



JOY HOFMEISTER  
STATE SUPERINTENDENT *of* PUBLIC INSTRUCTION  
OKLAHOMA STATE DEPARTMENT *of* EDUCATION

**MEMORANDUM**

**TO:** Joy Hofmeister, State Superintendent and Chair  
State Board of Education

**FROM:** David L. Kinney, General Counsel  
State Department of Education

**DATE:** February 25, 2016

**SUBJECT:** Grant-Goodland Dependent School District No. C-3

Over the last several weeks, Oklahoma State Department of Education (“OSDE”) staff and I have reviewed the Financial Statements-Regulatory Basis and Reports of Independent Auditor of Grant-Goodland Dependent School District No. C-3, Choctaw County, Oklahoma, dated June 30, 2015. Our review has included discussions with Gary Jones, State Auditor and Inspector for the State of Oklahoma, Grant-Goodland Board Auditor Eric Bledsoe and Grant-Goodland Board Attorney Laura Holmes.

The audit was performed by Sanders, Bledsoe & Hewett, Certified Public Accountants, LLP of Broken Arrow, Oklahoma. The Independent Auditor’s Report (page 5) provides:

1. An Adverse Opinion on U.S. Generally Accepted Accounting Principles
2. An Adverse Opinion on Regulatory Basis of Accounting

(Complete copy of audit is attached to this memorandum).

A summary of the Auditor’s Results is found on page 10 of the audit:

1. An adverse opinion was issued on the financial statements with respect to the regulatory basis of accounting prescribed.
2. The audit disclosed a significant deficiency in the internal controls over financial reporting, 2015-1, which was a material weakness.
3. The audit disclosed an instance of noncompliance that is required to be reported under Government Auditing Standards described below as item 2015-1.

Note 15-1 titled “Questionable Vendors” outlines an analysis of blanket purchase orders for large amounts made to 14 vendors. (Page 10). All purchase orders were signed by the encumbrance clerk, and signed as approved by the superintendent. They all had invoices attached for the goods or services.

Because of the large dollar amount (collectively \$386,211.00) of the purchase orders, and because this was a repeat finding from the previous audit, all payments were examined extensively. Documents were present, but not actual, original invoices with letterhead and normal business information. Bank statements were reviewed. The names and addresses of the vendors were on each check. All checks were signed, by hand, by the board president, clerk and either the treasurer or deputy treasurer.

The auditor made the following observations regarding these checks:

- The checks to the vendors were almost always written as a group together each month, on the same date.
- The checks were normally all cashed, together as a group, at the District's bank on the same day.
- The date the checks were actually cashed/deposited was usually either the same date they were issued, or the following day. Some of the vendors were located out of town, and it would seem unlikely that these checks could have been issued, mailed and cashed in such a short amount of time, or that they could have been picked up on the issue date.
- The check signature for Wes Bailey (Board President) sometimes was signed "Wes Bailey" and sometimes was signed "J.W. Bailey". These signatures did not appear to be done by the same person. (Page 11).

The auditor requested and was provided bank statements showing the endorsed checks for the district. Based on a review of the check's endorsement to the vendors, the auditor made the following observations:

- The Checks to the vendors were normally endorsed with the same name that was printed on the front of the check, but the endorsement handwriting appeared to be similar on the majority of these check endorsements.
- A majority of the checks cashed on the same day were normally deposited within minutes of each other. The deposit times were shown on the backs of the checks by the printing done by the bank when deposited.
- Fourteen of the checks issued to the vendor Tina Byerly had an endorsement of her name on the check, but also included the signature of Wes Bailey under her name. Wes Bailey is a board member at Grant-Goodland school. The total amount of the checks endorsed by Bailey in 2014-15 was \$33,800.
- One of the checks issued to vendor Danny Carter, in the amount of \$2,900 had an endorsement of his name on the check, but also included the endorsement signature of Buck Hammers. Buck Hammers is the superintendent of Grant-Goodland School. This check appeared to be deposited into the same bank account where Mr. Hammer's monthly paychecks were deposited. The other checks issued to Danny Carter had only his name endorsed, in the same handwriting as the other questionable endorsements.
- Nine of checks issued to Cross K Supplies had an endorsement of the company name, and also had the signatures of Pam Keeling, Gary Wayne Keeling, or M. Keeling. Pam Keeling is the Deputy Treasurer of Grant-Goodland School. Cross K is not registered in Oklahoma and when the auditor drove to the address listed on the invoices, they found only a vacant building. The total amount of the Cross K Supplies checks endorsed by Keeling in 2014-15 was \$22,514.
- Five of the checks issued to vendor Robert Greggs had an endorsement signature that was notably different than the majority of the checks issued and endorsed in his name. These

checks were not deposited on the same day or the next day after issuance and actually appeared to show enough time for the mailing and depositing of these checks in Oklahoma City. These five checks, in the total amount of \$22,102, appear to be legitimate. There were 19 other checks that were endorsed with the questionable endorsement handwriting, and were cashed the same day or the following day after the check date. These 19 checks, in the total amount of \$37,851, appear to be fraudulent. There was also one occurrence of the 19 questionable checks were the check, issued for \$975, was endorsed with the normal (questionable) endorsement, and also endorsed by Pam Keeling.

- Checks written to vendors Janet Lynn Branton Storie and Lindsey Thomas had an endorsement that was different than most of the other questionable endorsements. However, because these checks were written at the same time as the others, and because the checks to these two vendors were normally cashed either on the same day they were issued or on the following day, and normally cashed along with other questionable checks, they included all checks to these vendors in the total.

Previous audits required an IRS Form 1099 be prepared and sent to each vendor. Copies of this form were provided for review for 2014, dated March 30, 2015. The auditors could not verify the forms were sent to the IRS or the vendors.

The Board approved contracts for Lindsey Thomas, Tina Byerly and Janet Lynn Branton Storie, per the board minutes. The minutes did not indicate the amount for these contracts. The contracts could not be located during the auditor visit. Contracts for these individuals for the 2015-16 year also could not be located during the audit visit. (Page 12).

The auditors recommended the appropriate law enforcement officials be notified immediately and request them to take the appropriate action regarding this apparent fraudulent activity. The response by the district is "On January 28, 2016, the Federal Bureau of Investigation and the United States Department of Education visited the District, and collected records and data."

Under the Oklahoma Public School Audit Law, "The State Board of Education may make inquiries it deems necessary to determine that each district board of education is properly complying with the Oklahoma Public School Audit Law." 70 O.S. § 22-108(D). "All accounting systems and procedures used by the school districts of the State of Oklahoma shall conform with the accounting systems and procedures prescribed by the State Board of Education." 70 O.S. § 22-113. "All further payments of state aid for each district shall be withheld until the provisions of this article [Oklahoma Public School Audit Law] have been fulfilled by said district." 70 O.S. § 22-112.

The Oklahoma Administrative Code provide "The State Board of Education shall examine each audit report and demand corrections of any existing deficiencies. It is mandatory that State Aid payments be withheld during noncompliance with the 'School Audit Law' at 70 O.S. § 22-101 et. seq." OAC 210:25-5-5 (a). "The State Board of Education may make inquiries and request additional documentation and response related to exceptions, recommendations or comments noted by an auditor." OAC 210:25-5-5(e)(4).

It is my recommendation that the President of the Grant-Goodland Board of Education, the Superintendent of Grant-Goodland school, and any additional employees with knowledge of this matter appear before the State Board of Education to explain how this fraud happened, what corrective action has been taken, and what preventive measures have been implemented to prevent future occurrences.

**FINANCIAL STATEMENTS - REGULATORY BASIS  
AND REPORTS OF INDEPENDENT AUDITOR**

**GRANT-GOODLAND DEPENDENT SCHOOL DISTRICT NO. C-3,  
CHOCTAW COUNTY, OKLAHOMA**

**JUNE 30, 2015**

Audited by

**SANDERS, BLEDSOE & HEWETT  
CERTIFIED PUBLIC ACCOUNTANTS, LLP**

**BROKEN ARROW, OK**

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
SCHOOL DISTRICT OFFICIALS  
JUNE 30, 2015

**BOARD OF EDUCATION**

**President**

Dennis Lee

**Vice-President**

Wes Bailey

**Clerk**

Cathie Pugh

**SUPERINTENDENT OF SCHOOLS**

Buck Hammers

**SCHOOL DISTRICT TREASURER**

Jimmie Sue Miller

**DEPUTY TREASURER**

Pam Keeling

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
JUNE 30, 2015

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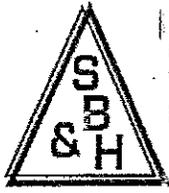
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DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
JUNE 30, 2015

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**SANDERS, BLEDSOE & HEWETT**  
CERTIFIED PUBLIC ACCOUNTANTS, LLP

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**INDEPENDENT AUDITOR'S REPORT**

January 27, 2016

The Honorable Board of Education  
Grant-Goodland School District Number C-3  
Grant, Choctaw County, Oklahoma

**Report on the Financial Statements**

We have audited the accompanying combined fund type and account group financial statements -- regulatory basis of the Grant-Goodland School District Number C-3, Grant, Choctaw County, Oklahoma (the District), as of and for the year ended June 30, 2015, as listed in the table of contents.

**Management's Responsibility for the Financial Statements**

Management is responsible for the preparation and fair presentation of these financial statements in accordance with financial reporting provisions of the Oklahoma State Department of Education, as described in Note 1, to meet financial reporting requirements of the State of Oklahoma; this includes determining that the regulatory basis of accounting is an acceptable basis for the preparation of the financial statements in the circumstances. Management is also responsible for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

**Auditor's Responsibility**

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit 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. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements 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 entity'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 statements.

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

**Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles**

As discussed in Note 1, the financial statements are prepared by the District, on the basis of the financial reporting provisions of the Oklahoma State Department of Education, 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 Oklahoma State Department of Education. The effects on the financial statements of the variances between the regulatory basis of accounting described in Note 1 and accounting principles generally accepted in the United States of America, although not reasonable determined, are presumed to be material.

### **Adverse Opinion on U.S. Generally Accepted Accounting Principles**

In our opinion, because the significance of the matter discussed in the "Basis for Adverse Opinion on U.S. Generally Accepted Accounting Principles" paragraph, the financial statements referred to in the first paragraph do not present fairly, in accordance with accounting principles generally accepted in the United States of America, the financial position of the District as of June 30, 2015, the changes in its financial position, or, where applicable, its cash flows for the year then ended.

### **Basis for Adverse Opinion on Regulatory Basis of Accounting**

As described in finding 15-1 in the accompanying schedule of audit results, findings and questioned costs, the District had misappropriations of assets that were deemed to be material to the fair presentation of the financial statements.

In addition, the financial statements referred to above do not include the general fixed asset account group, which is a departure from the regulatory basis of accounting prescribed by the Oklahoma State Department of Education. The amount that should be recorded in the general fixed asset account group is not known.

### **Adverse Opinion on Regulatory Basis of Accounting**

In our opinion, because of the significance of the matter described in the "Basis for Adverse Opinion on Regulatory Basis of Accounting" Paragraph, the financial statements referred to in the first paragraph do not present fairly, in all material respects, the assets, liabilities and fund balance arising from regulatory basis transactions of each fund type and account group of the District, as of June 30, 2015, and the revenues collected and expenditures paid and encumbered for the year then ended on the regulatory basis of accounting described in Note 1.

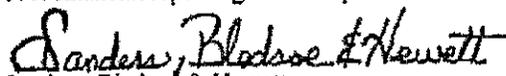
### **Other Matters**

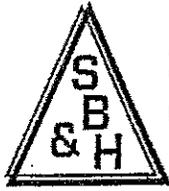
Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the District's basic financial statements. The combining statements – regulatory basis, are presented for purposes of additional analysis and are not a required part of the basic financial statements. The schedule of expenditures of federal awards is presented for purposes of additional analysis as required by U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, and is also not a required part of the basic financial statements.

The combining statements – regulatory basis and the schedule of expenditures of federal awards are the responsibility of management and were derived from and relate directly to the underlying accounting and other records used to prepare the basic financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic 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 combined statements – regulatory basis and the schedule of expenditures of federal awards are fairly stated in all material respects in relation to the basic financial statements as a whole.

### **Other Reporting required by Government Auditing Standards**

In accordance with *Government Auditing Standards*, we have also issued our report dated January 27, 2016 on our consideration of the District's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and to other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the District's internal control over financial reporting and compliance.

  
Sanders, Bledsoe & Hewett  
Certified Public Accountants, LLP



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**INDEPENDENT AUDITOR'S 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**

January 27, 2016

The Honorable Board of Education  
Grant-Goodland School District Number C-3  
Grant, Choctaw County, Oklahoma

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 accompanying fund type and account group financial statements – regulatory basis within the combined financial statements of the Grant-Goodland School District Number C-3, Grant, Choctaw County, Oklahoma (District), as of and for the year ended June 30, 2015, and the related notes to the financial statements, which collectively comprise the District's financial statements, and have issued our report thereon dated January 27, 2016, which was adverse with respect to the presentation of the financial statements in conformity with accounting principles generally accepted in the United States because the presentation followed the regulatory basis of accounting for Oklahoma school districts and did not conform to the presentation requirements of the Governmental Accounting Standards Board. However, our report was adverse for the omission of the general fixed asset account group and misappropriation of assets with respect to the presentation of financial statements on the regulatory basis of accounting authorized by the Oklahoma State Board of Education.

**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 District's internal control. Accordingly, we do not express an opinion on the effectiveness of District's internal control.

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. However, as described in the accompanying Schedule of Audit Results, Findings and Questioned Costs as item 2015-1, we identified a certain deficiency in internal control that we consider to be a material weakness and a significant deficiency.

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 entity's financial statements will not be prevented, or detected and corrected on a timely basis. We consider the deficiency described in the accompanying Schedule of Audit Results, Findings, and Questioned Costs, 2015-1, to be a material weakness. 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.

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

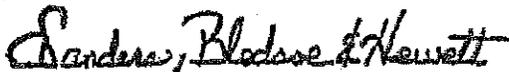
As part of obtaining reasonable assurance about whether the District's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, non-compliance with which could have a direct and material effect on the determination of financial statements 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 instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards* and which are described in the accompanying Schedule of Audit Results, Findings and Questioned Costs, as item 2015-1.

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

The District's response to the findings identified in our audit are described in the attached corrective action plan. The District's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

#### **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 entity'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 entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.



Sanders, Bledsoe & Hewett  
Certified Public Accountants, LLP

INDEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
DISPOSITION OF PRIOR YEAR'S SIGNIFICANT DEFICIENCIES AND  
MATERIAL INSTANCES OF NON-COMPLIANCE  
JUNE 30, 2015

**2014-1 Purchase Orders/Documentation**

Condition: Several purchase orders had similar invoices attached for support. These invoices did not include the vendor's address or phone number. They were vague in their description and lacked detail. They did not include a rate of pay or a unit cost. These conditions lead to possibility that unauthorized purchases will be made and/or payments could be issued to nonexistent vendors.

Current Status: This prior year deficiency continued during the current fiscal year.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 SCHEDULE OF AUDIT RESULTS  
 JUNE 30, 2015

**Section 1** - Summary of Auditor's Results:

1. An adverse opinion was issued on the financial statements with respect to the regulatory basis of accounting prescribed.
2. The audit disclosed a significant deficiency in the internal controls over financial reporting, 2015-1, which was a material weakness.
3. The audit disclosed an instance of noncompliance that is required to be reported under *Government Auditing Standards* described below as item 2015-1.

**Section 2** - Findings relating to the financial statements required to be reported in accordance with GAGAS:

**2015-1 Questionable Vendors**

**Condition:** We observed that the District had several blanket purchase orders for large amounts made to individuals for various purposes. The purchase orders in question are:

<u>Fund/PO</u>	<u>Vendor</u>	<u>Purpose</u>	<u>Amount</u>
GF - 27	Robert E. Greggs	E-Rate	\$ 61,083.00
GF - 31	Janet Lynn Branton Storie	Psychologist	51,470.00
GF - 37	Tina Byerly	Cleaning	47,350.00
GF - 43	Janet Lynn Branton Storie	Psychologist	13,380.00
GF - 44	Lindsey L. Thomas	Speech	62,670.00
GF - 45	Terry Reece	Bus Repairs	27,224.00
GF - 46	Freddy Smith	Repairs to Bldgs	45,186.00
GF - 47	Mike Ables	Supplies & Dirt Work	33,367.00
GF - 58	Danny Carter	Redone Floor	6,370.00
GF - 59	Cross K Supplies	Supplies	22,514.00
BF - 15	Freddy Smith	Repairs to Bldgs	2,865.00
BF - 18	Correy Dawson	Paint and Repairs	5,690.00
CNF - 10	Correy Dawson	Repairs	4,880.00
CNF - 11	Freddy Smith	Leak Repairs	2,162.00
	<b>TOTAL</b>		<b><u>\$386,211.00</u></b>

All these purchase orders were signed by the encumbrance clerk, and signed as approved by the superintendent. They all had invoices attached for the goods or services as shown above.

Because of the large dollar amount of these purchase orders, and because this was a repeat finding from prior years, all these payments were examined extensively. These purchase orders actually had more detailed invoices and descriptions than in prior years, but none of them had actual, original invoices with letterhead and normal business information. We examined all the checks issued to the above listed vendors by reviewing the school's bank statements. The checks were actually issued to these vendors, and had the names and addresses of the vendors on every check. The checks to these vendors were all signed, by hand, by the board president, clerk and either the treasurer or deputy treasurer.

We made the following observations regarding the checks to these vendors:

- The checks to these vendors were almost always written as a group together each month, on the same date.
- The checks were normally all cashed, together as a group, at the District's bank (First United Bank in Hugo, Ok) on the same day.
- The date the checks were actually cashed/deposited was usually either the same date they were issued, or the following day. Some of these vendors were located out of town, and it would seem unlikely that these checks could have been issued, mailed and cashed in such a short amount of time, or that they all could have been picked up on the issue date.
- The check signature for Wes Bailey (Board President) sometimes was signed "Wes Bailey" and sometimes was signed "J. W. Bailey". These signatures did not appear to be done by the same person.

The bank statements kept by the District only included images of the front of the checks, so no endorsements could be observed during our audit visit. We requested images of the back of these checks from the treasurer, and she had the bank send us these images.

We made the following observations regarding the check's endorsements to these vendors:

- The checks to these vendors were normally endorsed with the same name that was printed on the front of the check, but the endorsement handwriting appeared to be similar on the majority of these check endorsements.
- A majority the checks cashed on the same day were normally deposited within minutes of each other. The deposit times were shown on the backs of the checks by the printing done by the bank when deposited.
- 14 of the checks issued to Tina Byerly had an endorsement of her name on the check, but also included the signature of Wes Bailey under her name. Wes Bailey is a board member at Grant-Goodland School. The total amount of the checks endorsed by Bailey in 2014-15 was \$33,800.
- One of the checks issued to Danny Carter, in the amount of \$2,900, had an endorsement of his name on the check, but also included the endorsement signature of Buck Hammers. Buck Hammers is the superintendent of Grant-Goodland School. This check appeared to be deposited into the same bank account where Mr. Hammer's monthly paychecks were deposited. The other checks issued to Danny Carter had only his name endorsed, in the same handwriting as the other questionable endorsements.

- Nine of the checks issued to Cross K Supplies had an endorsement of the company name, and also had the signatures of Pam Keeling, Gary Wayne Keeling, or M. Keeling. The Deputy Treasurer for Grant-Goodland School is Pam Keeling. We researched Cross K Supplies with the Oklahoma Secretary of State, and found no company registered in Oklahoma under that name. We drove to the address shown on the invoices in Valliant, Oklahoma, and only found a vacant building. The total amount of the Cross K Supplies checks endorsed by Keeling in 2014-15 was \$22,514.
- Some of the checks issued to Robert Greggs had an endorsement signature that was notably different than the majority of the checks issued and endorsed in his name. These checks were not deposited on the same day or the next day after issuance, and actually appeared to show enough time for the mailing and depositing of these checks in Oklahoma City (his residence). There was also at least one occurrence where a check, for \$975, was endorsed with the normal (questionable) endorsement, and also endorsed by Pam Keeling.

In prior audits, we had recommended that an IRS Form 1099 be prepared and sent to each of these individuals, so the amounts paid to them can be reported on their individual tax returns as compensation. The District gave us copies of the 2014 Form 1099's for these vendors, dated 3/30/2015, and the amounts shown as paid appeared to be approximately the same as what was encumbered and paid by the District. However, we could not verify that these 1099 forms were actually sent to the vendors, or to the IRS.

The Board of Education approved contracts for Lindsey Thomas, Tina Byerly and Janet Lynn Branton Storie, per the board minutes. The minutes did not indicate the amounts of these contracts. However, none of these contracts could be located during our audit visit. These were also approved for the 2015-16 fiscal year also, but could not be located during our visit.

Criteria: School Districts are required, per Oklahoma Statute Title 70§5-135, to implement internal controls and procedures over purchasing to provide reasonable assurance that all district assets are adequately safeguarded.

Cause: The inherent limitations resulting from a small number of employees performing almost all the accounting functions, that would normally be divided among employees were a larger number available, prevent a proper segregation of duties. District internal controls and procedures were not being properly followed regarding the approval of purchases and the signing of checks.

Effect: Because of the lack of implementation, oversight and execution of procedures, several instances of misappropriation of assets appeared to have occurred in the 2014-15 fiscal year. It is our contention that some of the checks issued to these vendors are for actual obligations that were paid by the school district, but the majority of the checks issued to these vendors appear to be fraudulent. At this time, we cannot specifically state how many individuals are involved in this scheme, but it appears there are several. Based upon the information we have at this time, the total amount that appears to at least be

questionable for the 2014-15 fiscal year is \$350,246. We also note that these same types of large encumbrances and payments to these questionable vendors are in place in the current (2015-16) fiscal year.

Recommendation: We recommend that the appropriate law enforcement officials be notified immediately and request them to take the appropriate action regarding this apparent fraudulent activity. This action may include investigations into specific school employees and board members personal banking information.

We further recommend that law enforcement investigate the possible involvement of one or more bank employees at the First United Bank in Hugo, Oklahoma in this fraudulent activity. It appears that many of these checks, issued to various names, were deposited at the same time. This practice would appear to be an obvious fraud indicator to a bank employee.

We also recommend that the district enforce its current procedures and implement new procedures immediately to address the aforementioned conditions. An annual contract for services should be approved by the Board of Education, and signed by both the board and the vendors providing any goods or services for material amounts, indicating the rate of pay and the approximate amount of hours/materials expected to be purchased. Encumbrances should be carefully reviewed at each board meeting before approval. Updated, year-to-date encumbrance reports should be provided to the Board at every meeting. The Board should also approve warrant/check numbers at each meeting, and compare them to the warrants/checks that are being signed.

Response:

**COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS**

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 COMBINED STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCE -  
 ALL FUND TYPES AND ACCOUNT GROUPS - REGULATORY BASIS  
 JUNE 30, 2015

	GOVERNMENTAL FUND TYPES		FIDUCIARY FUND TYPES	TOTALS (MEMORANDUM ONLY)
	GENERAL	SPECIAL REVENUE	AGENCY FUNDS	
<b><u>ASSETS</u></b>				
Cash	\$ 140,592	13,211	19,677	173,480
Total Assets	<u>\$ 140,592</u>	<u>13,211</u>	<u>19,677</u>	<u>173,480</u>
<b><u>LIABILITIES AND FUND BALANCE</u></b>				
Liabilities:				
Warrants payable	\$ 85,145			85,145
Funds held for school organizations			19,677	19,677
Total liabilities	<u>85,145</u>	<u>0</u>	<u>19,677</u>	<u>104,822</u>
Fund Balance:				
Restricted		13,211		13,211
Unassigned	55,447			55,447
Cash fund balances	<u>55,447</u>	<u>13,211</u>	<u>0</u>	<u>68,658</u>
Total Liabilities and Fund Balance	<u>\$ 140,592</u>	<u>13,211</u>	<u>19,677</u>	<u>173,480</u>

The notes to the combined financial statements are an integral part of this statement

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES IN CASH FUND BALANCES  
 - ALL GOVERNMENTAL FUND TYPES - REGULATORY BASIS  
 FOR THE YEAR ENDED JUNE 30, 2015

	GOVERNMENTAL FUND TYPES		TOTALS (MEMORANDUM ONLY)
	GENERAL	SPECIAL REVENUE	
Revenues Collected:			
Local sources	\$ 174,823	25,019	199,842
Intermediate sources	22,828		22,828
State sources	1,242,304	9,229	1,251,533
Federal sources	308,936	91,553	400,489
Interest earnings	76	11	87
Non-revenue receipts	150		150
Total revenues collected	<u>1,749,117</u>	<u>125,812</u>	<u>1,874,929</u>
Expenditures:			
Instruction	832,585		832,585
Support services	847,097	28,073	875,170
Operation of non-instructional services	22,948	105,512	128,460
Total expenditures	<u>1,702,630</u>	<u>133,585</u>	<u>1,836,215</u>
Excess of revenues collected over (under) expenditures	46,487	(7,773)	38,714
Cash fund balances, beginning of year	8,960	20,984	29,944
Cash fund balances, end of year	<u>\$ 55,447</u>	<u>13,211</u>	<u>68,658</u>

The notes to the combined financial statements are an integral part of this statement

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND  
 CHANGES IN CASH FUND BALANCES - BUDGETED GOVERNMENTAL FUND TYPES - REGULATORY BASIS  
 FOR THE YEAR ENDED JUNE 30, 2015

GENERAL FUND

	Original Budget	Final Budget	Actual	Variance Favorable (Unfavorable)
<b>Revenues Collected:</b>				
Local sources	\$ 152,509	152,509	174,823	22,314
Intermediate sources	21,202	21,202	22,828	1,626
State sources	1,213,866	1,229,503	1,242,304	12,801
Federal sources	118,517	290,768	308,936	18,168
Interest earnings			76	76
Non-revenue receipts			150	150
Total revenues collected	<u>1,506,094</u>	<u>1,693,982</u>	<u>1,749,117</u>	<u>55,135</u>
<b>Expenditures:</b>				
Instruction	711,864	711,864	832,585	(120,721)
Support services	779,930	967,818	847,097	120,721
Operation of non-instructional services	22,948	22,948	22,948	
Unbudgeted	312	312		312
Total expenditures	<u>1,515,054</u>	<u>1,702,942</u>	<u>1,702,630</u>	<u>312</u>
Excess of revenue collected over (under) expenditures	(8,960)	(8,960)	46,487	55,447
Cash fund balance, beginning of year	<u>8,960</u>	<u>8,960</u>	<u>8,960</u>	<u>0</u>
Cash fund balance, end of year	<u>\$ 0</u>	<u>0</u>	<u>55,447</u>	<u>55,447</u>

The notes to the combined financial statements are an integral part of this statement.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 COMBINED STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND  
 CHANGES IN CASH FUND BALANCES - BUDGETED GOVERNMENTAL FUND TYPES - REGULATORY BASIS  
 FOR THE YEAR ENDED JUNE 30, 2015

	SPECIAL REVENUE FUNDS			Variance
	Original Budget	Final Budget	Actual	Favorable (Unfavorable)
Revenues Collected:				
Local sources	\$ 21,920	21,920	25,019	3,099
State sources	9,372	9,372	9,229	(143)
Federal sources	101,977	101,977	91,553	(10,424)
Interest earnings			11	11
Total revenues collected	<u>133,269</u>	<u>133,269</u>	<u>125,812</u>	<u>(7,457)</u>
Expenditures:				
Support services	30,235	30,235	28,073	2,162
Operation of non-instructional services	92,772	92,772	105,512	(12,740)
Unbudgeted	31,246	31,246		31,246
Total expenditures	<u>154,253</u>	<u>154,253</u>	<u>133,585</u>	<u>20,668</u>
Excess of revenue collected over (under) expenditures	(20,984)	(20,984)	(7,773)	13,211
Cash fund balances, beginning of year	<u>20,984</u>	<u>20,984</u>	<u>20,984</u>	<u>0</u>
Cash fund balances, end of year	<u>\$ 0</u>	<u>0</u>	<u>13,211</u>	<u>13,211</u>

The notes to the combined financial statements are an integral part of this statement

**NOTES TO COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS**

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

**1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

The accompanying financial statements of the Grant-Goodland Public Schools Dependent District, No. C-3 (the "District"), have been prepared in conformity with another comprehensive basis of accounting prescribed by the Oklahoma State Department of Education as authorized by Oklahoma Statutes. Accordingly, the accompanying financial statements are not intended to present financial position and results of operations in conformity with the accounting principles generally accepted in the United States of America. The District's accounting policies are described in the following notes that are an integral part of the District's financial statements.

**A. Reporting Entity**

The District is a corporate body for public purposes created under Title 70 of the Oklahoma Statutes and accordingly is a separate entity for operating and financial reporting purposes. The District is part of the public school system of Oklahoma under the general direction and control of the State Board of Education and is financially dependent on State of Oklahoma support. The general operating authority for the public school system is the Oklahoma School Code contained in Title 70, Oklahoma Statutes.

The governing body of the District is the Board of Education composed of three elected members. The appointed superintendent is the executive officer of the District. The Board, constituting an on-going entity, is the level of government, which has governance responsibilities over all activities, related to public elementary and secondary school education within the jurisdiction of the local Dependent school district. The District receives funding from local, state and federal government sources and must comply with the requirements of these funding source entities. However, the District is not included in any other governmental "reporting entity" as defined in Section 2100, Codification of Governmental Accounting and Financial Reporting Standards, since Board members are elected by the public and have decision making authority, the power to designate management, the responsibility to significantly influence operations and primary accountability for fiscal matters.

In evaluating how to define the District, for financial reporting purposes, management has considered all potential component units. The decision to include a potential component unit in the reporting entity was made by applying the criteria established by the Governmental Accounting Standards Board (GASB). The basic – but not the only – criterion for including a potential component unit within the reporting entity is the governing body's ability to exercise oversight responsibility. The most significant manifestation of this ability is financial interdependency. Other manifestations of the ability to exercise oversight responsibility include, but are not limited to, the selection of governing authority, the designation of management, the ability to significantly influence operations and accountability for fiscal matters. A second criterion used in evaluating potential component units is the scope of public service. Application of this criterion involves considering

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

**1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd**

**A. Reporting Entity – cont'd**

whether the activity benefits the District and/or its citizens, or whether the activity is conducted within the geographic boundaries of the District and is generally available to its patrons. A third criterion used to evaluate potential component units for inclusion or exclusion from the reporting entity is the existence of special financing relationships, regardless of whether the District is able to exercise oversight responsibilities. Based upon the application of these criteria, there are no potential component units included in the District's reporting entity.

**B. Measurement Focus**

The District uses funds and account groups to report on its financial position and the results of its operations. Fund accounting is designed to demonstrate legal compliance and to aid financial management by segregating transactions related to certain District functions or activities.

A fund is a separate accounting entity with a self-balancing set of accounts. An account group, on the other hand, is a financial reporting device designed to provide accountability for certain assets and liabilities that are not recorded in the funds because they do not directly affect net expendable available financial resources.

Funds are classified into three categories: Governmental, proprietary and fiduciary. Each category, in turn, is divided into separate "fund types."

**Governmental Fund Types**

Governmental funds are used to account for all or most of a government's general activities, including the collection and disbursement of earmarked monies (special revenue funds), the acquisition or construction of general fixed assets (capital projects funds), and the servicing of general long-term debt (debt service funds).

General Fund – The general fund is used to account for all financial transactions except those required to be accounted for in another fund. Major revenue sources include state and local property taxes and state funding under the Foundation and Incentive Aid Program. Expenditures include all costs associated with the daily operations of the schools except for programs funded for building repairs and maintenance, school construction and debt service on bonds and other long-term debt. The general fund includes federal and state restricted monies that must be expended for specific programs.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

B. Measurement Focus - cont'd

Special Revenue Funds – Special revenue funds account for revenue sources that are restricted to expenditures for specific purposes. The special revenue funds typically include the building, co-op and child nutrition funds. The district did not maintain a child nutrition fund during the 2014-15 fiscal year.

Building Fund – The building fund consists mainly of monies derived from property taxes levied for the purpose of erecting, remodeling, repairing, or maintaining school buildings and for purchasing furniture, equipment and computer software to be used on or for school district property, for paying energy and utility costs, for purchasing telecommunications services, for paying fire and casualty insurance premiums for school facilities, for purchasing security systems, and for paying salaries of security personnel.

Co-op Fund – The co-op fund is established when the boards of education of two or more school districts enter into cooperative agreements and maintain joint programs. The revenues necessary to operate a cooperative program can come from federal, state, or local sources, including the individual contributions of participating school districts. The expenditures for this fund would consist of those necessary to operate and maintain the joint programs.

Child Nutrition Fund - The child nutrition fund consists of monies derived from federal and state financial assistance and food sales. This fund is used to account for the various nutrition programs provided to students.

Debt Service Fund – The debt service fund is the District's sinking fund and is used to account for the accumulation of financial resources for the payment of general long-term (including judgments) debt principal, interest and related costs. The primary revenue sources are local property taxes levied specifically for debt service and interest earnings from temporary investments. The District did not maintain this fund during the 2014-15 fiscal year.

Capital Projects Fund – The capital projects fund is the District's bond fund and is used to account for the proceeds of bond sales to be used exclusively for acquiring school sites, constructing and equipping new school facilities, renovating existing facilities and acquiring transportation equipment. The District did not maintain this fund during the 2014-15 fiscal year.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

B. Measurement Focus – cont'd

**Fiduciary Fund Types**

Fiduciary funds are used to account for assets held on behalf of outside parties, including other governments, or on behalf of other funds within the District. The terms “non-expendable” and “expendable” refer to whether or not the District is under an obligation to maintain the trust principal. Agency funds generally are used to account for assets that the District holds on behalf of others as their agent and do not involve measurement of results of operation.

Expendable Trust Funds – Expendable trust funds typically include the gifts and endowments fund. The District did not maintain any expendable trust funds during the 2014-15 fiscal year.

Gifts and Endowments Fund – The gifts and endowments fund receives its assets by way of philanthropic foundations, individuals, or private organizations for which no repayment or special service to the contributor is expected. This fund is used to promote the general welfare of the District.

Agency Fund – The agency fund is the school activities fund which is used to account for monies collected principally through the fundraising efforts of students and District-sponsored groups. The administration is responsible, under the authority of the Board, for collecting, disbursing and accounting for these activity funds.

**Account Groups**

An account group is not a fund and consists of a self-balancing set of accounts used only to establish accounting control over long-term debt and fixed assets.

General Long-Term Debt Account Group – This account group is established to account for all the long-term debt of the District, which is offset by the amount available in the debt service fund and the amount to be provided in future years to complete retirement of the debt principal. It is also used to account for other liabilities (judgements and lease purchases) which are to be paid from funds provided in future years.

General Fixed Assets Account Group – This account group is used by governments to account for the property, plant and equipment of the school district. The District does not have the information necessary to include this group in its financial statements.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

B. Measurement Focus – cont'd

**Memorandum Only - Total Column**

The total column on the combined financial statements – regulatory basis is captioned “memorandum only” to indicate that it is presented only to facilitate financial analysis. Data in this column does not present financial position or results of operations in conformity with accounting principles generally accepted in the United States. Neither is such data comparable to a consolidation. Interfund eliminations have not been made in the aggregation of this data.

C. Basis of Accounting and Presentation

The District prepares its financial statements in a presentation format that is prescribed by the Oklahoma State Department of Education. This format is essentially the generally accepted form of presentation used by state and local governments prior to the effective date of GASB Statement No. 34, *Basic Financial Statements – Management’s Discussion and Analysis for State and Local Governments* with certain modifications. This format differs significantly from that required by GASB 34.

The financial statements are essentially prepared on the basis of cash receipts and disbursements modified as required by the regulations of the Oklahoma State Department of Education as follows:

- Encumbrances represented by purchase orders, contracts, and other commitments for the expenditure of monies are recorded as expenditures when approved.
- Investments are recorded as assets when purchased.
- Inventories of school supplies are recorded as expenditures and not as inventory assets.
- Warrants payable are recorded as liabilities when issued.
- Long-term debt is recorded in the General Long-Term Debt Account Group and not in the basic financial statements.
- Compensated absences are recorded as expenditures when paid and not recorded as a liability.
- Fixed assets are recorded in the General Fixed Asset Account Group and not in the basic financial statements. Fixed assets are not depreciated.

This regulatory basis of accounting differs from accounting principles generally accepted in the United States of America, which require revenues to be recognized when they become available and measurable, or when they are earned, and expenditures or expenses to be recognized when the related liabilities are incurred for governmental fund types; and, when revenues are earned.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
 FOR THE YEAR ENDED JUNE 30, 2015

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

C. Basis of Accounting and Presentation – cont'd

Basis of accounting refers to when revenues and expenditures are recognized in the accounts and reported in the financial statements. Basis of accounting relates to the timing of the measurements made, regardless of the measurement focus applied. All governmental type funds are accounted for using the regulatory basis of accounting. Revenues are recognized when they are received rather than earned and expenditures are generally recognized when encumbered/reserved rather than at the time the related fund liability is incurred. These practices differ from accounting principles generally accepted in the United States.

D. Budgets and Budgetary Accounting

The District is required by state law to prepare an annual budget. A preliminary budget must be submitted to the Board of Education by December 31, for the fiscal year beginning the following July 1. If the preliminary budget requires an additional levy, the District must hold an election on the first Tuesday in February to approve the levy. If the preliminary budget does not require an additional levy, it becomes the legal budget. If an election is held and the taxes are approved, then the preliminary budget becomes the legal budget. If voters reject the additional taxes, the District must adopt a budget within the approved tax rate.

A budget is legally adopted by the Board of Education for all funds (with the exception of the trust and agency funds) that includes revenues and expenditures.

The 2014-15 Estimate of Needs was amended by supplemental appropriations as follows:

<u>Fund</u>	<u>Total</u>
General	\$ 187,888

These amendments were approved by the county excise board.

Encumbrances represent commitments related to unperformed contracts for goods or services. Encumbrance accounting – under which purchase orders and other commitments of resources are recorded as expenditures of the applicable fund – is utilized in all governmental funds of the District. Unencumbered appropriations lapse at the end of each fiscal year. While the Debt Service Fund is a governmental fund, a comparison of budget to actual schedule is presented in the financial statements, although the board can exercise no control of the revenue sources for this fund (except interest earnings), and no control over its expenditures.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

E. Assets, Liabilities and Fund Equity

Cash and cash equivalents – The District considers all cash on hand, demand deposit accounts, and highly liquid investments, with an original maturity of three months or less when purchased, to be cash and cash equivalents.

Investments – The District considers investments of direct obligations of the United States government and agencies, certificates of deposits, savings accounts or savings certificates with maturities of greater than three months. All investments are recorded at cost, which approximates market value.

Inventories – The value of consumable inventories at June 30, 2015, is not material to the combined financial statements.

Fixed Assets and Property, Plant and Equipment – The District has not maintained a record of general fixed assets, and, accordingly, a General Fixed Assets Account Group required by the regulatory basis of accounting prescribed by the Oklahoma State Department of Education is not included in the financial statements. General fixed assets purchased are recorded as expenditures in the various funds at the time of purchase.

Warrants Payable – Warrants are issued to meet the obligations for goods and services provided to the District. The District recognizes a liability for the amount of outstanding warrants that have yet to be redeemed by the District's treasurer.

Encumbrances – Encumbrances represent commitments related to purchase orders, contracts, other commitments for expenditures or resources, and goods or services received by the District for which a warrant has not been issued. An expenditure is recorded and a liability is recognized for outstanding encumbrances at year end in accordance with the regulatory basis of accounting. While the regulatory basis that is used for the Debt Service Fund approximates full accrual accounting, the accruals recorded are reported to meet regulatory requirements, as opposed to the requirements of generally accepted accounting principles.

Compensated Absences – The District provides vacation and sick leave benefits in accordance with Title 70 of the Oklahoma Statutes, Article 6-104, which provides for annual sick leave and personal business days. District policy allows certified employees to accumulate such days to a maximum number of days. Vested or accumulated vacation leave that is expected to be liquidated with expendable available financial resources had not been reported as an expenditure of the governmental fund that will pay it since the financial statements have been prepared on the regulatory basis of accounting. This practice differs from generally accepted accounting principles.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

E. Assets, Liabilities and Fund Equity – cont'd

Funds Held for School Organizations – Funds held for school organizations represent the funds received or collected from students or other cocurricular and extracurricular activities conducted in the District, control over which is exercised by the board of education. These funds are credited to the account maintained for the benefit of each particular activity within the school activity fund.

Long-Term Debt – Long-term debt is recognized as a liability of a governmental fund when due, or when resources have been accumulated in the debt service fund for payment early in the following year. For other long-term obligations, only that portion expected to be financed from expendable available financial resources is reported as a fund liability of a governmental fund. The remaining portion of such obligations is reported in the general long-term debt account group.

Fund Balance – In the fund financial statements, governmental funds report the hierarchy of fund balances. The hierarchy is based primarily on the degree of spending constraints placed upon use of resources for specific purposes versus availability of appropriation. An important distinction that is made in reporting fund balance is between amounts that are considered *nonspendable* (i.e., fund balance associated with assets that are not in spendable form, such as inventories or prepaid items, long-term portions of loans and notes receivable, or items that are legally required to be maintained intact (such as the corpus of a permanent fund)) and those that are *spendable* (such as fund balance associated with cash, investments or receivables).

Amount in the spendable fund balance category are further classified as *restricted*, *committed*, *assigned* or *unassigned*, as appropriate.

*Restricted* fund balance represents amounts that are constrained either externally by creditors (such as debt covenants), grantors, contributors or laws or regulations of other governments; or by law, through constitutional provisions or enabling legislation.

*Committed* fund balance represents amounts that are useable only for specific purposes by formal action of the government's highest level of decision-making authority. Such amounts are not subject to legal enforceability (like restricted amounts), but cannot be used for any other purpose unless the government removes or changes the limitation by taking action similar to that which imposed the commitment.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

E. Assets, Liabilities and Fund Equity – cont'd

*Assigned* fund balance represents amounts that are intended to be used for specific purposes, but are neither restricted nor committed. Intent is expressed by the governing body itself, or a subordinated high-level body or official who the governing body has delegated the authority to assign amounts to be used for specific purposes. Assigned fund balances include all remaining spendable amounts (except negative balances) that are reported in governmental funds other than the general fund, that are neither restricted nor committed, and amounts in the general fund that are intended to be used for specific purposes in accordance with the provisions of the standard.

*Unassigned* fund balance is the residual classification for the general fund. It represents the amounts that have not been assigned to other funds, and that have not been restricted, committed, or assigned to specific purposes within the general fund.

F. Revenue and Expenditures

Local Revenues – Revenue from local sources is the money generated from within the boundaries of the District and available to the District for its use. The District is authorized by state law to levy property taxes which consist of ad valorem taxes on real and personal property within the District. These property taxes are distributed to the District's general, building and sinking funds based on the levies approved for each fund. The County Assessor, upon receipt of the certification of tax levies from the county excise board, extends the tax levies on the tax rolls for submission to the county treasurer prior to October 1. The county treasurer must commence tax collection within fifteen days of receipt of the tax rolls. The first half of taxes is due prior to January 1. The second half is due prior to April 1. If the first payment is not made in a timely manner, the entire tax becomes due and payable on January 2. Second half taxes become delinquent on April 1, of the year following the year of assessment. If not paid by the following October 1, the property is offered for sale for the amount of taxes due. The owner has two years to redeem the property by paying the taxes and penalty owed. If at the end of two years the owner has not done so, the purchaser is issued a deed to the property. Other local sources of revenues include tuition, fees, rentals, disposals, commissions and reimbursements.

Intermediate Revenues - Revenue from intermediate sources is the amount of money from funds collected by an intermediate administrative unit, or a political subdivision between the District and the state, and distributed to Districts in amounts that differ in proportion to those which are collected within such systems.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

F. Revenue and Expenditures – cont'd

State Revenues – Revenues from state sources for current operations are primarily governed by the state aid formula under the provisions of Article XVIII, Title 70, Oklahoma Statutes. The State Board of Education administers the allocation of state aid funds to school districts based on information accumulated from the Districts.

After review and verification of reports and supporting documentation, the State Department of Education may adjust subsequent fiscal period allocations of money for prior year errors disclosed by review. Normally, such adjustments are treated as reductions from or additions to the revenue of the year when the adjustment is made.

The District receives revenue from the state to administer certain categorical educational programs. State Board of Education rules require that revenue earmarked for these programs be expended only for the program for which the money is provided and require that the money not expended as of the close of the fiscal year be carried forward into the following year to be expended for the same categorical programs. The State Department of Education requires that categorical educational program revenues be accounted for in the general fund.

Federal Revenues – Federal revenues consist of revenues from the federal government in the form of operating grants or entitlements. An operating grant is a contribution to be used for a specific purpose, activity or facility. A grant may be received either directly from the federal government or indirectly as a passthrough from another government, such as the state. Entitlement is the amount of payment to which the District is entitled pursuant to an allocation formula contained in applicable statutes. The majority of the federal revenues received by the District are apportioned to the general fund. The District maintains a separate child nutrition fund and the federal revenues received for the child nutrition programs are apportioned there.

Non-Monetary Transactions – The District receives commodities from the U.S. Department of Agriculture. The value of these commodities has been included in the Schedule of Expenditures of Federal Awards; however, they have not been included in the financial statements as either revenue or expense since they are not reported under the regulatory basis of accounting.

Interest Earnings – Represent compensation for the use of financial sources over a period of time.

Non-Revenue Receipts – Non-revenue receipts represent receipts deposited into a fund that are not new revenues to the District, but the return of assets.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

F. Revenue and Expenditures – cont'd

Instruction Expenditures – Instruction expenditures include the activities dealing directly with the interaction between teachers and students. Teaching may be provided for students in a school classroom, in another location, such as a home or hospital, and in other learning situations, such as those involving cocurricular activities. It may also be provided through some other approved medium, such as television, radio, telephone and correspondence. Included here are the activities of teacher assistants of any type (clerks, graders, teaching machines, etc.) which assist in the instructional process. The activities of tutors, translators and interpreters would be recorded here. Department chairpersons who teach for any portion of time are included here. Tuition/transfer fees paid to other LEAs would be included here.

Support Services Expenditures – Support services expenditures provide administrative, technical (such as guidance and health) and logistical support to facilitate and enhance instruction. These services exist as adjuncts for fulfilling the objectives of instruction, community services and enterprise programs, rather than as entities within themselves.

Operation of Non-Instructional Services Expenditures – Activities concerned with providing non-instructional services to students, staff or the community.

Facilities Acquisition and Construction Services Expenditures – Consists of activities involved with the acquisition of land and buildings; remodeling buildings; the construction of buildings and additions to buildings; initial installation or extension of service systems and other built-in equipment; and improvements to sites.

Other Outlays Expenditures – A number of outlays of governmental funds are not properly classified as expenditures, but still require budgetary or accounting control. These are classified as Other Outlays. These include debt service payments (principal and interest).

Other Uses Expenditures – This includes scholarships provided by private gifts and endowments; student aid and staff awards supported by outside revenue sources (i.e., foundations). Also, expenditures for self-funded employee benefit programs administered either by the District or a third party administrator.

Repayment Expenditures – Repayment expenditures represent checks/warrants issued to outside agencies for refund or restricted revenue previously received for overpayment, non-qualified expenditures and other refunds to be repaid from District funds.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – cont'd

F. Revenue and Expenditures – cont'd

Interfund Transactions – Quasi-external transactions are accounted for as revenues, expenditures or expenses. Transactions that constitute reimbursements to a fund or expenditures/expenses initially made from it that are properly applicable to another fund, are recorded as expenditures/expenses in the fund that is reimbursed.

All other interfund transactions, except quasi-external transactions and reimbursements, are reported as transfers. Nonrecurring or nonroutine permanent transfers of equity are reported as residual equity transfers. All other interfund transfers are reported as operating transfers. There were no interfund transfers made during the 2014-15 fiscal year.

2. CASH AND INVESTMENTS

Custodial Credit Risk – Custodial credit risk is the risk that in the event of a bank failure, the District's deposits may not be returned to the District. The District's cash deposits and investments at June 30, 2015, were \$164,634, at financial institutions, and were completely insured or collateralized by federal depository insurance, direct obligations of the U.S. Government, or securities held by the District or by its agent in the District's name.

Investment Interest Rate Risk – Interest rate risk is the risk that changes in interest rates will adversely affect the fair market value of an investment. Due to the required liquidity for those investments, these funds have no defined maturity dates. The District does not have a formal policy that limits investment maturities as a means of managing its exposure to fair value losses from increasing interest rates.

Investment Credit risk – Credit risk is the risk that the issuer or other counterparty to an investment will not fulfill its obligations. The District does not have a formal policy limiting its investment choices, other than the limitation of state law as follows:

- Direct obligations of the U.S. Government, its agencies and instrument to which the full faith and credit of the U.S. Government is pledged, or obligations to the payment of which the full faith and credit of the State is pledged.
- Certificates of deposit or savings accounts that are either insured or secured with acceptable collateral with in-state financial institutions, and fully insured certificates of deposit or savings accounts in out-of-state financial institutions.
- With certain limitation, negotiable certificates of deposit, prime bankers acceptances, prime commercial paper and repurchase agreements with certain limitations.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
 FOR THE YEAR ENDED JUNE 30, 2015

**2. CASH AND INVESTMENTS – cont'd**

- County, municipal or school district tax supported debt obligations, bond or revenue anticipation notes, money judgments, or bond or revenue anticipation notes of public trusts whose beneficiary is a county, municipality or school district.
- Notes or bonds secured by mortgage or trust deed insured by the Federal Housing Administrator and debentures issued by the Federal Housing Administrator, and in obligations of the National Mortgage Association.
- Money market funds regulated by the SEC and in which investments consist of the investments mentioned in the previous bullet items.

Concentration of Investment Credit Risk – The District places no limit on the amount it may invest in any one issuer.

**3. INTERFUND RECEIVABLES AND PAYABLES**

There were no interfund receivables or payables at June 30, 2015.

**4. GENERAL LONG-TERM DEBT**

State statutes prohibit the District from becoming indebted in an amount exceeding the revenue to be received for any fiscal year without approval by the District's voters. Bond issues can be approved by the voters and issued by the District for various capital improvements. These bonds are required to be fully paid serially within 25 years of the date of issue.

General long-term debt of the District consists of capital leases.

The following is a summary of the long-term debt transactions of the District for the year ended June 30, 2015:

	Capital Leases
Balance, July 1, 2014	\$ 43,124
Deductions	(43,124)
Balance, June 30, 2015	\$ -

Interest paid on general long-term debt incurred during the 2013-14 fiscal year totaled \$1,015.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

**5. EMPLOYEE RETIREMENT SYSTEM**

Description of Plan

The District participates in the state-administered Oklahoma Teachers' Retirement System, which is a cost sharing, multiple-employer defined benefit public employee retirement system (PERS), which is administered by the Board of Trustees of the Oklahoma Teachers' Retirement System (the "System"). The System provides retirement and disability benefits, annual cost-of-living adjustments, and death benefits to plan members and beneficiaries. Title 70 Section 17 of the Oklahoma Statutes establishes benefit provisions and may be amended only through legislative action. The Oklahoma Teachers' Retirement System issues a publicly available financial report that includes financial statements and required supplementary information for the System. That report may be obtained by writing to the Oklahoma Teachers' Retirement System, P.O. Box 53624, Oklahoma City, OK 73152, or by calling 405-521-2387.

Basis of Accounting

The System's financial statements are prepared using the cash basis of accounting, except for accruals of interest income. Plan member contributions are recognized in the period in which the contributions are made. Benefits and refunds are recognized when paid. The pension benefit obligation is a standardized disclosure measure of the present value of pension benefits. This pension valuation method reflects the present value of estimated pension benefits that will be paid in future years as a result of employee services performed to date and is adjusted for the effect of projected salary increases. There are no actuarial valuations performed on individual school districts. The System has an under-funded pension benefit obligation as determined as part of the latest actuarial valuation.

Funding Policy

The District, the State of Oklahoma, and the participating employee make contributions. The contribution rates for the District and its employees are established by and may be amended by Oklahoma Statutes. The rates are not actuarially determined. The rates are applied to the employee's earnings plus employer-paid fringe benefits. The required contribution for the participating members is 7.0% of compensation. Contributions received by the System from the State of Oklahoma are used to offset required employer contributions by the local school district. For the 2014-15 fiscal year, the District contributed 9.5% and the State of Oklahoma contributed the remaining amount during the year. The District is allowed by Oklahoma Teachers' Retirement System to make the required contributions on behalf of the participating members. In addition, if a member's salary is paid in part by federal or private funds, the contribution on that portion of the salary paid by those funds must be matched by the District at 5.12%.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

**5. EMPLOYEE RETIREMENT SYSTEM – cont'd**

Annual Pension Cost

The District's total contributions for 2015, 2014 and 2013 were \$109,996, \$121,786, and \$134,062, respectively. Ten-year historical trend information is presented in the Teacher's Retirement System of Oklahoma Annual Report for the year ended June 30, 2015. This information is useful in assessing the pension plan's accumulation of sufficient assets to pay pension benefits as they become due. Please visit [www.ok.gov/TRS](http://www.ok.gov/TRS) for all plan information.

GASB Statement 68 became effective for fiscal years beginning after June 15, 2014, and significantly changes pension accounting and financial reporting for governmental employers who participate in a pension plan, such as the System, and who prepare published financial statements on an accrual basis using Generally Accepted Accounting Principles. Since the District does not prepare and present their financial statements on an accrual basis, the net pension amount is not required to be presented on the audited financial statements. The amount of calculated pension liability for the District at June 30, 2014 (the latest information available) was \$1,033,805.

**6. RISK MANAGEMENT**

The District is exposed to various risks of loss related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; or acts of God. The District purchases commercial insurance to cover these risks, including general and auto liability, property damage, and public officials liability. Settled claims resulting from risks have not exceeded the commercial insurance coverage in any of the past three fiscal years.

The School participates in a risk pool for Workers' Compensation coverage in which there is a transfer or pooling of risks among the participants of that pool. In accordance with GASB No. 10, the School reports the required contribution to the pool, net of refunds, as insurance expense. The risk pool is the Oklahoma School Assurance Group (OSAG), an organization formed for the purpose of providing workers' compensation coverage to participating schools in the State of Oklahoma. In that capacity, OSAG is responsible for providing loss control services and certain fiscal activities, including obtaining contract arrangements for the underwriting, excess insurance agreements, claims processing, and legal defense for any and all claims submitted to it during the plan year. As a member of OSAG, the District is required to pay fees set by OSAG according to an established payment schedule. A portion of the fees paid by the District goes into a loss fund for the District. The fee for the loss fund is calculated by projecting losses based on the school's losses for the last five years. OSAG provides coverage in excess of the Loss Fund so the District's liability for claim loss is limited to the balance of the loss fund. If the District does not use its loss fund in three years, it is returned to the District with no interest.

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
NOTES TO THE COMBINED FINANCIAL STATEMENTS – REGULATORY BASIS  
FOR THE YEAR ENDED JUNE 30, 2015

**7. CONTINGENCIES**

Federal Grants

Amounts received or receivable from grant agencies are subject to audit and adjustment by grantor agencies. Any disallowed claims, including amounts already collected, may constitute a liability of the applicable funds. The amounts, if any, of expenditures which may be disallowed by the grantor cannot be determined at this time, although the District expects such amounts, if any, to be immaterial.

Schedule of Expenditure of Federal Awards

The schedule shows the federal awards received and expended by the District during the 2014-15 fiscal year. The revised OMB Circular A-133 Audits of States, Local Governments and Non-Profit Organizations, established uniform audit requirements for nonfederal entities which expended more than \$500,000 in federal awards.

The District did not fall under this threshold for the 2014-15 fiscal year.

Litigation

School officials are not aware of any pending or threatened litigation, claims or assessments or unasserted claims or assessments against the District.

Subsequent Events

Management has evaluated subsequent events through January 27, 2016, which is the date the financial statements were available to be issued, and have determined that no additional information needs to be added to the financial statements.

**COMBINING FINANCIAL STATEMENTS – REGULATORY BASIS**

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 COMBINING STATEMENT OF ASSETS, LIABILITIES AND FUND BALANCE -  
 ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS  
 JUNE 30, 2015

<u>ASSETS</u>	<u>BUILDING FUND</u>	<u>CHILD NUTRITION FUND</u>	<u>TOTAL</u>
Cash	\$ 3,466	9,745	13,211
Total Assets	<u>\$ 3,466</u>	<u>9,745</u>	<u>13,211</u>
 <u>LIABILITIES AND FUND BALANCE</u>			
Liabilities	\$ 0	0	0
Fund Balance: Restricted	<u>3,466</u>	<u>9,745</u>	<u>13,211</u>
Total Liabilities and Fund Balance	<u>\$ 3,466</u>	<u>9,745</u>	<u>13,211</u>

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES  
 IN CASH FUND BALANCES - ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS  
 FOR THE YEAR ENDED JUNE 30, 2015

	BUILDING FUND	CHILD NUTRITION FUND	TOTAL
Revenues Collected:			
Local sources	\$ 23,938	1,081	25,019
State sources		9,229	9,229
Federal sources		91,553	91,553
Interest earnings		11	11
Total revenues collected	<u>23,938</u>	<u>101,874</u>	<u>125,812</u>
Expenditures:			
Support services	28,073		28,073
Operation of non-instructional services		105,512	105,512
Total expenditures	<u>28,073</u>	<u>105,512</u>	<u>133,585</u>
Excess of revenue collected over (under) expenditures	(4,135)	(3,638)	(7,773)
Cash fund balances, beginning of year	<u>7,601</u>	<u>13,383</u>	<u>20,984</u>
Cash fund balances, end of year	<u>\$ 3,466</u>	<u>9,745</u>	<u>13,211</u>

INDEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 COMBINING STATEMENT OF REVENUES COLLECTED, EXPENDITURES AND CHANGES  
 IN CASH FUND BALANCES - BUDGET AND ACTUAL COMPARISON  
 ALL SPECIAL REVENUE FUNDS - REGULATORY BASIS  
 FOR THE YEAR ENDED JUNE 30, 2015

	BUILDING FUND		CHILD NUTRITION FUND	
	ORIGINAL BUDGET	FINAL BUDGET	ORIGINAL BUDGET	FINAL BUDGET
Revenues Collected:				
Local sources	\$ 21,787	21,787	\$ 133	133
State sources			9,372	9,372
Federal sources			101,977	101,977
Interest earnings				11
Total revenues collected	<u>21,787</u>	<u>21,787</u>	<u>111,482</u>	<u>111,482</u>
Expenditures:				
Support services	28,073	32,713	2,162	2,162
Operation of non-instructional services			92,772	92,772
Unbudgeted	1,315		29,931	29,931
Total expenditures	<u>29,388</u>	<u>32,713</u>	<u>124,865</u>	<u>124,865</u>
Excess of revenues collected over (under) expenditures	<u>(7,601)</u>	<u>(10,926)</u>	<u>(13,383)</u>	<u>(13,383)</u>
Cash fund balances, beginning of year	7,601	7,601	13,383	13,383
Cash fund balances, end of year	<u>\$ 0</u>	<u>0</u>	<u>\$ 0</u>	<u>0</u>
		3,466		9,745

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 COMBINING STATEMENT OF CHANGES IN ASSETS AND LIABILITIES -  
 AGENCY FUNDS - REGULATORY BASIS  
 FOR THE YEAR ENDED JUNE 30, 2015

<u>ASSETS</u>	<u>BALANCE</u> 7-01-14	<u>ADDITIONS</u>	<u>NET</u> <u>TRANSFERS</u>	<u>DEDUCTIONS</u>	<u>BALANCE</u> 6-30-15
Cash	\$ 13,775	47,595	0	41,693	19,677
 <u>LIABILITIES</u>					
Funds held for school organizations:					
Athletics	\$ 1,894	26,919	121	24,713	4,221
Yearbook	69	0		0	69
Miscellaneous	3,581	6,441		5,734	4,288
Cheerleaders	200	0		0	200
Concession	1,997	3,905		2,785	3,117
Archery	46	0	(46)	0	0
Dance team	70	0	(70)	0	0
Faculty fund	1,763	2,930		2,743	1,950
Graduation	266	0		35	231
Newspaper	5	0	(5)	0	0
Special needs program	101	0		0	101
Kindergarten	166	939		665	440
1st grade class	11	1,116		900	227
2nd grade class	443	2,486		2,208	721
3rd grade class	171	411		165	417
4th grade class	538	176		181	533
5th grade class	155	102		0	257
6th grade class	44	268		0	312
7th grade class	674	656		350	980
8th grade class	416	574		758	232
Pre-kindergarten	166	662		456	372
PTO	122	10		0	132
Ag livestock booster club	877	0		0	877
Total Liabilities	\$ 13,775	47,595	0	41,693	19,677

**SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
REGULATORY BASIS**

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS - REGULATORY BASIS  
 FOR THE YEAR ENDED JUNE 30, 2015

Federal Grantor / Pass Through Grantor / Program Title	CFDA Number	Federal Grantor's/ Pass-through No.	Program or Award Amount	Balance at 7/1/14	Revenue Collected	Total Expenditures	Balance at 6/30/15
<u>U.S. Department of Education</u>							
<u>Direct Programs:</u>							
Indian Education	84.060	S060A140806	\$ 15,950		15,950	15,950	
Small rural school development	84.358	S358A143247	5,269		5,269	5,269	
Impact Aid	84.041	S041B-2015-6332	116,114		116,114	116,114	
Impact Aid - Special Education	84.041	S041B-2015-6332	17,458		17,458	17,458	
Sub Total			154,791	0	154,791	154,791	0
<u>Passed Through State Department of Education:</u>							
Title I	84.010		87,309		66,316	66,316	
Title I School Support	84.010		35,359		10,598	10,598	
Title II, Part A	84.367		34,554		11,095	11,095	
Title II, Part A 2013-14 - Note	84.367			5,048	5,048		
IDEA-B, Flowthrough	84.027		52,714		49,051	49,051	
IDEA-B, Preschool	84.173		5,951		5,301	5,301	
Sub Total			215,887	5,048	147,409	142,361	0
<u>U.S. Department of Agriculture:</u>							
<u>Passed Through State Department of Education</u>							
<u>Child Nutrition Programs:</u>							
School breakfast program	10.553				29,694	29,694	
National school lunch program	10.555				61,860	61,860	
Sub Total					91,554	91,554	
<u>Passed Through Department of Human Services:</u>							
<u>Non-cash assistance - commodities - Note 1</u>							
National school lunch program	10.555				11,042	11,042	
<u>Other Federal Assistance:</u>							
Johnson O'Malley	15.130		3,120		3,120	3,120	
Johnson O'Malley 2013-14 - Note	15.130			3,616	3,616		
Sub Total			3,120	3,616	6,736	3,120	0
<b>Total Federal Assistance</b>			<b>\$ 373,798</b>	<b>8,664</b>	<b>411,532</b>	<b>402,868</b>	<b>0</b>

Note - These amounts represent reimbursements received in the current fiscal year from prior fiscal year claims for reimbursement.

Note 1 - Commodities received by the District in the amount of \$11,042 were of a non-monetary nature. Therefore, the total revenue does not agree with the financial statements by this amount.

INDEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
 STATEMENT OF STATUTORY, FIDELITY AND HONESTY BONDS  
 FOR THE YEAR ENDED JUNE 30, 2015

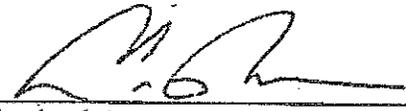
BONDING COMPANY	POSITION COVERED	BOND NUMBER	COVERAGE AMOUNT	EFFECTIVE DATES
CNA Surety -				
Westen Surety Company	Treasurer / Minutes Clerk	14236604	\$ 100,000	09/01/2014 - 09/01/2015
Old Republic Surety Company	Deputy Treasurer	LPO - 2111608	100,000	09/03/2014 - 09/03/2015
	Superintendent / Activity Fund	0601-61433912	100,000	08/07/2014 - 08/07/2015
	Encumbrance Clerk / Lunch Fund	POB - 0319310	5,000	06/30/2014 - 06/30/2015

DEPENDENT SCHOOL DISTRICT NO. C-3, CHOCTAW COUNTY  
SCHEDULE OF ACCOUNTANT'S PROFESSIONAL LIABILITY INSURANCE  
AFFIDAVIT  
JULY 1, 2014 TO JUNE 30, 2015

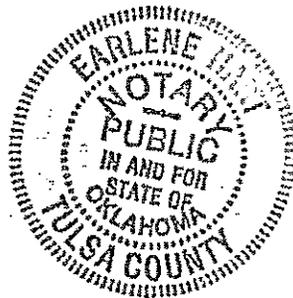
State of Oklahoma            )  
  ) ss  
County of Tulsa             )

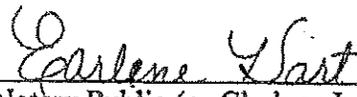
The undersigned auditing firm of lawful ages, being first duly sworn on oath says that said firm had in full force and effect Accountant's Professional Liability Insurance in accordance with the "Oklahoma Public School Audit Law" at the time of audit contract and during the entire audit engagement with Grant-Goodland Public School for the audit year 2014-15.

Sanders, Bledsoe & Hewett,  
Certified Public Accountants, LLP  
Auditing Firm

By   
Authorized Agent

Subscribed and sworn to before me  
This 27<sup>th</sup> day of January, 2016



  
Notary Public (or Clerk or Judge)

My Commission Expires: 5/19/2016  
Commission No. 00008621