

Santora CPA Group

**State of Delaware
Statewide School Districts' Construction
Projects Attestation Engagements
Colonial School District**

Fiscal Year Ended June 30, 2013

Report Issued: February 25, 2014

Table of Contents

Independent Accountants' Report	3
Independent Accountants' Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Examination Performed in Accordance With <i>Government Auditing Standards</i>	5
Schedule of Construction Projects	7
Schedule of Current Year Findings	8

Independent Accountants' Report

Dr. Dorothy Linn
Superintendent
Colonial School District
318 East Basin Road
New Castle, Delaware 19720

The Honorable Mark Murphy
Secretary, Department of Education
Townsend Building, Suite 2
401 Federal Street
Dover, Delaware 19901

We have examined the accompanying State of Delaware Colonial School District (the District) *Schedule of Construction Projects* for the year ended June 30, 2013. The District's management is responsible for the *Schedule of Construction Projects*. Our responsibility is to express an opinion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants, and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States and, accordingly, included examining, on a test basis, evidence supporting the District's *Schedule of Construction Projects* and performing such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

As discussed in the *Schedule of Current Year Findings*, the District is not classifying expenditures properly on the *Schedule of Construction Projects*, creating either an overstatement or understatement of expenditures by project. As a result, the amounts reported in the Expended in Prior Years and Expended in Current Year columns are correct in total, but not accurately stated by project.

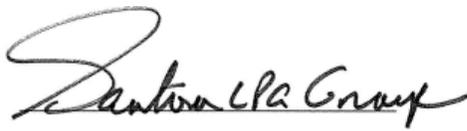
In our opinion, the *Schedule of Construction Projects* referred to above does not present fairly, in all material respects, the construction projects for the District for the year ended June 30, 2013, based on the criteria set forth in the *Delaware Code, State of Delaware Generally Accepted Accounting Principles Reporting Package Manual, the State of Delaware Department of Education School Construction Technical Assistance Manual, and the State of Delaware Budget and Accounting Policy Manual.*

In accordance with *Government Auditing Standards*, we have also issued our report dated January 1, 2014, on our consideration of the District's internal control over financial reporting applicable to preparing the *Schedule of Construction Projects* (internal control) and on our tests of its compliance with certain provisions of laws, regulations, and other matters. The purpose of that report is to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the internal control or on compliance. That report is an integral part of an attestation engagement performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of our examination.

We did not examine the amounts reported in the Expended in Prior Years column on the *Schedule of Construction Projects* that were expended prior to July 1, 2010 and, therefore, express no opinion on those amounts.

We noted certain matters that we reported to the management of the District in a separate letter dated January 1, 2014.

This report is intended solely for the information and use of District management and Board Members, the Office of Auditor of Accounts, and the Department of Education and is not intended to be, and should not be, used by anyone other than these specified parties. However, under 29 Del. C., §10002(1), this report is public record and its distribution is not limited. This report, as required by statute, was provided to the Office of the Governor, Office of the Controller General, Office of the Attorney General, and Office of Management and Budget.

A handwritten signature in cursive script that reads "Stanton CPA Group". The signature is written in black ink and is positioned above the date and location text.

January 1, 2014
Newark, Delaware

**Independent Accountants' Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Examination Performed in Accordance With
*Government Auditing Standards***

Dr. Dorothy Linn
Superintendent
Colonial School District
318 East Basin Road
New Castle, Delaware 19720

The Honorable Mark Murphy
Secretary, Department of Education
Townsend Building, Suite 2
401 Federal Street
Dover, Delaware 19901

We have examined the accompanying State of Delaware Colonial School District (the District) *Schedule of Construction Projects* for the year ended June 30, 2013, and have issued our report thereon dated January 1, 2014. We conducted our examination in accordance with attestation standards established by the American Institute of Certified Public Accountants, and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States.

Internal Control Over Financial Reporting

Management of the District is responsible for establishing and maintaining effective internal control over financial reporting. In planning and performing our examination, we considered the District's internal control over financial reporting (internal control) applicable to preparing the *Schedule of Construction Projects* as a basis for designing our procedures for the purpose of expressing our opinion on the *Schedule of Construction Projects*, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control over financial reporting applicable to preparing the *Schedule of Construction Projects*. Accordingly, we do not express an opinion on the effectiveness of the District's internal control over financial reporting applicable to preparing the *Schedule of Construction Projects*.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the District's *Schedule of Construction Projects* will not be prevented, or detected and corrected on a timely basis.

Our consideration of internal control over financial reporting applicable to preparing the *Schedule of Construction Projects* was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting applicable to preparing the *Schedule of Construction Projects* that might be deficiencies, significant deficiencies, or material weaknesses. We consider the deficiency described in the accompanying *Schedule of Current Year Findings* as finding 2013-1 to be a material weakness.

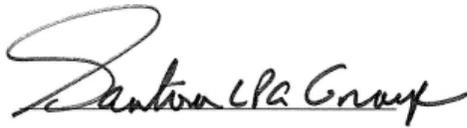
Compliance and Other Matters

As part of obtaining reasonable assurance about whether the District's *Schedule of Construction Projects* is free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of *Schedule of Construction Projects* amounts. The results of our tests disclosed instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*, described in the accompanying *Schedule of Current Year Findings* as findings 2013-1, 2013-2, and 2013-3.

The District's response to the findings identified in our examination is described in the accompanying *Schedule of Current Year Findings*. We did not audit the District's response, and accordingly, we express no opinion on it.

We noted certain matters that we reported to the management of the District in a separate letter dated January 1, 2014.

This report is intended solely for the information and use of District management and Board Members, the Office of Auditor of Accounts, and the Department of Education and is not intended to be, and should not be, used by anyone other than these specified parties. However, under 29 Del. C., §10002(l), this report is public record and its distribution is not limited. This report, as required by statute, was provided to the Office of the Governor, Office of the Controller General, Office of the Attorney General, and Office of Management and Budget.

A handwritten signature in cursive script, appearing to read "Denton CPA Group".

January 1, 2014
Newark, Delaware

Schedule of Construction Projects
Fiscal Year Ended June 30, 2013

Project Name	FY	APPR	Source of Funding (State/Local)	Original Funding	Increases (Decreases) in Funding	Total Funding to Date	Expended in Prior Years	Expended in Current Year	Total Expended to Date	Balance as of 6/30/13
Colwyck Elementary	2011	50111	67/33	\$ 4,499,000	\$ (3,200,000)	\$ 1,299,000	\$ 1,292,955	\$ -	\$ 1,292,955	\$ 6,045
New Castle Middle	2010	50115	67/33	5,472,400	(1,822,565)	3,649,835	3,635,008	14,827	3,649,835	-
George Read	2008	50124	67/33	6,047,300	2,564,962	8,612,262	5,706,738	1,708,841	7,415,579	1,196,683
William Penn	2009	50152	67/33	10,674,200	620,000	11,294,200	10,402,761	3,912	10,406,673	887,527
Castle Hills	2010	50342	67/33	4,059,700	1,376,119	5,435,819	5,429,529	-	5,429,529	6,290
Eisenberg	2010	50349	67/33	4,236,700	1,526,677	5,763,377	5,753,274	10,103	5,763,377	-
Leach 9553	2010	50348	100/0	2,678,400	-	2,678,400	1,501,650	313,936	1,815,586	862,814
Construction Projects Total				\$ 37,667,700	\$ 1,065,193	\$ 38,732,893	\$ 33,721,915	\$ 2,051,619	\$ 35,773,534	\$ 2,959,359

Schedule of Current Year Findings
June 30, 2013

Finding 2013-1

29 Del. C. §6504 states:

Each agency shall keep a detailed account of all receipts and expenditures under such appropriate headings, classifications, and arrangements as may be prescribed by the Director of the Office of Management and Budget (OMB) and used in the budget estimates. All bills, statements, letters, vouchers, and documents pertaining to these receipts and disbursements shall be preserved and systematically filed by each agency.

In addition, 29 Del. C. §6528 defines the necessary approvals needed for transfer of funds between projects.

Condition

In the 2012 examination engagement, we noted one transaction related to the William Penn project (appropriation 50152) for \$3,912 that was incorrectly charged to the George Read project (appropriation 50124).

In addition, we noted several transactions in the 2011 examination engagement where the detail of project costs per the First State Financials (FSF) voucher did not agree to the breakout of costs, by project, on supporting invoices. The misclassification lead to the following projects being overstated and (understated) on the Schedule of Construction Projects for the year ended June 30, 2011:

Table with 2 columns: Project Name and Amount. Rows include Castle Hills, Colwyck & Leach, Eisenberg, Gunning Bedford, McCullough, Pleasantville, and William Penn.

The District did not correct the above errors in the Schedule of Construction Projects for the year ended June 30, 2013. As a result, the Schedule remains misstated for amounts Expended in Prior Years, by project.

Cause

The District did not comply with 29 Del. C. §6504, referenced above, to ensure an accurate, detailed account of all receipts and expenditures under such appropriate headings, classifications, and arrangements.

In Fiscal Year 2013, the District elected not to correct the balances, resulting in the Expended in Prior Years column for each project being overstated or (understated) in the June 30, 2013 *Schedule of Construction Projects*.

Effect

Expenditures are not classified properly on the *Schedule of Construction Projects*, creating either an overstatement or understatement of expenditures by project.

Recommendation

The District should ensure that all expenditures are appropriately classified by project and that any necessary transfers are properly approved and processed in FSF.

District Response

The District acknowledges the one \$3,912 transaction that was incorrectly charged to the wrong project and reiterates that this expense has since been recoded to the proper project. Additionally, the District will take steps to ensure that all future expenses are broken out by cost and by project in compliance with 29 Del. C. §6504 and that the proper approvals are obtained in FSF.

Finding 2013-2

Criteria

The *State of Delaware Budget and Accounting Policy Manual* (BAM) Chapter 6, Section 6.5.7 states:

“All requisitions, purchase orders, change orders, and direct claim vouchers coded to bond accounts (other than Highway and School – Minor Capital) must be sent to the OMB for approval prior to processing by the Division of Accounting (DOA).”

The BAM, Chapter 7, Section 7.2 includes the approval requirements for purchase order transactions (these requirements are referenced in the BAM Chapter 7, Section 7.5.6 below):

“Requisitions, POs, and Direct Claims are initiated at the agency. After receiving all required agency approvals, agencies must determine if the purchase is subject to any special approvals. All Requisitions, POs, and Direct Claims for \$5,000 or more require DOA review and approval for processing in FSF. For more information on standard and special approval requirements for transactions, agencies should refer to Chapter 6 – Approvals.

If no special approvals are required to process the transaction, and the purchase is for less than \$5,000, the Requisition, PO, or Direct Claim is processed in the FSF system with only agency approvals required. If special approvals are required to process the purchase transaction, and the purchase is for \$5,000 or more, the Requisition, PO, or Direct Claim is to be forwarded for the needed additional special approvals before it is submitted to DOA for review and special processing.”

The BAM Chapter 7, Section 7.5.6 includes the following requirements for use and approval of change orders:

“All adjustments to encumbrances, where the aggregate total is \$5,000 or greater, (approved POs) must be initiated by agencies using a Change Order transaction, and submitted to the DOA. Change orders are to be used for all adjustments (increases or decreases) to both regular and Open Order POs.

The same approvals required to approve the original encumbrance are necessary to adjust the PO...when a modified PO amount exceeds a higher dollar threshold (e.g. \$5,000), additional approvals are required.”

Condition

During Fiscal Year 2013, the District processed 11 construction change orders totaling \$55,113. In testing a sample of three change orders totaling \$12,046, we could not verify that the change orders received the same approvals as the original purchase order, as required by the BAM Chapter 7, Section 7.5.6.

Cause

FSF system limitations prevent conclusively determining whether change orders received the same approvals as the original purchase order transaction. When a change order is processed, the original purchase order workflow approvals are overwritten in FSF. As subsequent change orders are processed, all previous data is no longer available. In addition, FSF workflow does not show the dollar amount or purchase order/change order number to which the approvals relate.

The District did not maintain other hard copy documentation outside of FSF.

Effect

Unauthorized change orders could be processed. There is no audit trail to support the validity and propriety of approved purchase orders and change orders.

Recommendation

Absent any system changes to resolve this issue, we recommend that screen shots of FSF transactions be maintained that reflect a detailed approval history for all activity for each purchase order and subsequent change order, including:

- each set of approvals,
- purchase order/change order number being approved, and
- corresponding approved dates and amounts.

District Response

The District will take steps to implement the recommended steps outlined in the report to ensure that all change orders are documented properly outside of FSF due to the limitations of the system.

Finding 2013-3

Criteria

The *State of Delaware Department of Education School Construction Technical Assistance Manual (SCM) 2.0*, Section 7.2 and 7.2.1 state:

“All Change Orders must be agreed upon by the architect, the school district, and the contractor and shall be forwarded to the Department of Education along with the purchase order.

Submission of a Change Order must include the following documents: Completed purchase order as applicable; local board of education minutes identifying and approving the changes; completed AIA document G701, and correspondence which gives a breakdown in materials mark-up and other expenses.”

Condition

During Fiscal Year 2013, the District processed 11 construction change orders totaling \$55,113. In testing a sample of three change orders totaling \$12,046, none of the change orders had been presented to, or approved by, the District’s local board of education, as required by SCM 2.0, Section 7.2.1.

Cause

Change orders are not reviewed or approved in the District’s local board of education meetings.

Effect

Unauthorized change orders could be processed. There is no local board of education approval trail to support the validity and propriety of approved change orders.

Recommendation

We recommend that the District present change orders to their local board of education on a monthly basis, and include documentation of the board’s review and approval of change orders in the monthly board minutes.

District Response

The District has begun to present all change orders to the school board for review and approval as required.