Report to Governance on the Results of the Annual Independent Audits

Board of Education of Jefferson County, Kentucky

For the Year Ended June 30, 2022

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Board of Education of Jefferson County, Kentucky

Board of Education, Members of the Audit & Risk Management Advisory Committee, and other Members of Management Board of Education of Jefferson County, Kentucky

We are pleased to present this report related to our audit engagements for the Board of Education of Jefferson County, Kentucky (the District) as of and for the year ended June 30, 2022. This report summarizes certain matters required by professional standards to be communicated to you in your oversight responsibility for the District's financial reporting process, as well as other matters that we believe may be of interest to you.

This information is intended solely for the information and use of the Board of Education, members of the Audit & Risk Management Advisory Committee, and members of management of the District, and is not intended to be, and should not be, used by anyone other than these specific parties.

It will be our pleasure to respond to any questions you have regarding this report. We appreciate the opportunity to be of service to the District. We received excellent cooperation and assistance from management and staff with respect to access to records, supporting documentation and responses to inquiries. No limitations were imposed on our audit procedures or the extent of our audits.

Meet the Team



Jim Tencza, CPA, CIA, CGMA Director



Megan Crane, CPA Associate Director Single Audit



Andrew Harris, CPA Manager Single Audit



Simon Keemer, CPA, CGMA, ACA Director



Tom Smither, CPA Manager Financial Statement Audit



Curtis Applebaum Lead Auditor School Activity Fund Audits



Overview of Audit Engagements

We expect to issue the following:

Annual Comprehensive Financial Report

An unmodified opinion on the District's financial statements for the year ended June 30, 2022.

Single Audit

- An unmodified report on compliance and on internal control over financial reporting based on an audit of the District's financial statements in accordance with *Government Auditing Standards*.
- An unmodified report on compliance for each major program, internal control over compliance, and report on the schedule of expenditures of federal awards required by the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* at 2 CFR 200 (Uniform Guidance).

School Activity Fund Financial Statements

- An unmodified opinion over the fiduciary net position of the Jefferson County Board of Education Elementary School Activity Funds as of June 30, 2022.
- An unmodified opinion over the fiduciary net position of the Jefferson County Board of Education Middle School Activity Funds as of June 30, 2022.
- An unmodified opinion over the fiduciary net position of the Jefferson County Board of Education High School Activity Funds as of June 30, 2022.



Auditing standards generally accepted a in the United States of America (AU-C 260, *The Auditor's Communication With Those Charged With Governance*) require the auditor to promote effective two-way communication between the auditor and those charged with governance.

Consistent with this requirement, the following summarizes our responsibilities regarding the audits as well as observations arising from our audits that are significant and relevant to your responsibility to oversee the financial and related compliance reporting process.

AREA	COMMENTS
Our Responsibilities With Regard to the Financial Statement and Compliance Audits Under:	Our responsibilities have been described in our arrangement letter dated April 12, 2022.
 U.S. Generally Accepted Auditing Standards Government Auditing Standards, issued by the 	Our responsibilities, as also stated in our auditors' reports, are summarized as follows:
Comptroller General of the United States	 Our audits were conducted in accordance with all relevant audit standards.
The Uniform Guidance The Uniform Guidance	Our audits were designed to obtain reasonable, rather than absolute, assurance about whether the financial statements are free of material
 Kentucky Public School Districts' Audit Contract and Requirements prescribed by the Kentucky 	misstatement, whether caused by error or fraud.
State Committee for School District Audits	 An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected and performed are dependent upon our
Our audits do not relieve management or those charged with governance of their responsibilities, which have been described in our arrangement letter dated April 12, 2022.	professional judgment based on our assessment of the risks of material misstatement and our consideration of internal control.

AREA	COMMENTS
Our Responsibilities, continued	 Our consideration of internal control was for the purpose of designing audit procedures and not for the purpose of expressing an opinion on the effectiveness of internal controls. Accordingly, we express no such opinion.
	 Our audits also included assessing the accounting principles used and significant accounting estimates made by management, as well as evaluating the overall financial statement presentation.
Overview of the Planned Scope And Timing Of The Audits	We performed the audits according to the planned scope and timing previously communicated to you in our letter dated August 5, 2022, regarding the nature, timing and extent of our audit procedures, and identified significant risks.

AREA	COMMENTS
Accounting Policies and Practices Management has the ultimate responsibility for the appropriateness of the accounting policies used by the District. Under generally accepted accounting principles, in certain circumstances, management may elect among alternative accounting practices. In our view, in such circumstances, management has selected the preferable accounting practice.	 The District adopted GASB 87, Leases in the year ended June 30, 2022. There were no other new accounting policies, nor have there been any changes in existing significant accounting policies during the current period. We did not identify any significant accounting policies in controversial or emerging areas for which there is a lack of authoritative guidance or consensus. We did not identify any significant unusual transactions. Significant accounting policies are described in Note A to the financial statements.

AREA	COMMENTS
Significant Accounting Policies The disclosures are neutral, consistent and clear. Certain disclosures are particularly sensitive because of their significance to the users of the financial statements.	Significant accounting policies are described in Note A to the financial statements. The most sensitive disclosures affecting the financial statements are: Note B – Cash, Cash Equivalents, and Investments Note D – Capital Assets Note E – Long-Term Liabilities Note F – Retirement Plans Note H – Postemployment Benefits
Management Judgments And Accounting Estimates Accounting estimates are an integral part of the preparation of financial statements and are based upon management's current judgment. The process used by management encompasses their knowledge and experience about past and current events, and certain assumptions about future events. You may wish to monitor throughout the year the process used to determine and record these accounting estimates.	The most notable estimates affecting the financial statements are: • Depreciation and useful lives of capital assets (see Note A) • Sick leave accrual (see Note E) • Workers compensation (see Note E) • Pension and OPEB related estimates (management uses reports from CERS and KTRS for balances included in the financial statements) We evaluated the key factors and assumptions used to develop these estimates in determining that they are reasonable in relation to the financial statements taken as a whole.

AREA	COMMENTS
Audit Adjustments and Uncorrected Misstatements	There were no audit adjustments made to the original trial balances presented to us to begin our audits.
Professional standards require us to accumulate all factual, judgmental and projected misstatements identified during the audit, other than those that are trivial, and communicate them to the appropriate level of management, and request their correction.	We are not aware of any uncorrected misstatements other than misstatements that are clearly trivial.
Changes to the Auditors' Standard Report	 We do not anticipate any departures from the auditors' standard report. For the year ended June 30, 2022 we adopted new auditing standards that changed the format and wording of the standard auditors' reports for all of the audits.

AREA	COMMENTS
Other Information in Documents Containing Audited Financial Statements Our responsibility for other information in documents containing the District's audited financial statements is contained within the auditors' report.	 The District prepares an Annual Comprehensive Financial Report (ACFR). Included within the Financial Section of the ACFR is the following: Management's Discussion and Analysis (MD&A) Require Supplementary Information (RSI) Budgetary comparison information for the General and Special Revenue funds Various Pension and OPEB schedules and information Supplementary Information (SI) Budgetary comparison information for other funds Combining financial statements for the nonmajor funds We do not express an opinion or provide any assurance on the MD&A, RSI or budgetary comparison information in the SI because the limited procedures we perform on the information does not provide us with sufficient evidence to express an opinion or provide any assurance. We provide an "in relation to" opinion for the combining financial statements in the SI.

AREA	COMMENTS
Other Information in Documents Containing Audited Financial Statements, continued	The ACFR also includes Introductory and Statistical sections which are not subject to our audit procedures, and accordingly, we do not express an opinion or provide any assurance on them. To our knowledge, the 2022 audited financial statements for the District are not included in any other document.
Disagreements With Management	We encountered no disagreements with management over the application of significant accounting principles, the basis for management's judgments on any significant matters, the scope of the audit, or significant disclosures to be included in the financial statements.
Consultations With Other Independent Accountants	We are not aware of any consultations management had with other accountants about accounting or auditing matters.
Significant Issues Discussed With Management	No significant issues arising from the audit were discussed or were the subject of correspondence with management.

AREA	COMMENTS
Significant Difficulties Encountered In Performing The Audits	We did not encounter any significant difficulties in dealing with management during the audit.
Difficult or Contentious Matters That Required Consultation	We did not encounter any significant and difficult or contentious matters that required consultation outside the engagement team.
Internal Control and Compliance Matters	Internal control findings will be discussed later in this report. We will also separately communicate significant deficiencies and material weaknesses in internal control over financial reporting and any compliance findings identified during our audit of the financial statements and major awards, as required by <i>Government Auditing Standards</i> and the Uniform Guidance.
Management Representations	We will request certain representations from management that will be included in the management representation letter, which is expected to be dated November 15, 2022.

Internal Control Findings Definitions

Internal control deficiencies are defined as follows:

- Internal control deficiency 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, financial statement misstatements on a timely basis.
 - Deficiency in design: A control necessary to meet the control objective is missing, or when an existing control is not
 properly designed so that, even if the control operates as designed, the control objective would not be met.
 - Deficiency in operation: A properly designed control does not operate as designed or when the person performing the
 control does not possess the necessary authority or qualifications to perform the control effectively.
- Material weakness 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 financial statements will not be prevented, or detected and corrected, on a timely basis
- Significant deficiency A deficiency or a combination of deficiencies in internal control that is less severe than a material weakness yet important enough to merit attention by those charged with governance.

Internal Control Findings – Current Year

- Material weaknesses None identified
- Significant deficiencies None reported

Update on Prior Year Findings

- Certain bank balance collateral was not fully compliant with Kentucky Revised Statute requirements. This has been remediated in the current year.
- IT policies and the continuity of operations and disaster recovery plan was not fully complete and authorized.
 The District has continued to make improvements in the current year.
 - JCPS has made great strides in this past year and has developed and received Board approval for 15 IT policies. They
 have also completed a number of initiatives that have greatly improved the IT environment, such as the District's
 comprehensive backup strategy, a cloud first approach to new systems, and working with 3rd party partners to make
 improvements to the recovery capabilities of their business-critical systems.
 - JCPS currently has 11 more polices and procedures in the evaluation stage. Management expects to submit these for
 official Board approval by the next audit.
 - There is still no official, approved Disaster Recovery Plan that covers the entire IT environment for the organization.
 - An official Business Continuity Procedure is currently in the evaluation stage, and is expected to be submitted for Board approval by next year's audit.
- Continued monitoring and improving of Red Book compliance. The District continues to make improvements in the current year.

Summary of School Activity Funds Audits

- Audit approach, risk assessment and scope of school activity funds audited
- We expect to issue unmodified opinions
- Minor findings noted 115 in the current year
- Findings noted in prior years 31 in 2020-2021 (in-person learning for one quarter of the year); 198 in 2019-2020 (in-person learning for three quarters of the year)
- Overall assessment of school-level accounting

Summary of Single Audit

- Major programs audited:
 - 10.555: Child Nutrition Cluster
 - 10.558: Child and Adult Care Food Program
 - 84.002: Adult Education Basic Grants to States
 - 84.425: COVID-19 Education Stabilization Fund/ESSER Funds
- We expect to issue an unmodified opinion
- No findings noted

Upcoming GASB Standards

- No. 91, Conduit Debt Obligations
 - Changes disclosures related to conduit debt
 - Effective for the District for the year ended June 30, 2023
- No. 92, Omnibus 2020
- No. 93, Replacement of IBORs
- No. 94, Public-Private and Public-Public Partnerships and Availability Payment Arrangements

Upcoming GASB Standards, continued

- No. 96, Subscription-Based Information Technology Arrangements (SBITAs)
 - SBITA is a contract that conveys control of the right to use another party's
 information technology (IT) software, alone or in combination with tangible capital
 assets (the underlying IT assets), as specified in the contract for a period of time in
 an exchange or exchange-like transaction
 - Essentially uses the same rules as within GASB 87 for leases
 - Effective for the District for year ended June 30, 2023
- No. 97, Component Units and IRS Code 457 Deferred Compensation Plans

Upcoming GASB Standards, continued

- No. 99, Omnibus 2022
- No. 100, Accounting for Changes and Error Corrections
- No. 101, Compensated Absences



Thank you

Jim Tencza, CPA, CIA, CGMA

Director

JTencza@deandorton.com

502.566.1071

Megan Crane, CPA

Associate Director MCrane@deandorton.com 859.425.7643

Simon Keemer, CPA, CGMA, ACA

Director

SKeemer@deandorton.com

502.566.1036

