

The University of the State of New York
The State Education Department
Office of Educational Management Services

AUDIT REFERENCE MANUAL

FOR AUDITS OF FINANCIAL STATEMENTS OF NEW YORK STATE SCHOOL DISTRICTS

(Eight or More Teachers)



2022

THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY

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July 2022

TO: Board of Education Members, Superintendents, and Financial Officials
of Public Schools

FROM: Office of Educational Management Services

RE: Audits of the Financial Statements of School Districts Employing
Eight or More Teachers

This Reference Manual may be obtained through the New York State Education Department's (NYSED) website at [Reference Manual](#). We strongly suggest that you furnish your independent auditor with the webpage address where the useable document can be retrieved, and also for the main purpose of enabling your school district to consider the information that it provides relating to independent audits of New York State school districts.

Education Law, Section 2116-a, and the Regulations of the Commissioner, Section 170.12(e), require each Board of Education to secure an annual audit by an independent auditor. The Audit Committee shall provide recommendations regarding the appointment of the external auditor, but its recommendations shall not substitute for any required review and acceptance by the Board of Education. The Uniform Guidance requires that an annual audit of the district's federal award programs be included with the annual school district audit if \$750,000 or more in federal awards was expended during the corresponding year. Section 172.3(d) of Commissioner's Regulations requires that the Extraclassroom Activity Fund also be audited.

Please be advised—

The information provided in this document is subject to revision following the release of forthcoming guidance from the Office of the State Comptroller regarding the implementation of GASB 87 – Leases. As GASB 87 is effective for reporting periods beginning after June 15, 2021, School District Financial Statements for 2021-22 should reflect its implementation.

AUDIT REFERENCE MANUAL
Is provided by the New York State Education Department
Office of Educational Management Services

With the assistance of:

Contributors in New York State Government

NYSED Office of Educational Management Services

NYSED Office of Audit Services

*Thank you to those in the NYS accounting and auditing profession who assisted in
the review and preparation of this year's manual.*

AUDIT
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FOR AUDITS OF FINANCIAL STATEMENTS OF
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Section I - Introduction

PURPOSE

This Reference Manual is provided to support school districts in New York State, and their auditors, through the annual audit process. Its main goal is to assist school districts to receive a quality audit.

New York State Education Law §2116-a and section 170.12(e) of the Regulations of the Commissioner of Education require each school district employing eight or more teachers to obtain an annual audit of its records by an independent certified public accountant or an independent public accountant. The New York State Education Department (NYSED) requires that all audits be conducted in accordance with Generally Accepted Auditing Standards (GAAS) in the United States of America, issued by the American Institute of Certified Public Accountants (AICPA), and Generally Accepted Government Auditing Standards (GAGAS), issued by the Comptroller General of the United States, regardless of whether the District is subject to the Single Audit Act of 1984, including the Single Audit Act Amendments of 1996 (P.L. 104 -156, 7/5/96) and Title 2 U.S Code of Federal Regulation Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance).

This assistance is primarily focused on the need of school officials and school board members to understand the basic requirements and limitations of an audit. This Reference Manual provides assistance from the engagement of the auditor through the filing of various audit reports with the appropriate regulatory bodies. The assistance will take the form of a general discussion, including references to more complete guidance.

Although this Reference Manual is intended for school officials and school board members, it should be shared with the District's auditor or prospective auditor. The auditor should not consider this manual to be all-inclusive, or a substitute for professional judgment. Furthermore, the auditor should consider this manual at the lowest level of the Generally Accepted Accounting Principles' (GAAP) hierarchy.

Comments or questions regarding this Reference Manual should be sent to:

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New York State Education Department
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Section II - Certain Significant Accounting and Auditing Issues

This summary update is intended to inform school officials, board members, and auditors about recent developments and areas receiving increased emphasis involving accounting and auditing issues. It is intended to be informative, but not all-inclusive.

School districts are required by the provisions of section 36 of the New York State General Municipal Law to follow the system of keeping accounts formulated and prescribed by the NYS Comptroller. Useful documents include the Accounting and Reporting Manual for School Districts (ARM) and Local Government Management Guides, developed by the Office of the State Comptroller. The ARM is intended to mirror GAAP, which will be followed in preparation of school districts' financial statements. However, the ARM is not intended to enumerate principles related to financial reporting. The Comptroller's Office issues accounting bulletins to update the ARM for new accounting pronouncements, and to clarify the implementation of existing guidance. GAAP are the culmination of a variety of authoritative sources (See AU Section 411: The Meaning of "Present Fairly in Conformity with Generally Accepted Accounting Principles").

On May 8, 2020, the Government Accounting Standards Board (GASB) issued Statement No. 95, Postponement of the Effective Dates of Certain Authoritative Guidance. This Statement was intended to provide relief to governments in light of the COVID-19 pandemic. This timeline summarizes the revised effective dates of some of the most recent Government Accounting Standards:

GASB Statement No. 83, Certain Asset Retirement Obligations	Periods Ending June 30, 2020
GASB Statement No. 84, Fiduciary Activities	Periods Ending June 30, 2021
GASB Statement No. 87, Leases	Periods Ending June 30, 2022
GASB Statement No. 88, Certain Disclosures Related to Debt	Periods Ending June 30, 2020
GASB Statement No. 89, Accounting for Interest Cost Incurred before the End of a Construction Period	Periods Ending June 30, 2022
GASB Statement No. 90, Majority Interests – an amendment of GASB Statement No. 14 and 61	Periods Ending June 30, 2021
GASB Statement No. 91, Conduct Debt Obligations	Periods Ending June 30, 2023
GASB Statement No. 92, Omnibus	Periods Ending June 30, 2022
GASB Statement No. 93, Replacement of Interbank Offered Rates (excluding paragraphs 11b, 13 and 14)	Periods Ending June 30, 2021

GASB Statement No. 93, Replacement of Interbank Offered Rates, Paragraphs 11b, 13 and 14	Periods Ending June 30, 2022
GASB Statement No. 94, Public-Private and Public-Public Partnership and Availability Payment Agreements	Periods Ending June 30, 2023
GASB Statement No. 96, Subscription-Based Information Technology Agreements	Periods Ending June 30, 2023
GASB Statement No. 97, Certain Component Unit Criteria, and Accounting and Financial Reporting for Internal Revenue Code Section 457 Deferred Compensation Plans - an Amendment of GASB Statements No. 14 and 84, and a Supersession of GASB Statement No. 32 (the requirements in paragraph 4, as they apply to defined contribution pension plans, defined contribution OPEB plans and other employee benefit plans, and paragraph 5 of this Statement were effective as of June 2020)	Periods Ending June 30, 2022

2022 Compliance Supplement

- Effective for audits of fiscal years beginning after June 30, 2021, and supersedes the 2021 Compliance Supplement (dated August 2021) and its Addenda (dated December 2021 and January 2022).
- The 2022 Compliance Supplement has been issued as a stand-alone document and is available on the Office of Management and Budget's (OMB) website: <https://www.whitehouse.gov/omb/management/office-federal-financial-management/>

The 2022 Compliance Supplement adds, deletes, and modifies prior Supplement sections as usual. Further, it continues the OMB mandate adopted in the 2019 Compliance Supplement requiring that each federal agency limit the number of compliance requirements subject to the audit to six, with the exception of the Research and Development cluster, which has been permitted to identify seven compliance requirements as subject to the audit. For this purpose, the requirements relating to A. Activities Allowed and Unallowed and B. Allowable Costs and Cost Principles are treated as one requirement. The Part 2 matrix and the related program sections in parts 4 and 5 reflect this OMB mandate. Additionally, this six-requirement mandate does not apply to programs not included in this Supplement.

The 2 CFR Part 200, Subpart F, describes the non-federal entity's responsibilities for managing federal assistance programs (2 CFR section 200.508) and the auditor's responsibility with respect to the scope of the audit (2 CFR section 200.514). Auditors are required to follow both the provisions of 2 CFR Part 200, Subpart F, and this Supplement.

Key Changes

Due to the number of changes that may be made to the Compliance Supplement each year, it is critical for auditors to carefully read it, inclusive of those parts that may not be referred to frequently such as Part 1, Background, Information, and Applicability. Auditors should also refer to Appendix V, List of Changes for the 2022 Compliance Supplement, to get a high-level overview of the detailed changes made. The following describes some of the key changes that you should be aware of.

Overview of the Supplement

Part 2 - The Matrix of Compliance Requirements (Matrix) of the Compliance Supplement identifies the federal programs and compliance requirements addressed in the Supplement and associates the programs with the applicable compliance requirements. The Matrix also identifies the applicable federal agency and the Assistance Listing (Catalog of Federal Domestic Assistance (CFDA)) number for each program included in the Supplement. (Note: The entry for each program/cluster also is included in the program/cluster in Part 4 or Part 5 of the Supplement.)

Part 3 - Compliance Requirements lists and describes the 12 types of compliance requirements and, except for Special Tests and Provisions, the related audit objectives that the auditor must consider, as applicable, in every audit conducted under 2 CFR part 200, Subpart F, with the exception of program-specific audits performed in accordance with a federal agency's program-specific audit guide. The auditor is responsible for achieving the stated audit objectives for the applicable compliance requirements. Part 3 also includes audit objectives and suggested audit procedures to test internal control. However, the auditor must determine the specific procedures to test internal control on a case-by-case basis, considering factors, such as the non-federal entity's internal control, the compliance requirements, the audit objectives for compliance, the auditor's assessment of control risk, and the audit requirement to test internal control as prescribed in 2 CFR Part 200, Subpart F.

Part 4 - Agency Program Requirements discusses program objectives, program procedures, and compliance requirements that are specific to the program. With the exception of section III.N, "Special Tests and Provisions," the auditor must refer to Part 3 for the audit objectives and suggested audit procedures that pertain to the program-specific compliance requirements associated with the programs. Since, in general, Special Tests and Provisions are unique to each program, the specific audit objectives and suggested audit procedures for each program are included in Part 4.

Part 5 - Clusters of Programs provides compliance requirements, audit objectives, and suggested audit procedures for the Research and Development (R&D) and Student Financial Assistance (SFA) clusters, and lists other clusters included in Part 4. In planning and performing the audit, the auditor can determine whether programs administered by the non-federal entity are part of a cluster by referring to both the provisions of Part 5 of the Supplement and the state award documents.

Part 6 - Internal Control addresses the objectives, principles, and components of internal control based on the “Standards for Internal Control in the Federal Government” (“Green Book”), issued by the Government Accountability Office, and the “Internal Control Integrated Framework” (revised 2013), issued by the Committee of Sponsoring Organizations of the Treadway Commission. It also includes appendices that include illustrations of entity-wide internal controls over federal awards (Appendix 1) as well as illustrations of internal controls specific to each type of compliance requirement (Appendix 2).

Part 7 - Guidance for Auditing Programs Not Included in this Compliance Supplement provides guidance to auditors in both identifying the compliance requirements and designing tests of compliance with such requirements for programs not included in the Supplement.

Part 8 - Appendix I Federal Programs Excluded from Portions of 2 CFR Part 200 lists block grants and other programs excluded from the requirements of the “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments,” which still may be in effect for some awards/funding and specified portions of 2 CFR Part 200.

Part 8 - Appendix II Federal Agency Codification of Governmentwide Requirements and Guidance for Grants and Cooperative Agreements includes regulatory citations for federal agencies’ codification of the OMB guidance on (1) “Uniform Administrative Requirements, Cost Principles, and Audit Requirements” (in 2 CFR Part 200) and (2) non-procurement suspension and debarment in 2 CFR Part 180.

Part 8 - Appendix III Federal Agency Single Audit, Key Management Liaison, and Program Contacts identifies federal agency-level contacts—single audit and, separately, management liaisons—from whom auditors can request information about the agency’s programs generally or the audit requirements of 2 CFR Part 200, Subpart F. It also includes, for each program/cluster listed in parts 4 and 5 of the Supplement, the name of a specific individual who can be contacted concerning that program, along with the individual’s contact information.

Part 8 - Appendix IV Internal Reference Tables provides a listing of programs in parts 4 and 5 that include IV, “Other Information.” This listing allows the auditor to quickly determine which programs have other information, such as guidance on Type A and Type B program determination or display on the Schedule of Expenditures of Federal Awards. This appendix also lists the seven programs currently identified as higher risk by OMB pursuant to 2 CFR section 200.519(c)(2).

Part 8 - Appendix V List of Changes for the 2022 Compliance Supplement provides a list of changes from the 2021 Compliance Supplement.

Part 8 - Appendix VI Program-Specific Audit Guides includes a list of program-specific guides maintained by the federal agencies and indicates where to obtain them.

Part 8 - Appendix VII Other Audit Advisories provides information on (1) Novel Coronavirus (COVID-19); (2) the effect of changes to compliance requirements and other clusters; (3) the due date for submission of audit reports and low-risk auditee criteria; (4) the treatment of National Science Foundation and National Institutes of Health Awards; (5) the exceptions to the Guidance in 2 CFR Part 200; and (6) audit sampling.

Part 8 - Appendix VIII Examinations of EBT Service Organizations provides guidance on audits of state electronic benefits transfer (EBT) service providers (service organizations) regarding the issuance, redemption, and settlement of benefits under the Supplemental Nutrition Assistance Program (Assistance Reference Manual | Page 8

Listing 10.551) in accordance with the American Institute of Certified Public Accountants (AICPA) Statement on Standards for Attestation Engagements (AT-C) section 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting*.

Part 8 - Appendix IX Compliance Supplement Core Team provides a listing of the Compliance Supplement Core Team members who were responsible for the production of the Supplement.

ADDITIONAL GUIDANCE

- Governmental Accounting Standards Board (GASB) may be contacted by calling GASB at (203) 847-0700; or writing GASB at 401 Merritt 7, PO Box 5116, Norwalk CT 06856-5116; or visiting the GASB webpage at [Governmental Accounting Standards Board](#). GASB offers a technical inquiry system at [Technical Inquiry System](#). GASB Pronouncements may also be viewed or downloaded from the following website: [GASB Pronouncements](#).
- Financial Accounting Standards Board (FASB) may be contacted by calling FASB at (203) 847-0700; or writing FASB at 401 Merritt 7, PO Box 5116, Norwalk CT 06856-5116; or visiting the FASB webpage at [Financial Accounting Standards Board](#).
- American Institute of Certified Public Accountants (AICPA) may be contacted by calling the AICPA at (888) 777-7077; or writing the AICPA at 220 Leigh Farm Road, Durham, NC 27707-8110; or visiting the AICPA webpage at [American Institute of Certified Public Accountants](#).
- The New York State Education Department (NYSED) may be contacted by calling the Department's Office of Educational Management Services at (518) 474-6541, or by visiting their webpage at [New York State Education Department](#).
- New York State Office of the State Comptroller (OSC) may be contacted at a local OSC regional office; or visit the OSC webpage at [New York State Office of the State Comptroller](#).
- New York State Consolidated Laws are available at [New York State Consolidated Laws](#).
- The Office of Management and Budget provides OMB circulars and Compliance Supplements at [The Office of Management and Budget](#).
- Government Auditing Standards, as re-codified, and including proposed amendments, are available at [U.S. Government Accountability Office](#).
- Guidance on the Internal Audit Function is available at [The Institute of Internal Auditors](#).

Key Accountability Laws

School districts and auditors should review legislation for details of accountability requirements. NYS Consolidated Laws can be found [here](#). Five areas for school financial accountability are addressed by legislation:

- *School Board Training - Education Law §2102-a*
- *Audit Committees - Education Law §2116-c*
- *Independent Audits (RFP) - Education Law §2116-a*
- *Claims Audit - Education Law §1709(20-a)(a)*
- *Internal Audit Function - Education Law §2116-b*

CHAPTER 97 AND 436 - TAX LEVY AND BUDGETARY COMPLIANCE

Chapter 97 of the Laws of 2011 enacted legislation that limits the total levy set by local governments and school districts. Under this legislation, the property taxes levied by school districts generally cannot

increase by more than two percent, or the rate of inflation, whichever is lower. The law does, however, allow school districts to levy an additional amount for certain excludable expenditures. An override of the levy limit is permitted under the legislation. For school districts, an override occurs when voters, by a 60 percent margin of the votes cast, approve a budget presented that requires a tax levy exceeding the statutory limit.

In the event a budget requiring 60 percent approval does not pass, the Board of Education may resubmit the same budget to the voters, submit a revised budget or immediately adopt a budget with no increase in the tax levy from the prior year. If the voters fail to approve a budget after the second submission, then the Board of Education must adopt a budget requiring a tax levy that is no greater than the levy of the prior year.

While the enactment of Chapter 97 instituted changes, there are still requirements from Chapter 436 of the Laws of 1997, which must be followed. Districts are still required to present to the public a proposed budget for all general fund appropriations. The presentation format separates the budget into three components: Administrative, Program, and Capital (Education Law §1716). Additionally, in the event of a contingency budget, the Administrative component cannot exceed the previous year's original budget (less Capital component) percentage or the last proposed defeated budget (less Capital component) percentage, whichever is less (Education Law §2023).

For a district operating under a contingency budget, it is important to document its compliance with the legislated tax levy limit and budget caps, both at the time of the contingency budget's adoption and throughout the school year. When adopting a contingency budget, the law requires the board to specify the projected percentage increase or decrease in total spending for the school year. The law also requires the board to explain the reasons for disregarding any portion of an increase in spending in formulating the contingency budget. During the year, the board is required to continue to maintain compliance with the budget caps.

The auditor should review the district's calculation of the budgetary caps and consider the district's mechanism for monitoring compliance with the budgetary caps (upon adoption of the contingency budget and throughout the school year), either when the district is operating under a contingency budget for the audited year or for the subsequent year.

Section III - Objectives and Limitations of the Financial Statement Audit

The objectives of a school district financial statement audit are tiered. At the basic level, the objectives of an audit are established by the AICPA through the issuance of GAAS. The NYSED has augmented these objectives by requiring all school district audits to be conducted according to GAGAS, issued by the Comptroller General of the United States. The audit objectives are further expanded to cover federal programs when the District meets the Uniform Guidance threshold of \$750,000 of federal award expenditures in a fiscal year. The auditor's responsibility is limited to the scope of the audit. The following is a brief description of each tier's audit objective:

Financial Statement Audit in Accordance With GAAS

The objective of a GAAS audit is the expression of an opinion on whether the financial statements present fairly, in all material respects, the financial position and the results of operations in accordance with Generally Accepted Accounting Principles. In this context, materiality is defined in the Financial

Accounting Standards Board's Statement of Financial Accounting Concepts No. 2 as "the magnitude of an omission or misstatement of account information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would have been changed or influenced by the omission or misstatement."

Boards of Education and administrators should understand that financial statement audits required for school districts are not designed to discover every dollar of misstatements, errors, fraud or abuse. The independent auditor's report usually provides an opinion about whether the financial statements present fairly the financial position and changes in financial position in conformity with Generally Accepted Accounting Principles in the United States of America.

During the planning process, the auditor should make a judgment about the level of materiality because the extent and type of audit evidence should relate to the size of any potential misstatements. Conclusions about materiality should also involve quantifications of tolerable misstatements and individually significant items.

The standards of GAAS are expanded by the following guidance:

- Statements on Auditing Standards (SAS) issued by the AICPA's Auditing Standards Board; under the AICPA's Code of Professional Conduct, all members must adhere to these statements.
- Audit Interpretations issued by the AICPA's Auditing Standards Board.
- Statements of Quality Control Standards issued by the AICPA's Auditing Standards Board.

The three AICPA Generally Accepted Auditing Standards of field work are as follows:

- 1) The auditor must adequately plan the work and must properly supervise any assistants.
- 2) The auditor must obtain a sufficient understanding of the entity and its environment, including its internal control, to assess the risk of material misstatement of the financial statements whether due to error or fraud, and to design the nature, timing, and extent of further audit procedures.
- 3) The auditor must obtain sufficient appropriate audit evidence by performing audit procedures to afford a reasonable basis for an opinion regarding the financial statements under audit.

Auditors should use professional judgment and consider the needs of users in applying the preceding standards.

Financial Statement Audit in Accordance With GAGAS

GAGAS prescribe additional standards for financial statement audits that go beyond the requirement of the AICPA's SASs. Auditors must comply with these standards when citing GAGAS in their reports. The additional GAGAS standards relate to:

- 1) Auditor communication
- 2) Considering the results of previous audits and attestation engagements
- 3) Detecting material misstatements resulting from contract provisions, grant agreements or from abuse

- 4) Developing elements of a finding for financial statement audits
- 5) Audit documentation

Audits of public school districts in New York State should be performed under GAGAS. Each auditor performing public school audits should be familiar with GAGAS. It is highly recommended that the auditor become familiar with these standards, which are available from the GAO at <https://www.gao.gov/yellowbook/overview>.

Section IV - Characteristics of a Quality Financial Statement Audit

The responsibility for engaging a qualified and competent Certified Public Accountant (CPA) or Public Accountant (PA) to perform the annual audit of the District's financial statements resides with the District's Board of Education. Included in the role of the Board of Education is establishing an Audit Committee to oversee and report to the Board of Education on the annual audit. The Audit Committee's responsibilities include performing oversight with respect to the appointment and performance of the auditor, as required by law. This required oversight encompasses review of any risk assessment, the draft annual audit report, accompanying draft management letter and all corrective action plans developed by the school district. This can provide a greater level of understanding associated with the purpose, results and findings of the annual audit by the external auditor

In addition, a good working relationship between the Audit Committee and the CPA or PA is ideal to ensure compliance with regulations which require specified deadlines. State laws and regulations require that the annual audit be "accepted" by a resolution of the District's Board of Education. This resolution along with the audit report must be filed with the NYSED by the applicable deadlines published in the [NYSED Application Business Portal](#) (Portal).

Some factors to be considered when reviewing the qualifications of an auditor are listed below.

AUDITOR QUALIFICATIONS

Auditors of New York school districts should meet the following minimum qualifications:

Registration and Licensing

The auditing firm should be registered with the NYSED. The registration process includes verification that all partners in the firm practicing in New York are identified, and presently licensed with the state. In addition, in order to maintain their license in New York State, CPAs and PAs must complete **either** 24 continuing professional education (CPE) contact hours in any one of the following subject areas: accounting, auditing, taxation, advisory services or specialized knowledge and application, **or** 40 acceptable credits of CPE in any combination of these subject areas, in each 12-month calendar year. Information regarding continuing professional education may be found at [CPE Professional Education](#).

Whether or not a firm is registered with the state, can be determined by utilizing NYSED's [Professional Business Entity](#) verification search function or by calling (518) 474-3817 ext. 390. For licensing, NYSED now maintains a listing of all CPAs in the state and the status of their license on the Internet at [CPA Licensure Information](#). School districts should confirm that the partner or owner of the firm assigned to the engagement maintains an active license to practice and is in good standing.

Qualification Standards of Government Auditing Standards

GAGAS requires that the auditing firm ensure individuals responsible for planning, directing, conducting, or reporting on the audit complete at least 80 hours of CPE every two years that directly enhances the auditor's professional proficiency to perform audits and/or attestation engagements. At least 20 hours must be completed in any one year of the two-year period. Individuals responsible for planning, directing or conducting substantial portions of the field work, or reporting on the government audit should complete at least 24 of the 80 CPE hours in subjects directly related to the government environment and to government auditing or the unique environment in which the audited entity operates.

Satisfactory Completion of a Triennial Peer Review

Quality Control Standards of GAGAS require that audit firms have an appropriate internal quality control system in place and undergo an external quality review at least once every three years. In addition, firms whose partners and staff CPAs are members of the AICPA must undergo a triennial peer review as a condition of membership. Participation in the AICPA peer review program satisfies the GAGAS requirement. As part of the annual review of the auditor's qualifications, the District should determine that the auditor is current with his or her peer review and must obtain a copy of the most recent peer review report. The auditing firm may include this peer review report with the annual engagement letter.

Possess the Necessary Experience

Audits of school districts, especially those that must also satisfy the requirements of the Federal Single Audit Act, are highly specialized in nature. The auditor should be experienced in audits of governmental entities conducted under GAGAS and, where applicable, the Single Audit Act requirements. This can be demonstrated through a list of relevant services to other similar clients, including names for reference checking purposes.

Completion of the Audit on a Timely Basis

State regulations require that the audit be completed annually and filed with NYSED by October 15th. The firm should demonstrate that it has sufficient staff at appropriate experience levels to complete the audit in a timely manner. This should include assurances that the staff assigned have met the CPE requirements under GAGAS.

Ongoing Auditor Communication

Building an ongoing relationship with the auditor is the best way to facilitate the audit process and strengthen the District's finance systems in the long term. It is important that the Board of Education, Superintendent and/or School Business Official inform the auditor of any significant financial transactions and compliance-related issues. Additionally, the auditor should keep the Board of Education, Audit Committee, Superintendent and/or School Business Official informed on the progress of the audit and of any significant findings that are identified. Members of the Board of Education and Audit Committee should be kept informed by the Superintendent and/or the Business Official of any audit-related matters that warrant their attention.

Section V - Auditor's Reports and Other Required Communications

ENGAGEMENT LETTER

School districts should execute an engagement letter with the independent auditor. The engagement letter should identify the nature and scope of the engagement, the type of report the auditor is expected to issue, the timing of rendering the services, and a target date for issuing the auditor's report to ensure that the October 15th filing date is met.

REPRESENTATION LETTER

School districts should execute written communications with the auditing firm, describing certain representations made during the course of the audit. AU-C Section 580 *Written Representations* requires the auditor to obtain written representations from current management on all periods covered in the report. In addition to the representations required by AU-C Section 580, the Representation Letter should ordinarily be tailored to include additional appropriate representations relating to matters specific to the District's circumstances.

REQUEST FOR LEGAL REPRESENTATION LETTER

The audit process includes requesting a letter from the school district's legal counsel to support information that the District's administration provides concerning litigation. For reasons including confidentiality and authority, the request should be written by the school district to its counsel, requesting that counsel's response be sent directly to the auditor. The letter should request information on pending or threatened litigation and on un-asserted claims identified by the administration and should confirm that counsel will advise the administration of any un-asserted claims that come to counsel's attention, which in their judgment must be considered for disclosure in the financial statements (formerly FASB Statement No. 5, new codification standard ASC 450 - Contingencies). Counsel's reply should be as of a date that is near to the date of the auditor's report release date. Each district will need to construct a letter requesting legal representation in a manner that suits its particular circumstances.

Counsel's refusal to furnish the information requested in the request for a legal representation letter is likely to constitute a limitation on the scope of the auditor's examination that would preclude the issuance of an unqualified opinion.

OTHER REQUIRED COMMUNICATIONS

AU-C Section 260 *The Auditor's Communication with Those Charged with Governance*, establishes a requirement for the auditor to:

- a. communicate clearly with those charged with governance the responsibilities of the auditor regarding the financial statement audit and an overview of the planned scope and timing of the audit.
- b. obtain from those charged with governance information relevant to the audit.
- c. provide those charged with governance with timely observations arising from the audit that are significant and relevant to their responsibility to oversee the financial reporting process.

- d. promote effective two-way communication between the auditor and those charged with governance.

The required communication is applicable to entities that either have an Audit Committee or that have otherwise formally designated oversight of the financial reporting process to a group equivalent to an Audit Committee (i.e., the Board of Education). This communication should be written, and when written, the report is intended for the use of the Audit Committee or the board of education and, if appropriate, management. This communication should include:

- Significant accounting policies and practices;
- Management judgments and accounting estimates;
- Significant audit adjustments;
- Uncorrected misstatements;
- Departure from the auditor's standard report
- Other information in documents containing audited financial statements;
- Disagreements with management;
- Consultation with other accountants;
- Major issues discussed with management prior to retention; and
- Difficulties encountered in performing the audit.

The AICPA's AU Section 333 *Management Representations* requires the auditor to inform the Audit Committee about uncorrected misstatements aggregated by the auditor during the current engagement and pertaining to the latest period presented, that were determined by management to be immaterial, both individually and in the aggregate, to the financial statements taken as a whole. The other required communications may include management related comments.

MANAGEMENT LETTER AND CORRECTIVE ACTION PLANS

While there are no authoritative standards for the content of the management letter, the independent auditor may prepare a management letter in conjunction with the financial report. The management letter includes material weaknesses, significant deficiencies, instances of non-compliance and other conditions that are not considered to be significant deficiencies or material weaknesses with recommendations for improvement, which should be brought to the Board of Education's attention based on the auditor's judgment and the Statements of Auditing Standards issued by the AICPA's Auditing Standards Board. If the independent auditor issues a management letter, it must be filed with NYSED regardless of the nature of the comments.

Management letters that have a finding or recommendation (they can be material weaknesses, significant deficiencies, as well as any recommendations that are not material or significant) must be filed with NYSED using the [NYSED Application Business Portal \(Portal\)](#). The related corrective action plan must also be filed with NYSED using the Portal.

Commissioner's Regulation Section 170.12(e)(4) requires that the District prepare a Board approved corrective action plan (CAP) within ninety (90) days of receipt of receiving the management letter that addresses any improvement opportunities or issues raised in the management letter that details any steps taken or that will be taken to address those issues and the expected dates of implementation, where appropriate. The CAP should include the contact responsible for implementation, as well as the

expected date of implementation, and must be filed with NYSED along with the Board's approval of the CAP.

In addition, Commissioner's Regulation Section 170.12(e)(4) requires that a Board approved CAP be prepared within ninety (90) days of receipt in response to any findings contained in:

- the annual external audit report,
- a final audit report issued by the State Comptroller,
- a final audit report issued by the district's internal auditor,
- a final audit report issued by the State Education Department; or
- a final audit report issued by the United States or an office, agency or department thereof.

Districts must begin implementation of their CAP no later than the end of the next fiscal year and file the CAP with NYSED using the [NYSED Application Business Portal](#).

Management's Discussion and Analysis (MD&A)

MD&A must be composed by the District's administration, not by the auditing firm. The reporting requirements relating to MD&A are specified within GASB 34. See Appendix 1 for additional information regarding MD&A.

Section VI - Filing Requirements

The following filing requirements must be followed to ensure the audit report is prepared and submitted in compliance with applicable legal requirements:

1. Audited financial statements for school districts are to be prepared in accordance with Generally Accepted Accounting Principles.
2. The audit is to be performed in accordance with GAAS issued by the AICPA and GAGAS issued by the Comptroller General of the United States. The auditor's report is to cover required supplemental schedules, supplemental schedules not required by GAAP, and the notes to the financial statements. The supplemental schedules not required by GAAP are not considered necessary for the fair presentation of the financial statements and must be reported by the auditor in accordance with AU-C Sections 720-730.
3. The amounts included in the audited financial statements are to agree in summary with the Annual Financial Report (ST-3 Form). Differences should be investigated by the District and corrected by amending the ST-3 Form.
4. In addition, the auditor must provide a management letter, when applicable. The auditor must also provide all applicable reports required by GAGAS regarding internal controls and compliance. If engaged to audit the Extraclassroom Activity Fund, the auditor should also provide an audit report of the Extraclassroom Activity Funds.
5. If the District is subject to the Single Audit Act Amendments of 1996, then the reporting requirements and filing requirements of the Uniform Guidance must be followed. The following is a summary of these requirements:
 - a. The auditor must opine as to whether the Schedule of Expenditures of Federal Awards is fairly presented, in all material respects, in relation to the financial statements taken as a whole.

- b. The auditor must issue a report on internal controls with respect to the financial statements and major programs.
 - c. The auditor must report on the District's compliance with laws, regulations, and provisions of contracts or grant provisions, which could have a direct and material effect on federal programs and is to contain an opinion with respect to the material effect on each major program. The report should refer to the Schedule of Findings and Questioned Costs when applicable.
 - d. The auditor shall prepare a Schedule of Findings and Questioned Costs, in compliance with 2 CFR §200.515(d).
 - e. The District shall prepare a CAP in accordance with the guidance of 2 CFR §200.511(c). The CAP must address each audit finding included in the current year auditor's report. It should provide the name(s) of the contact person(s) responsible for corrective action, a description of the corrective action planned, and the anticipated completion date of the corrective action. If the District does not agree with the audit findings or believes corrective action is not required, then the CAP must include an explanation and specific reasons.
 - f. The District shall prepare a Summary Schedule of Prior Audit Findings, in accordance with 2 CFR §200.511(b). The Summary Schedule of Prior Audit Findings must report the status of all audit findings included in the prior audit's Schedule of Findings and Questioned Costs, and in the prior audit's Summary Schedule of Prior Audit Findings (except findings listed as corrected, no longer valid or not warranting further action). When findings are fully corrected, the schedule is only required to list the finding and state that corrective action was taken. When findings were not corrected or were only partially corrected, the Schedule should describe the planned corrective action, as well as any partial corrective action taken. When the school district believes the audit findings are no longer valid or do not warrant further action, the reasons for that position should be described.
 - g. A senior level representative of the auditee must sign a statement to be included as part of the data collection that says that the auditee complied with the requirements of 2 CFR Part 200 Subpart F, the data were prepared in accordance with these requirements (and the instructions accompanying the form), the reporting package does not include protected personally identifiable information, the information included in its entirety is accurate and complete, and that the Federal Audit Clearinghouse (FAC) is authorized to make the reporting package and the form publicly available on a website.
6. Districts' financial statements and related data **must** be submitted using [NYSED Application Business Portal \(Portal\)](#). Submission to the Portal should be completed before the applicable due dates.

A tutorial is available on the Portal under the supporting documents section. The tutorial explains how to obtain permission to access and navigate the Portal. It is important that the designated District employee has permission to use the Portal and has learned to navigate the screens at least two weeks prior to the due dates, which will ensure timely submissions. Due dates are provided below:

Due Dates for Financial Data and Reports

- School Districts (other than Buffalo, Rochester, Syracuse, Yonkers and New York City) must submit audited financial statements by **October 15** (or the next business day if the due date falls on a Saturday or Sunday).
- Buffalo, Rochester, Syracuse, Yonkers and New York City school districts must submit audited financial statements by **January 1** (or the next business day if the due date falls on a Saturday or Sunday)

Due Dates for Single Audits

The Single Audit or Program-Specific Audit reporting package and the data collection form must be submitted to the FAC within the earlier of **30 calendar days after receipt of the auditor's report(s)**, or **9 months after the end of the fiscal year**. See Uniform Guidance **2 CFR §200.512(a)** for additional information and exceptions.

Updates to filing due dates for data collection forms can be found on the OMB website and are generally updated through Memoranda releases.

The [NYSED Application Business Portal](#) has the following sections. Within each section there are questions and areas to upload documents.

Survey 1	Section 1	Financial Statements
Survey 1	Section 2	Independent Auditor
Survey 2/3	Section 1	Management Letter, Extraclassroom Audit, CAPs, & Board Approvals
Survey 4	Section 1	Single Audit Threshold and/or Single Audit Exemption Form
Survey 5	Section 1	Single Audit Corrective Action Plan(s) for Financial Statement Findings (Section II) and Major Federal Program Findings (Section III)
Survey 6	Section 1	Internal Control Report and Related Corrective Action Plan (CAP)
Survey 6B	Section 1	Internal Control Exemption
Survey 7	Section 1	Regulatory Audit and Related Corrective Action Plan (CAP)

If you have any questions, please email FSandSingleAudit@nysed.gov.

In an effort to reduce the need for physical storage, to reduce paper waste, and to reduce the cost of submitting documents, NYSED requires that all documents be submitted electronically in the NYSED Application Business Portal. In extenuating circumstances when a school district must send a hard copy, and after prior approval has been obtained from the Office of Audit Services, the District should use a delivery service that tracks receipt of the documents, since NYSED has experienced instances where school districts state that the

financial information was sent and NYSED has no record of its receipt. The address is as follows:

NYS Education Department
Office of Audit Services
89 Washington Avenue
Room 471 EBA
Albany, NY 12234
(one copy)

7. Reports must also be sent by October 15 to the NYS Comptroller's Office with a copy of the District's corrective action plan (See Item 5), if applicable:

Email to: AFRFILE@osc.ny.gov (NYS Comptroller's Office)

Or mail to:

Office of the NYS Comptroller
Division of Local Government and School Accountability
Data Management Unit, 12th Floor
110 State Street
Albany, NY 12236
(one copy)

If subject to the Single Audit Act of 1996, then one copy of the Single Audit or Program-Specific Audit reporting package, including the following, must be submitted electronically within the earlier of 30 calendar days after receipt of the auditor's report, or 9 months after the end of the fiscal year—whichever comes first.

Reports to be submitted include:

- Financial Statements,
- Schedule of Expenditures of Federal Awards,
- Summary Schedule of Prior Audit Findings,
- Opinion on Financial Statements,
- Report on Internal Control (GAS),
- Report on Compliance (GAS),
- Report on Internal Control (Single Audit),
- Report on Compliance (Single Audit),
- Schedule of Findings and Questioned Costs,
- Corrective Action Plan (if findings), and
- Opinion or Disclaimer of Opinion on Schedule of Expenditures of Federal Awards (if Single/Program-Specific Audit is not bound with financial statements)

The Single/Program-Specific Audit reporting package and SF-SAC (Data Collection Form) should be uploaded to the [Federal Audit Clearinghouse](#).

8. Article 3, section 35 of the General Municipal Law (GMU) requires that within 10 days after the filing of a report of an external audit performed by an independent public accountant (or any management letter prepared in conjunction with such an external audit) with the clerk of the District, the clerk shall give public notice in substantially the form provided in the legislation.

Section 35 of GMU also permits the Board to provide to the Comptroller and the Commissioner of Education, and to file in the office of the clerk of the District, a written response to the findings and recommendations in the report or letter, not later than 90 days after their presentation to the Board. The written response prepared pursuant to section 35 shall include, with respect to each finding or recommendation, a statement of the corrective actions taken or proposed to be taken, or if corrective action is not taken or proposed, an explanation of the reasons, therefor. Any such response shall also include a statement of the status of corrective actions taken on findings or recommendations contained in any previous report of an external audit, or any management letter prepared in conjunction with one, for which a written response was required.

Section 35 provides similar requirements for reports of examinations by the Office of the State Comptroller.

Wording for the public notice suggested in the legislation is:

Notice is hereby given that the fiscal affairs of _____ District for the period beginning on _____ and ending on _____, have been examined by (the Office of the State Comptroller or an independent public accountant) and that the (report of examination performed by the Office of the State Comptroller or report of, or management letter prepared in conjunction with the external audit by the independent public accountant) has been filed in my office where it is available as a public record for inspection by all interested persons. Pursuant to §35 of the General Municipal Law, the governing board of _____ District may, in its discretion, prepare a written response to the (report of examination performed by the Office of the State Comptroller or the report of external audit or management letter by independent public accountant) and file any such response in my office as a public record for inspection by all interested persons not later than _____.

9. The board resolution accepting the report must be submitted to NYSED at the above address. The resolution can be filed after the audit report has been submitted.

Section VII - Federal Single/Program-Specific Audit

The Uniform Guidance requires Districts that expend total federal awards of \$750,000 or more in a year to be audited in accordance with the Single Audit Act. The Uniform Guidance can be obtained from Electronic Code of Federal Regulations.

GOVERNING LITERATURE

There are many guidance documents which explain Single/Program-Specific Audit requirements, among them being the Single Audit Act of 1984, the Single Audit Act Amendments of 1996, the Uniform Guidance, and OMB Compliance Supplement, cited above. In addition, auditing firms and school districts can refer to:

- Government Auditing Standards (Yellow Book), which provides standards relating to such elements as workpaper documentation, components of text for significant deficiencies and material weaknesses, District follow-up on findings, continuing professional education, independent quality review, and reporting issues.
- USGAO Government Auditing Standards Interpretation of Continuing Education and Training Requirements.

Many documents published by the federal government can be purchased in printed form from Superintendent of Documents, United States Government Printing Office, PO Box 371954, Pittsburgh, Pennsylvania 15250, or [U.S. Government Bookstore](#).

The AICPA Audit and Accounting Guides, Government Auditing Standards, which is updated annually for changed requirements, present interpretive guidance for the audits of financial statements conducted in accordance with Government Auditing Standards.

The AICPA's Government Audit Quality Center (GAQC) promotes the importance of quality governmental audits and the value of such audits to purchasers of governmental audit services, see [AICPA's GAQC](#) task forces have developed several Single Audit Practice Aids, which are available through the website.

SCHOOL DISTRICT RESPONSIBILITIES

The District is required to identify the amounts and federal programs for all federal awards received and expended. Federal awards may take different forms, including grants, loans, loan guarantees, property, interest subsidies and insurance. Some federal assistance (such as certain Medicare and Medicaid payments) is not considered a federal award expended. Guidance on the basis for determining federal awards expended, and for valuing non-cash assistance, is provided in 2 CFR §200.502. School district records must show the Assistance Listing/CFDA title and number, award number and year, name of the federal agency, name of the pass-through agency, if any, as well as the names and amount for all subrecipients.

The District is also responsible for maintaining internal control over federal programs that provides reasonable assurance that the District is managing the awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each program. The District must also follow up and take corrective action on audit findings, if any, including preparation of a Summary Schedule of Prior Audit Findings and a corrective action plan.

The District must prepare appropriate financial statements, including the Schedule of Expenditures of Federal Awards, in accordance with requirements of the Uniform Guidance. The financial information it presents should be derived from the same accounting records that underlie the financial statements and should be consistent with information reported on other federal and state pass-through grant reports. While the schedule's data must be reconcilable to those grant reports, the grant reports may be prepared on a different fiscal period, or may include cumulative data from prior periods, and may not directly agree with the schedule. A sample format for the Schedule of Expenditures of Federal Awards is provided in Appendix 5 of this Reference Manual.

DOCUMENTATION OF PAYROLL FUNDED THROUGH FEDERAL AWARDS

There are many federal documentation requirements that auditors need to keep in mind during school district audits. Because payroll expense is likely to be material in relation to the Single Audit or Program-Specific Audit of federally aided programs, it is important to be sure that school districts are complying with federal, as well as state, payroll documentation requirements.

The federal rules governing payroll documentation, is less prescriptive under the Uniform Guidance than it was under OMB Circular A-87. It is important to become familiar with 2 CFR §200.430, Compensation – personal services, for more detailed guidance. It is important to note the Uniform Guidance does not require any grantee to change their current system for time and effort reporting.

Federal cost principles under the Uniform Guidance state that compensation costs must “be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated; be incorporated into the official records of the non-federal entity; reasonably reflect the total activity for which the employee is compensated by the non-federal entity (school district), ...; encompass both federally assisted and all other activities ...; comply with the established accounting policies and practices of the non-federal entity (school district); and support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one federal award; a federal award and non-federal award...”. It goes on to say that budget estimates by themselves are not sufficient documentation but can be used on an interim basis so long as there is a reconciliation of actual time worked to what was budgeted.

SUSPENSION AND DEBARMENT

In administering federal funds, school districts are prohibited from contracting with, or making sub-awards under covered transactions to parties that are suspended or debarred, or whose principals are suspended or debarred, under rules that were revised in November 2003. Verification of whether a party is suspended or debarred can be accomplished by reviewing the [System for Award Management](#).

Section VIII - Common Mistakes, Errors or Omissions in the Preparation of Financial Statements and Single/Program-Specific Audits

FINANCIAL STATEMENTS

The following are common errors and omissions that the NYSED Office of Audit Services (OAS) has observed while reviewing financial statements:

Management letter:

- Not submitted by the District.
- The corrective action plan for the issues noted in the management letter was not included or did not provide a specific plan to address these issues.
- The corrective action plan for Single Audit or Program-Specific Audit findings was not submitted or does not contain the required elements.

The corrective action plan for issues noted in the "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" was not included or did not provide a specific plan to address these issues.

MD&A:

- Did not include all elements required by GASB Statement No. 34.
- Significant discrepancies in information between the MD&A and the other sections of the current and/or prior year's financial statements.
- Insufficient analysis of the changes in net position, fund balances, or budget.
- Appears to have been prepared by the independent auditors.
- Did not include the name of a contact person.

Statement of Net Position:

- Long-term liability balances differing from balances shown in the notes to the financial statements.
- Net investment in capital assets balance did not agree with the balance shown in the supplemental schedules.

Statement of Activities:

- No depreciation expense reported and/or not properly allocated between functions/programs.
- Employee benefits not properly allocated between functions/programs.
- Lack of or insufficient disclosures for prior period adjustments.

Balance Sheet:

- Debt service not broken down between principal and interest.
- Reserves of fund balance that were not authorized by General Municipal and/or Education Law.

Statement of Revenues, Expenditures, and Changes in Fund Balance:

- Lack of or insufficient disclosures for prior period adjustments.

Reconciliation between fund statements and entity-wide statements did not include all required items and/or there were insufficient disclosures for the reconciling items, or the data did not agree with information in the entity-wide and/or fund statements.

Notes to the financial statements:

- Beginning balances in various notes differing from the ending balances in the notes to the prior year's financial statements.
- Capitalization thresholds very low, very high or not disclosed at all.
- Lack of or insufficient disclosures for short term debt.
- No disclosures for accruals/reversals of interest on debt.
- Inadequate disclosure of inter-fund transactions. Fund balance was over the 4% limit for

- assigned fund balance and not disclosed.
- No disclosures for deficit fund balance.

Supplemental Schedules:

- Expenditures exceed available appropriations.
- Capital projects not broken down by project number and could not be verified to the capital project data submitted on the ST-3.
- Calculation of unrestricted fund balance limits were not calculated properly.
- Net Investment in Capital Assets did not agree to Statement of Financial Position.

Extraclassroom activities:

- Titles of extraclassroom activities were insufficient to determine nature of activities.
- Inactive extraclassroom activities that should be considered for closure.
- Extraclassroom activities that do not meet the definition of a bona fide activity.

SINGLE/PROGRAM-SPECIFIC AUDITS

The New York State Education Department (NYSED), as an entity that provides federal funds to sub-recipients, is responsible for the review of Single Audit and Program-Specific Audit reporting packages. The Office of Audit Services (OAS) administers the review process for NYSED. The following are common errors and or omissions that were noted:

Schedule of Expenditures of Federal Awards (SEFA):

- Improper identification of pass-through entity:
 - 1) NYSED was identified as the pass-through entity for federal programs that did not pass through NYSED.
 - 2) Programs that passed through NYSED were not identified as passed through NYSED, instead were shown as passed through another entity or identified as a direct federal award.
- The pass-through identifying number was not included.
- Expenditures for state funded programs were included on the SEFA.
- For clusters, the federal expenditures for multiple federal programs were shown under one Assistance Listing/CFDA number. 2 CFR §200.510 (b) requires that the SEFA show total federal awards expended for each federal program with Assistance Listing/CFDA number (or other identifying number).
- The wrong Assistance Listing/CFDA # was used or an inactive Assistance Listing/CFDA # was used.

Schedule of Finding and Questioned Costs:

- The summary information (a.k.a., Section I) was not consistent with the independent auditor's report, the "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," and/or the "report on compliance with requirements applicable to each major program and on internal control over compliance in accordance with the Uniform Guidance."

- Not all federal programs in a cluster were identified and audited as major programs.
- The wrong threshold was noted for determining type A programs.
- Designated low-risk even though the criteria for low-risk designation were not met.
- Inadequate audit coverage of federal expenditures (sometimes due to improper low-risk designation).
- The findings section for financial statements (a.k.a., Section II) and/or major programs (a.k.a., Section III) was not included.
- Findings from the prior year(s) that were not corrected were not identified as current findings.

The following list of items required by 2 CFR §200.510(b) was not always included:

- Federal program and specific federal award identification including:
 - The Assistance Listing/CFDA title and number.
 - Federal award number and year.
 - Name of federal agency.
 - Name of the applicable pass-through entity.

(When information, such as the Assistance Listing/CFDA title and number or federal award number, is not available, the auditor shall provide the best information available to describe the federal award.)

The criteria or specific requirement upon which the audit finding is based, including statutory, regulatory, or other citation required by 2 CFR §200.516 was not always included or was not sufficiently specific.

- A CAP for findings for major programs was not submitted and/or did not include the minimum components required by 2 CFR §200.511(c) (i.e., name(s) of the contact person(s) responsible for corrective action, the corrective action planned, and the anticipated completion date).
- Federal data collection form SF-SAC required by 2 CFR §200.512 was not filed with the FAC.
- The wrong federal employer identification number (FEIN) was used when filing the SF-SAC with the FAC.
- Information in the Single Audit or Program-Specific Audit reporting package required by 2 CFR §200.512 did not agree with the information in the SF-SAC submitted to the FAC.
- The Summary Schedule of Prior Audit Findings required 2 CFR §200.511 was not submitted when there were findings in prior year(s).