

CORRECTIVE ACTION PLAN
INTERNAL AUDIT REPORT ON GRANTS ADMINISTRATION
June 30, 2020
AUDIT FIRM – R.S. ABRAMS

Policies and Procedures

Procedure Performed: We reviewed the District’s policies and procedures to determine whether the District has adopted the written policies and procedures recommended by NYSED surrounding the administration of federal funds.

Findings: We noted the District does not have a written policy or procedures regarding the completion of payroll certifications to substantiate time and effort for employees who work on federal awards as required under the Uniform Guidance.

Recommendations: We recommend that the District develop written policies and procedures regarding the completion of payroll certifications by employees who work on federal awards as required under the Uniform Guidance to substantiate time and effort. We noted that the District is in the process of developing a federal funds procedural manual that incorporates policies and procedures for all federal grants and the associated applicable compliance requirements.

District Response: We thank RS Abrams for their comment, the Federal Policy manual is in place and includes the updated payroll certification forms to substantiate time and effort of employees working under federal awards.

Compliance with Allowable Costs

Procedure Performed: We obtained a sample of eight federal grant expenditures to verify the following:

- The expenditure charged was an allowable cost as per the Uniform Guidance.
- The expenditure was charged to the proper period.
- The expenditure was properly authorized and followed the District’s purchasing policy.
- The expenditure was properly recorded and coded in the AIS.

Findings: No exceptions were noted as a result of applying these procedures

Recommendation:
N/A

District Response:
N/A

Payroll Compliance

Procedure Performed: We reviewed a sample of payroll transactions for twenty employees whose salaries were charged to federal grants to verify the following:

- The District had payroll certifications on file to substantiate salaries charged to grants in compliance with the Uniform Guidance.
- The employee’s salary was charged to the grant in the proper period and coded correctly.

Findings: Based on the procedures performed, we noted the following for the District’s payroll compliance procedures:

- The payroll certification forms utilized by the District were outdated and referenced Circular A-87, rather than Uniform Guidance.

Recommendations: We recommend the District update their payroll certification forms in accordance with Uniform Guidance. We noted that after our field work the District has since updated their payroll certification forms.

District Response: The District thanks RS Abrams for their comment, the District has updated the payroll certification forms as recommended.

Cash Receipts

Procedure Performed: We selected a sample of grant payments made by the OSC to the District from the *OSC Payment Information Inquiry Report* for 2019-2020 to verify payments received were properly recorded in the AIS.

Findings: No exceptions were noted as a result of applying these procedures.

Recommendations:
N/A

District Response:
N/A

Grants Accounting

Procedure Performed: We obtained the District's FS-10, FS-10-A, and FS-25 forms for the 2018-2019 school year, filed with the Grants Finance Unit for Title I, Title II, Title IV, and IDEA (611 and 619) grants to verify the following:

- The FS-25 forms agreed to the expenditures recorded in the District's AIS.
- The FS-10 and FS-10-A forms (as applicable) agreed to the budget recorded in the District's AIS.

Findings: No exceptions were found as a result of applying these procedures.

Recommendation:

N/A

District Response:

N/A

Maintenance of Effort

Procedure Performed: We reviewed the maintenance of effort calculations (MOE) provided to NYSED by the District for the 2018-2019 compliance and 2019-2020 eligibility requirements and verified the following:

- Budgeted and actual expenditures, allocation of state and local expenditures, fringe benefits, and child counts reported on the amounts tab of the calculations agreed to related supporting documentation.
- The District was in compliance with level of effort/maintenance of effort requirements per the MOE tab of the calculation.

Findings: No exceptions were found as a result of applying these procedures.

Recommendation:

N/A

District Response:

N/A

Eligibility

Procedure Performed: We reviewed the District's Title I Consolidated Application for the 2019-2020 school year to verify that the District properly determined what school attendance areas were eligible for Title I funding and properly allocated funding to those school attendance areas.

Findings: No exceptions were noted as a result of applying these procedures.

Recommendation:

N/A

District Response:

N/A

High School Graduation Rate

Procedure Performed: We selected a sample of students who left the District during the period from July 1, 2019 through February 29, 2020 either by transfer to another outside District or departure from the country to verify that the District is obtaining and maintaining formal written documentation for all transferred students who are allowed to be removed from the District's cohort for the purpose of the high school graduation rate calculation.

Findings: No exceptions were noted as a result of applying these procedures.

Recommendation:

N/A

District Response:

N/A

Private School Participation

Procedure Performed: We obtained supporting documentation to verify the District has consulted with private school officials regarding participation in the Title I, II, III, and IV grants for the 2019-2020 school years. For schools that did not decline participation, we reviewed program expenditures and other records to determine that the services that were planned for private school children were provided and that the funds for private school children were available and set aside prior to allocating funds to the District level areas.

Findings: No exceptions were found as a result of applying these procedures. All private schools declined participation in the Title I, II, III, and IV grants.

Recommendation:

N/A

District Response:

N/A