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January 18, 2019

The Honorable President and Members
of the Board of Education
Sussex County Technical School District
County of Sussex, NJ

We have audited, in accordance with auditing standards generally accepted in the United States of America and Government Auditing Standards issued by the Comptroller General of the United States, the basic financial statements of the Board of Education of the Sussex County Technical School in the County of Sussex for the fiscal year ended June 30, 2018, and have issued our report thereon dated January 18, 2019.

As part of our audit, we performed procedures required by the New Jersey Department of Education, and the findings and results thereof are disclosed on the following pages, as listed in the accompanying table of contents. This letter does not affect our report dated January 18, 2019, on the financial statements of the Board.

We will review the status of the comments during our next audit engagement. We have already discussed these comments and suggestions with various management personnel, and we will be pleased to discuss them in further detail at your convenience, to perform any additional study of these matters, or to assist you in implementing the recommendations.

This report is intended for the information of the Sussex County Technical School Board of Education’s management and the New Jersey Department of Education. However, this report is a matter of public record and its distribution is not limited.

NISIVOCCIA LLP

Francis Jones of NISIVOCCIA LLP
Francis Jones,
Licensed Public School Accountant #1154
Certified Public Accountant

www.nisivoccia.com
Independent Member of BKR International
Scope of Audit

The audit covered the financial transactions of the Board Secretary/School Business Administrator and Treasurer of School Monies, the activities of the Board of Education, the records of the various funds under the auspices of the Board of Education.

Administrative Practices and Procedures

Insurance

Insurance coverage was carried in the amounts as detailed on Exhibit J-20, Insurance Schedule contained in the District's CAFR.

Officials in Office and Surety Bonds

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Coverage</th>
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</thead>
<tbody>
<tr>
<td>Eileen Kithcart</td>
<td>Treasurer of School Monies</td>
<td>$200,000</td>
</tr>
<tr>
<td>Andrew Italiano</td>
<td>School Business Administrator</td>
<td>200,000</td>
</tr>
</tbody>
</table>

Tuition Charges

A comparison of tuition charges and actual receipts and receivables was made. It appears, from our testing, that tuition charges appear to be valid revenues of the District.

Financial Planning, Accounting and Reporting

Examination of Claims

An examination of claims paid on a test basis, during the period under review did not indicate any discrepancies with respect to signatures, certification or supporting documentation.

Payroll Account and Position Control Roster

The net salaries of employees of the Board were deposited in the Payroll Account. Employees' payroll deductions and employer's share of fringe benefits were deposited in the Payroll Agency Account.

All payrolls tested were approved by the Superintendent and were certified by the President of the Board, the Board Secretary/School Business Administrator and the Superintendent.

Salary withholdings were promptly remitted to the proper agencies, including health benefit withholdings due to the General Fund.

Finding:

During our review of the District's payroll records, we noted that a few employees were overpaid due to an incorrect retro salary calculation. However, as the District is aware of this and is in the process of rectifying this error, a formal recommendation is not deemed necessary.
Financial Planning, Accounting and Reporting (Cont’d)

Reserve for Encumbrances and Accounts Payable

A review of outstanding issued purchase orders was made on a test basis as of June 30, for proper classification of orders as reserve for encumbrances and accounts payable.

Classification of Expenditures

The coding of expenditures was tested for proper classification in accordance with N.J.A.C. 6A:23A-16.2(f) as part of our test of transactions of randomly selected expenditure items. We also reviewed the coding of all expenditures included in our compliance and single audit testing procedures. Overall compliance was noted.

Board Secretary's Records

In planning and performing our audit of the financial statements of the Board, we considered the condition of the Board Secretary's records for the purpose of expressing our opinion on the financial statements and not to provide specific assurance on the condition of the records. Based on these procedures, we have the following comment.

Finding:

The District made certain one-sided budget transfers that did not net to zero. However, under the direction of the Business Administrator, the entries were corrected. No formal recommendation is deemed warranted.

Treasurer's Records

In planning and performing our audit of the financial statements of the Board, we considered the condition of the Treasurer's records for the purpose of expressing our opinion on the financial statements and not to provide specific assurance on the condition of the records. Based on these procedures, we have no comments.

Elementary and Secondary Education Act (E.S.E.A.) as amended by the Every Student Succeeds Act (ESSA)

The E.S.E.A. financial exhibits are contained herein within the Special Revenue Section of the District's CAFR. This section of the CAFR documents the financial position pertaining to projects under Title I, Title II and Title IV of the Elementary and Secondary Education Act as amended and reauthorized.

The study of compliance for E.S.E.A. did not indicate any areas of noncompliance except as detailed on the following page.

Other Special Federal and/or State Projects

The District's Special Projects were approved as listed on Exhibit E-1 located in the CAFR.

Our audit of the federal and state funds on a test basis indicated that obligations and expenditures were incurred during the fiscal year or project period for which the project was approved.
Other Special Federal and/or State Projects (Cont’d)

The financial exhibits are contained within the Special Revenue Section of the CAFR. This section of the CAFR documents the financial position pertaining to the aforementioned special projects.

Findings:

1.) Expenditures per the final expenditure reports for the fiscal year 2017 E.S.E.A., I.D.E.A., and Carl D. Perkins Secondary and Post Secondary grant programs do not agree with the District’s accounting records. However, since the District has already ensured that the fiscal year 2018 final expenditure reports for E.S.E.A., I.D.E.A., and Carl D. Perkins Secondary and Post Secondary grant programs agree with the District’s accounting records, no formal recommendation is deemed warranted.

2.) As of June 30, 2018, the District has $24,820 of federal funds and $45,604 of state funds due to various granting agencies. However, as the District subsequently returned $9,910 of federal funds to the grantor in July 2018 and is in the process of returning the remaining funds to the state and federal granting agencies, a formal recommendation is not deemed necessary.

T.P.A.F. Reimbursement

Our audit procedures included a test of the biweekly reimbursements filed with the Department of Education for district employees who are members of the Teachers Pension and Annuity Fund. No exceptions were noted.

The reimbursement form for the T.P.A.F. Reimbursement to the State for Federal Salary Expenditures was reviewed and no exceptions were noted.

Finding:

The TPAF reimbursement to the State for Federal Salary Expenditures was not remitted to the State of NJ by October 1, 2018. However, as the District has subsequently remitted the payment to the State, a formal recommendation is not deemed necessary.

School Purchasing Programs

Contracts and Agreements Requiring Advertisement for Bids

N.J.S.A. 18A18A-3 states:

a. “When the cost or price of any contract awarded by the purchasing agent in the aggregate, does not exceed in a contract year the total sum of $17,500, the contract may be awarded by a purchasing agent when so authorized by resolution of the Board of Education without public advertising for bids and bidding therefore, except that the Board of Education may adopt a resolution to set a lower threshold for the receipt of public bids or the solicitation of competitive quotations. If the purchasing agent is qualified pursuant to subsection b. of section 9 of P.L.1971, c. 198 the Board of Education may establish that the bid threshold may be up to $25,000. Such authorization may be granted for each contract or by a general delegation of the power to negotiate and award such contracts pursuant to this section.
School Purchasing Programs (Cont’d)

Contracts and Agreements Requiring Advertisement for Bids (Cont’d)

b. Commencing in the fifth year after the year in which P.L. 1999, c. 440 takes effect and every five years thereafter, the Governor, in consultation with the Department of Treasury, shall adjust the threshold amount and the higher threshold amount which the Board of Education is permitted to establish as set forth in subsection a. of this section or the threshold amount resulting from any adjustment under this subsection, in direct proportion to the rise or fall of the index rate as that term is defined in N.J.S.A. 18A18A-2, and shall round the adjustment to the nearest $1,000. The Governor shall notify all local school districts of the adjustment no later than June 1 of every fifth year. The adjustment shall become effective on July 1 of the year in which it is made . . . ."  

N.J.S.A. 18A18A-4 states, "Every contract for the provision or performance of any goods or services the cost of which in the aggregate exceeds the bid threshold, shall be awarded only by resolution of the Board of Education to the lowest responsible bidder after public advertising for bids and bidding therefore, except as is provided otherwise in this chapter or specifically by any other law . . . ."

Effective July 1, 2015 and thereafter the bid thresholds in accordance with N.J.S.A. 18A:18A-2 and 18A:18A-3(a) are $40,000 (with a Qualified Purchasing Agent) and $29,000 (without a Qualified Purchasing Agent), respectively. The law regulating bidding for public school student transportation contracts under N.J.S.A. 18A:39-3 is $19,000 for 2017-18.

As per N.J.S.A. 18A:18A-3, the Board passed a resolution at its July 23, 2015 meeting, authorizing the Business Administrator as a qualified purchasing agent and increasing the bid threshold to $40,000.

The Board of Education has the responsibility of determining whether the expenditures in any category will exceed the statutory thresholds within the contract year. Where question arises as to whether any contract or agreement might result in violation of the statute, the Attorney's opinion should be sought before a commitment is made.

Inasmuch as the system of records did not provide for an accumulation of payments for categories for the performance of any work or the furnishing or hiring of any materials or supplies, the results of such an accumulation could not reasonably be ascertained. Disbursements were reviewed, however, to determine whether any clear-cut violations existed. No exceptions were noted.

The results of our examination indicated that no individual payments, contracts, or agreements were made "for the performance of any work or the furnishing or hiring of any materials or supplies", in excess of the statutory thresholds where there had been no advertising for bids in accordance with the provision of N.J.S.A. 18A18A-4.

Resolutions were adopted authorizing the awarding of contracts or agreements for "Professional Services" per N.J.S.A. 18A18A-5.

The system of records did not provide for an accumulation of purchases for which the school board used contracts entered into by the State Department of Purchase and Property pursuant to Ch. 114, P.L. 1977, therefore, the extent of such purchases could not reasonably be ascertained.
School Food Service

The school food service program was not selected as a major federal and/or state program. We inquired of school management, or the appropriate school food service personnel, as to whether the SFA had any Child Nutrition Program reimbursement overclaims or underclaims. No exceptions were noted except as indicated below.

Finding:

The December 2017 and January 2018 meal claims for low income students were not submitted for reimbursement due to personnel turnover. However, since the District has hired a new Cafeteria Manager and meal claims for the remaining months in fiscal year 2018 were submitted in a timely fashion, no formal recommendation is deemed warranted.

We also inquired of school management, or appropriate school food service personnel, as to whether the SFA’s expenditures of school food service revenues were limited to allowable direct and indirect costs. No exceptions were noted.

Non-program foods were purchased, prepared or offered for sale. The Statement of Revenue, Expenses and Changes in Net Position in the CAFR Schedule B-5 does separate program and non-program revenue and program and non-program cost of goods sold.

Student Body Activities

In planning and performing our audit of the financial statements of the Board, we considered the condition of the records of the Student Activities Fund for the purpose of expressing our opinion on the financial statements and not to provide specific assurance on the condition of the records.

Application for State School Aid

Our audit procedures included a test of information reported in the October 13, 2017 Application for State School Aid (A.S.S.A.) for on-roll and low income students. We also performed a review of the District procedures related to its completion. The information on the A.S.S.A. was compared to the District workpapers with one exception. The information that was included on the workpapers was verified on a test basis with no exceptions.

The District maintained workpapers on the prescribed State forms or their equivalent.

The District’s written procedures for the recording of student enrollment data appear to be adequate.

Pupil Transportation

Our procedures also included a review of transportation related contracts and purchases. Based on our review, the District complied with proper bidding procedures and award of contracts. No exceptions were noted in our review of transportation related purchases of goods and services except as noted herein.
Pupil Transportation (Cont’d)

Finding:

During our review, it was noted that the District’s transportation contract was not approved by the County Superintendent.

Recommendation:

It is recommended that all transportation contracts be filed with the County for approval by the County Superintendent.

Management’s Response:

The District will ensure that all transportation contracts are approved by the County Superintendent.

Travel Expense and Reimbursement Policy

Travel regulations require each District to adopt a formal policy and procedure pertaining to travel and expense reimbursement for its employees and board members. The regulations require the District to establish a maximum travel for the year and to ensure that the maximum is not exceeded. The regulations also require that all travel be preapproved by the Board of Education and that the approval must be itemized by event, event total cost, and individuals attending.

Facilities and Capital Assets

Our procedures included a review of the SDA grant agreements for consistency with recording of the revenue and awarding of contracts for eligible facilities construction. No exceptions were noted.

Testing for Lead of All Drinking Water in Educational Facilities

The District did submit the annual Statement of Assurance to the NJ Department of Education, pursuant to N.J.A.C. 6A:26-12.4(g).

Management Suggestions

Student Activities

During our review of the Student Activities Fund records and the Petty Cash records, it was noted that several outstanding checks are more than a year old. It is suggested that the records be reviewed and any stale dated checks be voided.
Management Suggestions (Cont’d)

Service Providers

Many school districts contract with service providers to perform functions such as the processing of payroll and provision of food service management services. In conjunction with these services, the service provider will engage an auditor to perform a SOC 1 (System and Organization Controls) engagement which results in a SOC 1 report. There are two different types of SOC 1 reports - a Type 1 and a Type 2 report. Both report on the fairness of the presentation of management’s description of the service organization’s system and the design of the controls to achieve the related control objectives. The Type 1 report is through a specific period. The Type 2 report also reviews the operating effectiveness of the controls included in the description throughout a specified period. Included in the Type 2 report will be the individual controls, what was tested and the results of the testing.

We suggest that the District review these SOC 1 reports to determine if there are any exceptions noted in the opinion in the Independent Auditors’ Report. Additionally, for SOC 1 Type 2 reports we suggest that the District review the test results related to the individual control testing to determine if there were any exceptions noted. If exceptions are noted in the report the District should contact the service provider and inquire what steps the service provider is taking to address these exceptions.

Status of Prior Year’s Findings/Recommendations

The prior year recommendations regarding timesheets being approved by a supervisor, expenditures reported on the E.S.E.A. and Carl D. Perkins Secondary grant final expenditures reconciling with the District’s records and findings regarding accounting records, allowable charges and fixed assets as noted in the OFAC’s monitoring report for the Perkins grant programs have been resolved during the current fiscal year.
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<th>County Vo Tech-</th>
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<th>FT Post Secondary</th>
<th>Special Ed - High School</th>
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<td>Reported on Workpapers as Low Income</td>
<td>Sample Errors</td>
<td>Verified to Application and Register</td>
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<tr>
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<td>94.5</td>
<td>(1)</td>
<td>10</td>
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</tbody>
</table>

Percentage Error

-1.07%                              0.00%
6% Calculation of Excess Surplus (2017-18 Expenditures of $100 million or less)

2017-18 Total General Fund Expenditures per the CAFR  
\[ \text{(B)} = 14,918,867 \]

Increased by:
- Transfer from Capital Outlay to Capital Projects Fund  
  \[ \text{(B1a)} = 0 \]
- Transfer from Capital Reserve to Capital Projects Fund  
  \[ \text{(B1b)} = 0 \]
- Transfer from General Fund to SRF for PreK-Regular  
  \[ \text{(B1c)} = 0 \]
- Transfer from General Fund to SRF for PreK-Inclusion  
  \[ \text{(B1d)} = 0 \]

Decreased by:
- On-Behalf TPAF Pension and Social Security  
  \[ \text{(B2a)} = 1,741,529 \]
- Assets Acquired Under Capital Leases  
  \[ \text{(B2b)} = 0 \]

Adjusted 17-18 General Fund Expenditures  
\[ \text{(B3)} = 13,177,338 \]

6% of Adjusted 2017-18 General Fund Expenditures  
\[ \text{(B4)} = 790,640 \]

Enter Greater of (B4) or $250,000  
\[ \text{(B5)} = 790,640 \]

Increased by: Allowable Adjustment  
\[ \text{(K)} = 0 \]

Maximum Unassigned Fund Balance  
\[ \text{(M)} = 790,640 \]

Section 2 - All Districts

Total General Fund - Fund Balances @ 6/30/18  
\[ \text{(C) } = 978,168 \]

(Per CAFR Budgetary Comparison Schedule/Statement)

Decreased by:
- Year End Encumbrances  
  \[ \text{(C1)} = 1,172 \]
- Restricted - Designated for Subsequent Year's Expenditures  
  \[ \text{(C2)} = 0 \]
- Restricted - Excess Surplus - Designated for Subsequent Year's Expenditures  
  \[ \text{(C3)} = 0 \]
- Other Restricted Fund Balances  
  \[ \text{(C4)} = 250,541 \]
- Assigned - Designated for Subsequent Year's Expenditures  
  \[ \text{(C5)} = 255,864 \]
- Additional Assigned Fund Balance - Unreserve - Designated for Subsequent Year's Expenditures 7/1/18-8/1/18  
  \[ \text{(C6)} = 0 \]

Total Unassigned Fund Balance  
\[ \text{(U)} = 470,591 \]
Section 3 - All Districts

Restricted Fund Balance - Excess Surplus [(U)-(M)] IF NEGATIVE, ENTER -0- $ -0- (E)

Recapitulation of Excess Surplus as of June 30, 2018

Restricted Excess Surplus - Designated for Subsequent Year's Expenditures $ -0- (C3)
Restricted Excess Surplus [(E)] $ -0- (E)
Total [(C3)+(E)] $ -0- (D)

Detail of Allowable Adjustments

Impact Aid $ -0- (H)
Sale and Lease Back $ -0- (I)
Extraordinary Aid $ -0- (J1)
Additional Nonpublic School Transportation Aid $ -0- (J2)
Current Year School Bus Advertising Revenue Recognized $ -0- (J3)
Family Crisis Transportation Aid $ -0- (J4)
Total Adjustments ((H)+(I)+(J1)+(J2)+(J3)+(J4)) $ -0- (K)

Detail of Other Restricted Fund Balance

Statutory restrictions:
Approved unspent separate proposal $ -0-
Sale/lease-back reserve $ -0-
Capital reserve $ 250,541
Maintenance reserve $ -0-
Tuition reserve $ -0-
School Bus Advertising 50% Fuel Offset Reserve - current year $ -0-
School Bus Advertising 50% Fuel Offset Reserve - prior year $ -0-
Impact Aid General Fund Reserve (Sections 8002 and 8003) $ -0-
Impact Aid Capital Fund Reserve (Sections 8007 and 8008) $ -0-
Other state/governmental mandated reserve $ -0-
Other Restricted Fund Balance not noted above $ -0-
Total Other Restricted Fund Balance $ 250,541 (C4)
It is recommended that:

1. Administrative Practices and Procedures
   None

2. Financial Planning, Accounting and Reporting
   None

3. School Purchasing Program
   None

4. School Food Service
   None

5. Student Body Activities
   None

6. Application for State School Aid
   None

7. Pupil Transportation
   All transportation contracts be filed with the County for approval by the County Superintendent.

8. Travel Expense and Reimbursement Policy
   None

9. Facilities and Capital Assets
   None

10. Status of Prior Year’s Findings/Recommendations
    The prior year recommendations regarding timesheets being approved by a supervisor, expenditures reported on the E.S.E.A. and Carl D. Perkins Secondary grant final expenditures reconciling with the District’s records and findings regarding accounting records, allowable charges and fixed assets as noted in the OFAC’s monitoring report for the Perkins grant programs have been resolved during the current fiscal year.