

East Ramapo Central School District, New York

Communication of Internal Control Matters Identified in the
Audit to Those Charged with Governance and Management

June 30, 2015

**Communication of Internal Control Matters Identified in the Audit to
Those Charged with Governance and Management**

**The Board of Education
East Ramapo Central School District
105 South Madison Avenue
Spring Valley, New York 10977**

Auditors' Communication on Internal Control

In planning and performing our audit of the basic financial statements of the East Ramapo Central School District, New York ("School District") as of and for the year ended June 30, 2015, in accordance with auditing standards generally accepted in the United States of America, we considered the School District's internal control over financial reporting ("internal control") as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the School District's internal control. Accordingly, we do not express an opinion on the effectiveness of the School 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 combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis.

Our consideration of internal control was for the limited purpose described in the first paragraph and was not designed to identify all deficiencies in internal control that might be deficiencies, significant deficiencies or material weaknesses and, therefore, there can be no assurance that all such deficiencies have been identified.

We did not identify any deficiencies in internal control that we consider to be material weaknesses, as defined above.

However, as indicated in the attached Addendum A, we share for your consideration other observations about the internal control and operations. In Addendum B, we identify other accounting and auditing matters for your information.

This communication and addenda are intended solely for the information and use of management and the Board of Education and are not intended to be and should not be used by anyone other than these specified parties. We will be pleased to discuss these communications and comments in further detail at your convenience, or to assist you in implementing the recommendations.

O'Connor Davies, LLP

O'Connor Davies, LLP
Harrison, New York
October 13, 2015

O'CONNOR DAVIES, LLP

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East Ramapo Central School District, New York

Addendum A

Control Deficiencies

- **Capital Projects Fund**

Project Deficit

The Capital Projects Fund is used to account for the construction of major capital facilities. Our audit of the Capital Projects Fund identified that the Warehouse Capital Project that has been completed has a deficit fund balance of \$20,445. The audit also identified deficits of \$266,041 and \$4,400 in the Various District Improvements Capital Project and Pomona Middle School–Tile Project, respectively. These deficits arose because of expenditures exceeding financing on the projects. These deficits can only be eliminated with the continued receipt of monies authorized from an adopted General Fund budget.

Recommendation

We have been advised that \$60,000 has been provided in the 2015-16 adopted budget to begin addressing these project deficits. A provision must continue to be made in future General Fund budgets to provide the necessary transfer of resources that would eliminate any remaining deficits.

- **Cash**

Outstanding Checks

During our audit, we noted that the bank reconciliation for the payroll account reflects outstanding checks totaling \$122,729, which are greater than one year old. We also noted that another account in the Special Aid Fund had seven outstanding checks greater than one year old totaling \$13,616. Of the former amount, one employee has outstanding, uncashed paychecks of a substantial amount, dating back numerous years. It is the School District's policy to write off outstanding checks greater than six years old.

Recommendation

We recommend that management determine the reason that paychecks have remained outstanding for such an extended period of time. After every effort has been exhausted, the Business Office should seek legal advice as to the proper disposition of these funds.

General Fund and Payroll Bank Reconciliations

The School District operates its payroll and general checking account as "imprest" accounts. This means that these accounts are only to be funded to the extent of the checks being processed. If all the checks were to have cleared the account, both the book and bank balances of these accounts should be zero. Our review of these accounts revealed that the bank balances are in excess of currently outstanding checks.

Recommendation

We suggest that School District personnel modify funding amounts to these accounts that would take into consideration such things as voided checks so as to reduce the overfunded amounts.

East Ramapo Central School District, New York

Addendum A

Control Deficiencies

- **Cash (Continued)**

Authorized Signatures

As part of our standard audit procedures, we request confirmation from the School District's depositories of a list of current authorized signatories for its bank accounts. These audit procedures revealed that at one of the School District's depositories, an individual listed as an authorized signer on the accounts has not worked for the School District since April 2013.

Recommendation

We suggest that the School District remove this former employee as an authorized signer on all accounts. Additionally, a periodic review of all banking authorizations should be performed.

- **Special Purpose Fund**

The Special Purpose Fund is used to account for assets held by the School District in accordance with the terms of a trust or scholarship agreement. Our review of the Special Purpose Fund indicated that, for several of these trust and scholarship accounts, there was no activity during 2014-2015 other than interest earnings. These accounts aggregate to approximately \$217,189 at June 30, 2015.

Recommendation

We recommend that the School District examine the status of all inactive trust and scholarship accounts and, if applicable, either transfer the monies to the General Fund with Board of Education approval or remit payments back to the appropriate depositor.

- **Procurement Policy**

The purpose of obtaining bids or quotations is to encourage competition in the procurement of supplies, equipment, and services which will be paid for by public funds. Competitive bids or quotations should be solicited in connection with all purchases, whenever feasible, and in the best interest of the School District. According to New York State General Municipal Law, all purchase contracts for materials, equipment, or supplies involving an annual expenditure of over \$20,000 and all public works involving an expenditure of more than \$35,000 should be awarded on the basis of public advertising and competitive bidding. During our audit, it was noted that the School District's procurement policy was several years old and has not been updated to reflect the new required bidding thresholds mandated by New York State.

Recommendation

We recommend that the School District update their procurement policy in order to adhere to the regulations mandated by New York State. In addition, the School District should ensure all purchases subject to competitive bidding are properly executed.

East Ramapo Central School District, New York

Addendum A

Control Deficiencies

- **Extraclassroom Activity Funds**

Extraclassroom activity funds are defined as funds raised other than by taxation in the name of a school student body. These funds are operated by and for the students and are an integral part of the educational program of the School District. As part of our audit, we have reviewed, evaluated and tested the Extraclassroom Activity Funds. The results of our tests disclosed the following deficiencies:

Lack of Financial Activity

We noted that there were numerous clubs in the Spring Valley High School and the Ramapo High School that had no financial activity during the fiscal year under audit. State Education Department regulations provide that the funds of a discontinued activity shall automatically revert to the account of the general student organization or to the student council and shall be expended in accordance with that organization's constitution.

Recommendation

We suggest that a determination of the status of the clubs with no financial activity be made to determine the proper disposition of funds. If the clubs are determined to be inactive, the funds should be transferred to the general student organization to be used in accordance with the regulations of the Commissioner of Education.

Outstanding Checks

During our audit, we noted that the bank reconciliations for the extraclassroom activity accounts at the Spring Valley High School, Ramapo High School and Pomona Middle School reflected nineteen outstanding checks greater than one year old aggregating \$3,237.

Recommendation

We recommend that management determine the reason that these checks have remained outstanding for such an extended period of time. After every effort has been exhausted, the funds should be returned to the general student organization or to the student council.

Cash Receipts

The State Education Department recommends that student club receipts be deposited within seventy two hours of receipt. Our test of cash receipts revealed that eight receipts for the Ramapo High School and two receipts for the Spring Valley High School were not deposited within this recommended time frame.

Recommendation

We suggest that the School District modify its procedures to ensure compliance with the above noted time line.

East Ramapo Central School District, New York

Addendum A

Control Deficiencies

- **Extraclassroom Activity Funds** (*Continued*)

Deposit Slip and Receipt Preparation

The State Education Department recommends each student activity treasurer issue a receipt for all monies received by him/her to be deposited in the activity account. These receipts shall be pre-numbered and must be used in consecutive order. Our test of cash receipts revealed that a description or use of funds was not clearly identified on the deposit slip to ensure the proper activity was credited for one transaction within the Chestnut Ridge Middle School and one transaction within the Pomona Middle School. We also noted that three cash receipts for the Chestnut Ridge Middle School did not have a written receipt prepared. Lastly, we noted that Spring Valley High School did not prepare the deposit slips completely to include appropriate signatures and identify sources of funds.

Recommendation

We recommend that the School District modify its procedures to ensure the preparation of the deposit slips and receipts be descriptive to ensure the proper club is being credited and to obtain the appropriate signatures for appropriate internal control.

Cash Disbursements

Our test of a sample of cash disbursements throughout the year revealed that the proper signatures were not noted on several disbursements made out of the Spring Valley High School, Ramapo High School and the Chestnut Ridge Middle School accounts. We also noted several disbursements that did not have supporting documentation made out of the Spring Valley High School, Chestnut Ridge Middle School, and Pomona Middle School accounts. Lastly, there were several items for which the description of the disbursement was either not evident or not clear and we were, therefore, unable to verify that the proper club was charged for the expenditure.

Recommendation

We recommend that all required signatures be present on all payment vouchers. Any disbursements from these funds should be clearly identified to a particular club.

- **Internal Audit Findings**

Transfers Between Accounts

M&T Bank only allows cash transfers to be made to a predetermined list of accounts. Although this is a good control over cash transfers, the School District Treasurer has the ability to make transfers and add accounts to this listing. In addition, other banks which hold School District funds do not have such restrictions.

East Ramapo Central School District, New York

Addendum A

Control Deficiencies

- **Internal Audit Findings** *(Continued)*

Recommendation

The School District should put into place a list of predetermined approved recipient accounts with each bank holding School District funds. In addition, employees who have the authority to authorize and execute transfers should not have the ability to alter these account lists. This would ensure that cash transfers can only be made into approved accounts.

East Ramapo Central School District, New York

Addendum B

Other Matters

- **Governmental Accounting Standards Board (“GASB”) Statement No. 75 “Accounting and Financial Reporting for Postemployment Benefits Other than Pensions”**

In June 2015, GASB issued Statement No. 75 “Accounting and Financial Reporting for Postemployment Benefits Other than Pensions.” This Statement replaces the requirements of GASB Statement No. 45 “Accounting and Financial Reporting by Employers for Postemployment Benefits Other than Pensions”. The key difference in the new standard for New York municipalities and school districts (since New York State has not authorized the establishment of an Other Postemployment Benefit (“OPEB”) trust fund) is that these governments must now report the *total OPEB liability* related to their employees. The prior standard allowed for the amortization of prior service cost over a thirty year period.

The statement requires municipalities and school districts to present more extensive note disclosures and required supplementary information (“RSI”) about their OPEB liabilities. Among the new note disclosures is a description of the effect on the reported OPEB liability of using a discount rate and a healthcare cost trend rate that are one percentage point higher and one percentage point lower than that assumed in the financial statements. The new RSI includes a schedule showing the causes of the increase and decreases in the OPEB liability and a schedule comparing a government’s actual OPEB contributions to its contribution requirements.

This new standard parallels the pension standard in GASB Statement No. 68 “Accounting and Financial Reporting for Pensions”. Together, these two new standards provide consistent and comprehensive disclosure for all postemployment benefits. **The provisions of this Statement are effective for fiscal years beginning after June 15, 2017 (i.e., the School District’s financial statements for the year ending June 30, 2018).**

- **GASB Statement No. 77 “Tax Abatement Disclosures”**

In August 2015, GASB issued Statement No. 77 “Tax Abatement Disclosures”. The requirements of this Statement are intended to improve financial reporting by providing users of financial statements essential information and disclosure about the nature and magnitude of tax abatements, making these types of transactions more transparent to financial statement users. As a result, users should be better equipped to understand how tax abatements affect a government’s future ability to raise resources and meet its financial obligations and the impact those abatements have on a government’s financial position and economic condition.

The statement requires governments to disclose information about their own tax abatements separately from information about tax abatements that are entered into by other governments and reduce the reporting government’s tax revenues. The new disclosures about one’s own tax abatement agreements include:

- The purpose of the abatement program
- The tax being abated
- Dollar amount of taxes abated
- Provisions for recapturing abated taxes
- The types of commitments made by tax abatement recipients
- Other commitments made by the entity in tax abatement agreements, such as to build infrastructure assets

East Ramapo Central School District, New York

Addendum B

Other Matters

• **GASB Statement No. 77 “Tax Abatement Disclosures”** (Continued)

The new disclosures about tax abatements that are entered into by other governments and reduce the reporting government’s tax revenues include:

- The name of the government entering into the abatement agreement
- The tax being abated
- Dollar amount of the reporting government’s taxes abated

The provisions of this Statement are effective for fiscal years beginning after December 15, 2015 (i.e., the School District’s financial statements for the year ending June 30, 2017).

East Ramapo Central School District, New York

Communication of Matters Identified in the Audit to Those Charged with Governance

We have audited the financial statements of the East Ramapo Central School District, New York ("School District") as of and for the year ended June 30, 2015, and have issued our report thereon dated October 8, 2015. Professional standards require that we provide you with information about our responsibilities under auditing standards generally accepted in the United States of America, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our engagement letter to you dated April 20, 2011, as amended by an addendum dated July 21, 2014. This letter provides additional required communications related to our audit.

Our responsibility under professional standards

Our responsibility is to form and express an opinion about whether the financial statements, which are the responsibility of management, are presented fairly, in all material respects, in conformity with accounting principles generally accepted in the United States of America ("US GAAP"). Those individuals charged with governance of the School District are responsible for the oversight of the financial reporting process, and our audit does not relieve management and those charged with governance of their respective responsibilities.

Our responsibility for the supplementary information accompanying the financial statements is to evaluate the presentation of the supplementary information in relation to the financial statements as a whole and to report on whether the supplementary information is fairly stated, in all material respects, in relation to the financial statements as a whole.

With respect to such supplementary information, we made certain inquiries of management and evaluated the form, content and methods of preparing the information to determine that the information complies with US GAAP, the method of preparing it has not changed from the prior year, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

In connection with our audit we performed tests of the School District's compliance with certain provisions of laws, regulations, contracts, and grants. However, the objective of our tests was not to provide an opinion on compliance with such provisions.

Planned scope and timing of the audit

We conducted our audit consistent with the planned scope and timing we previously communicated to you.

Qualitative aspects of significant accounting practices

Significant accounting policies

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by the School District are described in Note 1 to the financial statements. There has been no initial selection of accounting policies and no changes in significant accounting policies or their application during the reporting period that had a significant impact on the financial statements other than the adoption of the provisions of the Governmental Accounting Standards Board ("GASB") Statement No. 68 "Accounting and Financial Reporting for Pensions" and 71, "Pension Transition for Contributions Made Subsequent to the Measurement Date" as disclosed in the notes to financial statements. No matters have come to our attention that would require us to inform you about (1) the

East Ramapo Central School District, New York

Communication of Matters Identified in the Audit to Those Charged with Governance

Qualitative aspects of significant accounting practices *(Continued)*

methods used to account for significant unusual transactions, and (2) the effect of significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus.

Significant accounting estimates

Accounting estimates made by management are an integral part of the financial statements and are based on management's knowledge and experience about past and current events and assumptions about future events. Actual results could differ from those estimates.

Certain accounting estimates are particularly sensitive because of their significance to financial statements and their susceptibility to change, such as:

- Actuarial assumptions related to the Other Post Employment Benefit Obligations ("OPEB")
- Actuarial assumptions and proportionate share calculations related to pension obligations
- Asset lives for depreciable capital assets
- Estimates of certain receivable balances and allowances for uncollectible amounts
- Estimates for certain operating and long-term liabilities

Management believes that the estimates used and assumptions made are adequate based on the information currently available. We evaluated the key factors and assumptions used to develop the estimates in determining that they are reasonable in relation to the financial statements as a whole.

Financial statement disclosures

Certain financial statement disclosures involve significant judgment and are particularly sensitive because of their significance to financial statement users. The most sensitive disclosures affecting the financial statements relate to:

- Pension plan information
- Other post employment benefit obligations payable
- Outstanding bonded indebtedness
- Fund balances
- Litigation

The financial statement disclosures are consistent and clear.

Significant difficulties encountered during the audit

We encountered no significant difficulties in dealing with management relating to the performance of the audit.

Uncorrected and corrected misstatements

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that we believe are trivial, and communicate them to the appropriate level of management.

East Ramapo Central School District, New York

Communication of Matters Identified in the Audit to
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Uncorrected and corrected misstatements *(Continued)*

We are required to communicate to you misstatements that remain uncorrected, including any related to prior periods, and the effect, if any, that they may have on the opinion in our report, and request their correction. There are no such financial statement misstatements that remain uncorrected.

In addition, we are required to communicate to you all material, corrected misstatements that were brought to the attention of management as a result of our audit procedures. The adjusting journal entry following this communications letter summarize the material adjustments that were corrected by management.

Disagreements with management

For purposes of this letter, a disagreement with management is a matter, whether or not resolved to our satisfaction, concerning financial accounting, reporting, or auditing, which could be significant to the financial statements or the auditors' report. No such disagreements arose during the course of the audit.

Representations requested from management

We have requested certain written representations from management in a separate letter dated October 8, 2015.

Management's consultations with other accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters. Management informed us that, and to our knowledge, there were no consultations with other accountants regarding auditing and accounting matters.

Other matters discussed with management

We generally discuss with management a variety of matters, including the application of accounting principles and auditing standards, business conditions affecting the School District, and plans and strategies that may affect the risks of material misstatement. None of the matters discussed and our responses thereto were a condition to our retention as auditors.

We have provided our comments regarding deficiencies and other matters noted during our audit in the attached addenda.

Auditor independence

We affirm that O'Connor Davies, LLP is independent with respect to the School District in accordance with professional standards.

This communication is intended solely for the information and use of the Board of Education and management of the School District and is not intended to be and should not be used by anyone other than these specified parties.

East Ramapo Central School District, New York

Adjusting Journal Entries

East Ramapo Central School District
6/30/2015

<u>Account</u>	<u>Description</u>	<u>Debit</u>	<u>Credit</u>
GENERAL FUND			
To increase accounts payable due to payables that were classified as encumbrances.			
5540-431-60-0000	Trans Regular Home-School	417,081.00	
821.00	Reserve for Encumbrances	417,081.00	
521.00	Encumbrances		417,081.00
600.99	Accounts Payable		417,081.00
Total		<u>834,162.00</u>	<u>834,162.00</u>