates closes. December 2nd – Date of Audit Committee meeting:	December 1, 2021 December 2-13, 2021
 The Committee reviews the candidates and invites qualified candidates to an interview. 	
 Audit Committee meeting: Based on the review and/or interviews conducted, the Audit Committee compiles formal recommendation of new member(s). Members vote to extend the terms of the existing Chair and Vice Chair one year, and formally recommend appointments to the Finance Committee. 	December 14, 2021
January 2022	
 Finance Committee Meeting: The Finance Committee reviews the Audit Committee's recommendation for new members and Chairs. If approved, the new members and Chairs are recommended to the full Board for approval before the February Audit Committee meeting. 	January 2022 BOE meetings after January Finance Committee meeting & before February Audit Committee meeting
February 2022	
 Audit Committee Meeting: The new member(s) attend the first Audit Committee meeting of the year. The Chair and Vice Chair assume/continue their responsibilities. 	February 2022

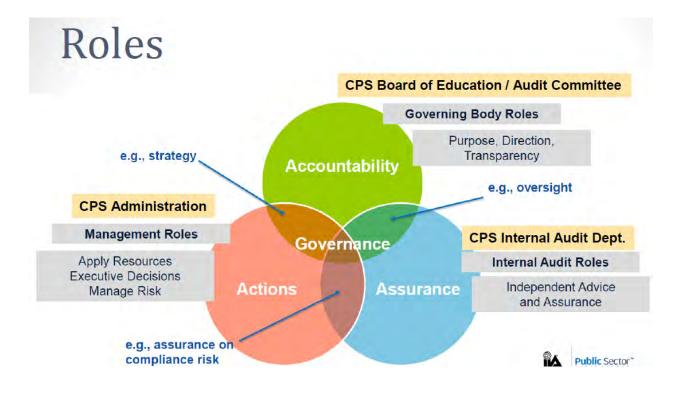
Internal Audit Comparison Endomance Performance Other brojects Advisory Assurance Follow- Upplance Other brojects Other brojects Interstigations Interstigations Interstigations Interstigations Interstigations

Internal Audit Cycle 2021-22



Governance Framework Three Lines of Defense







ESSER Funding – Summary of Awards

	Spend Through 9/30/2022	Spend Through 9/30/2023	Spend Through 9/30/2024
ESSER 1: Coronavirus Aid, Relief, & Economic Security (CARES)	\$20,007,913.90		
ESSER 2: Coronavirus Response & Relief Supplemental Appropriations (CRRSA)		\$92,327,405.62	
ESSER 3: American Rescue Plan (ARP)			\$207,501,517.02

Advisory Project Overview

	Scope
•	Funding Examined: ESSER 1 & 2
	Audit Period: 3/13/2020 – 9/8/2021
	Objectives
	To determine if proper internal controls are clearly portrayed for tracking, managing, and reporting ESSER funds.
•	To determine if expenditures are compliant with ESSER requirements and regulations as well as CPS internal processes.

ESSER Funding – Population & Sampling as of 9/8/2021

	Total Expenditures	Expenditures Selected	Contracts Selected	Total Transactions	Transactions Selected
ESSER 1: CARES	\$19,912,584.60	\$339,486.84	\$6,331,655.85	7,864	48
ESSER 2: CRRSA	\$19,242,429.18	\$190,260.65	\$5,533,203.07	14,323	48
ESSER 3: ARP	-	-	4	4	-
Total	\$39,155,013.78	\$529,747.49	\$11,864,858.92	22,187	96

ESSER Regulations Testing – ESSER 1 & 2 Results

96/96 Compliant

	Allowable Activities	Period of Funds Available	Employee Tieback	Exceptions Totals
Wages	+	- (e)	.÷.	0
Fringe Benefits			*	0
Purchased Services	-		n/a	0
Supplies and Materials	-		n/a	0
Exceptions Totals	0	0	0	

CPS Procurement Testing – ESSER 1 & 2 Results 93/96 Compliant

	Proper Purchasing	Invoice, PO, Transaction Match	"Receiver" and Received Date	Exceptions Totals
Wages	n/a	n/a	n/a	n/a
Fringe Benefits	n/a	n/a	n/a	n/a
Purchased Services	÷	4	2	2
Supplies and Materials	÷	÷	1	1
Exceptions Totals	0	0	3	

Internal Audit Recommendations

- ESSER Regulations Testing
 - Justification of Need Form: Add field to state reasoning for utilizing "Urgent Necessity" resolution
- CPS Procurement Testing
 - Provide additional training regarding the importance of accurate receiving
 - Ensure multiple contracts with the same vendor are combined to ensure compliance with bidding requirements
 - All purchases should comply with CPS Method of Procurement requirements so they have the ability to be reclassified from General Fund to Fund 507 (ESSER) if later deemed appropriate

Attachment 1 (Page 1)



Memo

To:	Preschool Workforce Development Council (PWDC)
CC:	Budget, Finance and Growth Committee Vera Brooks, Director of Early Childhood
	Jennifer Wagner, Treasurer/CFO
	Daniel Hoying, General Counsel
From:	Lauren Roberts, Chief Audit Executive
Subject:	Next Steps Regarding the September 13, 2021 PWDC Memo
Date:	September 28, 2021

The Budget, Finance and Growth Committee reviewed the attached memo from the PWDC during their September 15, 2021 meeting. The following action item resulted from the Committee's discussion:

"The Committee referred the memo to Lauren Roberts, Chief Audit Executive, for review to determine what is and is not allowable according to the Board's adopted Preschool Workforce Development Council Charter."

In response to the action item, I met with Vera Brooks to further discuss the request and determine the best next steps to assist the PWDC. It is my understanding that the PWDC is in need of guidance regarding their responsibilities as defined by their Charter. As the request is both financial and regulatory in nature, it is my recommendation that a Vera and I work with General Counsel and a representative from the Treasurer's Office to devise a plan to assist the PWDC. Our next step will be scheduling a meeting with the four parties (Early Childhood, Treasurer's Office, General Counsel, and Internal Audit) to review this request and provide feedback in our respective areas of expertise.

We appreciate the PWDC reaching out for guidance and we are looking forward to providing support to the team. Attachment 1

(Page 2)



Through Academic Achievement - Personal Well-Being - Career Readiness

Early Childhood Education, Vera Brooks, Director

Education Center + 2651 Burnet Avenue * Cincinnati, OH 45219 * Phone: 513-363-0240 * Fax: 513-363-0245

TO:	Cincinnati Board of Education Finance, Growth and
FROM:	Preschool Workforce Development Council Laura Sanregret, WFDC Facilitator
DATE:	September 13, 2021
SUBJECT:	Request for Guidance

The Preschool Workforce Development Council ("PWDC" or "Council"), has been charged with a number of broad responsibilities, which include:

- Compliance Monitoring
- **Reporting Responsibilities** .
- Professional Standards and Development
- Career Pathways Development
- Other Responsibilities ÷

With so many broad areas of responsibility and a Council composed of volunteer members, fulfilling these Charter responsibilities and evaluating the Council's performance has been especially challenging. The Charter does not specify how the Council should accomplish these responsibilities, we are requesting the Budget, Finance and Growth Committee review the Charter, clarify responsibilities, and provide guidance and direction on how best to proceed to carry out the Charter mandates.

Every member of this Council is committed to supporting early childhood education, and we are grateful for the opportunity to serve on this Council. It is in this spirit that we are asking for the Board's guidance and assistance so that we can more effectively continue to carry out the PWDC Charter goals and mandates.

Attachment 2



To:Policy and Equity CommitteeCC:Audit CommitteeTianay Amat, Interim Superintendent
Daniel Hoying, General CounselFrom:Lauren Roberts, Chief Audit ExecutiveSubject:Board Policy Review by Internal AuditDate:October 28, 2021

Background

The Policy and Equity Committee directed Internal Audit to perform a review of four Board Policies selected during the September 24, 2021 meeting:

- 2255 Equity and Excellence in Education
- 2256 Anti-Racism
- 2261.01 Parent and Family Engagement in Federal Programs
- 6320 Purchasing of Goods and Services

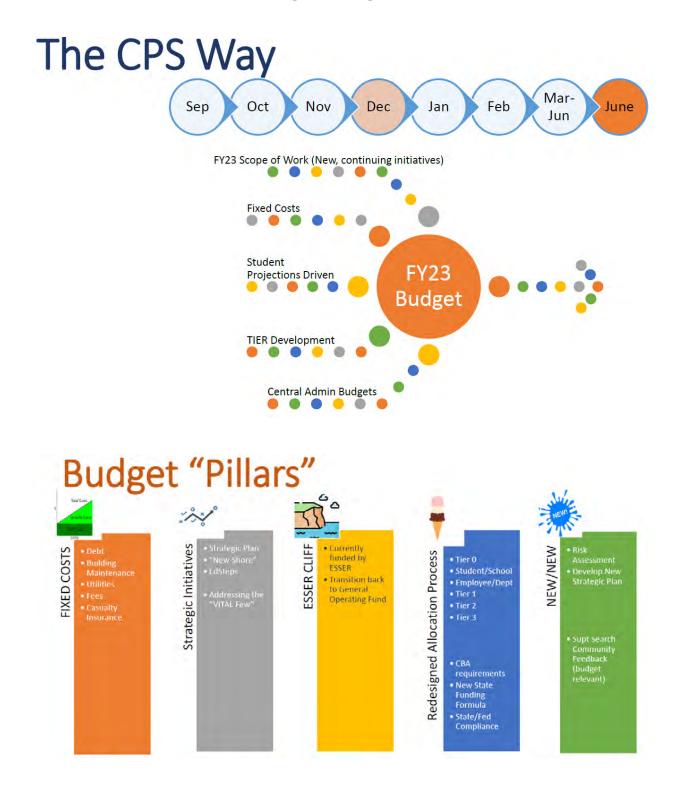
The Policy and Equity Committee asked Internal Audit to devise a plan to complete the policy reviews and report back at the October 28, 2021 meeting.

Proposed Internal Audit Approach

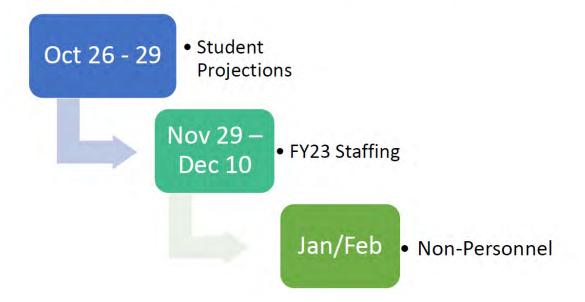
Internal Audit proposes a limited scope advisory project to address the Policy and Equity Committee's request. Internal Audit will develop a questionnaire for the administrative procedure owner to complete. The questionnaire will ask management the following questions for each Board Policy:

- Does management have written procedures that address the Board Policy? If so, do they support each significant aspect of the Board Policy?
- Is there evidence showing the procedures have been implemented? If so, are the procedures
 providing the intended results?

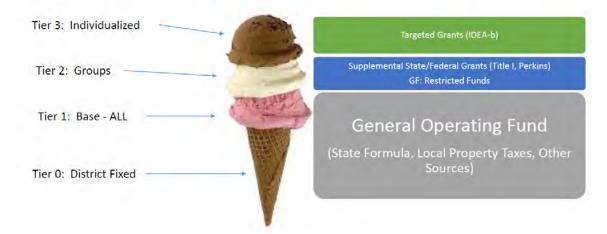
Internal Audit will review management's responses to the questionnaire and corresponding documentation, and summarize the extent to which the Board Policies have been implemented thus far. The results will be communicated to the Policy and Equity Committee, as well as the Audit Committee, upon completion of the project.



School Related Timelines (draft)



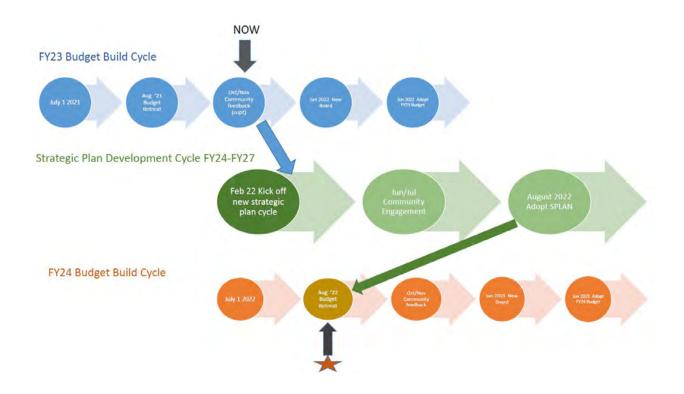
Funding "TIERS" (Students/Schools & Employees/Departments)



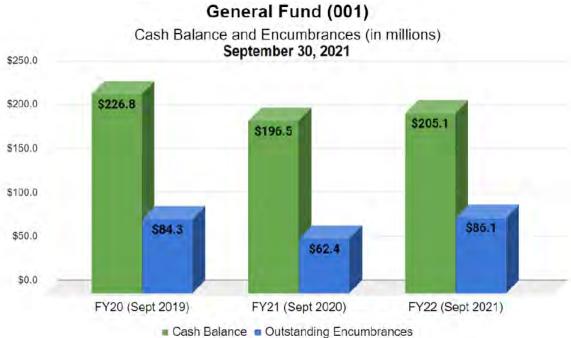
Central Administration Timeline

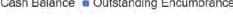


- More User Friendly
- Better resource allocation (FTEs)
- Improved Reporting/Views
- Built for AND by K-12 Educators



September 2021 Financial Update Presentation

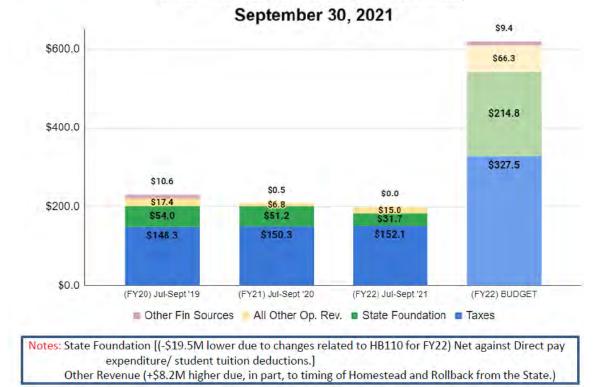




Revenue

General Fund (001)

3 Year Revenue by Source Comparison (in millions)

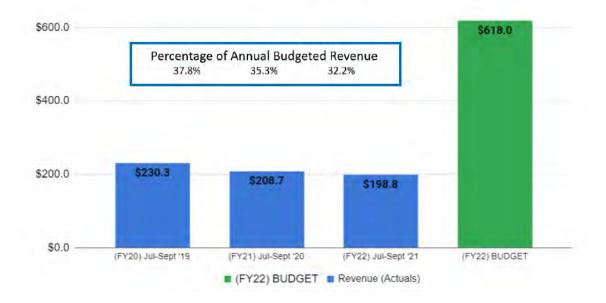


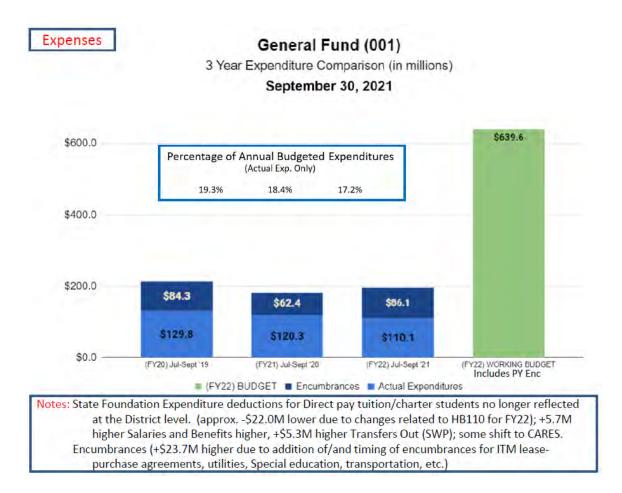
Revenue

General Fund (001)

3 Year Revenue Comparison (in millions)

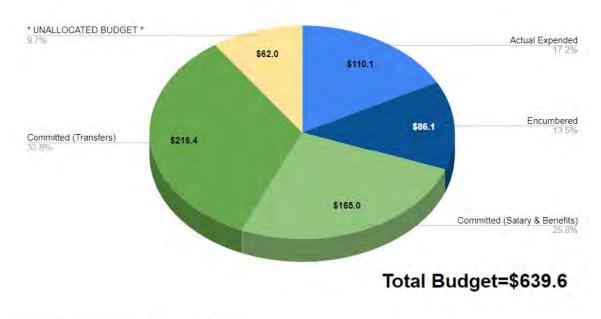
September 30, 2021





General Fund (001) Unallocated Expenditure Budget Assessment (in millions)

September 30, 2021

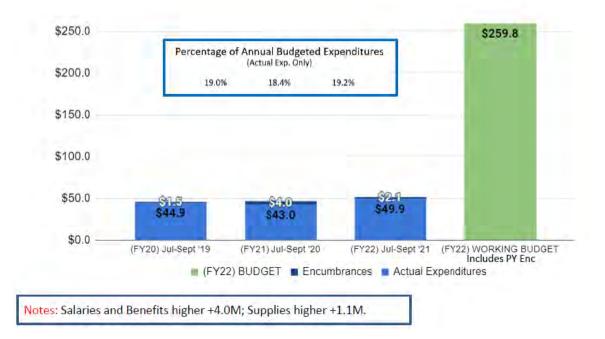


Note: Prior year Unallocated Budget was approximately 20.9%.

School Wide Pool (SWP) Fund (598)

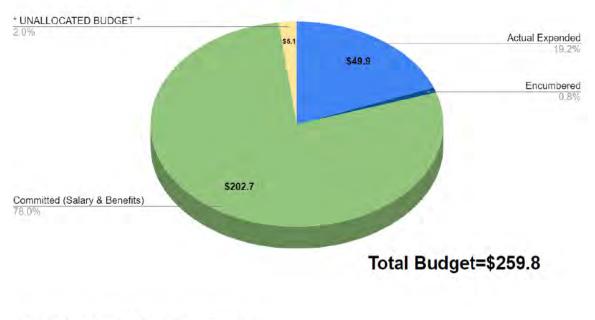
3 Year Expenditure Comparison (in millions)

September 30, 2021



School Wide Pool (SWP) Fund (598) Unallocated Expenditure Budget Assessment (in millions)

September 30, 2021



Note: Prior year Unallocated Budget was approximately 2.8%.

200

CPS Tuition Assistance Summary

	Income		FT	HT	Total	Days	Tuition Assist \$
SEP	<200 %		638	47	685	11,413	\$459,928
	200-250		70	15	85	1,545	\$53,703
	Sub-Tota	l	708	62	770	12,958	\$513,631
Tuitio	Tuition Assistance						
FY22	FYTD:	(Se	(Sept 2021 # of students=770)			18,169*	\$753,134
FY21	FYTD:	(Se	(Sept 2020 # of students=564)			10,811*	\$444,109

* - FY22–August '21=9 instructional days versus FY21–August '20=1 instructional day

Note: The data in the chart above represents only the CPS preschool students who receive Preschool Tuition Assistance. CPS currently has enrolled 1,713 preschool students.

CPS Preschool Expansion

SEPTEMBER 2021 (FY22)	* Budget FY22	FY22 Actual Jul-Sept 2021	Prior FY21 Actual Jul-Sept 2020
Revenues: (net of Co. Auditor Fees)	\$15,943,542	\$7,434,338	\$7,288,097
Expenses:			
CPS Tuition Assistance	5,300,000	753,134	444,109
Payments to United Way @	7,105,000	0	777,901
Workforce Development	146,605	19,234	30,163
Special Education Support	807,273	156,233	162,244
Administrative Support	183,246	37,134	26,688
Other Professional Services	114,022	4,722	0
Supplies and Materials	237,886	4,178	0
Bldgs/Equip-Capital Outlay	21,732	<u>13,431</u>	123,444
Total	<u>\$13,915,764</u>	<u>\$988,066</u>	\$1,564,549
Net Income	\$2,027,778	\$6,446,272	\$5,723,548